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## VII. ALTERNATIVES TO THE PROPOSED PROJECT

### A. INTRODUCTION

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#### INTRODUCTION

As stated in the State CEQA Guidelines (Public Resources Code, Section 21002.1(a)):

*“the purpose of an environmental impact report is to identify the significant effects on the environment of a project, **to identify alternatives to the project**, and to indicate the manner in which those significant effects can be mitigated or avoided (emphasis added).”*

Section 15126.6 of the State CEQA Guidelines requires that EIRs include a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible.

CEQA requires that the alternatives analysis include a No Project Alternative. The purpose of analyzing a No Project Alternative is to allow decision-makers to compare the impacts of approving the Proposed Project with the likely environmental consequences of not approving the Proposed Project (State CEQA Guidelines Section 15126.6(e)(1)). The No Project Alternative should be based on the reasonably foreseeable future if the project is not approved, based on current plans and consistent with available infrastructure and community services. Additionally, in accordance with the Guidelines, the No Project analysis shall discuss 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. The discussion of the No Project Alternative is provided in Section VII.B, below.

Based on the findings of the alternatives analysis, an environmentally superior alternative must be identified from among the alternatives evaluated. If the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (Guidelines Section 15126.6(e)(2)). The analysis of the environmentally superior alternative is provided in Section VII.E, below.

#### PROPOSED PROJECT OBJECTIVES

An important consideration in the analysis of alternatives to the Proposed Project is the degree to which such alternatives would achieve the objectives of the Proposed Project. To facilitate this comparison,

the objectives of the Proposed Project contained in Section III.B, Project Objectives, are re-stated below.

The overall objectives of the Proposed Project are:

- To renovate the Coliseum in conformance with the generally accepted standards of design for National Football League (NFL) stadiums, thus enabling the Coliseum Commission to acquire and maintain an NFL franchise in the City of Los Angeles.
- To extend the useful life of the Coliseum so as to assure that the stadium will continue to provide to the public a facility capable of hosting a wide variety of athletic, cultural, political, and community events.
- To renovate the Coliseum in conformance with the generally accepted standards of design for collegiate football, thus enabling the Coliseum Commission to continue its landlord/tenant relationship with the University of Southern California football team.
- To provide spectators and users of the Coliseum with the amenities and conveniences which are consistent with a state-of-the-art facility, including improved restrooms, concession, and press facilities; improved spectator viewing; luxury suites and club seating; improved locker and dressing facilities; additional circulation space; and better accessibility to seating, concessions, and restroom facilities.
- To assure that stadium operations generate enough revenue to enable the Coliseum Commission to preserve and maintain the Coliseum in a self-sufficient manner.
- To preserve, where feasible, the historic character of the Coliseum in a manner compatible with the other objectives of the Proposed Project.
- To finance the renovation of the Coliseum without expending money from the General Fund.

## **ALTERNATIVES CONSIDERED**

In addition to the No Project Alternative, the range of alternatives was structured to (1) analyze alternatives which would meet the project objectives of creating the highest possible level of management, operation, and maintenance of the Coliseum as a world class, “state-of-the-art” public assembly facility of the first magnitude, and (2) provide a reasonable analysis of environmental impacts associated with the NFL relocating a franchise team to a site within the greater Los Angeles region, but not at the Coliseum. For purposes of this Alternatives analysis, the Alternatives evaluated in this EIR include:

1. No Project Alternative;
2. Alternative Design Without Roof Structure;
3. Evaluation of Alternative Site(s).

Alternative 2, the Alternative Design Without Roof Structure, considers a development alternative that is within the control of the Coliseum Commission. Alternative 3, Evaluation of Alternative Site(s), considers the environmental consequences of an alternative that is outside the control of the Coliseum Commission. The Alternative sites include the potential for the NFL to relocate a franchise team to the City of Pasadena (at the Rose Bowl) or the City of Carson (at a 157-acre site of a former landfill adjacent to the Home Depot Center), both of which have been publicly announced as potential development opportunities. While these alternative sites are outside the control of the Lead Agency, they were considered because they are representative of the Project's environmental consequences that are regional in nature (i.e., traffic and air quality, consumption of natural resources). In effect, the environmental consequences associated with either of these alternative sites would be in addition to those outlined below in the evaluation of the No Project Alternative. These alternatives are evaluated in greater detail in Sections VII.C and VII-D, respectively.

