

Chapter 4. Alternatives Analysis

4.1 INTRODUCTION AND OVERVIEW

CEQA requires that an EIR describe a range of reasonable alternatives to the proposed project, or to the location of the proposed project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the proposed project. An EIR should also evaluate the comparative merits and feasibility of the alternatives. As mentioned previously in Chapter 2, Project Description and Site Characteristics, the proposed project in this Draft EIR is defined as an LAUSD K-12 campus providing for 825 elementary school seats, 1,392 middle school seats, and 2,154 high school seats on the Ambassador Hotel site. Chapters 2 and 3 above describe, discuss and compare 5 different alternatives by which LAUSD could implement the proposed project. This analysis is performed in project-level detail. Thus, Chapters 2 and 3 contain a substantial amount of the alternatives analysis that is required by CEQA. This Chapter 4 identifies and compares additional project alternatives, expanding the range of reasonable alternatives even further. It also discusses information bearing on the feasibility of alternatives.

Key provisions of the CEQA Guidelines (Section 15126.6) pertaining to the alternatives analysis are summarized below:

- The discussion of alternatives shall focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.
- The no project alternative shall be evaluated along with its impact. The no project analysis shall discuss the existing conditions at the time the notice of preparation is published, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.
- The range of alternatives required in an EIR is governed by a "rule of reason"; therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. The range of reasonable alternatives are selected and discussed in a manner to foster meaningful public participation and informed decision-making.
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR.

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- An EIR need not consider an alternative whose effects cannot be reasonably ascertained, whose implementation is remote and speculative, or if it would not achieve the basic project objectives.

For a project with potential impacts on historical resources, Guidelines § 15064.5 states that a lead agency must “identify potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource.” “Feasible” is defined as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors” (CEQA § 21061.1). Among the factors that may be taken into account when addressing the feasibility of alternatives (as described in CEQA Section 15126.6(f)(1)) are site suitability, economic viability, availability of infrastructure, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the proponent could reasonably acquire, control, or otherwise have access to the alternative site.

A determination of feasibility involves a balancing of various economic, environmental, social and technological factors. Infeasibility does not mean impossibility; a mitigation measure or alternative that is undesirable or impractical from a policy standpoint may be rejected as infeasible. For example, a conflict between a lead agency’s planning goals and a proposed mitigation measure or alternative may support a finding of infeasibility.

4.2 ALTERNATIVES ELIMINATED FROM FURTHER CONSIDERATION

An EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are potentially feasible and, therefore, merit in-depth consideration, and which are clearly infeasible. Alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, need not be considered (CEQA Guidelines, Section 15126(f)(3)). This section identifies alternatives considered by the lead agency, but rejected as infeasible, and provides a brief explanation of the reasons for their exclusion. Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the project objectives (see Chapter 2, Section 2.1.4), are infeasible, or do not avoid any significant environmental effects (CEQA Guidelines, Section 15126.6(c)).

Five alternatives identified below were not carried forward for analysis because they do not maximize use of the site for school use and/or they involve development of uses outside the mandate/expertise of LAUSD. If they were to move forward some other entity would need to be involved in the site planning/development process in order to fully realize workable schemes; they are therefore considered too remote and speculative at this time. The District considered a number of reduced-program alternatives, and selected one for consideration in the “reasonable range”. To include more than one would be redundant, because for purposes of the alternatives analysis they all sacrifice program objectives in order to reduce impacts on historic resources. These alternatives are described below:

Reduced Program (High School Only) with 2.4-Acre Potential Commercial Frontage on Wilshire Boulevard

This alternative would include the maximum retention and adaptive reuse of the existing main 7-story Hotel Building. All ancillary buildings on-site would be removed. In addition, 2.4 acres of the property along the Wilshire frontage would be made available for potential commercial development (up to 627,264 square feet).

This alternative would retain and reuse the main 7-story Hotel Building, including the Coconut Grove and Embassy Ballroom, as administrative offices and high school classrooms. The Coconut Grove would be used as an auditorium while the Embassy Ballroom would be used as a library. New construction would include a high school gymnasium to be located on the northwest side of the existing main 7-story Hotel Building. No middle or elementary school would be included under this alternative.

Athletic facilities would include a football stadium located along the West 8th Street frontage; 9 basketball/volleyball courts and 2 tennis courts located southeast of the main 7-story Hotel Building; 3 baseball and softball fields located north and south of the main 7-story Hotel Building; and, 1 combined soccer, field hockey, and touch football field located south of the main 7-story Hotel Building. Parking for 424 vehicles would be accommodated in an underground garage.

Access to the high school would be provided via a circular driveway on South Catalina Street at West 7th Street. Access to the underground parking garage would be provided on South Mariposa Avenue at West 7th Street.

Continuation of West 7th Street

This alternative would include the construction of a high school, continuation high school, and a district sports facility on the project site. In addition, West 7th Street would be reconnected from South Catalina Street to South Mariposa Avenue to provide east-west traffic through the project site. The connection of West 7th Street across the proposed project site was proposed in circulation plans when the City of Los Angeles Wilshire District Community Plan was last updated in September 2001, however these plans were not adopted.¹ Therefore, this alternative would not be consistent with the City of Los Angeles Wilshire District Community Plan.

This alternative would include the removal of all existing buildings on-site. Educational facilities would include two 5-story high school buildings (including a gymnasium) and a library to be located on the southern portion of the project site between the newly connected West 7th Street and existing West 8th Street. A second gymnasium would be located in the northern portion of the project site north of the newly connected West 7th Street. The high school would accommodate approximately 2,142 students. A two-story continuation high school, to be located on the northwest corner of the West 8th Street and South Catalina Street intersection, would

¹ Rausch, Charlie, City of Los Angeles Planning Department, telephone conversation, March 25, 2003.

accommodate approximately 87 students. No middle or elementary school would be included under this alternative.

The District Sports Facility would include a football/track and field stadium, 3 soccer fields, 17 outdoor basketball courts, 6 tennis courts, 4 baseball/softball fields, and 2 swimming pools. In addition, a 3-story athletic support facility containing concession stands and health offices would be located in the northern portion of the site. Access to the high school would be provided off of West 8th Street. Parking for 424 vehicles would be accommodated in an underground garage.

Reuse of Bungalows for Residences

This alternative would include the construction of a high school and continuation high school along with residential reuse of the six bungalows currently located on the east side of the project site. This alternative would require the removal of the main 7-story Ambassador Hotel building. This alternative would construct six new high school buildings around a central quad area along the western edge of the project site. Additionally, a gymnasium would be constructed north of the six new high school buildings. The new high school would accommodate approximately 2,142 students. A continuation high school, accommodating approximately 87 students, would be located at the northwest corner of the West 8th Street and South Catalina Street intersection. No middle or elementary school would be included under this alternative. Athletic facilities would include a football/track and field stadium located along West 8th Street, ten outdoor basketball courts located at various places on the school grounds, one soccer field, two tennis courts, two baseball/softball fields, and one swimming pool.

The existing six bungalows would be made available for reuse, and one additional new bungalow would be constructed along the eastern edge of the project site to accommodate a total of 124 studio apartments, 20 two-bedroom apartments, and 18 one-bedroom apartments. Parking for 424 vehicles for school use would be accommodated in aboveground and underground parking areas.

A circular driveway located on West 7th Street off of South Catalina Street would provide access to the new high school. Access to the high school underground parking garage would be located off of South Mariposa Avenue at West 7th Street. A drop-off lane for the continuation high school would be located along West 8th Street. Access to the five bungalows located north of West 7th Street would be provided off of Wilshire Boulevard. Access to the underground parking for the two bungalows south of West 7th Street would be provided off of South Catalina Street between West 7th Street and West 8th Street.

Adaptive Reuse of Main Ambassador Hotel Building for Residences

This alternative would include the construction of a high school and continuation high school on the southern half of the project site. The existing main 7-story Ambassador Hotel building would be retained and reused as residential apartments. The existing bungalows and apartment buildings would be removed from the site. The high school would consist of five buildings set around a central quad, to be located along West 8th Street (south of the main 7-story Hotel

Building). The continuation high school would be located at the northwest corner of the South Catalina Street and West 8th Street intersection. No middle or elementary school would be under this alternative. Athletic facilities would include a football/track and field stadium, baseball/softball fields, one gymnasium, and one swimming pool. Parking would be accommodated in an underground parking garage accessed off of South Mariposa Avenue at West 7th Street.

Adaptive Reuse of Main Ambassador Hotel Building for Senior Housing

Under this alternative, the existing main 7-story Ambassador Hotel building and five of the six existing bungalows would be retained and reused for assisted and independent senior living. One of the existing bungalows (the "Side Bungalow") would be removed under this alternative. Under this alternative, the senior housing would be broken up into two living areas. The assisted living housing would be located in the main 7-story Hotel Building, while the five existing bungalows would be used as senior independent living quarters. Access to the senior living areas would be provided off of Wilshire Boulevard.

In addition, a three-story, 34-room elementary school would be constructed along the southern edge of the project site (along West 8th Street). The elementary school would include a 3.2-acre play area east of the elementary school building (along West 8th Street) and a kindergarten play area west of the elementary school building. Access to the elementary school would be provided on West 8th Street and along a new drop-off lane north of the new elementary school. No high school or middle school would be included under this alternative.

4.3 COMPARISON OF PROJECT ALTERNATIVES

Chapter 2 describes five project-level alternatives for the site (Alternatives 1- 5). The potential environmental impacts of each of these alternatives have been analyzed in the individual impact sections in Chapter 3. This Section 4.3 discusses and compares the feasibility of Alternatives 1-5 in light of a number of factors. As discussed below, Alternatives 1-5 raise potential issues of program compliance (i.e. physical suitability of the space for educational use), anticipated costs, scheduling considerations, and design and operational questions.

Table 4-1 below compares Alternatives 1-5 in terms of the LAUSD's project objectives and requirements. Following Table 4-1 is a narrative discussion of these factors bearing on feasibility.

TABLE 4-1: COMPARISON OF ALTERNATIVES 1 THROUGH 5

Issue:	Alternative				
	1 (Max. Reuse)	2 (Partial Reuse)	3 (Reuse North Tower)	4 (New Construction)	5 (Commercial Frontage)
1. Program					
a. Provides a K through 12 Programmed Concept on-site. ²	Yes	Yes	Yes	Yes	No ñ does not provide for Elementary School
b. Has further social and economic displacement impacts to local housing and/or business because of the need to acquire additional sites to fulfill program requirements.	No	No	No	No	Yes ñ approximately 8 additional acres will be require elsewhere to satisfy Program requirements for an Elementary School and shortfall of outdoor playfields
c. Classroom size larger than Program / CDE Standard classroom size ³	Yes ñ in Hotel Building	No	Yes ñ in North Tower of Hotel Building only	No	Yes ñ in Hotel Building
d. Actual facility square feet (SF) to be provided as compared to the Programmed Facility SF	166,842 SF over programmed SF	No difference in SF	15,045 SF over programmed SF	No difference in SF	166,842 SF over programmed SF
e. Will comply with Calif. Dept. of Education (CDE) playground acreage requirements ⁴	No - 0.8 acres short of requirement	Yes	Yes	Yes	No - 3.9 acres short of requirement
f. Meets Program SF for auditorium (Program amount is 9000 SF) ⁵	No ñ 3,600 SF shortfall	No ñ 3,600 SF Shortfall	No ñ 3,600 SF Shortfall	Yes	No ñ 3,600 Shortfall

² LAUSD, *Interoffice Correspondence From: Richard A. Alonzo, Superintendent To: Keith Packey Subject: Comparison of Design Alternatives*, April 17, 2003 (Appendix B).

³ Classrooms oversized in existing hotel building to limit costs for anticipated structural modifications. See LAUSD, *Interoffice Correspondence From: Richard A. Alonzo, Superintendent To: Keith Packey Subject: Comparison of Design Alternatives*, April 17, 2003 (Appendix B).

⁴ The CDE Small School Site Policy follows the Rodriguez Consent Decree for minimum playground acreage requirements. See California Department of Education (CDE), *Small School Site Policy*, February 28, 2001 (Appendix B).

TABLE 4-1: COMPARISON OF ALTERNATIVES 1 THROUGH 5 ñ (Cont.)

Issue:	Alternative				
	1 (Max. Reuse)	2 (Partial Reuse)	3 (Reuse North Tower)	4 (New Construction)	5 (Commercial Frontage)
g. Meets Program SF for auditorium stage (Program amount is 2650 SF)	No ñ 450 SF shortfall	No ñ 450 SF shortfall	No ñ 450 SF shortfall	Yes	No ñ 450 SF shortfall
h. Meets Programmed bleacher seating for 5000.	No ñ 1,500 seat shortfall	Yes	Yes	Yes	Yes
i. Existing building(s) will provide the flexibility for an Academy Concept - (small within large, specific disciplines in a central area) ⁶	Yes	Yes	Yes	Yes	Yes
2. Cost					
a. Construction cost	\$227,727,846	\$166,740,163	\$177,063,208	\$149,250,404	\$208,642,113
b. Soft costs	\$45,012,367	\$34,906,740	\$37,409,710	\$32,133,971	\$44,072,291
c. Environmental costs	\$10,935,013	\$10,935,013	\$10,935,013	\$10,935,013	\$10,935,013
d. Construction contingency	\$11,386,392	\$8,337,008	\$8,853,160	\$7,462,520	\$10,432,106
e. Land acquisition costs	\$83,349,880	\$83,349,880	\$83,349,880	\$83,349,880	\$83,349,880
f. Furnishings, fixtures & equipment	\$3,441,111	\$3,161,041	\$3,233,223	\$3,139,558	\$3,441,111
g. Replacement Site Cost for Elementary School and play field	\$0	\$0	\$0	\$0	\$18,300,000
h. Replacement Site Cost for Elementary School	\$0	\$0	\$0	\$0	\$24,898,542
TOTALS:	\$381,852,609	\$307,429,845	\$320,844,194	\$286,271,346	\$404,071,056
3. Schedule					
a. Approximate Month/Year Middle School and High School will open (opening occurs in July or September)	September 2008 to March 2009	June 2007 to December 2007	December 2007 to July 2008	June 2007 to September 2007	July 2008 to March 2009

⁵ A smaller than programmed auditorium would require additional meeting sessions to accommodate all the students and facility. Coconut Grove to be reused as an auditorium. See LAUSD, *Interoffice Correspondence From: Richard A. Alonzo, Superintendent To: Keith Packey Subject: Comparison of Design Alternatives*, April 17, 2003 (Appendix B).

