V. Alternatives

V. Alternatives

1. Introduction

The identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process under CEQA. Public Resources Code (PRC) Section 21002 states, in part, that the environmental review process is intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives which will avoid or substantially lessen such significant effects. If specific economic, social, or other conditions make infeasible such alternatives, individual projects may be approved in spite of one or more significant effects. In addition, PRC Section 21002.1(a) states, in part, that the purpose of an environmental impact report is to identify the significant effects on the environment of a project, identify alternatives to the project, and indicate the manner in which those significant effects can be mitigated or avoided.

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

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

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

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries […], and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site […].

Beyond these factors, CEQA Guidelines Section 15126.6(e) requires the analysis of a "no project" alternative, and CEQA Guidelines Section 15126.6(f)(2) requires an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives.

2. Overview of Selected Alternatives

As indicated above, the intent of the alternatives is to reduce the significant impacts of a project. Based on the analysis provided in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant and unavoidable impacts related to on-site construction noise, on- and off-site construction vibration (related to human annoyance), and intersection levels of service during operations.[1] Cumulative impacts with respect to on- and off-site construction noise and off-site construction vibration (related to human annoyance) also would be significant and unavoidable.[2]

Accordingly, based on the significant environmental impacts of the Project, the objectives established for the Project (refer to Section II, Project Description, of this Draft EIR), and the feasibility of potential alternatives, the alternatives to the Project listed below were selected for evaluation. The rationale for selecting this range of alternatives was based on the ability of the alternatives to avoid or substantially lessen one or more of the Project's significant impacts combined with the overarching intent to develop a former surface parking lot within a vibrant area of Downtown Los Angeles with a transit-oriented, high-density project that will generate new economic opportunities for the Downtown area.

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[1] *The Project's on-site construction noise impact and on-site construction vibration impact (with respect to human annoyance) would only be significant and unavoidable if Related Project No. 121 (Times Mirror Square project) is completed and occupied before or during Project construction.*

[2] *Cumulative on-site construction noise impacts would only be significant and unavoidable if construction of Related Project No. 121 (Times Mirror Square project) occurs concurrently with Project construction. Additionally, should peak construction traffic associated with the Times Mirror Square project be completed prior to commencement of Project construction, the cumulative off-site construction noise impact may not occur.*

- Alternative 1: No Project/No Build Alternative
- Alternative 2: Reduced Density Alternative
- Alternative 3A: Office Alternative A (411,000 square feet)
- Alternative 3B: Office Alternative B (590,000 square feet)
- Alternative 4A: Residential Alternative A (with podium)
- Alternative 4B: Residential Alternative B (without podium)

Each of these alternatives is described in the sections that follow. In addition, CEQA Guidelines Section 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible, which are discussed immediately below.

3. Alternatives Considered and Rejected as Infeasible

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

- **Elimination of Significant Noise and Vibration Impacts During Construction:** Alternatives were considered to eliminate the significant, short-term, Project-level impacts related to on-site construction noise and on- and off-site construction vibration (related to human annoyance) and cumulative impacts with respect to on- and off-site construction noise as well as off-site construction vibration (related to human annoyance).[3,4] As discussed in

[3] *The Project's on-site construction noise impact and on-site construction vibration impact (with respect to human annoyance) would only be significant and unavoidable if Related Project No. 121 (Times Mirror Square project) is completed and occupied before or during Project construction.*

[4] *Cumulative on-site construction noise impacts would only be significant and unavoidable if construction of Related Project No. 121 (Times Mirror Square project) occurs concurrently with Project construction. Additionally, should peak construction traffic associated with the Times Mirror Square project be completed prior to commencement of Project construction, the cumulative off-site construction noise impact may not occur.*

Section IV.G, Noise, of this Draft EIR, significant noise and vibration impacts would occur during Project construction for limited durations due to the operation of on-site construction equipment and off-site delivery/concrete/haul trucks. However, significant and unavoidable construction noise and vibration impacts would be expected to occur with any viable development scenario, regardless of floor area or land use mix, because construction activities and the need to grade and excavate the Project Site are inherently disturbing. Thus, reducing temporary construction noise and vibration impacts below a level of significance at sensitive uses adjacent to the Project Site or truck activity would be infeasible. Additionally, any reduction in the intensity of construction or truck activity would increase the overall duration of the construction period. Therefore, Alternatives to eliminate the Project's short-term noise and vibration impacts during construction were rejected as infeasible.

- **Alternative Site:** The Project Applicant already owns the Project Site, and its location is conducive to the development of a mixed-use project. The Project Site is located in an area of Downtown well served by public transit and characterized by a mix of residential, retail, restaurant, office, and government uses. These uses, as well as the addition of the new Metro station and portal at 2nd/Broadway (on-site), make the Project Site particularly suitable for development of a mixed-use development that provides new multi-family housing, neighborhood-serving commercial, and office uses that would serve the community, increase housing, create jobs, and promote walkability. Furthermore, the Project Applicant cannot reasonably acquire, control, or access an alternative site in a timely fashion that would result in implementation of a project with similar uses and square footage. Given its urban location, if an alternative site in Downtown that could accommodate the Project could even be found, it is expected that the significant and unavoidable impacts associated with noise and vibration due to construction (depending on the proximity of sensitive uses) and intersection levels of service during Project operations likely would still occur and could be greater. Moreover, development of the Project at an alternative site could potentially produce other environmental impacts that would not occur at the current Project Site, thus resulting in new or additional environmental impacts compared with the Project. Therefore, an alternative site is not considered feasible as the Project Applicant does not own another suitable site that would achieve the underlying purpose and objectives of the Project, and an alternative site would not likely avoid the Project's significant impacts. Thus, this alternative was rejected from further consideration.

- **Maximum FAR of 13:1:** An alternative involving development at a density up to the maximum floor area ratio (FAR) of 13:1 proposed for the Project Site under the DTLA 2040 Plan (i.e., the Central City Community Plan update), or which could be allowed under the Project's current zoning through a transfer of floor area rights (TFAR) approval, also was considered. This scenario would involve up to 1,534,618 square feet of development on the Project Site. Due to its size, such a project likely would exacerbate the impacts of the Project and could result

in new significant and unavoidable impacts. In addition, construction of a project of this size at the Project Site may be infeasible since the subsurface Metro facilities currently under construction within the Project Site may be unable to structurally support such a large building. Thus, this alternative was rejected from further consideration.

- **Demolition of Existing Parking Structure:** Also considered was an alternative involving removal of the existing parking structure in the southern portion of the Project Site and development of a land use mix similar to the Project's. With a larger development area, this scenario would allow for reduced density within the Project Site. However, such an alternative would be expected to result in the same significant and unavoidable impacts with respect to construction-related noise and vibration (due to the proximity of residential uses proposed as part of Related Project No. 121), intersection levels of service, and cumulative construction-related noise and vibration. Additionally, such a design would result in new and possibly greater construction noise impacts due to demolition activity. Therefore, this alternative was rejected from further consideration.

4. Alternatives Analysis Format

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the Project objectives, identified in Section II, Project Description, of this Draft EIR, would be substantially attained by the alternative.[5] The evaluation of each of the alternatives follows the process described below:

a. The net environmental impacts of the alternative are determined for each environmental issue area analyzed in Section IV, Environmental Impact Analysis, of this Draft EIR assuming that the alternative would implement the same project design features and mitigation measures identified in Section IV, Environmental Impact Analysis, of this Draft EIR.

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

[5] *CEQA Guidelines Section 15126.6(c).*

- Less: Where the net impact of the alternative would be clearly less adverse or more beneficial than the impact of the Project, the comparative impact is said to be “less.”
- Greater: Where the net impact of the alternative would clearly be more adverse or less beneficial than the Project, the comparative impact is said to be “greater.”
- Similar: Where the impact of the alternative and Project would be roughly equivalent, the comparative impact is said to be “similar.”

c. The comparative analysis of the impacts is followed by a general discussion of whether the underlying purpose and basic project objectives are feasibly and substantially attained by the alternative.

A summary matrix that compares the impacts associated with the Project with those of each of the analyzed alternatives is provided in Table V-1 on page V-7.