## **OTHER ALTERNATIVE SITES CONSIDERED BUT REJECTED**

In a collaborative effort to evaluate potential locations for a new state-of-the-art NFL stadium to be built or remodeled to support an NFL team, the City of Los Angeles Community Redevelopment Agency (CRA) prepared an analysis to evaluate the feasibility of the best possible location to facilitate the NFL's goal of relocating a team to the Southern California region.<sup>1</sup> Within this study, the CRA evaluated nine locations within the Los Angeles City limits as possible development sites as having goals and objectives consistent with the development of an NFL stadium. Of those nine locations, three potential sites were selected for further detailed analysis. These sites included Adelante Eastside Site, City Center Site and the Hoover Site, otherwise known as the Los Angeles Memorial Coliseum. (See Figure VII-1. A summary of the development potential for developing the Adelante Eastside Site and the City Center Site with a football stadium is provided below.

### **Adelante EastSide Site**

The Adelante Eastside Site is a 46-acre site located on the north side of Cesar E. Chavez Avenue at Mission Road, east of the Los Angeles River and north of the San Bernardino Freeway (I-10) (See Figure VII-1). The site consists of approximately 57 parcels that are

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<sup>1</sup> *Report to the Ad Hoc Sports Franchise Assessment Committee of the Los Angeles City Council, submitted by the Community Redevelopment Agency of the City of Los Angeles, January 2003.*

currently used for a variety of industrial uses, primarily automobile wrecking and dismantling, several small office buildings, along with a portion of an adjacent railroad yard and truck-to-train transfer facility. Approximately 49 businesses operate on the site. The site is designated for industrial use in the Boyle Heights Community Plan and the Adelante Eastside Redevelopment Plan, and is zoned for industrial use.

The proposed site is accessible by existing regional transportation corridors and by both local streets and public transportation, including the Hollywood/Ventura (US-101), San Bernardino (I-10) and Golden State (I-5) Freeways. The site is also within one-half mile of Union Station, with access to the regional Metrolink commuter rail system, numerous regional bus lines and the MetroRail Red Line subway. The San Bernardino and Golden State Freeways physically separate the site from the residential communities of Boyle Heights to the south and Lincoln Heights to the northeast. The site offers the potential for numerous community benefits, including on-site employment opportunities and the ability to attract additional retail and supporting services to the area surrounding the site. From the City's perspective, the development of a stadium at this location could have substantial long-term benefits as it would encourage investment and reinvestment in upgrading nearby business and residential areas, thus contributing to an improved physical environment and an expanded tax base.

Redevelopment of the site with a stadium could also eliminate blighting conditions on the site itself and facilitate upgrading public improvements in the surrounding area and along key corridors linking the site to Downtown Los Angeles, Boyle Heights, Lincoln Heights and other nearby communities. Moreover, development of this site could contribute to facilitating revitalization of nearby portions of the Los Angeles River corridor with attractive recreational and open space uses compatible with a stadium.

There are 22 affected property owners, seven of whom own four or more parcels. There are no residential uses on the site. There are approximately 49 businesses on the site. The industrial uses may be difficult to relocate, especially those involved in automotive salvage, which may result in the need to buy them out. In addition, Mission Road would need to be relocated westward to consolidate the site. The relocation of Mission Road would, however, have the beneficial impact of substantially improving its now offset intersection with Cesar E. Chavez Avenue. In addition, the Environmental Impact Report for the Adelante Eastside Redevelopment Plan identified eleven contaminated parcels on this site. The contamination is believed to result from the industrial uses and remediation will be needed. Remediation could require nine to twelve months depending on the specific nature of the contamination.

The site can accommodate approximately 12,000 parking spaces, in structures that would be constructed around the stadium. It may be necessary to bridge one existing active railroad line.

Figure VII-1: Alternative Sites Evaluated by the City of Los Angeles CRA

However, the high level of transit access may allow for the on-site parking to be reduced. In addition, there are several off-site locations where parking can be provided. Within three quarters of a mile are approximately 10,546 parking stalls, including those at USC/LA County Medical Center (3,240), White Memorial Hospital (2,446), the Metropolitan Transportation Authority Headquarters (2,407), Terminal Annex (1,703) and the Metropolitan Water District Building (750). With a comprehensive parking plan and shuttle system, these facilities could potentially provide a substantial portion of the desired parking, with a corresponding reduction in the cost of constructing on-site parking structures. In addition, existing school and university facilities in the vicinity may have the potential to provide additional off-site parking resources.

### **City Center Site**

The City Center Site includes a 16.2-acre superblock bounded by the Harbor Freeway, Olympic Boulevard, Figueroa Street and Eleventh Street (See Figure VII-1).<sup>2</sup> This site consists of three parcels currently paved and used for off-street parking for the Staples Center Arena. The parcels contain approximately 3,160 parking spaces and are master-planned as part of the LA Arena Company's Los Angeles Sports and Entertainment District (LASED).