⁶ LAUSD, *Interoffice Correspondence From: Richard A. Alonzo, Superintendent To: Keith Packey Subject: Comparison of Design Alternatives*, April 17, 2003 (Appendix B).

TABLE 4-1: COMPARISON OF ALTERNATIVES 1 THROUGH 5 ñ (Cont.)

Issue:	Alternative				
	1 (Max. Reuse)	2 (Partial Reuse)	3 (Reuse North Tower)	4 (New Construction)	5 (Commercial Frontage)
b. Meet target opening date of September 1, 2007 for Middle School and High School	No	Might meet target school opening date	No	Yes	No
c. Approximate year Elementary School will open (opening occurs in July or September)	2006	2006	2006	2006	2009 - on alternate site
d. Additional delays to learning center opening date as a result of requirement to acquire additional land.	No	No	No	No	Yes ñ approximate delay of up to 3 years for Elementary School opening date
e. Design duration thru 100% construction documents	18 to 21 months	12 to 15 months	15 to 18 months	12 to 15 months	18 to 21 months
f. Design approval duration	6 to 9 months	6 to 7 months	6 to 8 Months	6 months	6 to 9 months
g. Construction duration for Middle School and High School	Up to 33 months	Up to 26 months	Up to 29 months	Up to 24 months	Up to 33 months
h. Construction duration for Elementary School	9 to 12 months	9 to 12 months	9 to 12 months	9 to 12 months	9 to 12 months
i. Preparation of design will require field visits to verify existing building dimensions and conditions	Yes ñ for Hotel Building, Coconut Grove, Embassy Ballroom	Yes ñ for Coconut Grove and Embassy Ballroom	Yes ñ for North Tower of Hotel Building and Coconut Grove	No	Yes ñ for Hotel Building, Coconut Grove, Embassy Ballroom
j. Existing materials testing program needed for design	Yes ñ for Hotel Building, Coconut Grove, Embassy Ballroom	Yes ñ for Coconut Grove	Yes ñ for North Tower and Coconut Grove	No	Yes ñ for Hotel Building, Coconut Grove, Embassy Ballroom
k. Preparation of design will need concurrent review from Division of State Architect (DSA)	Yes ñ for Hotel Building, Coconut Grove, Embassy Ballroom	Yes ñ for Coconut Grove and Embassy Ballroom	Yes ñ for North Tower and Coconut Grove	No	Yes ñ for Hotel Building, Coconut Grove, Embassy Ballroom
l. Design process will require preparation of record drawings to the approval of DSA	Yes ñ for Hotel Building, Coconut Grove, Embassy Ballroom	Yes ñ for Coconut Grove and RFK Site	Yes ñ for North Tower, Coconut Grove and RFK site	No	Yes ñ for Hotel Building, Coconut Grove, Embassy Ballroom

TABLE 4-1: COMPARISON OF ALTERNATIVES 1 THROUGH 5 ñ (Cont.)

Issue:	Alternative				
	1 (Max. Reuse)	2 (Partial Reuse)	3 (Reuse North Tower)	4 (New Construction)	5 (Commercial Frontage)
4. Design Standards and Operational Issues					
a. Will meet sustainability requirements in terms of long term life cycle costs - Design Schools to last 100 years & Energy Efficiency	No ñ for Hotel Building, Ballroom and potentially the Coconut Grove	Might be compromised in the Coconut Grove only in terms of material long life cycles where reuse of existing materials occur	No ñ for North Tower of Hotel Building and potentially the Coconut Grove	Yes	No ñ for Hotel Building, Ballroom and potentially the Coconut Grove
b. Will meet sustainability requirement for retaining existing landscaping and natural features where possible	Yes	Yes	Yes	Yes	No ñ will likely lose the Wilshire View Corridor (Landscape Element)
c. Single loaded corridors that create additional walking distances ⁷	Yes ñ in Hotel Building	No	Yes - in North Tower of Hotel Building	No	Yes ñ in Hotel Building
d. Meets LAUSD minimum ceiling height standard of 10 feet ⁸	No ñ in Hotel Building	Yes	No ñ in North Tower of Hotel Building only	Yes	No ñ in Hotel Building
e. Meets LAUSD standard noise requirements ⁹	Potentially compromised in Hotel Building	Yes	Potentially compromised in North Tower of Hotel Building	Yes	Potentially compromised in Hotel Building
f. Meets LAUSD standard daylight factor of 2 (DF=2) in classrooms ¹⁰	No ñ in Hotel Building	Yes	No ñ in North Tower of Hotel Building only	Yes	No ñ in Hotel Building
g. Installation of shear walls in existing buildings to address seismic code upgrades, will in some instances block out existing window openings, therefore, further reducing daylight to the interior of the buildings.	Yes	No	Yes	No	Yes

⁷ LAUSD, *Interoffice Correspondence From: Richard A. Alonzo, Superintendent To: Keith Packey Subject: Comparison of Design Alternatives*, April 17, 2003 (Appendix B).

⁸ LAUSD, *Typical Section: Ceiling Clearances*, 2003 (Appendix B). LAUSD, *Interoffice Correspondence From: Richard A. Alonzo, Superintendent To: Keith Packey Subject: Comparison of Design Alternatives*, April 17, 2003 (Appendix B).

⁹ LAUSD, *Summary of Comparison of Industry Standards vs. ANSI Acoustical Requirements*, 2003 (Appendix B).

¹⁰ LAUSD, *Daylight Factor Calculation*, 2003 (Appendix B). LAUSD, *Interoffice Correspondence From: Richard A. Alonzo, Superintendent To: Keith Packey Subject: Comparison of Design Alternatives*, April 17, 2003 (Appendix B).

TABLE 4-1: COMPARISON OF ALTERNATIVES 1 THROUGH 5 ñ (Cont.)

Issue:	Alternative				
	1 (Max. Reuse)	2 (Partial Reuse)	3 (Reuse North Tower)	4 (New Construction)	5 (Commercial Frontage)
h. Reuse of existing Hotel Building windows may require the installation of a secondary interior window or other mitigation measures. ¹¹	Yes - In Hotel Building	No	Yes - North Tower of Hotel Building only	No	Yes ñ in Hotel Building
i. Meets LAUSD standard to optimize natural ventilation ¹²	Potentially compromised in Hotel Building	Yes	Potentially compromised in North Tower of Hotel Building only	Yes	Potentially compromised in Hotel Building
j. Has additional unimproved facility SF that could be used for other than program purposes	Yes - 81,932 additional SF	No	No	No	Yes - 81,932 additional SF
k. The existing tower bifurcates site ¹³	Yes	No	Yes	No	No
l. Design can provide a physical separation between Middle School and High School students. ¹⁴	Has functional relationship concerns. Difficulty separating Middle School from High School students.	Yes	Yes	Yes	Has functional relationship concerns. Difficulty separating Middle School from High School students.
m. Can meet LAUSD adopted policy on Collaborative for High Performance Schools (CHPS) ¹⁵	No - in Hotel Building	Yes	No - in North Tower of Hotel Building only	Yes	No - in Hotel Building
n. Potential variance in operational costs as compared to new construction (ranking in order of 1 being most costly to operate through 5 being the least costly to operate)	1	4	3	5	2 (less landscaping a field area to maintain than in Alternate 1)

¹¹ Gonzalez Goodale Architects, *Ambassador Hotel ñ Reuse of Existing Windows*, October 30, 2002 (Appendix B).

¹² LAUSD, *Interoffice Correspondence From: Richard A. Alonzo, Superintendent To: Keith Packey Subject: Comparison of Design Alternatives*, April 17, 2003 (Appendix B).

¹³ *Ibid.*

¹⁴ *Ibid.*

¹⁵ LAUSD, *Interoffice Correspondence From: James A. McConnell, Jr., Chief Facilities Executive To: Members, Facilities Committee Subject: High Performance Building Design and Implementation Plan*, May 15, 2001 (Appendix B).

TABLE 4-1: COMPARISON OF ALTERNATIVES 1 THROUGH 5 ñ (Cont.)

Issue:	Alternative				
	1 (Max. Reuse)	2 (Partial Reuse)	3 (Reuse North Tower)	4 (New Construction)	5 (Commercial Frontage)
5. Safety/Security					
a. Existing corridors don't provide open sight lines for easy supervision. ¹⁶	Yes ñ in Hotel Building	No	Yes ñ in North Tower of Hotel Building	No	Yes ñ in Hotel Building
6. Construction Issues					
a. Builder will utilize a construction waste-recycling plan to sort out wood waste, cardboard, scrap metal and drywall, at a minimum.	Yes - except for retained materials in Hotel Building, Coconut Grove and Embassy Ballroom	Yes - except for retained materials in Coconut Grove	Yes - except for retained materials in North Tower and Coconut Grove	Yes - requirement needed throughout as all existing buildings are removed	Yes - except for retained materials in Hotel Building, Coconut Grove and Embassy Ballroom
b. Will require potential mold investigation and abatement in existing buildings	Yes ñ for Hotel Building, Coconut Grove and Embassy Ballroom	Yes ñ for Coconut Grove	Yes ñ for North Tower of Hotel Building and Coconut Grove	No	Yes ñ for Hotel Building, Coconut Grove and Embassy Ballroom
c. Will require special grading or other design modifications on east side of Hotel Building to eliminate potential high rise building condition	Yes	No	Yes	No	Yes
d. School classroom floors are required to be level	The existing hotel floors are not level. With the limited floor to ceiling space in the Hotel Building., leveling slabs instead of built up flooring will need to be placed on existing floor slabs. In areas where the existing floor slabs have deteriorated, the floor slab will need to be removed and replaced.	New construction would provide level classroom floors.	The existing floors in the North Tower are not level. With the limited floor to ceiling space in the North Tower, leveling slabs instead of built up flooring will need to be placed on existing floor slabs. In areas where the existing floor slabs have	New construction would provide level classroom floors.	The existing hotel floors are not level. With the limited floor to ceiling space in the Hotel Building, leveling slabs instead of built up flooring will need to be placed on existing floor slabs. In areas where the existing floor slabs have deteriorated, the floor

¹⁶ LAUSD, *Interoffice Correspondence From: Richard A. Alonzo, Superintendent To: Keith Packey Subject: Comparison of Design Alternatives*, April 17, 2003 (Appendix B).

TABLE 4-1: COMPARISON OF ALTERNATIVES 1 THROUGH 5 ñ (Cont.)

Issue:	Alternative				
	1 (Max. Reuse)	2 (Partial Reuse)	3 (Reuse North Tower)	4 (New Construction)	5 (Commercial Frontage)
			deteriorated, the floor slab will need to be removed and replaced.		slab will need to be removed and replaced.
e. Total SF of construction	There is approximately 167,000 SF of additional facility to build out as compared to the Program SF.	Actual facility SF to be constructed will follow the Program SF.	There is approximately 15,045 SF of additional facility to build out as compared to the Program SF.	Actual facility SF to be constructed will follow the Program SF.	There is approximately 167,000 SF of additional facility to build out as compared to the Program SF.
f. Internal building demolition to address structural upgrades	Internal demolition is needed to remove existing stairs and elevators. Concrete cuts needed for new wider, longer stairs and larger elevators. Structural upgrades such as doweling, reinforcing and small concrete pours will be needed throughout the existing buildings. Concrete cuts needed for added columns, beams and shear walls. Concrete coring needed for new HVAC ducts, conduit and piping penetrations.	Internal building demolition will be needed in the Cocoanut Grove to address structural upgrades.	Internal demolition is needed in the North Tower to remove existing stairs and elevators. Concrete cuts needed for new wider, longer stairs and larger elevators. Structural upgrades such as doweling, reinforcing and small concrete pours will be needed throughout the North Tower. Concrete cuts needed for added columns, beams and shear walls. Concrete coring needed for new HVAC ducts, conduit and piping penetrations.	No internal building demolition work to address structural upgrades	Internal demolition is needed to remove existing stairs and elevators. Concrete cuts needed for new wider, longer stairs and larger elevators. Structural upgrades such as doweling, reinforcing and small concrete pours will be needed throughout the existing buildings. Concrete cuts needed for added columns, beams and shear walls. Concrete coring needed for new HVAC ducts, conduit and piping penetrations.
g. Internal building demolition to address elements reused for historical significance	Demolition of internal walls and other potentially significant historical elements will need to wait for design approvals from the	(For Cocoanut Grove only) Demolition of internal walls and other potentially significant historical elements will need to wait for design approvals from	(For Cocoanut Grove and North Tower only) Demolition of internal walls and other potentially significant historical elements will	No internal building demolition work to address elements reused for historical significance	Demolition of internal walls and other potentially significant historical elements will need to wait for design approvals from the

TABLE 4-1: COMPARISON OF ALTERNATIVES 1 THROUGH 5 ñ (Cont.)

Issue:	Alternative				
	1 (Max. Reuse)	2 (Partial Reuse)	3 (Reuse North Tower)	4 (New Construction)	5 (Commercial Frontage)
	Architectural Historian and/or Preservation Consultants as addressed in the Draft EIR.	the Architectural Historian and/or Preservation Consultants as addressed in the Draft EIR.	need to wait for design approvals from the Architectural Historian and/or Preservation Consultants as addressed in the Draft EIR.		Architectural Historian and/or Preservation Consultants as addressed in the Draft EIR.
h. External building demolition to address elements reused for historical significance	Demolition of external building elements will require careful removal of existing clay roof tiles and windows to the extent some are reused.	No external building demolition work to address elements reused for historical significance.	Demolition of external building elements will require careful removal of existing clay roof tiles and windows to the extent some are reused.	No external building demolition work to address elements reused for historical significance.	Demolition of external building elements will require careful removal of existing clay roof tiles and windows to the extent some are reused.
i. Site grading	Site grading would need to occur around existing structures. The location of the existing buildings require the football field to be placed along Wilshire Boulevard resulting in a significant increase in the amount of material export.	Site grading would occur from a mostly clear site except for the Coconut Grove that remains.	Site grading would occur from a mostly clear site except for the Coconut Grove and North Tower that remains.	Site grading would occur from an entirely cleared site.	Site grading would need to occur around existing structures.
j. Foundations and retaining walls	New foundations and retaining walls will be stepped throughout the site in order to accommodate the varying elevations of existing buildings. New column foundations needed for new and existing columns in existing buildings. Installation of column foundations will occur in	Except around the Coconut Grove that remains, site grading to limit the need for retaining walls and varying foundation elevations would occur.	Except around the Coconut Grove and North Tower, site grading to limit the need for retaining walls and varying foundation elevations could occur. In the North Tower, new column foundations are needed for new and existing columns. Installation of column	With a clear site, site grading to limit the need for retaining walls and varying foundation elevations would occur.	New foundations and retaining walls will be stepped through out the site in order to accommodate the varying elevations of existing buildings. New column foundations needed for new and existing columns in existing buildings. Installation of column foundations will occur in

TABLE 4-1: COMPARISON OF ALTERNATIVES 1 THROUGH 5 ñ (Cont.)