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Reduced Density Alternative	Alternative 3A: Office Alternative (411,000 square feet)	Alternative 3B: Office Alternative (590,000 square feet)	Alternative 4A: Residential Alternative (with podium)	Alternative 4B: Residential Alternative (without podium)
A. AESTHETICS (FOR INFORMATIONAL PURPOSES ONLY)							
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar(Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Greater (Less Than Significant)
B. AIR QUALITY							
Construction							
Regional and Localized Emissions	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Greater (Less Than Significant)	Greater (Less Than Significant)
Toxic Air Contaminants	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation							
Regional and Localized Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Greater (Less Than Significant)
Toxic Air Contaminants	Less Than Significant	Less (No Impact)	Less(Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Reduced Density Alternative	Alternative 3A: Office Alternative (411,000 square feet)	Alternative 3B: Office Alternative (590,000 square feet)	Alternative 4A: Residential Alternative (with podium)	Alternative 4B: Residential Alternative (without podium)
C. CULTURAL RESOURCES							
Historic Resources	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Archaeological Resources	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Paleontological Resources	Less Than Significant With Mitigation	Less (No Impact)	Similar (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)
D. GREENHOUSE GAS EMISSIONS							
Greenhouse Gas Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
E. HAZARDS AND HAZARDOUS MATERIALS							
Construction	Less Than Significant With Mitigation	Less (No Impact)	Less (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)	Greater (Less Than Significant With Mitigation)	Greater (Less Than Significant With Mitigation)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Greater (Less Than Significant)

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Reduced Density Alternative	Alternative 3A: Office Alternative (411,000 square feet)	Alternative 3B: Office Alternative (590,000 square feet)	Alternative 4A: Residential Alternative (with podium)	Alternative 4B: Residential Alternative (without podium)
F. LAND USE							
Land Use Consistency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Land Use Compatibility	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
G. NOISE							
Construction							
On-Site Noise	Significant and Unavoidable[6]	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Greater (Significant and Unavoidable)	Greater (Significant and Unavoidable)
Off-Site Noise	Less Than Significant[7]	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Greater (Less Than Significant)	Greater (Less Than Significant)

[6] *Impact conclusion assumes the future residential uses at Related Project No. 121 (Times Mirror Square project) are completed and occupied prior to or during Project construction. However, if Related Project No. 121 is not occupied and instead its construction occurs concurrently with Project construction, the Project-level impact would be less than significant but cumulative construction noise impacts associated with on-site noise sources would be significant and unavoidable.*

[7] *Based on concurrent construction of Related Project No. 121 (the Times Mirror Square project) and other related projects identified in the immediate area, cumulative off-site noise impacts associated with construction traffic are conservatively assumed to be significant and unavoidable. However, should peak construction traffic associated with the Times Mirror Square project be completed prior to commencement of Project construction, the cumulative off-site construction noise impact may not occur.*

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Reduced Density Alternative	Alternative 3A: Office Alternative (411,000 square feet)	Alternative 3B: Office Alternative (590,000 square feet)	Alternative 4A: Residential Alternative (with podium)	Alternative 4B: Residential Alternative (without podium)
On-Site Vibration (Building Damage)	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Greater (Less Than Significant)	Greater (Less Than Significant)
On-Site Vibration (Human Annoyance)	Significant and Unavoidable[8]	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Greater (Significant and Unavoidable)	Greater (Significant and Unavoidable)
Off-Site Vibration (Building Damage)	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Greater (Less Than Significant)	Greater (Less Than Significant)
Off-Site Vibration (Human Annoyance)	Significant and Unavoidable[9]	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Greater (Significant and Unavoidable)	Greater (Significant and Unavoidable)
Operation							
On-Site Noise	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Greater (Less Than Significant)

[8] *Impact conclusion assumes Related Project No. 121 (Times Mirror Square project) is completed and occupied prior to or during Project construction. However, if construction of Related Project No. 121 occurs concurrently with Project construction, cumulative vibration impacts associated with on-site construction activities would be less than significant.*

[9] *Cumulative off-site vibration impacts with respect to human annoyance during Project construction also would be significant and unavoidable.*

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Reduced Density Alternative	Alternative 3A: Office Alternative (411,000 square feet)	Alternative 3B: Office Alternative (590,000 square feet)	Alternative 4A: Residential Alternative (with podium)	Alternative 4B: Residential Alternative (without podium)
Off-Site Noise	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
H. POPULATION, HOUSING, AND EMPLOYMENT							
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Greater (Less Than Significant)
I. PUBLIC SERVICES							
Police Protection							
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Greater (Less Than Significant)
Fire Protection							
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Reduced Density Alternative	Alternative 3A: Office Alternative (411,000 square feet)	Alternative 3B: Office Alternative (590,000 square feet)	Alternative 4A: Residential Alternative (with podium)	Alternative 4B: Residential Alternative (without podium)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Schools							
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Libraries							
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Greater (Less Than Significant)
Parks and Recreation							
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Greater (Less Than Significant)

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Reduced Density Alternative	Alternative 3A: Office Alternative (411,000 square feet)	Alternative 3B: Office Alternative (590,000 square feet)	Alternative 4A: Residential Alternative (with podium)	Alternative 4B: Residential Alternative (without podium)
G. TRANSPORTATION/TRAFFIC							
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Greater (Less Than Significant)
Operation							
Intersection Levels of Service	Significant and Unavoidable	Less (No Impact)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Less (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)
Access and Circulation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Bicycle, Pedestrian, and Vehicular Safety	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
H. TRIBAL CULTURAL RESOURCES							
Tribal Cultural Resources	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
I. UTILITIES AND SERVICE SYSTEMS							
Water Supply and Infrastructure							
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Greater (Less Than Significant)

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Reduced Density Alternative	Alternative 3A: Office Alternative (411,000 square feet)	Alternative 3B: Office Alternative (590,000 square feet)	Alternative 4A: Residential Alternative (with podium)	Alternative 4B: Residential Alternative (without podium)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Wastewater							
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Solid Waste							
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Greater (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Greater (Less Than Significant)
J. ENERGY CONSERVATION AND INFRASTRUCTURE							
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Greater (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Reduced Density Alternative	Alternative 3A: Office Alternative (411,000 square feet)	Alternative 3B: Office Alternative (590,000 square feet)	Alternative 4A: Residential Alternative (with podium)	Alternative 4B: Residential Alternative (without podium)
Source: Eyestone Environmental, 2019.							

V. Alternatives

A. Alternative 1: No Project/No Build Alternative

1. Description of the Alternative

In accordance with the CEQA Guidelines, the No Project Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. CEQA Guidelines Section 15126.6(e)(3)(B) states in part that "in certain instances, the No Project Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, Alternative 1, the No Project/No Build Alternative, assumes the Project would not proceed, and no new Project-related development would occur within the Project Site. Thus, the physical conditions of the Project Site generally would remain as they have been, with the exception of ongoing activities on-site unrelated to the Project. Currently, the northern portion of the Project Site consists of a former surface parking lot, which is in use as a staging and excavation area for construction of the Los Angeles County Metropolitan Transportation Authority (Metro) Regional Connector 2nd Street/Broadway rail station and portal. Pursuant to a right-of-entry agreement, Metro has had exclusive control and use of the surface parking area since March 2015 and will continue to use it as a construction staging/laydown location for the Regional Connector project until up to September 2021. At that time, control of the surface parking lot (with the exception of the portal area), will revert back to the Project Applicant (CA-LATS South, LLC). Metro's current plans call for the restoration of a paved surface area on those areas of the northern portion of the Project Site outside of the new Metro portal and plaza area following the completion Metro's construction activities. Thus, under the No Project/No Build Alternative, operation of the Metro station and portal would commence as planned but no new construction associated with the Project would occur. Impacts associated with the Metro Regional Connector project are separate from the proposed Project and are not considered part of this analysis.[10] In addition, the southern portion of the Project Site contains a five-story, approximately 67-foot-tall parking structure that includes rooftop parking and two subterranean levels, which would remain and continue to operate as under existing conditions.

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[10] *The Metro Regional Connector project was evaluated in a Final EIS/EIR (SCH No. 2009031043), available at www.metro.net/projects/connector/connector-final-eiseir/, accessed May 22, 2018.*

2. Environmental Impacts

a. Aesthetics (Visual Character, Views, Light/Glare, and Shading)

The No Project/No Build Alternative would not involve removal of the surface parking area on the Project Site or construction of a new building. Therefore, Alternative 1 would not change the visual character of the Project Site. Thus, no construction or operational impacts related to aesthetics would occur under Alternative 1, and impacts would be less than those of the Project. However, it is noted that pursuant to Senate Bill (SB) 743 and the City's Zoning Information (ZI) No. 2452, Project impacts related to aesthetics would not be considered significant.

b. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

The No Project/No Build Alternative would not involve removal of the surface parking area on the Project Site or construction of a new building. Therefore, Alternative 1 would not result in any construction emissions associated with construction worker or truck traffic, fugitive dust from demolition and excavation, or the use of heavy-duty construction equipment. As such, no construction-related regional and localized air quality impacts would occur. Accordingly, impacts would be less than the less-than-significant impacts of the Project.