The site is accessible by major regional transportation systems, including the Harbor (CA-110), Santa Monica (I-10), Hollywood (US-101) and Golden State (I-5) Freeways; Metro Rail Blue and Red Lines; several LACMTA bus lines; and LADOT downtown DASH service. The major north-south streets serving the site include Figueroa Street, Flower Street, Hope Street and Grand Avenue. The major east-west streets are Ninth Street, Olympic Boulevard, Eleventh Street, Pico Boulevard, and Venice Boulevard.

The most prominent land uses in the area are Staples Center and the Los Angeles Convention Center, both of which are located to the south of this site. Other land uses in the vicinity include community-serving and regional commercial and hotel uses to the north and a mixture of predominantly low-density residential, commercial and light industrial uses to the east. Approximately 1,300 housing units are located within three blocks of the Project Site. The high-rise downtown core begins approximately two blocks north of the site.

Proposed uses included in the Los Angeles Sports and Entertainment District (LASED) Master Plan for the site include retail and entertainment space, a convention center headquarters hotel,

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<sup>2</sup> *This is not the site that was identified by Anschutz Entertainment Group as a potential National Football League stadium in May 2002. That site was rejected because of its designated use as a key part of the emerging South Park residential district in the City Center Redevelopment Plan and the Central City Community Plan, the loss of potential housing sites and difficulty in achieving a "critical mass" without the ability to develop that site with mixed-use, predominantly residential development, and the disruption associated with the number of streets that would need to be closed or rerouted.*

a theater, a plaza, expansion space for the Los Angeles Convention Center and parking for LASED. The site can be developed with a stadium and some amount of on-site parking, and could accommodate the proposed convention center headquarters hotel and a limited amount of retail and entertainment space. If the site is developed with a stadium, however, the remaining proposed uses for the parcels, including the proposed expansion of the Convention Center, would be displaced.

Positive attributes of the site include the established infrastructure – both physical and socio-economic – already in place, which could readily serve a proposed stadium. Although some modifications may be needed to nearby freeway ramps, transportation and other infrastructural systems are already in place, and a substantial amount of parking exists in nearby office and other buildings. Major visitor and sports-related facilities (e.g., Convention Center, hotels, Staples Center) are located either adjacent to or within walking distance of the site. Established restaurants and other businesses are already in the neighborhood, ready to serve the spectators expected at the proposed stadium. Other areas of interest (e.g., Little Tokyo and Chinatown) that could serve the stadium are in close proximity and can be easily reached by either automobile or public transportation.

The most serious site attribute, however, is the site's designation for development of a substantial portion of the proposed Los Angeles Sports and Entertainment District (LASED). The District also includes other surface parking lots assembled by CRA/LA currently used for surface parking for the Staples Center Arena. The total LASED development, which has received its entitlements from the City, includes a long-sought Convention Center headquarters hotel (which could still be accommodated on the block), a second downtown hotel, an expansion site for the Los Angeles Convention and Exhibition Center, 800 units of housing, a 7,000-seat theater, and a substantial amount of retail and entertainment-related space, to complement the existing Convention Center and Staples Center and to provide a high-quality, pedestrian-oriented link between the Convention Center/Staples Center campus and the rest of Downtown Los Angeles.

The anticipated economic benefits of this proposed development were extensively spelled out in the approval process for the LASED entitlements, and there is general agreement that development of the LASED program will generate substantial economic and community benefits. While the use of a portion of the site for a stadium could allow the development of the Convention Center headquarters hotel and a portion of the retail-entertainment complex, the remaining components of the LASED development would not be accommodated. This would be a serious trade-off for a stadium, which, as noted elsewhere in the CRA's Report to the Ad Hoc Sports Franchise Assessment Committee, could be located effectively in either the Adelante-Eastside or Hoover Redevelopment Projects on a highly competitive basis. Thus, while the City Center Redevelopment Plan does have goals that could support the placement of

a National Football League stadium there, and while there are marketing advantages to a downtown location, a site within the City Center Redevelopment Project is seriously problematic.

### **Environmental Considerations**

In developing a reasonable range of project alternatives, CEQA directs lead agencies to focus on alternatives that are capable of avoiding or substantially lessening any significant effects of the project. Developing a new stadium at either of these alternative sites would clearly be more intensive than renovating an existing venue such as the Coliseum. While these sites were considered in the CRA Report to the Ad Hoc Sports Franchise Assessment Committee, they were not considered as potential alternative sites within the scope of this EIR because the potential for the sites to result in increased significant environmental impacts would exceed those generated by renovating the Coliseum.

With regard to construction impacts, development of either the Civic Center or Adelante Site would necessitate building a new stadium from the ground up. This would consume a greater amount of natural resources and land than renovating the Coliseum for the same purpose. Additionally, development of a stadium at both locations would displace existing land uses and/or conflict with planned land uses. Both locations would need to be developed with the appropriate infrastructure, including parking structures, which would generate additional construction-related impacts. Air pollution and increased noise are two notable environmental impacts that would be obviously increased as compared to the Proposed Project.