Issue:	Alternative				
	1 (Max. Reuse)	2 (Partial Reuse)	3 (Reuse North Tower)	4 (New Construction)	5 (Commercial Frontage)
	low overhead areas. Shoring and/or angled cut back of soil needed at existing building perimeters to accomplish footing upgrades and added shear walls.		foundations will occur in low overhead areas. Shoring and/or angled cut back of soil needed at existing building perimeters to accomplish footing upgrades and added shear walls.		low overhead areas. Shoring and/or angled cut back of soil needed at existing building perimeters to accomplish footing upgrades and added shear walls.
k. Structure of buildings	Existing building structures will require added shear walls, foundation upgrades, added columns and beams, replaced floor slabs, fiber wrapping of existing columns and structural upgrades for the concrete roof. A factor of unforeseen structural conditions exists; further demolition activities would expose areas that are currently inaccessible, further structural materials testing and design process will reveal unforeseen structural conditions. A scheduling factor of time should be applied to address the likelihood of unforeseen structural conditions.	The majority of the school will be new steel constructed frame. The Coconut Grove is concrete construction that will require structural upgrades.	The majority of the school will be new steel constructed frame. The North Tower building structure will require added shear walls, foundation upgrades, added columns and beams, replaced floor slabs, fiber wrapping of existing columns and structural upgrades for the concrete roof. A factor of unforeseen structural conditions exist; further demolition activities that would expose areas that are currently inaccessible, further structural materials testing and design process will reveal unforeseen structural conditions. A scheduling factor of time should be applied to	New steel constructed frame.	Existing building structures will require added shear walls, foundation upgrades, added columns and beams, replaced floor slabs, fiber wrapping of existing columns and structural upgrades for the concrete roof. A factor of unforeseen structural conditions exist; further demolition activities that would expose areas that are currently inaccessible, further structural materials testing and design process will reveal unforeseen structural conditions. A scheduling factor of time should be applied to address the likelihood of unforeseen structural conditions.

TABLE 4-1: COMPARISON OF ALTERNATIVES 1 THROUGH 5 ñ (Cont.)

Issue:	Alternative				
	1 (Max. Reuse)	2 (Partial Reuse)	3 (Reuse North Tower)	4 (New Construction)	5 (Commercial Frontage)
			address the likelihood of unforeseen structural conditions.		
l. New systems installation - Mechanical, Electrical and Plumbing (MEP)	MEP systems installation in existing structures will require numerous concrete penetrations through floors and beams requiring a significant amount of coordination with structural designer. Routing of ducts, piping, conduits, etc is difficult in the existing building structures due to low floor to ceiling height. Many unique architectural design situations will arise to conceal and/or prevent the possibility of vandalism to new ducts, piping, conduit, etc.	MEP systems can be designed for the best possible economic and schedule considerations in New Construction.	The majority of the school is new construction in which MEP systems can be design for the best possible economic and schedule considerations. However, In the North Tower, MEP systems installation will require concrete penetrations through floors and beams requiring coordination with the structural designer. Routing of ducts, piping, conduits, etc is difficult in the North Tower due to low floor to ceiling heights. Architectural design situations will arise as needed to conceal and/or prevent vandalism of new ducts, piping, conduit, etc.	MEP systems can be designed for the best possible economic and schedule considerations in New Construction.	MEP systems installation in existing structures will require numerous concrete penetrations through floors and beams requiring a significant amount of coordination with structural designer. Routing of ducts, piping, conduits, etc is difficult in the existing building structures due to low floor to ceiling height. Many unique architectural design situations will arise to conceal and/or prevent the possibility of vandalism to new ducts, piping, conduit, etc.
m. DSA construction inspections	DSA inspection will be extensive considering the magnitude of Structural, Access, Fire Life Safety and Historical oversight that will be involved with	Inspection required by DSA will be typical for New Construction except for upgrades required in the Cocoanut Grove and reconstructed Embassy	DSA inspection will be extensive considering the magnitude of Structural, Access, Fire Life Safety and Historical oversight that	Inspection required by DSA will be typical of New Construction.	DSA inspection will be extensive considering the magnitude of Structural, Access, Fire Life Safety and Historical oversight that will be involved with

TABLE 4-1: COMPARISON OF ALTERNATIVES 1 THROUGH 5 ñ (Cont.)

Issue:	Alternative				
	1 (Max. Reuse)	2 (Partial Reuse)	3 (Reuse North Tower)	4 (New Construction)	5 (Commercial Frontage)
	a 7-story building built in 1921. Change Order approvals will be more involved and take more time considering the reviews required for the factors above.	Ballroom buildings.	will be involved with a 7-story building built in 1921. Change Order approvals will be more involved and take more time considering the reviews required for the factors above.		a 7-story building built in 1921. Change Order approvals will be more involved and take more time considering the reviews required for the factors above.
n. General design approach	<p>Design will require preparation of record drawings and an existing materials testing program to the satisfaction of DSA. DSA will also require a detailed code analysis for the specific building reuse contemplated.</p> <p>The DSA variable in approach to the structural system is great considering unforeseen structural conditions. Fire life safety and access issues will involve numerous peer reviews due to the variety of existing building elevations, access points and room size changes.</p>	Design will follow typical standards for New Construction except for upgrades required in the Cocoanut Grove and reconstructed Embassy Ballroom buildings.	<p>Design will require preparation of record drawings and an existing materials testing program to the satisfaction of DSA. DSA will also require a detailed code analysis for the specific building reuse contemplated. The DSA variable in approach to the structural system is great considering unforeseen structural conditions. Fire life safety and access issues will involve peer reviews due to the variety of existing building elevations, access points and room size changes.</p>	Design will follow typical standards for New Construction.	<p>Design will require preparation of record drawings and an existing materials testing program to the satisfaction of DSA. DSA will also require a detailed code analysis for the specific building reuse contemplated. The DSA variable in approach to the structural system is great considering unforeseen structural conditions. Fire life safety and access issues will involve numerous peer reviews due to the variety of existing building elevations, access points and room size changes.</p>

TABLE 4-1: COMPARISON OF ALTERNATIVES 1 THROUGH 5 ñ (Cont.)

Issue:	Alternative				
	1 (Max. Reuse)	2 (Partial Reuse)	3 (Reuse North Tower)	4 (New Construction)	5 (Commercial Frontage)
o. Structural design ¹⁷	<p>It is likely that DSA will take a very conservative approach to structural design review and approval considering the 7-story hotel building structure built in 1921. In addition to Title 5 and Field Act requirements for schools, DSA must consider schools as essential facilities to the public. Essential facilities are considered safe buildings for the public to go to during emergencies such as an earthquake. With this in mind, it is likely that unforeseen existing building conditions or structural design approach considerations could be changed by DSA as the design evolves. Consideration for extra design time as well as extra construction time for this factor must be applied.</p>	<p>Design will follow typical Standards for New Construction except for upgrades required in the Coconut Grove and reconstructed Embassy Ballroom buildings.</p>	<p>It is likely that DSA will take a very conservative approach to structural design review and approval considering the 7-story hotel building structure built in 1921. In addition to Title 5 and Field Act requirements for schools, DSA must consider schools as essential facilities to the public. Essential facilities are considered safe buildings for the public to go to during emergencies such as an earthquake. With this in mind, it is likely that unforeseen existing building conditions or structural design approach considerations could be changed by DSA as the design evolves. Consideration for extra design time as well as extra construction time for this factor must be applied.</p>	<p>Design will follow typical Standards for New Construction</p>	<p>It is likely that DSA will take a very conservative approach to structural design review and approval considering the 7-story hotel building structure built in 1921. In addition to Title 5 and Field Act requirements for schools, DSA must consider schools as essential facilities to the public. Essential facilities are considered safe buildings for the public to go to during emergencies such as an earthquake. With this in mind, it is likely that unforeseen existing building conditions or structural design approach considerations could be changed by DSA as the design evolves. Consideration for extra design time as well as extra construction time for this factor must be applied.</p>

¹⁷ Williams, Alan, Facility Resource Center, *The Field Act/Uniform Building Code Comparison*, September 16, 2002. (Appendix B).

TABLE 4-1: COMPARISON OF ALTERNATIVES 1 THROUGH 5 ñ (Cont.)

Issue:	Alternative				
	1 (Max. Reuse)	2 (Partial Reuse)	3 (Reuse North Tower)	4 (New Construction)	5 (Commercial Frontage)
p. Environmental	Removal action for the underground storage tank located beneath the basement footing of the Northeast Hotel Tower would need to be accomplished with the Hotel Building in place. Clean up of lead/asbestos around the perimeters of the existing buildings will need to be done with the buildings in place.	For the most part, removal actions will be completed from a clear site.	Removal action for the underground storage tank located beneath the basement footing of the Northeast Hotel Tower would need to be accomplished with the Hotel Building in place. Clean up of lead/asbestos around the perimeters of the existing buildings will need to be done with the buildings in place.	Removal actions will be completed from a clear site.	Removal action for the underground storage tank located beneath the basement footing of the Northeast Hotel Tower would need to be accomplished with the Hotel Building in place. Clean up of lead/asbestos around the perimeters of the existing buildings will need to be done with the buildings in place.

Note:

- 1) Approximately 8 additional acres will be required elsewhere to satisfy LAUSD Program requirements for an elementary school and shortfall of outdoor play fields.
- 2) Approximate additional delay of up to 3 years for elementary school opening date.

Source: LAUSD, June 2003.

Program

Integrated K-12 Education

As shown in Table 4-1, all of the Alternatives except Alternative 5 meet LAUSD's objective to provide a K through 12 facility. Alternative 5 does not provide for an elementary school and would require the LAUSD to acquire approximately 2.9 additional acres to site this component of the LAUSD Program for this project and an additional 4 acres for playfields for the high school and middle school components. The absence of a K-5 elementary school on the same site as the middle and high schools would have adverse effects on the planned education program.

A K-12 educational system has proven to be a primary agent for change that yields greater student academic achievement at all grade levels.¹⁸ It creates coherent entry and exit expectations between the elementary, middle, and high school levels.¹⁹ Schools engaged in integrated K-12 grade education have increased the percentage of their third-grade reading at or above grade level in more than 60 percent of the students.²⁰ A K-12 system engages students in all grade levels to participate in academic programs, and has proven to reduce dropout rates and increases attendance rates.²¹ A K-12 system has also proven to engage parents and community resulting in improved student achievement.²²

Classroom Space

Alternatives 1, 3 and 5 all raise issues pertaining to classroom space, with Alternatives 1 and 5 involving the greatest impact on Program requirements due to their reuse of the entire Hotel Building. Alternative 3 raises these issues with respect to reuse of the Hotel's North Tower for classroom purposes. Alternatives 2 and 4 do not raise these issues as both provide for new classroom construction.

Under Alternatives 1, 3 and 5, the proposed classroom size in the Hotel Building would be larger than the LAUSD Program/CDE Standard for classroom size. Classroom spaces must be a minimum of 960 square feet.²³ The majority of existing hotel room space within the Ambassador Hotel is below 960 square feet, with many existing hotel rooms in the 250 to 350 square foot range. To address the deficiency, each classroom would need to be comprised of at least two rooms and corridor space, creating larger classroom sizes than called for by the LAUSD program and CDE requirements. While a larger than standard size classroom would be adequate for some classrooms that require student movement and interaction, it would have a negative result in classrooms that require intimate-working stations that is driven by group work. The LAUSD

¹⁸ Williams, Alan, Facility Resource Center, *The Field Act/Uniform Building Code Comparison*, September 16, 2002. (Appendix B).

¹⁹ *Ibid.*

²⁰ *Ibid.*

²¹ LAUSD, *Interoffice Correspondence From: Richard A. Alonzo, Superintendent To: Keith Packey Subject: Comparison of Design Alternatives*, April 17, 2003 (Appendix B).

²² *Ibid.*

²³ Title 5, Calif. Code of Regulations, Div. 1, Chap. 13, Subchapter 1, Article 4, 14030.g, Classrooms, 1. Classroom size standards, A.

Program also calls for column-free classrooms in order to provide adequate classroom design, including an unobstructed view of the classroom for the instructor. The Ambassador Hotel rooms contain columns, which would need to be removed.

Programmed Square Footage Requirements

School facilities consist of classrooms, administrative offices, support buildings and playing fields. The required size and number of these components is governed by the Education Code and the California Department of Education (CDE). The LAUSD Program adheres to these specifications and requires 254,725 square feet for the high school, 139,520 square feet for the middle school, and 66,148 square feet for the elementary school to house the proposed K-12 school facility. Any additional square footage provided by an alternative translates to additional costs the LAUSD must incur to build out and/or restore and maintain the space. Actual use of the additional space requires more work and additional LAUSD financial resources.

The existing Hotel Building contains 166,842 square feet more than the amount called for by the LAUSD Program. Thus, Alternatives 1 and 5, which both involve Hotel Building reuse, would result in 166,842 square feet of excess space beyond LAUSD Program facility requirements. Alternative 3 involves reuse of the Hotel's North Tower and would require the LAUSD to build out and/or restore 15,045 square feet beyond Program requirements. Alternatives 2 and 4, in contrast, do not require LAUSD to build out and/or reuse excess square footage.

Auditorium Square Footage

LAUSD's Program requirement for an auditorium is 9,000 square feet.²⁴ With the exception of Alternative 4, which calls for new construction, each Alternative proposes reuse of the Cocoanut Grove as a school auditorium. The Cocoanut Grove contains approximately 11,000 square feet. However, due to the presence of numerous columns and obstructions, only 5,400 square feet is usable space for seating. Thus, Alternatives 1, 2, 3 and 5 fall 3,600 square feet short of the LAUSD Program requirement pertaining to auditorium size. A smaller than programmed auditorium would require additional meeting sessions to accommodate all the students and facility. The lack of appropriate space in the auditorium could place an undue burden on the instructional schedule due to the multiple number of assembly schedules that would be needed to accommodate all students. This multiple assembly schedule has shown to decrease the number of instructional assemblies programmed by a school.