(b) Toxic Air Contaminants

Since construction activities would not occur, the No Project/No Build Alternative would not result in diesel particulate emissions during construction that could generate toxic air contaminants (TACs). Therefore, no impacts associated with the release of TACs would occur under Alternative 1. As such, TAC impacts under the No Project/No Build Alternative would be less than the less-than-significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

The No Project/No Build Alternative would not result in new development or increased operations that could generate operational emissions related to vehicular traffic or the consumption of electricity and natural gas beyond what is currently generated by the

existing uses on-site. Therefore, no operational air quality impacts associated with regional and localized emissions would occur under Alternative 1. Thus, operational impacts associated with regional and localized emissions under Alternative 1 would be less than the less-than-significant impacts of the Project.

(b) Toxic Air Contaminants

The No Project/No Build Alternative would not result in new development or increased operations on the Project Site, so no new mobile source emissions or associated TACs would be generated. No operational impacts associated with TACs would occur under the No Project/No Build Alternative, and such impacts would be less than the less-than-significant impacts of Project.

c. Cultural Resources

(1) Historic Resources

The existing parking structure on the southern portion of the Project Site is not considered a historic resource. Additionally, no demolition, grading, or construction activities that could potentially affect nearby historical resources would occur under the No Project/No Build Alternative. Therefore, impacts to historical resources would not occur under Alternative 1, and the Project's less-than-significant impacts would be reduced.

(2) Archaeological Resources

No grading or earthwork activities would occur under the No Project/No Build Alternative. Therefore, there would be no potential for Alternative 1 to uncover subsurface archaeological resources. As such, no impacts to archaeological resources would occur, and impacts would be less than the less-than-significant impacts of the Project.

(3) Paleontological Resources

Grading and other earthwork activities would not occur under the No Project/No Build Alternative. Therefore, there would be no potential for Alternative 1 to uncover subsurface paleontological resources. As such, no impacts to paleontological resources would occur, and impacts would be less than the Project's, which would be less than significant with mitigation.

d. Greenhouse Gas Emissions

The No Project/No Build Alternative would not involve construction activities or the development of new uses on the Project Site. Therefore, no new greenhouse gas (GHG)

emissions would be generated under Alternative 1, and impacts associated with global climate change would not occur. As such, GHG impacts under the No Project/No Build Alternative would be less than the less-than-significant impacts of the Project.

e. Hazards and Hazardous Materials

(1) Construction

Alternative 1 would not require demolition, excavation, or construction activities. Therefore, Alternative 1 would not have the potential to uncover subsurface hazards, use or release hazardous materials, or generate hazardous waste during construction. Accordingly, no construction-related impacts with regard to hazards and hazardous materials would occur under Alternative 1, and impacts would be less than those of the Project, which would be less than significant with mitigation.

(2) Operation

Alternative 1 would not result in new development or increased operations that would use hazardous materials or generate hazardous waste on-site. Furthermore, since Alternative 1 would not affect existing uses on the Project Site, no impact related to the implementation of any emergency response or evacuation plans would occur. Accordingly, no impacts related to hazards and hazardous materials would occur under Alternative 1, and impacts would be less than those of the Project, which would be less than significant.

f. Land Use

Under the No Project/No Build Alternative, there would be no changes to the physical or operational characteristics of the existing uses on-site, and no land use approvals or permits would be required. Therefore, Alternative 1 would not result in any inconsistencies with applicable land use plans and policies that govern the Project Site. No impacts associated with consistency with land use regulations and plans would occur, and impacts would be less than the less-than-significant impacts of the Project. However, Alternative 1 would not advance local and regional planning objectives to promote the development of infill mixed-use developments in urban centers near public transit, new housing to meet current housing demands, or pedestrian-oriented improvements. As the Project Site would continue to be used for parking uses, there would be no opportunity to enhance the street frontages, connectivity with the Metro portal, or the overall pedestrian experience in Downtown. In addition, the existing land use relationships in the immediate Project area would remain unchanged under Alternative 1, and no impacts related to land use compatibility would occur. Impacts would be less compared to the less-than-significant impacts of the Project.

g. Noise

(1) Construction

Construction activities would not occur under the No Project/No Build Alternative. Therefore, no construction-related noise or vibration would be generated on- or off-site. As such, Alternative 1 would eliminate the Project's significant and unavoidable on-site construction noise impact and on- and off-site construction vibration impacts (related to human annoyance), as well as the significant and unavoidable cumulative impacts with respect to off-site construction vibration (related to human annoyance) and on- and off-site construction noise.[11,12] No impacts associated with construction noise and vibration would occur under Alternative 1, and such impacts would be less when compared to those of the Project.

(2) Operation

The No Project/No Build Alternative would not involve the development of new uses on the Project Site, and no changes to existing site operations would occur. Therefore, no new stationary or mobile noise sources would be introduced. As such, no impacts associated with on-site or off-site operational noise would occur under Alternative 1, and impacts would be less than the less-than-significant impacts of the Project.

h. Population, Housing, and Employment

(1) Construction

As Alternative 1 would not involve construction, Alternative 1 would not result in any potential indirect population impacts associated with construction workers relocating their place of residence. Thus, no construction-related population, housing, or employment impacts would occur under Alternative 1, and impacts would be less than the less-than-significant impacts of the Project.

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[11] *The Project's on-site construction noise impact and on-site construction vibration impact (with respect to human annoyance) would only be significant and unavoidable if Related Project No. 121 (Times Mirror Square project) is completed and occupied before or during Project construction.*

[12] *Cumulative on-site construction noise impacts would only be significant and unavoidable if construction of Related Project No. 121 (Times Mirror Square project) occurs concurrently with Project construction. Additionally, should peak construction traffic associated with the Times Mirror Square project be completed prior to commencement of Project construction, the cumulative off-site construction noise impact may not occur.*

(2) Operation

No changes to existing land uses or operations would occur under the No Project/No Build Alternative. More specifically, Alternative 1 would not include the development of new residential units, and on-site employment, which is minimal, would remain unchanged. Therefore, this Alternative would not result in direct or indirect population, housing, or employment growth. No impacts would occur, and impacts would be less than the less-than-significant impacts of the Project. However, Alternative 1 also would not have the Project's beneficial effect of creating new housing to meet the market demand in Los Angeles.

i. Public Services

(1) Police Protection (Construction and Operation)

No construction activities or changes to existing land uses or site operations would occur under Alternative 1. Therefore, there would be no increase in the level of activity on the Project Site or the service population for the Los Angeles Police Department (LAPD) Central Community Police Station. No impacts to police protection services would occur under Alternative 1, and impacts would be less than the less-than-significant impacts of the Project.

(2) Fire Protection (Construction and Operation)

No construction activities or changes to existing land uses or site operations would occur under Alternative 1. Therefore, there would be no increase in the level of activity on the Project Site or the service population for the Los Angeles Fire Department (LAFD) stations that serve the Project Site. No impacts to fire protection and emergency services would occur under Alternative 1, and impacts would be less than the less-than-significant impacts of the Project.

(3) Schools (Construction and Operation)

The No Project/No Build Alternative would not result in new development on-site. Therefore, there would be no increase in the population of school-aged children within the attendance boundaries of the Los Angeles Unified School District (LAUSD) schools that serve the Project Site. Accordingly, no impacts to school services would occur under Alternative 1, and impacts would be less than the Project's less-than-significant impact on schools.

(4) Libraries (Construction and Operation)

The No Project/No Build Alternative would not result in new development operations on-site. Therefore, Alternative 1 would not increase the service population of any libraries that serve the Project Site. No impacts to library services would occur under the No Project/No Build Alternative, and impacts would be less than the Project's less-than-significant impact on libraries.