From an operational standpoint, developing a new stadium at either of the alternative locations would not preclude future renovation, improvements or use of the Coliseum. More importantly, the Coliseum would continue to operate as a major venue whether or not either of these sites are developed with a new stadium. Operational-related environmental impacts would increase two-fold on a regional basis as the operation of two major sports venues would increase the number of major events in the region (e.g., traffic congestion, parking, air quality pollution, and event-related noise). In addition, these alternative sites would not be capable of meeting any of the project's stated objectives relative to improving the outdated and deteriorating Coliseum. As such, both of these alternative sites were rejected from further consideration.

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## **VII. ALTERNATIVES TO THE PROPOSED PROJECT**

### **B. NO PROJECT**

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As required by CEQA, this Section analyzes a “No Project” Alternative. Under the No Project Alternative, the proposed renovation and seating alterations within the Coliseum would not be implemented. The No Project Alternative assumes the continuation of existing conditions and would include continuation of the Coliseum’s landlord/tenant relationship with the University of Southern California (USC) football team, in addition to the Coliseum’s continued utilization for a wide variety of public assembly and sporting events.

While the No Project Alternative would not include a renovation of the Coliseum of the magnitude described for the Proposed Project, the No Project Alternative would include minor repair and improvements to concessions to maintain the Coliseum in good condition. Many elements of the Coliseum are in need of notable repairs, which would likely be made with or without a complete redesign of the Coliseum’s structure. Such minor improvements may include but would not be limited to upgraded restrooms and concession facilities and other associated infrastructure. The No Project Alternative would not include any modification to the existing seating bowl within the interior of the Coliseum. It would also not include any structural modifications to the Coliseum’s exterior façade. The current seating capacity of 92,500 seats would remain unchanged.

Demolition of the existing outbuildings would not occur. These existing facilities would continue to remain operational, with minor repairs or renovations occurring on an as-needed-basis only. This alternative would not include any additional development on the Proposed Project Site. The existing landscaped grounds and perimeter fence will remain unaltered.

Future events at the Coliseum under this Alternative would remain unchanged as compared to existing conditions. The Coliseum currently hosts, on average, 34 major events per year. Such events include USC football games, political events, international soccer matches, music concerts and other cultural events. These activities would continue to be operated at the Coliseum for the foreseeable future. This alternative does not assume that the NFL will relocate to the Coliseum, as it has been expressed that the Coliseum, as it currently stands, does not meet the NFL’s needs for a modern, state-of-the-art sports facility.

The NFL has verbally stated its intent to bring a football team franchise back to the Los Angeles market. However, the location of a host stadium is still uncertain. Without the proper renovations to the Coliseum as proposed, the Coliseum would be precluded from providing a modern state-of-the-art sports venue that the NFL is seeking. Under the No Project Alternative the NFL would be compelled to find an alternative stadium to host an NFL franchise team, build a new stadium outside of the Los Angeles City limits, or construct a stadium on undeveloped land. As such, the environmental consequences of developing a new

NFL stadium at the alternative sites within the region should be considered in conjunction with the No Project Alternative.

## **Aesthetics**

### ***Visual Impacts***

Visual impacts to the Coliseum and surrounding area would not change under the No Project Alternative. No improvements or physical modifications would occur and the Coliseum would remain in its current condition. Views of the site and surrounding area are depicted in Views 1 through 8 as presented in Figures, V.A-1-2 through V.A-1-4, respectively. These views would remain unaltered. The No Project Alternative would have no impact on these views, as it would leave the site in its present form.

### ***Light and Glare***

The Coliseum is a fully functional sports and entertainment venue and is already equipped with adequate field-lighting infrastructure. The Coliseum structure includes eight floodlight towers located on and extending above the perimeter of the Coliseum's rim. These field lighting fixtures would remain operational and unmodified under this Alternative. No additional sources of light or glare would be placed within or around the Project Site. This alternative would, however, preclude the beneficial lighting impacts that would occur under the Proposed Project. The Proposed Project would replace the existing fixtures with more directional lighting fixtures, placed beneath the proposed tensile fabric roof. As such, the Proposed Project would reduce the amount of spill over light and glare that is currently created by the Coliseum. This environmental benefit would not occur under the No Project Alternative. While implementation of the No Project Alternative would generate less than significant lighting impacts (as no changes from existing conditions would occur), the net adverse impact from light and glare would be greater than the Proposed Project.

## **Air Quality**

Under the No Project Alternative, no construction activities would occur. Therefore, no construction-related air quality emissions would be generated.