Within the auditorium, the LAUSD Program requires a 2,650 square foot stage.²⁵ Reuse of the Cocoanut Grove as a school auditorium would allow for a stage of 2,200 square feet, or 450 square feet less than the required space. Thus, Alternatives 1, 2, 3 and 5 all fall 450 square feet short of the LAUSD Program requirement. Alternative 4 meets the LAUSD Program Requirement.

²⁴ Final Program for CEQA, Central LA New HS#8, Rev. 10, dated June 27, 2002, Page 6, Auditorium.

²⁵ *Ibid.*

Playground Square Footage

In densely developed urban areas, where developable land is difficult to acquire, the CDE has created exceptions to the minimum site area policies through a Small School Site Policy, as defined in the California Code of Regulations.²⁶ This policy allows for a significant reduction in site acreage playground requirements in urban areas. The Small School Site Policy goals define the following minimum areas for outdoor playfield (not including the footprint of school buildings): elementary 2 acres; middle school 6 acres; and high school 9 acres. For a K-12 facility, this is a total of 17 acres.²⁷ The LAUSD Program must comply with the CDE Small Site Policy. In addition, the District recently entered into the Rodriguez Consent Decree, which prescribes specific goals for outdoor playing fields and facilities. These goals vary only slightly in relation to student population. For the projected grade levels and school population at the Ambassador Hotel site, the Rodriguez Consent Decree also requires a total of 17 acres of playground space.

The Ambassador Hotel site is 23.77 acres. Under Alternative 1, the hotel and new structures would cover approximately 7.6 acres. The remaining 16.2 acres would be available for outdoor playing areas. Thus, Alternative 1 would be 0.8 acre short of the CDE's requirements for playground acreage. Alternative 5 would require 15 acres of playground area. Alternative 5 would be 3.9 acres short of the requirements. Alternatives 2, 3 and 4 would comply with the CDE playground acreage requirements of the Small Site Policy.

The LAUSD Program requirements also require bleacher seating for 5,000 students.²⁸ Alternatives 2, 3, 4 and 5 would meet this requirement. Alternative 1 involves a 1,500-seat shortfall due to the reduction of seating caused by the lowering of bleachers necessary to preserve the Wilshire View Corridor.

Implementation of Academy Concept

The Academy Concept involves small educational clusters of specific disciplines within a larger school facility featuring a central area.²⁹ Small Learning Communities need to have clear academic identities as well as distinct physical boundaries. It is much more difficult to achieve these two significant requirements when a facility is restricted by an existing layout that does not lend itself to new configuration. Alternatives 1, 3 and 5 would seriously restrict the LAUSD's ability to carry out the Academy Concept on the site.

Cost

The renovation and rehabilitation required for adaptive reuse under Alternatives 1, 2, 3 and 5 would involve significant costs. Costs to reuse the existing structure fall into three broad categories: 1) costs required to improve the structure to current seismic standards, building codes and Field Act requirements; 2) costs required to adapt the existing structures to a new use in

²⁶ Title 5, Chap. 13 of Div. 1, § 14010(a).

²⁷ California Department of Education (CDE), *Small School Site Policy*, February 28, 2001 (Appendix B).

²⁸ Final Program for CEQA, Central LA New HS#8, Rev. 10, dated June 27, 2002, Page 8, Optimum Facilities.

²⁹ LAUSD, *Small Communities of Learning for Secondary Schools in the Los Angeles Unified School District*, January 8, 2003. (Appendix B).

accordance with CDE requirements; and, 3) cost to repair, maintain and operate the facility over its useful life. The estimated cost to reuse the Hotel Building for school purposes and meet the current building and safety codes and school facility requirements substantially exceeds the cost of constructing a new K-12 learning center on the site.

Construction Costs

Adaptive reuse of all or part of the Ambassador Hotel has implications for total project construction costs, and for project compliance with applicable code requirements. The CDE and the Division of the State Architect (DSA), the governing school design approval bodies, enforce these requirements through a rigorous plan approval process.

While several areas of similar space requirements and usage coincide between the Hotel and school uses, the primary requirements of classrooms and circulation are substantially different from Hotel guest room needs. Accordingly, locating school classrooms within the existing Hotel structure as proposed under Alternatives 1 and 5 would require substantial changes to the interior and exterior of the Hotel Building. Alternatives 1 and 5 present the highest estimated costs of the Alternatives 1-5 as examined in this Draft EIR, since they include both the complete renovation of the Ambassador building and new construction of an elementary school. Alternative 1 is estimated to incur \$227,727,846 construction costs. Alternative 5 is estimated to incur \$208,642,113 construction costs.

Alternative 3 also requires substantial modifications to the Hotel's North Tower to render this area usable for classroom purposes. The estimated construction cost of this renovation is \$177,063,208. Alternative 2 involves new construction, adaptive reuse of the Coconut Grove, and reconstruction of the Embassy Ballroom. Taking into account all renovation and reconstruction required under Alternative 2, construction costs would be \$166,740,163. Total construction costs for Alternative 4 are estimated at \$149,250,404.

Soft Costs

Soft costs include design costs, project management, testing and inspection, and a 4% owners contingency. Soft costs would range from \$32,133,971 for Alternative 4 to \$45,012,367 for Alternative 1.

Environmental Costs

Environmental costs include preparation of the EIR, PEA and RAW. It also includes site clean up of hazardous materials and lead/asbestos abatement in existing buildings. Environmental costs are anticipated to be \$10,935,013 for all five alternatives.

Construction Contingency Costs

The size, configuration and general condition of the main Hotel structure will make renovation very expensive with some costs remaining unpredictable until the project is initiated or in

progress. Costs associated with the reuse may increase as the project progresses. Therefore, a 5% contingency is applied to construction costs for potential changes.

Land Acquisition Costs

Alternative 5 involves the sale of 5.6 acres of the Ambassador site and the acquisition of additional property to locate the elementary school and playfields, as only the high school and middle school would be built on-site. A new middle school would need approximately 2.9 new acres. Any replacement site must be located in relatively close proximity to the Ambassador Hotel site, in the densely populated Wilshire Center District.

According to District real estate officials, recent land acquisition costs in the area, including relocation costs, have been ranging from \$3.0 to 4.1 million per acre.³⁰ Sale or lease of the frontage along Wilshire Boulevard could, in some scenarios, generate substantial funds for the District. However, these proceeds will not cover the additional costs incurred by the District in procuring replacement sites for the displaced schools. Land acquisition costs are estimated to be \$83,349,880 under all five alternatives.

Furnishings, Fixtures & Equipment (iFF&Ei) Costs

FF&E costs are anticipated to range from \$3,139,558 under Alternative 4 to \$3,441,111 under Alternatives 1 and 5.

Replacement Site Costs

Replacement site costs for the elementary school and play field would only occur under Alternative 5. The replacement site cost for the elementary school and play field would range between \$21 and \$28 million, with approximately \$9-12 million being allocated to the elementary school.

Total Costs

The total cost for implementation of the proposed project is anticipated to range from \$286,271,346 under Alternative 4 to \$404,071,056 under Alternative 5.

Schedule

Due to existing overcrowding in area schools and the need to meet continuing student population growth, school-opening schedules are vitally important. Alternatives 1-5 vary in their impact on school opening schedules.

School opening dates for each Alternative are influenced primarily by the length of the design process and the duration of construction. As shown in the Table 4-1, the design duration of each Alternative through 100% construction documents would range from one year to almost two years (12 to 21 months) depending on whether the Alternative involves reuse of all or part of the

³⁰ LAUSD, *Commercial Development Preliminary Feasibility Study, February 2003* (Appendix B).

Hotel Building. Design approval is expected to take anywhere from six to nine months under any of the five alternatives.

Under Alternatives 1 and 5, construction of the middle and high schools is anticipated to last up to 33 months. Construction of the middle and high schools under the other alternatives is anticipated to last up to 26 months (Alternative 2); 29 months (Alternative 3); and 24 months (Alternative 4). Construction of the elementary school is anticipated to last from nine to twelve months under all five alternatives.

All of the alternatives except Alternative 4, which proposes all new construction, would require field visits to verify existing building dimensions and conditions and a testing program of the existing materials needed for design. All of the alternatives except Alternative 4 would also require approval of record drawings by the DSA. These processes, depending on the outcomes, can be lengthy and add significant time to the learning center opening schedule.

Under Alternatives 2 and 4, the middle school and high school are projected to open the earliest, in June to December 2007. Under Alternative 3, the middle school and high school would likely open in the period December 2007 to July 2008. Under Alternatives 1 and 5, the middle school and high school would not open until the period September 2008 to March 2009. Under all alternatives except Alternative 5, the elementary school would open in July or September of 2006. Under Alternative 5, the elementary school would open on an alternative site in July or September of 2009, under the same schedule as the remainder of the learning center. Under Alternative 5, there would be additional delays (approximately 3 years) to the elementary school opening date as a result of requirements to acquire land (i.e., acquisition through escrow or condemnation, tenant relocations and building demolition, DTSC and CEQA approvals, etc.)

Design Standard & Operational Issues

School Facility Sustainability Requirements Met

School facilities are designed to last approximately 100 years. None of the alternatives except Alternative 4 would completely meet all sustainability requirements in terms of long-term life cycle costs.³¹ Sustainability goals could be compromised under Alternative 2 in terms of material long life cycles where reuse of existing materials occurs. The designs under Alternatives 1, 3 and 5 are compromised in terms of State Historic Building Code Title 24 exemptions and larger building envelope (exterior skin to floor ratio) causing higher use demand on equipment. Material long life cycle issues could exist where reuse of existing materials occur. Energy efficiency also will not be maximized due to the limited use of existing daylight resulting from the existing arrangement, size and number of windows (fenestration).

All of the alternatives except Alternative 5 would meet the sustainability requirement for retaining existing landscaping and natural features where possible. This requirement would not

³¹ LAUSD, *Interoffice Correspondence From: James A. McConnell, Jr., Chief Facilities Executive To: Members, Facilities Committee Subject: High Performance Building Design and Implementation Plan*, May 15, 2001. (Appendix B).

be met under Alternative 5 because there would be a loss of the Wilshire View Corridor landscape element.

Circulation Issues

Due to the size of existing hotel corridors, under Alternatives 1, 3 and 5, there would be single loaded corridors in the main Hotel Building where classroom entrances will exist along one side of the corridor, rather than on both sides. Single-loaded corridors create additional walking distances for students and faculty, creating circulation problems for the 3,546 middle and high school students that must move through as many as 7 floors within the 6 minute period between classes.

Although abundant elevators could be designed under Alternatives 1, 3 and 5, teachers and administrators have expressed concern about the difficulty of supervising and moving students from classroom to classroom, or floor to floor, within the required passing period. Education Code section 46160 requires that students receive a minimum of 180 instructional minutes per day, including passing periods. Single loaded corridors would likely require additional time for students to move from one area to another. An increase in passing period allotted time could significantly impact the instructional day by requiring students to attend a longer day. If the passing period exceeds 6 minutes, LAUSD could also suffer economic hardship due to current labor union agreement with teachers that contain specific limitations on the length of the school day.

For safety and security, stairs and corridors must be redesigned in order to eliminate areas that currently escape surveillance. New main stairs must be constructed to facilitate flow and visibility, requiring additional intrusion into the existing Hotel structure. Secondary egress stairs must be controlled and located to avoid dead end corridors, while allowing maximum use of available space on each floor. Alternatives 2 and 4 would avoid these potential problems in meeting the educational mission requirements.

Noise Impacts

LAUSD follows industry standards for noise levels in school facilities.³² Only Alternatives 2 and 4 would meet LAUSD's standard noise requirements. Under Alternatives 1, 3 and 5, the noise requirements are potentially compromised in the main Hotel Building. This is due to the Hotel Building's low ceiling clearance and to the HVAC system, which would be required due to duct routing concerns raised in the Hotel Building. As Alternative 3 involves reuse of the North Tower rather than the entire Hotel Building, the concerns are proportionately less than those raised by Alternatives 1 and 5, which involve total reuse of the Hotel Building.

³² LAUSD, *Summary of Comparison of Industry Standards vs. ANSI Acoustical Requirements*, 2003 (Appendix B).

Lighting Standards

Alternatives 2 and 4 would meet LAUSD's standard daylight factor of two in classrooms.³³ Under Alternatives 1, 3 and 5, however, the existing fenestration of the main Hotel Building does not meet LAUSD's daylight standards for classrooms. Reuse of the existing Hotel Building's windows would require the windows to be fixed in place or have limited opening space due to safety concerns, as well as the deteriorated condition of the existing windows.³⁴ Reuse could also require installation of a second interior window or other mitigation measures to address safety concerns raised by school occupant access to the compromised exterior windows.

The adverse impacts from Alternatives 1, 3 and 5 on the learning environment in this area could be significant. Research has shown that in addition to the potential for greater energy efficiency, natural daylight is perceived to be warmer and more appealing than the fluorescent light typically found in a school building.³⁵ Studies have shown that students perform better in well-designed classrooms illuminated by daylight.³⁶ Windows and skylights that bring natural light into a school, but prevent distracting glares and shadows, can create a more comfortable and pleasing environment for students and teachers.³⁷ These benefits are due, in part, to an architectural breakthrough involving light refraction that takes the powerful glare out of natural sunlight.³⁸ Natural light produces health and performance benefits, including higher attendance rates and most importantly, higher student academic achievement.³⁹ Attendance in daylighted schools routinely exceeds attendance in neighboring counties.⁴⁰

Ventilation

Indoor air quality is important in schools because most students are still developing their respiratory systems. Their immune systems are less effective than an adult's, and their higher metabolic rates cause them to breathe more air and retain more toxins, according to the U.S. Department of Energy.⁴¹ If LAUSD standards for natural ventilation are not met, the potential exists for establishing an unhealthy setting for students and teachers.

Alternatives 1, 3 and 5 do not meet LAUSD ventilation standards. Reuse of the windows and frames would obstruct LAUSD's ability to optimize natural ventilation in the classrooms. The Hotel windows' glass and wooden frames raise safety issues due to their poor existing condition.⁴² The existing annealed glass windows used in the Hotel are subject to easy breakage and shards of glass readily break off. The DSA likely will require that this glass be removed and

³³ LAUSD, *Daylight Factor Calculation*, 2003 (Appendix B).

³⁴ Gonzalez Goodale Architects, *Ambassador Hotel ñ Reuse of Existing Windows*, October 30, 2002 (Appendix B)

³⁵ LAUSD, *Interoffice Correspondence From: Richard A. Alonzo, Superintendent To: Keith Packey Subject: Comparison of Design Alternatives*, April 17, 2003 (Appendix B).