(5) Parks and Recreation (Construction and Operation)

The No Project/No Build Alternative would not result in new development on-site. Therefore, Alternative 1 would not generate demand for parks and recreational facilities in the Project vicinity. No impacts to parks and recreational facilities would occur under the No Project/No Build Alternative, and impacts would be less than the Project's less-than-significant impact on parks and recreational facilities.

j. Transportation/Traffic

(1) Construction

Since construction activities would not occur, Alternative 1 would not generate vehicle trips associated with heavy-duty construction equipment, delivery/concrete/haul trucks (sometimes generically referred to herein as haul trucks), or construction worker vehicles. As such, no construction-related traffic impacts would occur under the No Project/No Build Alternative, thus reducing the Project's less-than-significant construction traffic impacts. In addition, there would be no potential for construction impacts related to access and safety, public transit, and on-street parking impacts, and such impacts would be reduced compared to the Project's less-than-significant impacts. Overall, no construction-related traffic impacts would occur under Alternative 1, and such impacts would be less when compared to those of the Project.

(2) Operation

The following discussion is based on the *222 West 2nd Project—Project Alternatives Traffic Analysis* (Alternatives Traffic Memo), prepared by Linscott, Law & Greenspan, Engineers on September 11, 2018, provided in Appendix P of this Draft EIR.

Since the No Project/No Build Alternative would not involve the development of new land uses on the Project Site, Alternative 1 would not generate any vehicle trips or alter existing access or circulation during operations. Therefore, no impacts would occur with respect to operational traffic, including intersection levels of service; the regional transportation system; public transit; access and circulation; bicycle, pedestrian, and

vehicular safety; and parking. As such, Alternative 1 would avoid the Project's significant and unavoidable impacts with respect to intersection levels of service. Overall, no traffic impacts would occur under Alternative 1, and such impacts would be less when compared to those of the Project.

k. Tribal Cultural Resources

Grading and other earthwork activities would not occur under the No Project/No Build Alternative. Therefore, there would be no potential for Alternative 1 to uncover any potential subsurface tribal cultural resources. As such, no impacts to tribal cultural resources would occur, and impacts would be less when compared to those of the Project, which would be less than significant.

l. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Construction activities would not occur under the No Project/No Build Alternative. Therefore, Alternative 1 would not generate a short-term demand for water during construction, and construction-related impacts to water supply and infrastructure would not occur. As such, impacts under the No Project/No Build Alternative would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

The No Project/No Build Alternative would not alter existing land uses or site operations. Therefore, Alternative 1 would not increase the long-term water demand on the Project Site. No operational impacts to water supply and water infrastructure would occur under the No Project/No Build Alternative, and impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Construction activities would not occur under the No Project/No Build Alternative. Therefore, Alternative 1 would not generate wastewater during construction, and construction-related impacts to wastewater conveyance and treatment infrastructure would not occur. As such, impacts under the No Project/No Build Alternative would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

The No Project/No Build Alternative would not alter existing land uses or site operations. Therefore, Alternative 1 would not increase wastewater flows generated on-site. No operational impacts related to wastewater conveyance or treatment would occur under the No Project/No Build Alternative, and impacts would be less when compared to the less-than-significant impacts of the Project.

(3) Solid Waste

(a) Construction

Construction activities would not occur under the No Project/No Build Alternative. Therefore, Alternative 1 would not generate solid waste during construction, and construction-related impacts to solid waste facilities would not occur. As such, impacts under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 would not alter existing land uses or site operations. Therefore, Alternative 1 would not increase the operational solid waste generation on-site. No operational impacts to solid waste collection or disposal facilities would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

m. Energy Conservation and Infrastructure

(1) Construction

Construction activities would not occur under the No Project/No Build Alternative. Therefore, Alternative 1 would not generate a short-term demand for energy during construction, and construction-related impacts to energy would not occur. As such, impacts under the No Project/No Build Alternative would be less when compared to the less-than-significant impacts of the Project.

(2) Operation

The No Project/No Build Alternative would not alter existing land uses or site operations. Therefore, Alternative 1 would not increase long-term energy demands. No operational impacts related to energy would occur under the No Project/No Build

Alternative, and impacts would be less when compared to the less-than-significant impacts of the Project.

3. Comparison of Impacts

The No Project/No Build Alternative would avoid the Project's significant and unavoidable impacts related to on-site construction noise, on- and off-site construction vibration (related to human annoyance), and operational intersection levels of service.[13] Additionally, the No Project/No Build Alternative would avoid the cumulative on- and off-site construction noise impacts and cumulative off-site vibration impacts (related to human annoyance).[14] Impacts associated with the remaining environmental issues would be less than those of the Project, although the Project's remaining impacts would be less than significant.

4. Relationship of the Alternative to Project Objectives

Under the No Project/No Build Alternative, the former surface parking area and existing parking structure would continue to operate on the Project Site, and no new development would occur. As such, Alternative 1 would not meet the underlying purpose of the Project to develop a former surface parking lot within a vibrant area of Downtown Los Angeles with a transit-oriented, high-density project that will generate new economic opportunities for the Downtown area, nor would it meet the Project objectives. Specifically, Alternative 1 would not meet any of the Project objectives:

- Revitalize a former surface parking lot to create a high-density mixed-use project with immediate proximity to existing and future transit lines, employment opportunities, shops, restaurants, and entertainment uses.
- Expand and diversify the supply of housing, retail, and commercial space within the Downtown area to further revitalize the northern end of the Broadway corridor.

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[13] *The Project's on-site construction noise impact and on-site construction vibration impact (with respect to human annoyance) would only be significant and unavoidable if Related Project No. 121 (Times Mirror Square project) is completed and occupied before or during Project construction.*

[14] *Cumulative on-site construction noise impacts would only be significant and unavoidable if construction of Related Project No. 121 (Times Mirror Square project) occurs concurrently with Project construction. Additionally, should peak construction traffic associated with the Times Mirror Square project be completed prior to commencement of Project construction, the cumulative off-site construction noise impact may not occur.*

- Provide new housing, retail, and commercial space with a balance of uses at a density consistent with the site's existing zoning designation to help meet market demands for housing and commercial space within the Downtown area.

- Enhance the pedestrian activity and street life in the area by providing ground floor retail uses and associated outdoor amenities that work harmoniously with the future station portal for the Metro Regional Connector line that will be located on the site.

- Maximize the Project's landscaped public open space at the grade level to create extensive pedestrian connections between the future station portal and the surrounding area.

- Reconfigure the existing parking structure on-site to provide sufficient vehicle and long-term bicycle parking and ensure the parking needs of the Project's tenants and visitors are met, while avoiding an over-supply.

- Create a landmark high-rise project that complements the aesthetic character of the area through high quality urban planning and architectural design.

- Incorporate the principles of smart growth and environmental sustainability by capitalizing on the Project Site's location within the established Downtown Los Angeles employment hub, proximity to transit and walkable streets, and the presence of existing infrastructure needed to service the proposed uses, while incorporating sustainable design components that emphasize resource conservation and efficiency.

- Reinforce public investment in and use of public transit by maximizing development density adjacent to existing and future major transit lines, including the Metro Regional Connector line.

- Maximize the creation of new construction jobs in the City with the development of a new high-rise building.

- Maximize revenues to the City in the form of additional sales, business license, documentary transfer, and property taxes.

Overall, the No Project/No Build Alternative would not meet the Project's underlying purpose or any of the Project objectives.

V. Alternatives

B. Alternative 2: Reduced Density Alternative

1. Description of the Alternative

The Reduced Density Alternative, Alternative 2, involves the Project's proposed land uses but reduces the amount of development that would occur. To define this Alternative, an analysis of the Project's significant and unavoidable impacts was conducted to determine which, if any, could be reduced to a less-than-significant level by reducing the amount of development. As evaluated in the environmental impact analysis sections throughout this Draft EIR and summarized above, the Project would result in significant and unavoidable impacts with respect to on-site construction noise, on- and off-site construction vibration (related to human annoyance), and operational intersection levels of service.[15] Cumulative impacts with respect to on- and off-site construction noise and off-site construction vibration (related to human annoyance) also would be significant and unavoidable.[16] Of these, the most likely impacts to be reduced to a less-than-significant level by a straight reduction in development are the impacts related to intersection level of service during Project operations.[17] As such, an analysis was conducted to determine the percentage reduction in residential and commercial floor area compared to the Project at which the impact at one or more study intersections would not exceed the defined significance thresholds. Accordingly, the Reduced Density Alternative involves a 26-percent reduction from the Project, resulting in the development of a 22-story mixed-use building of up to 359 feet in height, consisting of 79 residential units (9 studios, 31 one-bedroom, 29 two-bedroom, and 10 three-bedroom units totaling 101,637 square feet), approximately 5,328 square feet of ground level commercial retail uses, and

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[15] *The Project's on-site construction noise impact and on-site construction vibration impact (with respect to human annoyance) would only be significant and unavoidable if Related Project No. 121 (Times Mirror Square project) is completed and occupied before or during Project construction.*

[16] *Cumulative on-site construction noise impacts would only be significant and unavoidable if construction of Related Project No. 121 (Times Mirror Square project) occurs concurrently with Project construction. Additionally, should peak construction traffic associated with the Times Mirror Square project be completed prior to commencement of Project construction, the cumulative off-site construction noise impact may not occur.*

[17] *As previously discussed, Project Alternatives designed to eliminate the Project's short-term noise and vibration impacts during construction were rejected as infeasible.*

395,193 square feet of office uses within the Project Site. Based on a total of 511,968 square feet of floor area (including the Metro portal), the Project Site would have an FAR of 4.34:1. In addition, based on the reduced number of dwelling units, Alternative 2 would provide at a minimum 9,375 square feet of open space in accordance with LAMC requirements.