Regional emissions associated with the operation of the Coliseum under this Alternative would be identical to those described under the Environmental Setting in Section V.B, Air Quality. The continuation of up to 34 annual major events with a maximum seating capacity of 92,500 persons would continue to generate the same level of vehicle emissions that currently occur. As shown in Table V.B-3 on page V.B-8, the Coliseum currently generates emissions in excess of the daily SCAQMD thresholds for all criteria pollutants except for sulfur oxides. These emissions would continue to be generated up to 34 days per year, when major events are scheduled at the Coliseum. It should be noted that these emissions are greater than those projected under the Proposed Project, as the project proposes to reduce

the maximum number of seats available for any one event. Air quality impacts under this Alternative would be considered significant and greater than the Proposed Project.

### **Geology/Seismic Hazards**

The Project Site is located in a seismically active region and is prone to experiencing moderate to major earthquakes (magnitude 6.0 or greater). After Southern California's damaging earthquake in January, 1994, \$93 million was required to repair the Coliseum to meet adequate safety standards. With the recent (1994) seismic retrofitting of the Coliseum complete, no other unique hazardous geotechnical issues are present on-site or in the immediate surrounding area that would create increased geotechnical hazards beyond those inherent to the surrounding Southern California region. However, in the event that a major earthquake struck the Southern California region during an event at the Coliseum, the exposure to seismic hazards under this Alternative could potentially affect a venue with a capacity of up to 92,500 persons. As compared to the Proposed Project, which reduces the Coliseum's seating capacity to 78,000 persons for one or two occasions and 68,000 for all other events, the No Project Alternative would potentially expose a greater number of people to regionally inherent seismic risk. While such impacts are considered less than significant, exposure to potential seismic hazards would be increased under this Alternative as compared to the Proposed Project.

### **Land Use**

The Coliseum would not experience any change in land use under the No Project Alternative. Land uses surrounding Exposition Park generally consist of commercial/retail uses, surface parking lots, and multi-family residential uses. Existing Project Site uses are compatible with the site's OS-1XL zoning designation. Therefore, land use impacts would be less than significant under both the No Project Alternative and the Proposed Project.

### **Energy Conservation**

From 1999-2002, the Project Site has, on average, had a total average annual consumption of 10,484 cubic feet (cf) of natural gas and 2,152,973 Kilowatts (Kwh) of electricity (See Section V.H.1). Continuation of existing operations under the No Project Alternative would not generate any additional demand for natural gas or electrical resources. Impacts upon natural gas and electricity would therefore be less than significant and reduced as compared to the Proposed Project.

### **Public Services**

#### ***Fire***

Under the No Project Alternative, Fire and Emergency services would continue to be served by LAFD fire stations No. 14, 15, and 46. Since the No Project Alternative would not alter the number or nature

of events currently hosted by the Coliseum, and would not change the level of service and demands at the Coliseum, impacts upon fire services would be less significant.

***Police***

The No Project Alternative would result in the continuation of existing conditions on the Project Site, which would not warrant a change in the demand for police services. The No Project Alternative would not alter the number or nature of events currently hosted by the Coliseum. Therefore, the current level of service and demand for police protection would remain unchanged. Impacts on police services would be less than significant.

**Public Utilities**

***Water Conservation***

The continuation of existing operations under the No Project Alternative would not generate any new demands for water resources. Water service is adequately provided to both the Project Site and the surrounding locale by the City of Los Angeles's Department of Water and Power (DWP). Existing water lines serving the Project Site include a 16-inch main under Figueroa Street, a 12-inch main under Martin Luther King Jr. Blvd., and a four-inch main under Menlo Avenue. No new demands for water services or supplies would be created under the No Project Alternative. Impacts upon water services would be less than significant and less than the Proposed Project.

***Sanitary Sewers***

The continuation of the existing operations under the No Project Alternative would not generate any new demand for wastewater facilities. The Hyperion Treatment Plant (HTP), located directly west of the Los Angeles International Airport in Playa Del Rey, has adequate treatment capacity for all wastewater flows generated by the Project Site. Impacts upon wastewater services would therefore be less than significant and less than the Proposed Project.

***Solid Waste***

The continuation of the existing operations under the No Project Alternative would not generate any new demands for solid waste facilities. No construction or demolition debris would be generated. During an average year of operation, the Coliseum currently generates approximately 92,500 pounds, or approximately 42 tons of solid waste per event, which is hauled away by a private company. Based on an average of 34 major events per year, this equates to approximately 1,430 tons of solid waste on an annual basis. Solid waste generation of this magnitude would continue to occur under the No Project Alternative. Since no renovation would occur and no new spectators would be generated, the

No Project Alternative impact upon solid waste facilities would be less than significant and less than the Proposed Project.