³⁶ *Ibid.*

³⁷ *Ibid.*

³⁸ LAUSD, *Interoffice Correspondence From: Richard A. Alonzo, Superintendent To: Keith Packey Subject: Comparison of Design Alternatives*, April 17, 2003 (Appendix B).

³⁹ *Ibid.*

⁴⁰ *Ibid.*

⁴¹ *Ibid.*

⁴² Gonzalez Goodale Architects, *Ambassador Hotel ñ Reuse of Existing Windows*, October 30, 2002 (Appendix B)

replaced with tempered glass on the upper floors. If the existing frames and glass are reused, the windows would need to be fixed in place or have a limited opening space to address the safety concerns. A secondary interior window could also be required to prevent access to the existing windows.

The LAUSD Program also establishes minimum ceiling height standard of 10 feet.⁴³ This standard is not met for Alternatives 1, 3 and 5 in the Hotel Building. Low ceiling heights adversely impact ventilation and air circulation, as they prevent hot, stale air from rising to the ceiling with natural ventilation. Low ceiling heights also prevent natural daylighting, which can save energy by allowing electric lights to be switched off. There are also concerns with low ceiling heights for securely mounting fixtures and equipment, as well as potential vandalism. Alternatives 2 and 4 would meet the LAUSD minimum ceiling height standard of ten feet.

Site Layout

Under Alternatives 1, 3 and 5, the existing tower bifurcates the project site. This would obstruct movement of staff and students around the proposed campus. In particular, it would obstruct movement related to outdoor programs and play fields. As a result, supervision of student would become more difficult, particularly with respect to play fields and outdoor programs. The proposed designs under Alternatives 2, 3, and 4 could provide a physical separation between the middle and high school students. However, to the extent that Alternatives 2 and 4 utilize a building layout similar to the existing Hotel towers, these two would adversely impact site layout.

Collaborative for High Performance Schools

Alternative 2 and 4 would meet LAUSD's Collaborative for High Performance Schools (CHPS) policy adopted in 2001 which mandates that all future LAUSD construction or renovation conform to guidelines which promote the use of more resource efficient design criteria in the construction of new and renovation of existing District schools.⁴⁴ The designs for the existing Hotel Building proposed under Alternatives 1, 3 and 5 would not meet this policy. To the extent Alternative 2 involves reuse of the Coconut Grove and Embassy Ballroom, it too may not comply with the CHPS regarding energy, materials and indoor environmental quality.

Operating Costs

The potential variance in operating costs were ranked for each alternative from 1 to 5 with 1 being most costly to operate through 5 being least costly to operate. The elements considered in determination of Maintenance and Operations costs include overall square footage of the facility to maintain, use of natural ventilation and lighting versus use of electrical lighting and HVAC,

⁴³ LAUSD, *Typical Section: Ceiling Clearances*, 2003 (Appendix B).

⁴⁴ See LAUSD, *Interoffice Correspondence From: James A. McConnell, Jr., Chief Facilities Executive To: Members, Facilities Committee Subject: High Performance Building Design and Implementation Plan*, May 15, 2001. (Appendix B).

amount of elevators, amount of landscaped areas and circulation. Alternative 1 was ranked to be the most costly and Alternative 4 was ranked to be the least costly.

Safety/Security

Student Supervision

The designs proposed under Alternatives 1, 3 and 5 would have corridors that do not provide open sight lines for easy supervision of students. A school's physical layout can influence whether crime will occur. Schools must be built with security in mind, to include adequate lighting and break-proof door and window locks, minimizing blind spots in or about the campus. Interior stairwells have proven to be the most susceptible to vandalism, and criminal incidents toward students and staff. Unrestrictive visibility both indoors and particularly outdoors is essential in preventing crimes and misconduct in large urban schools. Due to their reuse of the all or part of the Hotel Building, Alternatives 1, 3 and 5 raise issues related to safety and security. Adaptive reuse of the Hotel would create "dead end" corridors that would have to be modified to meet fire, life and safety access requirements by the addition of stairwells to the outside. The existing Hotel corridors bend and therefore do not provide open sight lines for easy student supervision. This would not be a concern under Alternatives 2 and 4.

Toxic Mold

All of the alternatives, except Alternative 4, would require potential mold investigation and abatement in the existing on-site structures that would be retained. A mold investigation would be required for the Hotel Building, the Coconut Grove and the Embassy Ballroom.

Construction Issues

School construction is governed by the Field Act (Education Code sections 17281 et seq). The Field Act incorporates the Uniform Building Code, with the necessary amendments to provide more stringent requirements. The purpose of the Field Act is to provide a building that is expected to withstand the forces generated by a major earthquake with minimal structural or architectural damages. The DSA must approve the design of all schools in the State of California. The design requirements for schools are strict and, in general, do not allow for alternative design concepts. Alternatives 1, 3, and 5, and to a lesser extent Alternative 2, present inherent physical challenges to adaptively reusing the all or part of the Hotel for school purposes.

Seismic Upgrades to Hotel Building

Alternatives 1, 3 and 5 would involve significant seismic upgrades in order to adaptively reuse the Hotel Building and/or the North Tower. For a building with a capacity of 300 students or greater, the Field Act requires that it withstand a seismic force 15% greater than specified in the Uniform Building Code. According to District structural experts, the existing Hotel seismic load resisting system does not possess adequate strength or ductility to resist anticipated earthquake

ground motion without excessive structural damage or building collapse.⁴⁵ The existing building displays cracking around stress points and buckling clay tiles. The reuse of existing building structures will require very significant seismic upgrades, including added shear walls, foundation upgrades, added columns and beams, replaced floor slabs, fiber wrapping of existing columns and structural upgrades for the concrete roof. Additional costs will be incurred for facilities providing handicapped access, full sprinkler coverage and fire separation between the school and office facilities.

In addition, for Alternatives 1, 3 and 5, the removal of the interior columns to create column-free classrooms will redistribute the gravity load distribution and impact the remaining columns and their foundations, necessitating extensive structural modifications. Significant work would be needed to strengthen the exterior columns along the corridors to satisfy the additional demand caused by the reframing of the interior columns. Upgraded foundations will be required under the strengthened columns. In addition, adaptive reuse will require the addition of new concrete beams to support the existing vertical framing, as the proposed column configuration will increase the axial demands to both the remaining interior columns and footings.

There are numerous areas throughout the interior and the exterior of the Hotel Building where the existing concrete structure has been seriously damaged by corrosion. Most of the installations exist below wet-use areas such as kitchens, below roof areas, and exterior balcony areas. These areas will require structural repairs to reinforce the corroded reinforcing steel as well as nonstructural repairs to prevent further corrosion, such as waterproofing or new roofing. Structural modifications to the existing framing system will also be required where new openings are introduced at locations such as new exit stairs, new elevator shafts, and new mechanical shafts.

Demolition of interior and exterior walls and other potentially significant historical elements would need to wait for design approvals from the project's architectural historian and/or preservation consultant, as may be required. Demolition of external building elements would require careful removal of existing clay roof tiles and windows, to the extent the safety concerns regarding these elements can be mitigated and they are reused. For Alternatives 1, 2, 3 and 5, a factor of unforeseen structural conditions exists; further demolition activities would expose areas that are currently inaccessible, and further structural materials testing and design process may reveal unforeseen structural conditions. While the majority of Alternative 2 will be new steel constructed frame, the Coconut Grove is made of concrete that will require substantial structural upgrades. For all reuse Alternatives, the likelihood of unforeseen structural conditions would adversely impact the school construction time schedule, as well as raise construction and other costs.

Structural Modifications to Create Classroom Space

For the existing Hotel structure and/or North Tower to function adequately for classroom purposes under Alternatives 1, 3 and 5, major structural modifications will be required. Reuse of the Hotel's upper levels for classroom space will initially require demolition of all interior

⁴⁵ Gonzales Goodale Architects, Structural & Seismic Evaluation for Ambassador Hotel, December, 2002.

partitions within the floors to increase room size, and to accommodate the new wall locations and structural upgrades required. In addition, reuse will require selective removal of columns that cause classroom obstructions and modify the remaining structure accordingly. The creation of column-free classrooms requires a substantial modification to the building's structural system, leaving virtually no area untouched. In addition, the existing Hotel room floors are not level as is required for school classrooms. With the limited floor to ceiling space in the Hotel Building, it will be necessary to place leveling slabs on existing floor slabs. In areas where the existing floor slabs have deteriorated, it will need to be removed and replaced with new flooring.

The number of levels required for student use will require a large vertical transportation system in order to meet the needs of moving large numbers of students quickly and safely through the facility. Building elevators will be a major cost component in the configuration of a potential new high school, and functionality of the vertical transportation system will be critical. Substantial modification to the existing Hotel Building will be required to efficiently circulate 3,546 middle and high school students throughout 7 floors. Internal demolition would be required to remove existing stairs and elevators. Concrete cuts would be needed for new wider, longer stairs and larger elevators, and for added columns, beams and shear walls. Concrete coring would be needed for new HVAC ducts, conduit and piping penetrations. Structural upgrades such as doweling, reinforcement, and small concrete pours will be needed throughout the existing buildings.

New Systems Installation

In Alternatives 1, 3, and 5, mechanical, electrical and plumbing (MEP) systems installation in existing structures will require numerous concrete penetrations through existing floors and beams requiring a significant amount of coordination with structural designer. Routing of ducts, piping, conduits, etc would be difficult in the existing Hotel Building structures due to low floor to ceiling height. It would be necessary to create unique architectural accommodations to conceal the systems and prevent the possibility of vandalism to new ducts, piping, conduit, and other system components.

Cocoanut Grove as School Auditorium

Under Alternatives 1, 2, 3 and 5, an auditorium is proposed in the existing Cocoanut Grove building located in the Hotel's lobby level. The Cocoanut Grove would require substantial modifications, including raked floors and restroom facilities, to provide the required functionality of an auditorium.⁴⁶ There will also be significant modifications required to provide handicap accessibility and to strengthen the existing concrete construction to meet applicable seismic code requirements.

Embassy Ballroom as School Library

Under Alternatives 1 and 5, the existing Embassy Ballroom would be adaptively reused as a school library. Alternative 2 involves the reconstruction of the Embassy Ballroom, and

⁴⁶ Gonzales Goodale Architects, Structural & Seismic Evaluation for Ambassador Hotel, December, 2002.

Alternatives 3 and 4 involve its demolition. The seismic rehabilitation of the Embassy Ballroom would be similar to that outlined for the Hotel tower.⁴⁷

Adaptive reuse entails the greatest challenge due to the poor condition of the existing space and the possibility that an original ceiling exists above the visible coffered ceiling existing today. Based on the poor condition of the visible coffered ceiling, it is possible the DSA will require the ceiling be completely removed to provide adequate support structure above.⁴⁸ If the original ceiling is in fact discovered above the coffered ceiling, significant work would be required to rebuild and restore the ceiling to modern-day code standards. Additional contingency allowances are recommended because of the poorly documented existing conditions.

Basement Level

Alternatives 1, 3 and 5 all involve adaptive reuse of the Hotel's basement level as janitorial facilities for the proposed K-12 school facility. Alternatives 2 and 4 involve demolition of the main Hotel Building, including the basement level. Most of the basement level is below grade (except on the westerly service side of the site) and serves as the foundation to the building. The basement level contains many of the original Hotel's chillers and boilers, most of which are in disrepair and nonfunctional. Adaptive reuse of the basement would entail substantial clean up and removal costs necessary to ready the area for school-related use. There is also significant foundation work needed in this area for which extensive shoring and excavation will be required.

High Rise Building Condition

Under Alternatives 1, 3 and 5, special grading or other design modifications would be required on the east side of the main Hotel Building to eliminate the high-rise building condition. Because this is a fire life safety issue, special analysis would be needed to determine if normal high rise requirements would be applied, as no DSA-approved high-rise building has been constructed in the State of California to date.

DSA Review and Approval of Hotel Reuse

Alternatives 1, 3 and 5 will require the preparation of record drawings and development of an existing materials testing program to the satisfaction of DSA. DSA will also require a detailed code analysis for the specific building reuse contemplated. The DSA variable in approach to the structural system is great considering unforeseen structural conditions. Fire, life, safety, and access issues will involve numerous peer reviews due to the variety of existing building elevations, access points and room size changes.

It is likely that DSA will take a conservative approach to structural design review and approval of Alternatives 1, 3 and 5, considering the inherent safety and structural issues involved in reusing a 7-story Hotel Building structure built in 1921 for modern school purposes. In addition to the Title 5 and Field Act requirements for school design and construction, DSA must consider

⁴⁷ *Ibid.*

⁴⁸ Gonzales Goodale Architects, Structural & Seismic Evaluation for Ambassador Hotel, December, 2002.

schools as essential facilities for the public. Essential facilities are considered safe buildings for the public to go to during emergencies such as an earthquake. With this in mind, it is likely that unforeseen existing building conditions will be discovered and structural design considerations changed by DSA as the school design evolves. This will require extra design time as well as extra construction time. For Alternative 2, design will follow typical Standards for New Construction except for upgrades required in the Coconut Grove and reconstructed Embassy Ballroom buildings.

DSA inspection during the construction process will be extensive for Alternatives 1, 3 and 5, considering the magnitude of structural, access, fire, life safety and historical issues that reuse of a 7-story building built in 1921 entails. Change Order approvals will be more involved and take more time considering the multi-level reviews required for each of the issue areas above.

Environmental Cleanup

For Alternatives 1, 3 and 5, the DTSC-approved Removal Action for the underground storage tank located beneath the basement footing of the northeast Hotel tower would need to be accomplished with the Hotel Buildings in place. The mandatory cleanup of lead and asbestos around the perimeters of the existing buildings will also need to be done with the buildings in place. For Alternative 2, removal action will for the most part be completed from a clear site.

Legal Issues

Loss of Funding

If the LAUSD chooses to sell a portion of the Ambassador Hotel site as required under Alternative 5, the District could face a loss of reimbursements from Proposition 1A, the \$9.2 billion, 1998 bond measure. Under terms of the bond issue, the State Office of Public School Construction (OPSC) has committed to reimburse LAUSD for 50% of Ambassador Hotel site land acquisition costs. Thus far, OPSC recognizes a total purchase price for the Ambassador Hotel site of only \$74,814,000. At 50% reimbursement, the total due the District would be \$37,407,000. On a simple pro rata basis, a loss of 5.6 acres would cost the District \$8,801,647 in lost reimbursements, and a loss of 2.24 acres would cost \$3,520,657.