All other components of Alternative 2 would be substantially comparable to the Project. The building design would be similar, with a podium extending over the on-site Metro portal, although the shifted footprints of the various building volumes would be tempered. A landscaped passage or paseo would form a pedestrian pathway from the Metro portal to Spring Street. Lighting would include low-level exterior lights at the perimeter of the building, in the canopy over the Metro portal, and in the paseo, as needed, for aesthetic, security, and wayfinding purposes. Signage could include general ground level and wayfinding pedestrian signage around the perimeter of the building and in the paseo, building identification signs, and other sign types, and Metro signage would be integrated with the overall signage concept. The existing parking structure would be reconfigured to provide vehicular and long-term bicycle parking spaces (plus additional short-term bicycle parking spaces to be provided outside and adjacent to the parking structure and the new building, as well as within the Metro plaza). A total of 445 of the vehicular spaces in the parking structure would be required tenant parking for Alternative 2, and surplus parking spaces would continue to be available for other off-site uses. Access to the parking structure would continue to occur via one existing driveway on Broadway and two existing driveways on Spring Street. In addition, one new driveway on Spring Street is proposed to access the loading area for the new building.

Similar to the Project, Alternative 2 would require grading and excavation to a maximum depth of 25 feet in areas of the Project Site where Metro is not excavating as part of its construction of the 2nd Street/Broadway rail station and portal. Construction of Alternative 2 would last approximately 36 months (compared to 39 months for the Project).

2. Environmental Impacts

a. Aesthetics (Visual Character, Views, Light/Glare, and Shading)

SB 743 (PRC) Section 21099(d)) sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: “[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment.” PRC Section 21099(a) defines a “transit priority area” as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed

within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." PRC Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." PRC Section 21099(a) defines an "employment center project" as "a project located on property zoned for commercial uses with a FAR of no less than 0.75 and that is located within a transit priority area. PRC Section 21099(a) defines an "infill site" as a lot located within an urban area that has been previously developed, or a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

This state law supersedes the aesthetic impact thresholds in the 2006 *L.A. CEQA Thresholds Guide*, including those established for aesthetics, obstruction of views, shading, and nighttime illumination. The related City of Los Angeles Department of City Planning ZI File No. 2452 provides further instruction concerning the definition of transit priority projects and states "[v]isual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the [*L.A. CEQA Threshold Guide*] shall not be considered an impact for infill projects within TPAs pursuant to CEQA."

As with the Project, Alternative 2 is considered a mixed-use residential project and/or employment center project on an infill site within a transit priority area. Accordingly, PRC Section 21099 applies to Alternative 2. Therefore, like the Project, Alternative 2 cannot result in significant impacts to the environment with respect to aesthetic impacts. The following analysis regarding aesthetics/visual character, views, light and glare, and shading is provided for informational purposes only.

(1) Construction

(a) Views and Visual Character

Similar to the Project, while construction activities under Alternative 2 would alter the visual character of the Project Site as well as views of and across the Project Site on a short-term basis, the appearance of the site during construction would be typical of construction sites in urban areas, and aside from vertical building construction, not substantially different than existing conditions on-site (i.e., ongoing construction activities associated with Metro's rail station and portal). In addition, the Alternative would implement the same Project design features as the Project, including the installation of temporary construction fencing along the periphery of the Project Site to screen construction activity from view at street level and the maintenance of any pedestrian walkways and construction fencing accessible or visible to the public in a visually attractive

manner (i.e., free of trash, graffiti, and peeling postings and a uniform paint color or graphic treatment) throughout the construction period. In general, construction-related aesthetics/visual character and view impacts would be comparable to those of the Project, although the duration of such impacts would be shorter under this Alternative due to the slightly shorter construction period.

(b) Light and Glare

Similarly, light and glare associated with construction of Alternative 2 would not substantially alter the visual character of the Project area or adversely impact day or nighttime views. As with the Project, a Project design feature would be implemented to ensure appropriate shielding of outdoor lighting during construction. Construction impacts related to artificial light and glare would be comparable to those of the Project, although the duration of such impacts would be shorter under this Alternative due to the slightly shorter construction period.

(c) Conclusion

Overall, while construction would alter the visual character of the Project Site on a temporary basis, construction activities associated with Alternative 2 would not substantially degrade the existing visual character or quality of the site and its surroundings. While impacts would be similar to those of the Project, in accordance with SB 743 and ZI No. 2452, any impact related to aesthetic character, visual resources, shade and shadow, light and glare, and scenic vistas would not be considered significant.

(2) Operation

(a) Views

As with the Project, the introduction of a high-rise building under Alternative 2 could affect short-range focal views, although to a somewhat lesser extent given the shorter building height (359 feet) as compared to the Project (449 feet). Given the presence of existing (and proposed) intervening development, including the parking structure on-site, substantial obstruction of public views of nearby visual resources would not be anticipated, similar to the Project. Regarding views of the Downtown Los Angeles skyline and San Gabriel Mountains, as is the case with the Project, the height and mass of the building would be visible and could intermittently block longer-range views from certain vantage points, but the proposed development would blend in and be consistent with Downtown's urban development, essentially becoming part of the skyline. Nonetheless, given the reduced building height, view impacts would be reduced as compared to the Project.

(b) Visual Character

Like the Project, the height and scale of the proposed building under Alternative 2 would be consistent with development in the surrounding area and Downtown Los Angeles as a whole, although shorter than the Project building. Also similar to the Project, Alternative 2 would be designed in a contemporary architectural style that would incorporate a variety of buildings materials and façade articulation, with a podium extending over the on-site Metro portal, although the shifted footprints of the stacked building volumes would not vary to the same extent as the Project. Proposed landscaping and open space areas, including the ground floor paseo, would also improve the visual environment on-site. Furthermore, like the Project, proposed signage would comply with the standards and goals of the Historic Broadway Sign Supplemental Use District, and complement the building architecture. Visual character impacts under Alternative 2 would be less than those of the Project due to the shorter building height.

(c) Light and Glare

Similar to the Project, lighting associated with Alternative 2 would comply with applicable City requirements, including LAMC lighting standards, as well as current energy standards and codes. Exterior lighting would be shielded and/or directed toward Project Site areas to minimize light spillover onto adjacent sensitive uses. Also like the Project, the proposed lighting sources would not generate artificial light levels that are out of character with the surrounding area, which is densely developed and characterized by a high degree of human activity and ambient light during the day and night. With respect to glare, glass used in the building façade would be low-reflective in order to minimize glare from reflected sunlight, and all vehicular parking would be contained within the existing parking structure. As such, impacts related to light and glare would be substantially similar to those of the Project.

(d) Shading

With regard to shading, the reduced building height of Alternative 2 would produce shorter shadows than the Project. Thus, shading impacts under Alternative 2 would be less than those of the Project.