**COMPARATIVE MERITS OF THE ALTERNATIVE'S ABILITY TO MEET THE PROJECT OBJECTIVES AND REDUCE ENVIRONMENTAL IMPACTS**

The No Project Alternative would not meet any of the project's goals or objectives as outlined previously in this Section. Continuation of major events at the Coliseum with no structural or design improvements would not increase the severity of environmental impacts over the existing operations. However, as compared to the impacts that would occur under the Proposed Project, this Alternative would have a greater potential for adverse environmental impacts with regard to aesthetics (light and glare), air quality, noise, traffic and parking, and seismic hazards. Impacts for the remaining environmental issues would not differ substantially as compared to the Proposed Project.

Most importantly, however, the No Project Alternative would not meet the Coliseum Commission's objective to enable the 1920s-era stadium to become a premiere state-of-the-art venue for a NFL franchise. The Proposed Project was conceptually designed to enhance the Historic Landmarks' presence and importance both nationally and in the Los Angeles region, which would attract an NFL franchise and generate sufficient revenue to enable the Coliseum Commission to preserve and maintain the Coliseum independently of public funds. While this Alternative would not modify any portion of the Coliseum's architecture, it would result in the ongoing underutilization and deterioration of an historic landmark. As the Coliseum is currently eighty years old, having its last maintenance and renovation efforts occurring nearly ten years ago, improvements and upgrades are necessary to increase the useful life of the Coliseum to ensure its ability to provide a safe public facility capable of hosting major regional events. As such, the net effect of the No Project Alternative could not be viewed as a beneficial impact from an historic preservation point of view.

If a No Project Alternative is selected as the preferred project and the renovation improvements are not made, the NFL franchise will likely relocate a franchise team to another venue, potentially outside the City of Los Angeles. The development of another venue that would compete for events with the Coliseum could result in diminished revenues for the Coliseum needed to maintain the historic structure. Failing to cover its ongoing upkeep from event revenues will require allocation of public funds for the obligated ongoing maintenance costs that an historic designation requires. In turn, this Alternative would likely result in either the construction of a new stadium on undeveloped land or in an extensive refurbishing of another stadium such as the Rose Bowl or Carson to host the NFL, both of which would cause more severe impacts on the environment compared to the Proposed Project. The impacts of these scenarios are addressed in Section VII.D, Alternative Sites.

For the reasons stated above, the No Project Alternative is not an environmentally superior alternative.

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## **VII. ALTERNATIVES TO THE PROPOSED PROJECT**

### **C. ALTERNATIVE DESIGN (WITHOUT ROOF)**

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The Alternative Design (Without Roof) would include renovating the Coliseum as currently proposed, but without the tensile fabric canopy over the north and south seating areas. The elimination of this feature would primarily result in a change in the proposed public address (PA) and sound system as well as the proposed lighting plan. Currently, the proposed sound and lighting systems are designed to take advantage of the overhanging roof feature to provide directional sound and light and minimize spillover light and noise pollution. With the elimination of the roof feature, the proposed lighting plan will need to be redesigned to place light poles on top of the Coliseum's rim, in a manner similar to the existing lighting plan. Similarly, the proposed acoustic and PA systems would need to be redesigned to place speakers throughout the Coliseum. All other aspects of the Proposed Project, including the proposed structural improvements and seating plan, would remain unchanged from the current proposal.

#### **Aesthetics (Visual Impacts)**

This alternative would change the exterior appearance of the proposed Coliseum design as it would eliminate the roof element. Structurally, the roof element would be replaced with four or more light pole towers, as they are currently positioned around the rim of the Coliseum. The elimination of the roof element would also change the proposed signage plan as the project proposes to include a signage element on the top side of the roof fabric. The aerial view of the stadium would provide an unobstructed view of the stadium, including all seating areas. The impact of this change is subjective, but could be perceived as an improvement over the proposed design.

#### **Aesthetics (Light and Glare)**

As stated previously, the Alternative Design Without Roof alternative would necessitate the placement of light poles on and around the Coliseum's rim in a manner similar to the existing conditions. The effects of this design would be similar to those of the existing conditions, with spillover lighting being cast onto adjacent neighborhoods. The beneficial impact of the Proposed Project would not be realized and the roof design of the Proposed Project would effectively shield light from illuminating areas outside of the Coliseum's bowl. As compared to the Proposed Project, this Alternative would have greater adverse impacts associated with spillover lighting.

#### **Air Quality**

This Alternative would not affect the project's construction or operational-related air quality impacts. As such, impacts associated with air quality would be less than significant and the same as the Proposed Project.