Priority Acquisition Rights of Other Public Agencies

Under Alternative 5, it may not be possible for the District to sell a portion of the Ambassador Hotel site for commercial use. If the District wishes to sell any of its properties, the School Board must first declare that the property will not be needed for classroom use.⁴⁹ The District must then comply with provisions of the Government Code (§§ 54220-54232) which mandate that surplus lands first be offered to public agencies that provide or support the provision of low cost housing, recreational facilities and open space. Only if and when all of these other potential users of the property have indicated that they have no interest in acquiring the site, could the District offer the site for sale to potential private purchasers.

⁴⁹ Education Code, §§ 17455-17484.

4.4 ALTERNATIVES TO THE PROPOSED PROJECT

In addition to Alternatives 1-5 previously analyzed, Section 4.4 describes and analyzes the No Project Alternative and three additional alternatives selected due to their potential to attain some of the project objectives and to lessen or avoid some of the significant environmental effects resulting from implementation of the proposed project.

No Project Alternative

An EIR is required to evaluate and analyze the impacts of a No Project Alternative. The purpose of evaluating the No Project Alternative is to allow decision-makers to compare the impacts of approving the project with the impacts of not approving the project. However, the No Project Alternative is not the baseline for determining whether the proposed project's impacts are significant, unless it is identical to the existing environmental setting analysis that establishes the baseline (CEQA Guidelines, Section 15126.6(e)(1)).

At the time the NOP is published, the No Project analysis must discuss the existing conditions and what would be reasonably expected to occur in the foreseeable future if the project were not approved based on current plans and consistencies with available infrastructure and community services (CEQA Guidelines, Section 15126.6(e)(2)).

The discussion of the No Project Alternative normally proceeds along one of two lines. When the project is the revision of an existing land use or regulatory plan, policy, or ongoing operation, the No Project Alternative will be the continuation of the plan, policy, or operation into the future. On the other hand, if the project is an individual development project on an identifiable location, the No Project Alternative should compare the environmental effects of the property remaining in its existing state. However, if other future uses of the land are predictable, such uses also should be discussed as possible no project conditions and the project should be compared to those uses (CEQA Guidelines, Section 15126.6(e)(3)).

No Project, No Development

The No Project, No Development Alternative involves the scenario where the K-12 learning center is not constructed at the Ambassador Hotel site. The site would remain as it is with the existing Ambassador Hotel complex, empty and vacant lots, parking lot, apartment buildings and abandoned nightclub and continue its current operations with no new construction. The Ambassador Hotel structures would likely continue to deteriorate and adversely impact the aesthetic value of the site. Demand for a new high school, middle school and elementary school would not be met and overcrowding at the existing Belmont Senior High School, Los Angeles High School, Berendo Middle School, Virgil Middle School and Hoover Elementary School would continue. The No Project, No Development Alternative would not achieve the LAUSD's long-term goal to relieve serious overcrowding at existing schools within the overall Belmont Planning Area. If overcrowding conditions continue at their current rate, it is likely that reliance

on portable classrooms could increase. In addition, overcrowded conditions could increase the need to bus students to school away from their neighborhoods. Finally, meeting the needs of special education students could be delayed.

Under the No Project, No Development Alternative, the site would remain with the existing Ambassador Hotel complex, empty lot, parking lot, vacant lot, three apartment buildings and former Budget Rent-A-Car office at least in the near future. The site would remain a candidate for other commercial or institutional development proposals, consistent with the Wilshire District Community Plan and zoning designations for the site. As the site has the potential to remain as it is with existing structures onsite, there would be:

- No new aesthetics impacts introduced into the existing project site viewshed;
- No new construction- or operation-related emissions such as fugitive dust, construction equipment emissions, or project-induced vehicle emissions;
- No historical resources would be demolished or moved, and therefore, no immediate cultural resource impacts, however, continued deterioration of the Ambassador Hotel structures could ultimately lead to their loss over time;
- No impacts associated with geology and soils;
- No impacts associated with hazardous materials;
- No impacts associated with hydrology and water quality;
- No changes in land use or recreational demands;
- No new sources of noise;
- No displacement of residents;
- No changes to demands on public services and utilities; and,
- No impact or change to current traffic, parking and circulation conditions.

The No Project, No Development Alternative would reduce all impacts associated with project construction of the K-12 learning center at the site, and many impacts associated with project operation. However, this Alternative would not attain any of the project objectives.

No Project, Development According to Existing Land Use Plans

This variant of the No Project Alternative ñ development according to existing land use plans - involves ultimate development of the site according to the City of Los Angeles General Plan designation and zoning designation. The site is located within the City of Los Angeles Wilshire District Community Plan area. According to the Wilshire District Community Plan, the land use designation of the project site is Regional Center.⁵⁰ The site is zoned R5-2 (Multiple Dwelling), C2-2 (Commercial) and C4-2 (Commercial).⁵¹ Specifically, the majority of the site is zoned C4-2, while only a small part (along the eastern and western borders of the site) is zoned R5-2. Additionally, the southeastern corner of the site is zoned C2-2 (Commercial). The Multiple Dwelling (R5-2) zoning allows for clubs, lodges, hospitals and all residential uses. The

⁵⁰ City of Los Angeles General Plan, *Wilshire District Community Plan ñ General Plan Land Use Map*, October 3, 2001.

⁵¹ See City of Los Angeles, *Planning and Zoning Code*, July 2000; City of Los Angeles, *Zoning Information Map Access System* (Accessed on March 31, 2003).

Commercial (C2-2 and C4-2) zoning allows for retail, limited manufacturing, studios, office buildings, hotels, and up to R4 residential uses. If the new K-12 learning center was not constructed, the could be developed with other uses (i.e., commercial, residential, etc.) under this zoning. However, the site is so large that the nature and extent of potential development is not reasonably foreseeable at this time.

Developing the proposed project site for these other uses would require redeveloping or renovating the existing site to accommodate the new use. While there are no current or proposed developments plans, previous proposals for the development of a large commercial complex at the project site (i.e., the Trump organization proposal) could result in significant impacts to the surrounding area. Development of the proposed project site for such uses could result in:

- Aesthetics impacts introduced into the existing project site viewshed;
- New construction- or operation-related emissions such as fugitive dust, construction equipment emissions, or project-induced vehicle emissions;
- Cultural resource impacts if historical structures were demolished or moved;
- Impacts associated with geology and soils;
- Impacts associated with hazardous materials;
- Impacts associated with hydrology and water quality;
- Changes in land use or recreational demands;
- New sources of noise;
- Displacement of residents;
- Changes to demands on public services and utilities; and,
- Impacts to current traffic, parking and circulation conditions.

Without a current development proposal, it is not possible to compare the impacts of the construction and operation of the K-12 learning center proposed by the LAUSD with an alternate residential or commercial development. Many impacts would be similar, but others (such as traffic patterns) could vary significantly. However, using the proposed project site for any uses other than a learning center that includes a high school, middle school and elementary school would not achieve the project objective of alleviating overcrowding at the existing Belmont Senior High School, Los Angeles High School, Berendo Middle School, Virgil Middle School and Hoover Elementary School, or any of the other project objectives discussed in this Draft EIR.

Maximum Reuse with New East Tower

The Maximum Reuse with New East Tower Alternative is a variant of Alternative 1. It would include the maximum retention and adaptive reuse of the existing project site. This alternative would involve removal of all ancillary buildings on-site, but like Alternative 1 would retain the main 7-story Ambassador Hotel building, including the Coconut Grove and Embassy Ballroom. Rather than a new “west” tower, in this alternative a new five-story “East Tower” would be connected to the east side of the main 7-story Hotel Building to house various science laboratories and other specialty classrooms. Unlike Alternative 1, this alternative would result in the elimination of the (historic) East Garden, a Class 3 feature, thereby creating greater impacts to cultural resources than Alternative 1.

This alternative would retain the main 7-story Hotel Building for reuse as administrative offices and middle and high school classrooms. A total of 52 middle and 92 high school classrooms would be built in the existing structure and new “East Tower”. The Coconut Grove would be reused as an auditorium while the Embassy Ballroom would be reused as a library. New construction would include the “East Tower”, as well as a separate high school/middle school gymnasium building to be located southwest of the existing main 7-story Hotel Building. In addition, a separate three-story 34-room elementary school (with partial rooftop play areas) would be located at the southwest corner of the project site (at South Mariposa Avenue and West 8th Street).

Athletic facilities would include a football stadium located along the Wilshire Boulevard frontage; 4 basketball/volleyball courts and 2 tennis courts located east of the main 7-story Hotel Building; 3 baseball and softball fields located southeast of the main 7-story Hotel Building; and, 1 combined soccer/football field located southwest of the main 7-story Hotel Building. Parking for 424 vehicles would be accommodated in an underground garage.

Access to the high school would be provided via a circular driveway on South Catalina Street at West 7th Street. Access to the middle school and the underground parking garage would be provided off of South Mariposa Avenue at West 7th Street. Access to the elementary school would be provided on West 8th Street.

Impact Analysis

Aesthetics

This alternative would have similar impacts on aesthetics as Alternative 1. Construction of the new learning center under this alternative would replace the existing Ambassador Hotel ancillary structures, but would remodel the main 7-story Hotel Building. As with Alternative 1, replacing the existing Hotel structures with the new learning center would only minimally change the visual character of the area since the main 7-story Hotel Building would still remain on-site as part of the new learning center. Potential light and glare impacts on adjacent properties would be similar to those discussed for Alternative 1.

Air Quality

The same significance criteria that are applied to the Alternatives 1-5 would apply to this alternative. Similar to construction activities associated with the Alternative 1, this alternative would require removal of all ancillary buildings on-site to support the new learning center facilities. Therefore, construction emissions associated with developing this alternative would be very similar to those associated with Alternative 1. Operational emissions under this alternative would be the same as those estimated for Alternative 1.

Biological Resources

The potential for impacts to biological resources from developing the new learning center with a new “East Tower” on the project site is similar to those that would occur from developing the

new learning center with a new "West Tower". The region is predominantly an urban setting with limited value as a wildlife habitat, no natural plant communities, and no special status animal or plant communities. Therefore, any future development at the proposed project site is not anticipated to result in biological impacts.

Cultural Resources

This alternative would have similar impacts on cultural resources as Alternative 1, which remain significant after mitigation. However, additional historic resources impacts also would occur as a result of the loss of the East Garden.

Geology and Soils

The potential for impacts to geology and soils at the project site from developing the new learning center with a new "East Tower" is similar to those that would occur from developing the new learning center with a new "West Tower". The project site is located in a region that is generally considered to be seismically active and prone to ground shaking. The potential for surface rupture, ground failure, and other geologic and soil hazards at the project site would be similar under this alternative and any of the proposed project alternatives.

Hazards and Hazardous Materials

The potential for hazards and hazardous material impacts at the project site from developing the new learning center with a new "East Tower" is similar to those that would occur from developing the new learning center with a new "West Tower". Prior to any future development of the project site, the existing USTs and any contaminated soil would be removed from the project site. Furthermore, the appropriate asbestos and lead paint abatement procedures would be implemented prior to demolition of any on-site structures.

Hydrology and Water Quality

The hydrology and water quality impacts associated with this alternative are similar to those under Alternative 1. Under this alternative, the new learning center would be constructed on an existing developed site. The closest surface water body in the immediate project vicinity is Ballona Creek, located approximately two miles southwest of the project site. Because a majority of the project site is currently developed with the Ambassador Hotel complex, the conditions of the site consist of predominantly impermeable surfaces. Therefore, it is anticipated that the impacts and mitigation measures presented for Alternative 1 also would apply to this alternative.

Land Use

The land use impacts associated with this alternative are similar to those under Alternative 1. The project site falls under the Wilshire District Community Plan of the City of Los Angeles General Plan. Development of the project with a new "East Tower" would be consistent with zoning and the community plan policies regarding the development of new school facilities.

Recreational facilities, including parks, located in the surrounding area would include the same recreational facilities for the proposed project site. Similar to Alternative 1, development of the new learning center would add to the recreational facilities available to the community in the project area. No impacts are anticipated on recreational facilities. Therefore, development of this alternative would have less than significant impacts to land use.

Noise

Potential impacts and mitigation measures associated with construction activities for this alternative would be similar to those described for Alternative 1. Similar to construction activities associated with the Alternative 1, this alternative would require removal of all ancillary buildings on-site to support the new learning center facilities. Therefore, overall noise levels associated with demolition activities under this alternative would be similar to construction noise levels described for Alternative 1 (significant and unavoidable). Potential impacts associated with operations of the new learning center under this alternative would be similar to those described for Alternative 1.

Population and Housing

Like Alternative 1, this alternative is designed to accommodate existing and projected future increased demand for educational and support facilities in the project area. This alternative would not result in the direct inducement of growth, but rather would respond to the demand for additional educational facilities. This alternative would include the demolition of 22 multi-family residential units to accommodate the proposed learning center. This is not considered a substantial displacement in light of the vacancies in the project area and the County (approximately 600 single-family residences and 137,000 multi-family residences), and would not necessitate construction of replacement housing elsewhere. Under the LAUSD relocation assistance program, LAUSD would pay for relocation and would work to find comparable existing housing in the area. If comparable housing is not available within the tenants' current range of affordability, the relocation assistance program will further compensate those being relocated so they can afford to relocate to better available housing. Therefore, the housing displacement that would occur under this alternative would not have a perceptible impact on the stock of available housing in Los Angeles County.

Public Services and Utilities

The public services and utilities impacts related to development of the new learning center under this alternative is anticipated to be similar to those related to Alternative 1. The public service agencies and departments have the capacity to meet the needs of the community with development of either. Public services and utilities access under this alternative would be similar to access under Alternative 1. Therefore, in comparison to Alternative 1, developing the learning center under this alternative would not significantly change the net demand for public services.

Transportation/Traffic

The traffic impacts associated with this alternative are expected to be similar to those of Alternative 1 because of the similar nature of the proposed designs. The site sits between South Mariposa Avenue and South Catalina Street, which would provide access to the new learning center under both this alternative and Alternative 1. Potential traffic impacts on the surrounding street network are anticipated to be similar under both scenarios.

Achievement of Project Objectives

Since the Maximum Reuse with New iEast Towerî alternative is a variant of Alternative 1 it would fulfill project objectives to the same degree as Alternative 1, as discussed under Section 4.3.