(e) Conclusion

Based on the above, impacts with respect to aesthetics/visual character, views, and shading would be reduced compared to the Project, while light and glare impacts would be substantially similar. Regardless, pursuant to SB 743 and ZI No. 2452, such impacts would not be considered significant.

b. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

As with the Project, construction of Alternative 2 has the potential to create air quality impacts through the use of heavy-duty construction equipment, vehicle trips generated from construction workers traveling to and from the Project Site, and fugitive dust emissions resulting from earthwork and construction activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Under Alternative 2, the intensity of construction, including the equipment mix, number of construction workers, and daily truck trips, would be similar to the Project, although the overall duration of construction would be slightly shorter, as summarized in Appendix P of this Draft EIR. Accordingly, on-site construction activities would be expected to be similar during maximum activity days since only the overall duration, and not the daily intensity of construction activities, would decrease under Alternative 2 as compared to the Project. Therefore, the maximum intensity of construction activities and the associated air emissions and fugitive dust would be similar to those of the Project. Because maximum daily conditions are used for measuring significance, regional and localized impacts on these days would be similar to those of the Project. Therefore, impacts associated with regional and localized construction emissions under Alternative 2 would be less than significant and similar to the Project's less-than-significant impacts.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 2 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.B, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. Given the similar amount and intensity of earthwork, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 2 would be similar to the less-than-significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Similar to the Project, operational air pollutant emissions associated with Alternative 2 would be generated by vehicle trips to/from the Project Site and the consumption of electricity and natural gas. As previously discussed, Alternative 2 would include the same mix of uses as the Project, but all uses would be reduced by approximately 26 percent. As such, the 3,151 daily weekday trips generated by the Reduced Density Alternative would be less than the 4,006 trips generated by the Project. As vehicular emissions depend on the number of trips, the overall pollutant emissions generated by this Alternative would be less than the emissions generated by the Project. With the overall reduction in development, both area sources and stationary sources would generate less on-site operational air emissions compared to the Project. As shown in Appendix P of this Draft EIR, overall operational emissions under Alternative 2 would be lower than under the Project due to the relative reduction in floor area and vehicle trips.

Therefore, under Alternative 2, total contributions to regional and localized air pollutant emissions during operation would be less than under the Project. Accordingly, regional and localized air quality impacts under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

(b) Toxic Air Contaminants

As discussed in Section IV.B, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include diesel particulate matter from delivery trucks. Under Alternative 2, the number of deliveries and associated diesel particulate matter emissions would be reduced compared to the Project due to the overall decrease in development. Similar to the Project, the land uses proposed under Alternative 2 are not considered land uses that generate substantial TAC emissions and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Therefore, Alternative 2 would not release substantial amounts of TACs, and impacts would be less than significant. Such impacts would be less than the less-than-significant impacts of the Project.

c. Cultural Resources

(1) Historical Resources

There are no historic resources on the Project Site; however, there are seven known historic resources within one block of the Project Site. Although Alternative 2 would introduce a new visual element to the area, the proposed building would be physically

separated from the Douglas Building and the Victor Clothing Company by a parking garage and surface parking lots and from the Times-Plant Complex, the Mirror Building, the Executive Building, the Higgins Building, and the Irvine-Byrne Building by West 2nd Street, South Spring Street, and South Broadway. As with the Project, Alternative 2 would not result in a substantial adverse change to the immediate surroundings of the nearby historic resources to a degree that their integrity or significance as resources would be materially impaired. As the Irvine-Byrne Building and Victory Clothing Company (located south of the Project Site) are the two northernmost contributors to the Broadway Theater and Commercial District (Historic District), Alternative 2 also would not impair the Historic District. The historic buildings that are individually significant, as well as the Historic District, would continue to be eligible for listing as historic resources defined by CEQA. As such, the Reduced Density Alternative would not cause direct or indirect impacts to historic resources. Impacts to historic resources would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Archaeological Resources

Similar to the Project, Alternative 2 would require excavation of up to 25 feet below ground surface in portions of the Project Site outside of Metro's excavation area. Accordingly, excavation activities would be largely limited to the disturbance of artificial fill and unlikely to encounter sensitive subsurface materials (i.e., native, undisturbed soils with a potential to contain resources). As such, the potential to uncover subsurface archaeological resources during construction of Alternative 2 would be similar to the Project's. Impacts to archaeological resources would be less than significant and similar to the less-than-significant impacts of the Project.

(3) Paleontological Resources

Similar to the Project, Alternative 2 would require excavation of up to 25 feet below ground surface in portions of the Project Site outside of Metro's excavation area. Accordingly, excavation activities would be largely limited to the disturbance of artificial fill and unlikely to encounter sensitive subsurface materials, and the possibility of discovering paleontological artifacts that were not recovered during prior construction or other human activity would be low. Nevertheless, as is the case with the Project, the potential to uncover previously unidentified paleontological resources remains. This potential impact would be reduced to a less-than-significant level with mitigation. Therefore, impacts to paleontological resources would be similar to the less-than-significant with mitigation impacts of the Project.

d. Greenhouse Gas Emissions

As discussed in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, the significance of GHG impacts is determined based on compliance with a GHG emissions reduction plan. Similar to the Project, Alternative 2 would be designed to comply with the requirements of the CALGreen Code, SCAG's 2016–2040 RTP/SCS, CARB's *Climate Change Scoping Plan*, the City of Los Angeles' LA Green Plan/ClimateLA and Sustainable pLAn, and the Los Angeles Green Building Code. Also like the Project, Alternative 2 would include sustainable design components such as drought tolerant landscaping, energy efficient lighting, electric vehicle charging infrastructure, and permeable pavement in the paseo. With regulatory compliance and implementation of comparable sustainability features, Alternative 2 would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans, similar to the Project. However, an emissions comparison indicates Alternative 2 would generate fewer GHG emissions than the Project, as shown in Appendix P of this Draft EIR. GHG emissions from a development project are determined in large part by the number of daily trips generated and energy consumption from proposed land uses. Under Alternative 2, the trip generation and energy and water consumption would be reduced compared to the Project due to the reduction in development. Thus, the amount of GHG emissions generated by Alternative 2 would be less than under the Project. Accordingly, Alternative 2 would better meet regulatory goals/targets to reduce GHG emissions. Thus, impacts related to GHG emissions under Alternative 2 would be less than significant, and less than the less-than-significant impacts of the Project.

e. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners would be used, handled, and stored on the Project Site during construction of Alternative 2, requiring proper management and disposal. The use of such materials would be slightly less than under the Project due to the reduced amount of construction. Nevertheless, like the Project, Alternative 2 would fully comply with all applicable federal, state, and local requirements, as well as manufacturers' instructions concerning the use, handling, storage, and disposal of hazardous materials.

As discussed in detail in Section IV.E, Hazards and Hazardous Materials, of this Draft EIR, several underground storage tanks (USTs) have been removed from the site in the past. In addition, residual contamination of soil and/or groundwater as a result of a former release (which received a no further action letter) is present on-site and, based on an evaluation of past sampling results, exceeds current cleanup standards for certain

contaminants. Grading and excavation could uncover or disturb any previously unknown or unidentified USTs or residual contamination, including soil and/or groundwater that was determined to be within historical cleanup standards but may now exceed current standards. Similar to the Project, such impacts would be reduced to a less-than-significant level through mitigation.

Based on the age of the parking structure, asbestos containing materials (ACMs) and lead based paint (LBP) are unlikely to be encountered on the Project Site. Nevertheless, in the event ACMs or LBP are encountered on site, such materials would be handled in accordance with applicable regulations and requirements.

Like the Project, Alternative 2 would require excavation to depths of up to 25 feet and is not expected to encounter groundwater, which occurs on-site at a depth of approximately 110 to 140 feet below ground surface. If construction dewatering is required, or if groundwater is encountered, it is anticipated to be short-term and limited to shallow/perched groundwater. Any groundwater encountered would be sampled for possible contamination and handled in accordance with applicable groundwater discharge requirements.

Based on the above, potential construction-related impacts associated with hazards and hazardous materials under Alternative 2 would be less than significant, and slightly less than the less-than-significant impacts of the Project due to the reduced level of construction activities.

(2) Operation

Similar to the Project, Alternative 2 would not involve the use of materials containing ACM, LBP, or polychlorinated biphenyls (PCBs) and would not involve the installation of any USTs. However, also like the Project, Alternative 2 may include the installation of one or more aboveground storage tanks (ASTs) for use with emergency generators. Any AST installation would comply with applicable regulatory requirements. In addition, operation of Alternative 2 would involve the limited use of potentially hazardous materials typical of those used in mixed-use developments, including cleaning agents, paints, pesticides, and other materials used for landscaping. Such use would be reduced slightly compared to the Project due to the overall reduction in development. In addition, as with the Project, all hazardous materials on the Project Site would be acquired, handled, used, stored, and disposed of in accordance with manufacturers' specifications and applicable federal, state, and local requirements.