### **Geology/Seismic Hazards**

Development of this Alternative would not affect the geologic or seismic impact of the Proposed Project. The foundation and footing design would be the same with or without the roof element. As such, geologic and seismic impacts would be less than significant and the same as the Proposed Project.

### **Land Use**

Development of this Alternative would not affect the land use consistency impacts of the Proposed Project. The project is exempt from local Zoning Codes and would not be subject to any local zoning regulations with regard to height. In terms of land use compatibility, this Alternative would result in greater adverse impacts than the Proposed Project with regards to spill over lighting and noise impacts. As discussed in each respective Section of this EIR, the proposed roof element would effectively block spillover lighting impacts and attenuate noise from encroaching into the surrounding community. These effects would continue to be created in the same manner as created by current operations.

### **Noise**

As stated above, this Alternative would result in the need to redesign the proposed sound system. Currently, the Proposed Project design entails positioning several hundred small speakers throughout the Coliseum, including on the roof structure. With the elimination of this element from the proposed design the speakers will need to be positioned in alternative areas along the Coliseum's rim or on posts throughout the stadium. In addition to the aesthetic impact associated with speakers being placed in more visible places, the acoustics of the Coliseum would generate spill-over noise in a manner consistent with the existing conditions. Currently there is no roof element to shield and attenuate noise from inside the Coliseum. The noise impacts would be generally the same as under existing conditions and would be greater as compared to the Proposed Project.

### **Public Utilities (Energy Conservation, Water Conservation, Sewers and Solid Waste)**

This Alternative would not alter any of the public utility services associated with the Proposed Project. As such, impacts associated with energy and water conservation, sanitary sewers, and solid waste would be less than significant and the same as the Proposed Project.

### **Public Services (Police and Fire)**

This Alternative would not alter the Proposed Project's demands on public services. As such, impacts associated with fire and police services would be less than significant and the same as the Proposed Project.

### **Traffic and Parking**

As stated above, this Alternative would result in the renovation of the Coliseum as defined under the Proposed Project, with the one exception that the roof element would be eliminated. This change would not affect either traffic congestion or parking demands of the Proposed Project. Therefore the impacts of this Alternative would be the same as the Proposed Project.

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## VII. ALTERNATIVES TO THE PROPOSED PROJECT

### D. ALTERNATIVE SITES

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As indicated for the No Project Alternative, if the Coliseum Commission is unable to renovate the Coliseum in conformance with the NFL's minimum design guidelines for NFL stadiums, the NFL will likely pursue an alternative venue within the Southern California region. There are two locations that have been publicly announced by the NFL as potential suitors for an NFL franchise team; the City of Carson and the City of Pasadena (Rose Bowl). While both locations have impacts that are specific to each locale, which would need to be analyzed in greater detail in a project-specific EIR under each respective Lead Agency, the following discussion is intended to provide a general overview of the regional impacts that would occur with either site being selected as a preferred location over the Coliseum. A regional location map depicting the Carson Site and the Rose Bowl Site in relation to the Project Site is provided in Figure VII-2.

#### **Carson Site**

Development of a new stadium at the Carson Site would generate greater adverse impacts associated with the construction process. This alternative would necessitate building an entire new stadium as opposed to building upon existing infrastructure. The 157-acre Carson Site that has been identified as a potential location for building a new NFL stadium is currently vacant and is situated on top of a former landfill site that is adjacent to the newly constructed Home Depot Center and California State University Dominguez Hills. As such, the site would need to be remediated and engineered to mitigate the potential adverse health effects associated with landfill gases. The site would need to be prepared for development and would consume greater amounts of natural resources, would generate more emissions, and would take longer to construct than building upon an existing facility.

In addition the construction of the stadium would entail the use and consumption of non-renewable resources and would consume more energy than would be required to renovate an existing stadium.

From an operational standpoint the development of a new regional facility would have a greater impact in the regional transportation system as the region would be subject to a larger number of regional events, some of which would likely coincide with events at other facilities. This would also result in adverse air quality impacts as more regional emissions would be generated with the use of one more regional venue. This alternative would not preclude a concurrent event at the Coliseum, which would continue to serve as a regional venue whether or not it is selected by the NFL to host a local football team. The Carson Site could also create potential conflict with the use of the Home Depot Center, which recently opened as a regional sports and entertainment venue.