Conclusion

This alternative is similar to Alternative 1 in that it includes maximum adaptive reuse of the Ambassador Hotel building but with a new East Tower (rather than a West Tower). Since it is a variant of Alternative 1 it would fulfill design standards to the same degree as Alternative 1. Costs are also anticipated to be similar to Alternative 1 (\$381,852,609). Overall impacts would be the same as those anticipated under Alternative 1, with the exception of impacts to cultural resources on-site. The construction of an East Tower, as opposed to a West Tower, would result in the elimination of the (historic) East Garden, a Class 3 feature. Like Alternative 1, this alternative raises a number of issues relating to compliance with the LAUSD program, increased costs associated with hotel reuse, design and operational issues arising with reuse, and safety and security concerns.

District Sports Facility

The District Sports Facility Alternative would include the construction of a high school, continuation high school, and a sports facility for use by all LAUSD schools in the area. No middle or elementary school would be built on the site under this Alternative. All existing buildings on-site would be removed and six new high school buildings (including a new gymnasium) would be constructed surrounding a central quad. The high school would accommodate approximately 2,142 students. The continuation high school, to be located at the southwest corner of the project site (at South Mariposa Avenue and West 8th Street), would accommodate approximately 87 students. The District Sports Facility would include a football/track and field stadium, 3 soccer fields, 16 outdoor basketball courts, 6 tennis courts, 2 baseball/softball fields, and 2 swimming pools. In addition, a 2-story athletic support facility containing a gymnasium, concession stands, health offices, and training facilities would be built along the West 8th Street frontage. Parking for 424 vehicles would be accommodated in an underground garage.

Access to the high school would be provided via a circular driveway on South Catalina Street at West 7th Street. Access to the underground parking garage would be provided on South Mariposa Avenue at West 7th Street.

Impact Analysis

Aesthetics

This alternative would have similar impacts on aesthetics to those of Alternative 4, which includes complete demolition of all on-site structures to accommodate construction of a new learning center. As with Alternative 4, replacing the existing Hotel structures with the new learning center would only minimally change the visual character of the area by introducing more structures but with similar heights. However, a sports facility would provide less structure density than Alternative 4. Potential light and glare impacts on adjacent properties would be similar to those discussed for Alternative 4.

Air Quality

The same significance criteria that are applied to the Alternatives 1 through 5 would apply to this alternative. Similar to construction activities associated with Alternative 4, this alternative would require removal of all on-site structures to support the new learning center facilities. Therefore, construction emissions associated with developing this alternative would be similar to those associated with Alternative 4. Operational emissions under this alternative would be the same as those estimated for Alternative 4.

Biological Resources

Potential impacts to biological resources from this Alternative would be similar to those that would occur from developing the new learning center under Alternative 4. The region is predominantly an urban setting with limited value as a wildlife habitat, no natural plant communities, and no special status animal or plant communities. Therefore, any future development at the proposed project site is not anticipated to contribute biological impacts to the project area.

Cultural Resources

This Alternative would have similar impacts on cultural resources as Alternative 4, which includes removal of all existing buildings and structures on the site. With implementation of all of the mitigation measures specified in Chapter 3D under Alternative 4, impacts would still be significant and not fully mitigatable.

Geology and Soils

Potential impacts to geology and soils from this Alternative would be similar to those that would occur from developing the new learning center under Alternative 4. The project site is located in a region that is generally considered to be seismically active and prone to ground shaking. The potential for surface rupture, ground failure, and other geologic and soil hazards at the project site would be similar under this alternative and any of the proposed project designs.

Hazards and Hazardous Materials

Potential hazards and hazardous material impacts from this Alternative would be similar to those that would occur from developing the new learning center under Alternative 4. Prior to any future development of the project site, the existing USTs and any contaminated soil would be removed from the project site. Furthermore, the appropriate asbestos and lead paint abatement procedures would be implemented prior to demolition of any on-site structures.

Hydrology and Water Quality

The hydrology and water quality impacts associated with this alternative are similar to those under Alternative 4. Under this alternative, the new learning center would be constructed on an existing developed site. The closest surface water body in the immediate project vicinity is Ballona Creek, located approximately two miles southwest of the project site. Because a majority of the project site is currently developed with the Ambassador Hotel complex, the conditions of the site consist of predominantly impermeable surfaces. Therefore, it is anticipated that the impacts and mitigation measures presented for Alternative 4 also would apply to this alternative.

Land Use

The land use impacts associated with this Alternative would be similar to those under Alternative 4. The project site falls under the Wilshire District Community Plan of the City of Los Angeles General Plan. Development of this Alternative would be consistent with zoning and the community plan policies regarding the development of new school facilities. Recreational facilities, including parks, located in the surrounding area would include the same recreational facilities for the proposed project site. As with Alternative 4, this Alternative would add to the recreational facilities available to the community in the project area. No impacts are anticipated on recreational facilities. Therefore, development of this Alternative would have less than significant impacts to land use.

Noise

Potential impacts and mitigation measures associated with construction activities for this Alternative would be similar to those described for Alternative 4. As with the projected construction activities associated with Alternative 4, this Alternative would require removal of all on-site structures to support the new facilities. Therefore, overall noise levels associated with demolition activities under this alternative would be similar to construction noise levels described for the proposed project (significant and unavoidable). Potential impacts associated with operations of the new facilities under this Alternative would be similar to those described for Alternative 4.

Population and Housing

Like Alternative 4, this Alternative is designed to accommodate existing and projected future increased demand for educational and support facilities in the project area. This Alternative

would not result in the direct inducement of growth, but rather would respond to the demand for additional educational facilities. It would include the demolition of 22 multi-family residential units to accommodate the proposed learning center. This is not considered a substantial displacement in light of the vacancies in the project area and the County (approximately 600 single-family residences and 137,000 multi-family residences), and would not necessitate construction of replacement housing elsewhere. Under the LAUSD relocation assistance program, LAUSD will pay for relocation and will work to find comparable existing housing in the area. If comparable housing is not available within the tenants' current range of affordability, the relocation assistance program will further compensate those being relocated so they can afford to relocate to better available housing. Therefore, the housing displacement that would occur under this Alternative would not have a perceptible impact on the stock of available housing in the County.

Public Services and Utilities

The public services and utilities impacts related to development under this Alternative are anticipated to be similar to those related to Alternative 4. The public service agencies and departments have the capacity to meet the needs of the community with development of either alternative. Public services and utilities access under this Alternative would be similar to access under Alternative 4. Therefore, in comparison to Alternative 4, developing this Alternative would not significantly change the net demand for public services.

Transportation/Traffic

The traffic impacts associated with this Alternative are expected to be similar to those of Alternative 4 because of the similar nature of the demolition/construction activities and proposed designs. The site sits between South Mariposa Avenue and South Catalina Street, which would provide access to the new learning center under both this Alternative and Alternative 4. Potential traffic impacts on the surrounding street network are anticipated to be similar under both scenarios.

Achievement of Project Objectives

The District Sports Facility alternative would fulfill some of the project objectives (see Chapter 2, Section 2.1.4):

- Allow more students to attend schools in their neighborhoods;
- Reduce the need to bus students involuntarily to schools outside of their neighborhoods as soon as possible;
- Reduce reliance on portable classrooms;
- Comply with the School District's internal design standards and policies for new school construction in designing the needed school facilities; and,
- Comply with the California Department of Education's (CDE) design standards and policies for new school construction in designing the needed school facilities.

However, this alternative would not fulfill the following major objectives:

- Provide integrated educational facilities for children in grades K-12 on one site;
- Relieve serious classroom overcrowding at Belmont Senior High School, Los Angeles High School, Berendo Middle School, Virgil Middle School, and Hoover Elementary School (the Existing Schools) in the Belmont Planning Area as soon as possible by restoring the pre-1991 norms classroom size as described in the 1998 Facilities Master Plan;
- Place as many students in the Belmont Planning Area as possible on a two-semester schedule as soon as possible, thereby reducing the number of students on year-round, multi-track schedules;
- Avoid the displacement of existing residences and businesses;
- Construct the needed school facilities within the budget established by the School District's Strategic Execution Plan;
- Maximize the use of state funds for site acquisition and construction of the needed school facilities;
- Preserve the flexibility necessary to implement the Academy Concept for the secondary school facilities to be provided;
- Achieve economies of scale in construction of the necessary school facilities by constructing a high school, a middle school and an elementary school on one site rather than on several different sites; and,
- Provide special education space as mandated.

The development of a District Sports Facility would meet one of the goals of LAUSD to provide athletic facilities for all schools located within the Belmont Planning Area. However, the development of only a high school, continuation high school and associated athletic facilities on the proposed project site would not meet the basic goals and objectives of the LAUSD to help relieve overcrowding at existing schools and accommodate continued student population growth at the earliest possible date. This Alternative also fails to meet the LAUSD program goal of providing an integrated K-12 educational facility on the project site. School openings also would suffer a several year delay due to the need to locate and acquire off-site parcels for the other learning center facilities.

Conclusion

This Alternative would require LAUSD to acquire additional property for an elementary school and a middle school. A new elementary school would need approximately 3.8 new acres and a new middle school would need approximately 9 acres. Any replacement site must be located in relatively close proximity to the Ambassador Hotel site, in the densely populated Wilshire Center District. According to District real estate officials, recent land acquisition costs in the area, including relocation costs, have been ranging from \$3.0 to 4.1 million per acre.

Alternate Sites

This proposed development of the K-12 schools on an alternative site or sites would involve the construction of an elementary school, a middle school, and a high school at three separate alternative off-site locations. Under this alternative, the Belmont New Elementary School #10

would be constructed on 2.87 acres of the block bounded by James M. Wood Boulevard to the north, San Marino Street to the south, Berendo Street to the west, and New Hampshire Avenue to the east. A small portion of the northwest corner of this block would not be a part of the alternate elementary school site. This site is located approximately 0.5-mile southeast of the proposed project site. The site is located one block west of Vermont Avenue, which is a busy commercial corridor in this area. Single- and multi-family residences occupy the site. Single- and multi-family residences also occupy adjacent properties. This elementary school would accommodate 896 students. Construction of the new elementary school would displace 93 residential units.

The Central Los Angeles Area New Middle School #3 would be constructed on two blocks totaling 8.2 acres and bounded by Olympic Boulevard to the north, West 11th Street to the south, Oxford Avenue to the west, and Hobart Boulevard to the east. This site is located approximately 0.5 mile southwest of the proposed project site. Serrano Avenue bisects this site from north to south. This site is occupied by commercial property along Olympic Boulevard, with single- and multi-family housing occupying the remainder of the site. Adjacent properties include commercial businesses to the northwest and northeast across Olympic Boulevard. Remaining adjacent properties include single- and multi-family residences. Busy commercial corridors are located one block west of this site along Western Avenue and Olympic Boulevard. This middle school would accommodate 1,392 students, and 92 residential units and 8 commercial businesses would be displaced for construction of the new middle school. Seven parking/vacant lots also occupy this site.

The Central Los Angeles Area New High School #8 would be constructed on three blocks totaling 12.93 acres and bounded by Beverly Boulevard to the south, Oakwood Avenue to the north, Juanita Avenue to the west, and Virgil Avenue to the east. This site is located adjacent to the south of the Hollywood Freeway (U.S. Highway 101) and approximately 1.0 miles northeast of the proposed project site. Madison Avenue and Westmoreland Avenue bisect this site from north to south. Light industrial businesses, commercial properties and a homeless shelter occupy the western-most and middle blocks (located between Juanita Avenue and Westmoreland Avenue). The Pacific Bell maintenance yard, Dewey Pest Control offices, and various other businesses also are located on these blocks. The eastern-most block (located between Westmoreland Avenue and Virgil Avenue) is occupied by multi- and single-family housing, along with a mini-mall on the northwest corner of Virgil Avenue and Beverly Boulevard. Additionally, one auto body shop and two auto repair garages are located along the north side of Beverly Boulevard east of Westmoreland Avenue (adjacent west of the mini-mall). The surrounding area is a mix of high-density single- and multi-family residences and commercial and light industrial businesses. A gas station is located across the street from the site at the southwest corner of Beverly Boulevard and Virgil Avenue. Various light industrial and commercial businesses are located across Beverly Boulevard to the south. This high school would accommodate 2,142 students. Construction of the new high school would displace 38 residential units and 18 commercial businesses. This alternative would displace a total of 223 residential units and 26 commercial businesses.

Impact Analysis

Table 4-2 presents the LAUSD criteria for selection of school sites. A site is deemed suitable for evaluation if it meets or exceeded Criteria A, B and C, which are used by the District as initial screening criteria. If a site does not meet Criteria A, B, or C, it is excluded from further evaluation. The Alternate Sites Alternative discussed in this section of the Draft EIR is evaluated because it met Criteria A, B, or C.

TABLE 4-2: LAUSD SITE SELECTION CRITERIA

A. Location	Is the proposed site within the geographic boundaries, which will serve the maximum number of resident students?
B. Size and Topography	Based on net usable acreage, the minimum required: <ul style="list-style-type: none"> • Grades K-3, 24 classroom Primary School: 1.5 to 3 acres • Grades 4-8 Middle School: 5 to 13 acres • Grades 9-12 High School: 8 to 15 acres
C. Environmental	<ul style="list-style-type: none"> • Phase I indication of no hazardous materials release • No hazardous substances generated by adjacent uses within ½ mile
D. Cost	<ul style="list-style-type: none"> • Estimated Initial LAUSD budget for site procurement • Additional acquisition costs due to relocation requirements • Additional construction costs due to site conditions, including site preparation • Maintenance of site until occupancy
E. Joint Use Opportunities	<ul style="list-style-type: none"> • Potential opportunities for shared facilities within 3 miles or less (park/athletic field, library, parking facility, theater, preschool or after school programs, health clinic, and family support services) • Potential opportunities on site for community services or off-hours activities
F. Safety	<ul style="list-style-type: none"> • Adjacent highway or railway with no opportunity for sound control • Airport or heliport within 2 miles • High voltage lines on or adjacent to property • Prior landfill, open pit mine • Directly on active seismic fault or fault zone • Within designated flood plain • Pipeline crossing property • Major street or intersection crossing required • Social hazards (crosses known gang lines, high crime area, etc.)
G. Political	<ul style="list-style-type: none"> • Minimum residential impact, with attention to low-income housing • Reviewed with city or county planning and zoning plans • Community acceptance
H. Soils	<ul style="list-style-type: none"> • Subsurface stability and bearing capacity based on area historical records • Slide or liquefaction potential • Drainage capabilities
I. Accessibility	<ul style="list-style-type: none"> • Access to public transportation • Access for bus and auto drop-off and pick-up
J. Utilities	Relocation of any major utilities located within property boundaries
K. Availability	<ul style="list-style-type: none"> • Site currently on the market or offered for sale • Site identified by other local agencies as blighted or targeted for redevelopment • Site currently abandoned

Source: LAUSD Facilities Service Division, School Building Planning, Real Estate Acquisition and Asset Management, April 4, 2001.