Based on the above, potential impacts related to hazards and hazardous materials during operation of Alternative 2 would be less than significant with mitigation, and less

than the Project's less-than-significant impacts with mitigation due to the decrease in development.

f. Land Use

(1) Land Use Consistency

As previously described, Alternative 2 would involve the same mix of land uses as the Project, with floor area reduced by approximately 26 percent. Accordingly, the Alternative's floor area ratio and density would be reduced compared to the Project; specifically, the Project Site would have an FAR of 4.34:1 (including the Metro portal), compared to the Project's FAR of 5.83:1. Nonetheless, Alternative 2 would require the same discretionary approvals as the Project, and with approval of the requested discretionary actions and implementation of design features comparable to those of the Project, Alternative 2 generally would be consistent with the overall intent of applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site, including the City's General Plan, the Community Plan, and the LAMC. Thus, impacts related to land use consistency would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Land Use Compatibility

Based on the same land use mix as the Project, Alternative 2 would be compatible with and would complement existing and future development in the Community Plan area and would not substantially or adversely change the existing land use relationships between the Project Site and adjacent land uses. Furthermore, like the Project, Alternative 2 would not physically divide an established community. As such, impacts associated with land use compatibility would be less than significant and similar to the less-than-significant impacts of the Project.

g. Noise

(1) Construction

Alternative 2 would involve the same general phases of construction as the Project (i.e., demolition, site grading and excavation, foundation, building construction, and paving/concrete/landscape installation). As with the Project, construction of Alternative 2 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Due to the reduction in development associated with Alternative 2, the amount and overall duration of construction would be reduced. Notwithstanding, on-site construction activities and the associated construction noise and vibration levels would be expected to be similar during maximum activity days since only

the overall duration, and not the daily intensity of construction activities and associated equipment noise, would decrease under Alternative 2 as compared to the Project. Noise and vibration levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Furthermore, Alternative 2 would require a similar number of truck trips as the Project throughout the various construction phases, as summarized in Appendix P of this Draft EIR. Therefore, noise and vibration impacts associated with both on-site construction activities and off-site truck trips under Alternative 2 would be similar to those under the Project. Alternative 2 would comply with applicable regulatory requirements and implement the same design features and mitigation measures as the Project to reduce on-site noise and vibration levels (pursuant to the threshold for human annoyance) during construction. Thus, as with the Project, construction of Alternative 2 would be anticipated to result in significant and unavoidable impacts with respect to on-site construction noise, on- and off-site construction vibration (related to human annoyance), and cumulative impacts with respect to on- and off-site construction noise and off-site construction vibration (related to human annoyance).[18,19]

(2) Operation

As discussed in Section IV.G, Noise, of this Draft EIR, sources of operational noise under the Project include: (a) on-site stationary noise sources, including outdoor mechanical equipment, loading dock and trash compactors, parking, and activities within the proposed outdoor spaces; and (b) off-site mobile (roadway traffic) noise sources. Alternative 2 would introduce noise from similar on- and off-site sources as the Project. However, it is anticipated that with the overall reduction in total floor area and an associated reduction in the number of building tenants, the noise levels resulting from building mechanical equipment and the use of outdoor spaces would be reduced. Similar to the Project, on-site mechanical equipment would comply with LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 A-weighted decibels (dBA). In addition, as the loading dock and trash collection areas for Alternative 2 would have a similar design and location as the Project, noise impacts from loading and trash collection activities would be similar to the

[18] *The Project's on-site construction noise impact and on-site construction vibration impact (with respect to human annoyance) would only be significant and unavoidable if Related Project No. 121 (Times Mirror Square project) is completed and occupied before or during Project construction.*

[19] *Cumulative on-site construction noise impacts would only be significant and unavoidable if construction of Related Project No. 121 (Times Mirror Square project) occurs concurrently with Project construction. Additionally, should peak construction traffic associated with the Times Mirror Square project be completed prior to commencement of Project construction, the cumulative off-site construction noise impact may not occur.*

Project. Overall, operational on-site noise impacts would be less than significant and less than the less-than-significant impacts of the Project.

With regard to off-site noise sources, Alternative 2 would result in a reduction in daily vehicle trips compared to the Project, as discussed further below. This reduction in vehicle trips would result in a decrease in off-site traffic-related noise levels under Alternative 2. Therefore, as with the Project, off-site noise impacts under Alternative 2 would be less than significant but reduced compared to the Project.

h. Population, Housing, and Employment

(1) Construction

As discussed in Section IV.H, Population, Housing, and Employment, of this Draft EIR, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by a particular development. Many construction workers are highly specialized (e.g., crane operators, steel workers, masons) and move from job site to job site as dictated by the demand for their skills. Given that Alternative 2 would involve the same type of building, building construction methods, and land use mix as the Project, a similar number of construction workers would be needed despite the reduced amount of floor area relative to the Project. Therefore, population impacts related to household growth in the City of Los Angeles or the Southern California Association of Governments (SCAG) region as a result of construction worker relocation under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Operation

Alternative 2 would involve the development of 79 residential dwelling units, which would generate a residential population of 193 persons, compared to 107 dwelling units and a residential population of 261 persons under the Project.[20] Like the Project, the residential growth generated by Alternative 2 would be consistent with SCAG growth forecasts. Additionally, this Alternative would incrementally advance the City's goal of generating more housing for the region in a developed, infill location, though to a lesser extent than the Project.

[20] *Based on 2015 Census American Community Survey 5-Year Estimate data (2011–2015), per correspondence with Jack Tsao, Housing Planner, Los Angeles Department of City Planning, March 29, 2017.*

Under Alternative 2, the proposed 395,193 square feet of office uses and 5,328 square feet of retail uses would generate an estimated 1,719 employees, or less than the 2,322 employees generated by the Project.[21] Many of these positions are likely be filled by persons already residing in the vicinity of Downtown or in neighboring areas/cities and who generally would not relocate their households due to such employment opportunities. In the event some jobs are filled by persons from outside the area who relocate for their job, limited indirect population growth and associated housing demand could occur, though such demand would be less than under the Project. As is the case with the Project, this demand could be met by a combination of the 79 dwelling units constructed as part of Alternative 2, existing vacancies in the surrounding housing market, as well as by the substantial number of new units currently planned Downtown. As such, similar to the Project, Alternative 2 would not induce substantial population growth or exceed SCAG's population forecast for the City or the SCAG region.

Overall, impacts related to population, housing, and employment under this Alternative would be less than significant and less than less-than-significant impacts of the Project due to the reduced amount of development and associated population.

i. Public Services

(1) Police Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 2 would be similar to those of the Project; however, the overall duration of construction would be slightly shorter due to the reduced amount of floor area. Alternative 2 would implement the same project design feature as the Project, which would involve implementing temporary security measures such as fencing, lighting, and locked entry to reduce the potential for theft and vandalism, thereby reducing the demand for police protection services. Construction activities under Alternative 2 could also affect emergency response for police vehicles along adjacent streets due to delays caused by traffic during the construction phase. However, given the permitted hours of construction and the nature of construction projects, most, if not all, of the construction worker trips would occur outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. In addition, as with the Project, a Construction Traffic

[21] *Based on employment generation rates of 4.31/1,000 square feet of office space (Large High Rise Commercial Office category) and 2.71/1,000 square feet of commercial retail space (Neighborhood Shopping Center category); source: Los Angeles Unified School District's 2016 Developer Fee Justification Study, Table 15, March 2017.*

Management Plan, including a worksite traffic control plan, would be implemented during construction to ensure adequate and safe access is available within and near the Project Site during construction activities. Furthermore, California Vehicle Code (CVC) Section 21806 allows drivers of emergency vehicles to use a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, construction-related impacts to police protection services under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project, although the construction duration would be slightly shorter.