Figure VII-2 – Alternative Sites (City of Carson, City of Pasadena)

**Rose Bowl Site**

The Rose Bowl Site is challenged with many of the same issues as the Coliseum. Similar to the Coliseum, the Rose Bowl is designated as an historic resource. As such, any redevelopment at the Rose Bowl has the potential to result in an adverse impact on the Rose Bowl's historic designation that must be evaluated in a project-specific EIR. Consequently, from an historic perspective, each project would be relatively the same with respect to the level of impact upon historic resources. However, for purposes of this EIR, this alternative would be equivalent to the No Project Alternative with respect to impacting an historical resource. While the Rose Bowl Alternative would also involve the reuse of an existing historic landmark and major sports and entertainment venue, the impacts of renovating the Rose Bowl will need to be evaluated in further detail in a separate EIR under the direction of the lead agency with jurisdiction over that resource. In terms of impacts upon the Coliseum, this alternative would involve no construction activities at the Coliseum; thus no new adverse impacts to the Coliseum would be created.

In terms of construction, the Rose Bowl would be remodeled in a similar fashion as the Proposed Coliseum. Both projects would renovate an existing structure. The impacts associated with the construction phase would be relatively comparable under either the Proposed Project or the Rose Bowl Alternative.

Impacts associated with the operational aspects of the Rose Bowl Alternative would be generally similar to the Proposed Project. Depending on the proposed seating capacity of the Rose Bowl redevelopment, the Alternative site would have the potential to generate traffic congestion and parking demands similar in nature to what is already experienced for special events. As such, the operational impacts for the Rose Bowl Alternative would be substantially similar to the Proposed Project.

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## **VII. ALTERNATIVES TO THE PROPOSED PROJECT**

### **E. ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

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Among the range of alternatives evaluated in this EIR, the No Project Alternative would represent the alternative with the least environmental impact. A matrix displaying the major characteristics and significant environmental effects of each project in relation to the Proposed Project is provided in Table VII.E-1.

As indicated in the impact matrix in Table VII.E-1, the No project Alternative would result in reduced environmental impacts with regards to Aesthetics/Visual Impacts, and Cultural Resources. The No Project Alternative would still result in significant unavoidable impacts with respect to Air Quality and Traffic. Impacts would be relatively the same as the Proposed Project for the remaining issue areas.

The Alternative Design (Without Roof) Alternative would result in reduced environmental impacts with regards to Aesthetics/Visual Impacts. The Alternative Design Alternative would still result in significant unavoidable impacts with respect to Air Quality, Cultural Resources and Traffic. Impacts would be increased with respect to Noise and Light and Glare impacts. Impacts would be relatively the same as the Proposed Project for the remaining issue areas.

The level of environmental impacts that would be created by either of the Alternative Sites is impossible to determine without a detailed analysis of the each respective locale. An evaluation of the specific circumstances surrounding the environmental conditions for each location is needed in order to accurately determine the level of significance for each environmental issue area.

**Table VI.E.-1  
Project Impacts and Alternatives Analysis Matrix**

Environmental Issues	Project Without Mitigation	Project With Mitigation	No Project Alternative	Alternative Design (Without Roof)	Alternative Sites	
					Carson	Rose Bowl
A.1. Aesthetics / Visual Impacts	LS	LS*	LS (-)	LS (-)	--	--
A.1. Aesthetics / Light and Glare	LS	LS*	LS (+)	LS (+)	--	--
B. Air Quality	S	SU	SU (-)	SU (=)	S (+)	S (=)
C. Cultural and Historic Resources	S	SU (-)	LS	SU (=)	LS (-)	LS (-)
D. Geology / Seismic Hazards	LS	LS (-)	LS (+)	LS (=)	LS (=)	LS (=)
E. Land Use	LS	LS (-)	LS	LS (=)	--	--
F. Noise	LS	LS (-)	LS (+)	LS (+)	LS (+)	LS (=)
G.1. Public Services / Fire Protection	LS	LS (-)	LS	LS (=)	NA	LS (-)
G.2. Public Services / Police Protection	S	LS (-)	LS	LS (=)	--	--
H.1 Public Utilities /Energy Conservation	LS	LS (-)	LS	LS (=)	--	--
H.2 Public Utilities / Water Conservation	S	LS	LS	LS (=)	--	--
H.3 Public Utilities / Sewers	LS	LS (-)	LS (+)	LS (=)	--	--
H.4 Public Utilities / Solid Waste	LS	LS (-)	LS (+)	LS (=)	LS+	LS+
I.1 Traffic & Access	S	SU	SU (+)	SU (=)	S	S
I.2. Parking	LS	LS (-)	LS	LS (=)	--	LS (=)
<i>Notes:</i> LS = Less than Significant Impact. LS* = Less than Significant Impact and No Mitigation Required. S = Significant Impact. SU = Significant Unavoidable Impact.			(+) = Impacts would be increased as compared to the Proposed Project. (-) = Impacts would be reduced as compared to the Proposed Project. (+/-) = Impacts would be mixed. While some of the project's negative impacts would be reduced, potential negative impacts would be created or net beneficial impacts would be compromised. -- = There is not enough information about developing these sites to render a conclusion.			