Aesthetics

This alternative would replace existing multi-family and single-family residential units and/or commercial and light industrial businesses with an elementary, middle, and high school on three different sites. These three sites are not located along a designated scenic highway. Implementation of the alternative would change the visual character of three separate sites, rather than one, and therefore visual quality impacts under this alternative could be greater as compared to the proposed project. In addition, this alternative would involve athletic field lighting similar to the proposed project, which could affect adjacent residential uses. Mitigation of these effects would occur, similar to the proposed project, and these potential impacts would be less than significant.

Air Quality

This Alternative would require the clearance of existing structures on each of the three proposed sites, as well as subsequent grading. Construction emissions would be similar to those of Alternative 4, which involves the clearance of all structures from the proposed project site and new construction of the elementary, middle, and high schools. Air quality impacts from construction activities for each school would likely be mitigated to less than significant levels. Since a similar school program would likely be implemented on the alternative sites and enrollments would also be similar to those of the proposed project, traffic levels would be similar yet spread out over three separate areas. Thus, the potential overall impacts from vehicle emissions would be similar to the proposed project, but spread out over three separate areas. Although impacts would likely be mitigated to less than significant levels, the use of three alternative sites could expose more sensitive receptors to air quality impacts than the use of one site under the proposed project, due to the greater number of residential uses. Furthermore, the alternate high school site is located adjacent to the Hollywood Freeway, and therefore, potential air toxic impacts (i.e., from freeway emissions) to future students and staff of the new high school exist. However, mitigation of any chronic hazardous air emissions would be made prior to school occupancy. This may be accomplished by minimizing the infiltration of contaminants (i.e., diesel particulate) into occupied building structures. A minimum ASHRAE (American Society of Heating, Refrigeration and Air Conditioning Engineers) Dust Spot Efficiency of 60 percent would be required to limit contaminant concentrations within building structures and reduce carcinogenic risk levels below the established significance threshold.

Biological Resources

Potential biological impacts under this Alternative are likely to be similar to the proposed project alternative, since the region where the proposed project site and three alternate sites are located is predominately urban. The three alternate sites are developed with residential and commercial uses and support less biological resources than the proposed project site. Therefore, significant biological impacts are not anticipated at any of the three sites. A complete site-specific biological assessment of each of the three alternate sites would have to be conducted before potential impacts can be confirmed.

Cultural Resources

A records search and reconnaissance survey of each of the three alternate sites was performed. No previously surveyed historical resources, either individual or district, were identified in the records search, nor were any potential districts identified in reconnaissance survey. However, there are individual buildings on each of the three alternate sites that should be further investigated by intensive survey. Nonetheless, potential historical resources on alternate sites would most likely not be comparable to the level of significance of the Ambassador Hotel property. Building schools on the alternate sites would avoid the impacts to the Ambassador Hotel property that would occur under the proposed project. However, the potential individual historical resources identified in reconnaissance survey on the alternate sites would still need to be more fully evaluated for their historical and cultural value before potential impacts can be fully assessed.

Geology and Soils

Potential geological and soil impacts for this Alternative are likely to be similar to those that would occur from developing the proposed project. The alternate sites are located in a seismically active region that is prone to ground shaking. None of the alternate sites overlay an active fault.⁵² None of the alternate sites are located in an area prone to landslides or liquefaction identified on published seismic hazards maps.⁵³ Each alternate site would require a site-specific geotechnical investigation to determine soil conditions and construction methods for each site. Mitigation measures for geological impacts are likely to be the same as those outlined for the proposed project.

Hazards and Hazardous Materials

Impacts from hazardous materials cannot be thoroughly addressed through the limited scope of the alternatives analysis. All three alternate sites are occupied primarily by residential units. These residential units could contain asbestos-containing materials and lead paint that would require proper removal and disposal from the site. The high school site is occupied by the Pacific Bell maintenance yard, Dewey Pest Control offices, one auto body shop and two auto repair garages. Furthermore, the area surrounding the alternate high school site consists of light industrial businesses, including a gas station. It is possible that hazardous materials may have been used at these businesses and may have resulted in contamination. Further analysis and testing would be required to evaluate potential contamination. Depending on the results of the analysis and testing, mitigation measures may be available to help mitigate potential hazards impacts.

Hydrology and Water Quality

Each of the alternate sites is developed with residential, commercial or light industrial uses. Water quality impacts would likely be similar to existing conditions at the Ambassador Hotel

⁵² California Geological Survey, Earthquake Fault Zone Map, Hollywood Quadrangle, July 1, 1986.

⁵³ California Geological Survey, Seismic Hazard Zones Map, Hollywood Quadrangle, website URL: http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_holly.pdf

site. Infiltration and groundwater recharge would remain similar to or slightly increase due to the pervious surfaces of the athletic fields. Hydrology and water quality impacts and mitigation measures would likely be similar to the proposed project, except for flooding impacts. A small portion of the alternate sites for the high school and middle school is located in the 100-year flood plain with flood depths of one to three feet.⁵⁴ Mitigation measures could reduce these impacts to less than significant levels.

Land Use

The alternate sites fall under the Wilshire District Community Plan of the City of Los Angeles General Plan. The schools would not divide established communities or conflict with land use or habitat conservation plans. Development of the middle school and high school would join separate city blocks into one continuous block for school use. Development of the schools at the alternate sites would displace 26 commercial businesses.

Noise

Potential noise impacts and mitigation measures associated with construction activities for this alternative would be similar to those described for the proposed project, however, they would be spread out over three separate areas. This Alternative would require removal of all on-site structures. Therefore, overall noise levels associated with demolition activities under this Alternative would be similar to construction noise levels described for the proposed project. However, since the alternate sites are located adjacent to residences, this Alternative would likely expose sensitive receptors to significant noise impacts during operation of the new schools. Furthermore, the alternate high school site is located adjacent to the Hollywood Freeway, which could create noise impacts (i.e., from cars driving by on the freeway) to future students and staff of the new high school. However, the District has established noise standards to protect students and staff from noise hazards generated from off-site uses. These standards were established based on regulations set forth by the California Department of Transportation and the City of Los Angeles, and were designed to ensure that ambient noise does not adversely impact the learning environment. If noise levels at the alternate high school site were determined to be in excess of allowable District standards, the appropriate mitigation measures would be implemented to reduce noise levels.

Population and Housing

Implementation of this alternative would require a total of 223 residential units to be displaced. The proposed project would involve only the demolition of 22 multi-family residential units to accommodate the proposed learning center. However, this is not considered a substantial displacement in light of the vacancies in the project area and the County (approximately 600 single-family residences and 137,000 multi-family residences), and would not necessitate construction of replacement housing elsewhere. Pursuant to state law, LAUSD has developed and implemented a relocation assistance program that would compensate tenants and landowners

⁵⁴ Federal Emergency Management Agency (FEMA), Flood Insurance Rate Map, City of Los Angeles, Panel 0601370064C, December 2, 1980, and Panel 0601370073D, February 4, 1987.

for displacement and proactively work with those requiring relocation on an individual basis. Under the program, LAUSD would pay for relocation and would work to find comparable existing housing in the area. If comparable housing is not available within the tenants' current range of affordability, the relocation assistance program would further compensate those being relocated so they can afford to relocate to better available housing. The proposed 223-unit residential displacement under this Alternative would not necessitate construction of replacement housing and no significant impacts are anticipated. However, by displacing a greater number of units, this alternative would create greater impacts to population and housing than the proposed project. Furthermore, the use of the alternate high school site would require the displacement of the homeless shelter that currently exists on-site.

Public Services and Utilities

Given the close proximity of the alternate sites to the proposed project site, most impacts to public services and utilities would be similar to that of Alternatives 1 through 4, which involve the construction of all three schools. Water and natural gas demands, as well as wastewater generation, would be similar to these alternatives. Electricity demand could be somewhat higher since there would be no overlap of facilities on a single site. Power requirements would be part of the total load growth forecast for the City of Los Angeles and have been taken into account in the planned growth of the Power System.⁵⁵ As with the Ambassador Hotel site, the elementary and high school would be located in the Rampart Community Area of the LAPD, which would serve as backup to the LAUSD PD.

The middle school would be located in a different community area. Because there is no overlap of the three schools on the same site as with Alternatives 1 through 4, this alternative would require more LAUSD police officers to provide law enforcement services for all three schools. The proposed schools would not increase the population served by the LAFD or the demand for fire protection services. Construction and demolition (C&D) debris could potentially be greater than under Alternative 4, which involves removal of all existing structures. However, implementation of the C&D waste management plan would maximize reuse and recycling of materials and mitigate this impact to less than significant levels. Storm water drainage would likely not be significantly impacted by development of the proposed schools since each of the sites is already developed with impervious surfaces. The athletic fields for the middle and high schools could potentially create more pervious surfaces than currently exist, which could result in more infiltration and consequently less storm water runoff from the sites.

Transportation/Traffic

Under this Alternative, each school would be constructed at a different location. Therefore, the total traffic impacts would be spread out over each of the three alternate site areas. A preliminary analysis of the three alternate sites indicates that a small increase in net trip generation would occur in the proposed elementary school site area and a slightly larger increase would occur in

⁵⁵ Holloway, Charles. LADWP. RE: Central Los Angeles Area New Learning Center No. 1. Letter to ESA dated December 23, 2002.

the proposed middle school site area.⁵⁶ The development of the high school at the alternate site would actually result in a reduction of daily traffic volumes. This is because the proposed land use is less intense (generates fewer daily vehicle trips) than the existing uses that would be replaced by the project. A site-specific traffic study for each alternate site would need to be performed to determine site-specific impacts and mitigation measures for each school.

Achievement of Project Objectives

This alternative would not meet the LAUSD's basic educational goal of providing an integrated K-12 educational facility on one site. It is highly likely that school openings would suffer a significant delay due to the need to locate, acquire, and investigate the other parcels, leading to other undesirable impacts such as increased bussing or use of portables. Furthermore, this alternative would require a total of 223 residential units and 26 commercial businesses to be displaced. The District's policy strongly disfavors displacement of residents and businesses unless necessary.

According to District real estate officials, recent land acquisition costs in the Ambassador area, including relocation costs, have been ranging from \$3.0 to \$4.1 million per acre. Sale or lease of the frontage along Wilshire Boulevard could in some scenarios generate substantial funds for the District. However, these proceeds will not cover the additional costs incurred by the District in procuring replacement sites for the displaced schools. In addition to direct replacement costs, the District could face loss of \$3.5 to \$8.8 million of the funds it received for the Ambassador Hotel site acquisition from Prop 1A if it does not utilize the entire 23.77 acres of the Ambassador Hotel site for school purposes. Finally, the delay required to find replacement sites would mean continued bussing of students for as much as two years more than if the Ambassador Hotel site, which is available now, is fully utilized for school use. District staff estimates that the average cost of bussing per student per year is approximately \$1,250, for a total additional bussing cost, if the full Ambassador Hotel site is not used, of \$2.1 to \$5.6 million. This does not include additional management and administrative costs that might be required to manage a land sale and entitlement process, or acquire replacement sites.

Identifying and acquiring replacement costs could be a time-consuming and complex process. Thus, the District would be faced with the arduous process of acquiring and assembling active commercial and high-density residential properties and relocating existing owners and tenants. The District's recent experience with site acquisition in urban Los Angeles suggests that there may be lengthy negotiations with numerous property owners. As a consequence, replacing a portion of the Ambassador Hotel site could involve numerous eminent domain proceedings and litigation. Although it is difficult to estimate the amount of time required, it is not unreasonable to assume that it could take up to three years to identify and acquire sites and relocate existing residents and businesses (i.e., to get back to the current status at the Ambassador Hotel site). With respect to a possible sale of a portion of the Ambassador Hotel site, delays required for the processing of entitlements for commercial, residential or hotel use could be very extensive. For example, the CEQA compliance process for the proposed commercial use projects, increased

⁵⁶ Katz Okitsu and Associates, *Traffic Study for the Central Los Angeles Area New Learning Center No. 1*, May 6, 2003.

automobile traffic on Wilshire Boulevard could become an extremely controversial and time-consuming issue.

Conclusion

Most of the impacts associated with the Alternatives Sites alternative would be similar in nature to the proposed project on the Ambassador Hotel site. There are several differences, however. This alternative would avoid the impact of the proposed project on historic resources at the Ambassador Hotel site by constructing the schools and related facilities elsewhere. At the present time, it is not known whether the alternative sites have important historic resources that would be demolished.

The proposed project would include the demolition of 22 multi-family residential units to accommodate the proposed learning center. In contrast, implementation of the Alternative Sites alternative would require a total of 223 residential units and 26 commercial businesses (including a homeless shelter) to be displaced. Implementation of this alternative would require the relocation of these displaced residents and businesses. Overall, this alternative would create greater impacts to population and housing than the proposed project. However, this is not considered a substantial displacement in light of the vacancies in the project area and the County (approximately 600 single-family residences and 137,000 multi-family residences), and would not necessitate construction of replacement housing elsewhere. The LAUSD would work to find comparable replacement housing and provide compensation for relocation of residents and businesses, which would mitigate this impact to less than significant levels.

The development of the alternate high school site could create air quality and noise impacts to future students and staff of the new high school. Site-specific air quality and noise analyses would need to be conducted at the alternate high school site to determine whether or not mitigation measures could either eliminate these impacts, or reduce these impacts to less than significant levels. In addition, the nature of any hazardous materials is unknown and would have to be examined.

4.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Considering only physical effects on the environment, and without regard to meeting the project objectives, the Alternate Sites Alternative is the environmentally superior alternative.⁵⁷ However, this alternative fails to meet the objectives of the project as described in Chapter 2.

While it is necessary to identify the environmentally superior alternative, the decision-makers are free to select any of the alternatives evaluated in this Draft EIR.

⁵⁷ Pursuant to CEQA Guidelines Section 15126.6, an EIR must identify an environmentally superior alternative, which is the alternative (other than the no project alternative) that has the least impact on the environment or is capable of avoiding or substantially lessening any significant impacts of the project.