(b) Operation

Based on the police service population factors provided in the *L.A. CEQA Thresholds Guide*, Alternative 2 would generate a police service population of approximately of approximately 1,868 persons (247 residents and 1,621 employees). This estimate is less than the Project's estimated police service population of 2,492 persons. Therefore, Alternative 2 would increase the existing police service population of the Central Community Police Station, but to a lesser extent than the Project. Like the Project, Alternative 2 would not meaningfully reduce the current officer-to-resident ratio in the Central Area (similar to the Project, the ratio would be reduced from 9.3 to 9.2 officers per 1,000 residents, which would still be substantially higher than the citywide ratio of 2.5 officers per 1,000 residents). Furthermore, Alternative 2 would implement the same project design features as the Project requiring on-site security features, appropriate security lighting, and the prevention of concealed spaces. The project design features would help offset the increase in demand for police protection services generated by Alternative 2. Furthermore, as discussed in Section IV.I.1, Public Services—Police Protection, of this Draft EIR, consistent with the *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police services is the responsibility of the City; at this time, LAPD has not identified the need for any new station construction due to development in the service area. Thus, as with the Project, Alternative 2 would not result in the need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service. Moreover, although traffic generated by Alternative 2 would have the potential to affect emergency vehicle response to the Project Site and surrounding properties due to delays caused by the additional traffic, drivers of police emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Therefore, the impact on police protection services would be less than significant and less than the less-than-significant impacts of the Project since the police service population generated by Alternative 2 would be reduced.

(2) Fire Protection

(a) Construction

Similar to the Project, construction activities under Alternative 2 would have the potential to result in accidental fires from such sources as the operation of mechanical equipment and the use of flammable construction materials. However, in compliance with Occupational Safety and Health Administration (OSHA) and Fire and Building Code requirements, construction managers and personnel would be trained in emergency response and fire safety operations. Additionally, fire suppression equipment specific to construction would be maintained on-site. Construction would occur in compliance with applicable federal, state, and local requirements concerning fire safety practices as well as the handling, disposal, use, storage, and management of hazardous waste. Thus, compliance with regulatory requirements would effectively reduce the potential for construction activities to expose people to the risk of fire or explosion, including that related to hazardous materials.

Additionally, access to the Project Site and the surrounding vicinity could be impacted by construction activities under Alternative 2, such as temporary lane closures, roadway/access improvements, and the construction of utility line connections. Furthermore, construction activities would generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic, which could temporarily affect emergency response along adjacent streets. However, as with the Project, construction worker and haul truck trips would be expected to occur largely outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. Additionally, like the Project, a Construction Traffic Management Plan would be implemented to ensure adequate and safe access remains available within and near the Project Site during construction. Furthermore, CVC Section 21806 allows drivers of emergency vehicles to use a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, construction-related impacts related to fire protection services under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project, although the construction duration would be slightly shorter.

(b) Operation

As discussed in Section IV.I.2, Public Services—Fire Protection of this Draft EIR, the Project Site would be served by Fire Station No. 9, the designated “first-in” station, located approximately 1 mile to the southwest. Fire Station Nos. 4, 10, 3, and 11 would also be available to serve development under Alternative 2 in the event of an emergency. Based on the same land use mix as the Project, Alternative 2 would be categorized as an Industrial and Commercial land use and thus would meet the required response distance

from a fire station with an engine and truck company. In comparison to the Project, Alternative 2 would involve fewer residential units (79 units vs. 107 units), less office space (395,193 square feet vs. 534,044 square feet), and less retail space (5,328 square feet vs. 7,200 square feet). Thus, the demand for fire protection and emergency medical services would be reduced compared to the Project based on the reduction in floor area and associated occupancy. With respect to response times, similar to the Project, emergency access would be maintained, and traffic generated by Alternative 2 would not impair the LAFD from responding to emergencies at the Project Site or the surrounding area. Average response times are anticipated to continue to meet National Fire Protection Association (NFPA) response time standards, although not formally adopted. In addition, similar to the Project, Alternative 2 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Also like the Project, the Alternative would implement a project design feature involving the installation of a fire flow pump system in order to meet water pressure demands. Furthermore, as discussed in Section IV.I.2, Public Services—Fire Protection, of this Draft EIR, consistent with the *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate fire protection services is the responsibility of the City; at this time, LAFD has not identified the need for any new station construction due to development in the service area. Therefore, impacts related to fire protection services would be less than significant under Alternative 2 and less than the less-than-significant impacts of the Project due to a reduction in floor area.

(3) Schools

(a) Construction

Due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by Alternative 2. Therefore, the construction employment generated by Alternative 2 would not result in a notable increase in the residential population or a corresponding demand for schools in the vicinity of the Project Site. Impacts on school facilities during construction under Alternative 2 would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

As previously indicated, Alternative 2 would develop the same mix of uses as the Project, but the overall amount of development would be reduced by approximately 26 percent. Because residential uses are the greatest driver of student generation, the total number of students generated by the Project would be reduced. Specifically, the 79 multi-family residential units, 395,193 square feet of office uses, and 5,328 square feet of residential uses in Alternative 2 would generate an estimated 467 students, consisting of

252 elementary school students, 69 middle school students, and 146 high school students (compared to the Project's 569 students, consisting of 309 elementary school students, 84 middle school students, and 176 high school students). Thus, the demand for LAUSD school services would be reduced under Alternative 2 as compared to the Project. Furthermore, pursuant to SB 50, the Applicant would be required to pay development fees to the LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of project-related school impacts. Therefore, payment of applicable development school fees to the LAUSD would offset the impact of additional student enrollment at schools serving the Project area. Impacts related to schools would be less than significant under Alternative 2 and less than the less-than-significant impacts of the Project.

(4) Libraries

(a) Construction

As previously discussed, construction workers are not likely to relocate their households as a consequence of a single construction project. Therefore, construction employment generated by Alternative 2 would not result in a notable increase in the residential population or a corresponding demand for library services in the vicinity of the Project Site.

In addition, it is unlikely that construction workers would visit libraries near the Project Site on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. As such, impacts to library facilities and services during construction of Alternative 2 would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

Residents are considered the primary users of library facilities within a given service area. Alternative 2 would develop fewer residential units than the Project and would therefore have a smaller service population. Specifically, the 79 residential units developed under Alternative 2 would generate approximately 193 residents compared to the 261 residents generated by the Project. In addition, the reduced amount of office and retail space in Alternative 2 would generate fewer employees than those proposed by Project (1,719 employees vs. 2,322 employees). Thus, both direct and indirect demand for library

services under Alternative 2 would be less than the less-than-significant impacts of the Project.

(5) Parks and Recreation

(a) Construction

As discussed above, the likelihood that construction workers would relocate their households as a consequence of short-term employment on the Project Site is negligible. Therefore, the construction workers associated with Alternative 2 would not result in a notable increase in the residential population in the Project vicinity or a corresponding permanent demand for parks and recreational facilities in the vicinity. As with the Project, during construction of Alternative 2, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. Furthermore, while there is a potential for construction workers to spend their lunch breaks at the parks and recreational facilities near the Project Site, lunch breaks typically are not long enough (30 to 60 minutes) for workers to take advantage of such facilities and return to work within the allotted time. Therefore, it is unlikely that construction workers would utilize nearby parks and recreational facilities during construction of Alternative 2.

In addition, as with the Project, construction of Alternative 2 would not be expected to result in access restrictions to City parks or recreation facilities, nor interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity.

Based on the above analysis, construction of Alternative 2 would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services or interfere with existing park usage. Therefore, impacts on parks and recreational facilities during construction of Alternative 2 would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

Based on the reduced number of residential units, Alternative 2 would be required to provide less on-site open space than the Project. Specifically, per LAMC Section 12.21G, Alternative 2 would be required to provide 9,375 square feet of open space, compared to the 12,675 square feet required by the Project. Alternative 2 would meet this requirement through amenity decks, outdoor terraces, and a ground floor paseo, similar to the Project. Thus, Alternative 2 would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site

open space and recreational amenities. Similar to the Project, while it is possible that employees of Alternative 2 may utilize local parks and recreational facilities, the increased demand would be negligible as it is anticipated that employees and visitors would also primarily utilize on-site open space during their time spent at the Project Site. Also similar to the Project, Alternative 2 would pay a Dwelling Unit Construction Tax in accordance with LAMC Section 21.10.3(a)(1) to offset impacts to parks. Therefore, impacts to park and recreation facilities would be less than significant under Alternative 2, and less than the less-than-significant impacts of the Project due to the reduced population on-site.

j. Transportation/Traffic

(1) Construction

As with the Project, construction of Alternative 2 would generate additional trips from heavy-duty construction equipment, haul trucks, and construction worker trips. However, all construction activities associated with Alternative 2 would be reduced in comparison with the Project due to the reduction in development. Therefore, the total number of haul truck trips and the overall duration of the construction period for Alternative 2 would be reduced. Similar to the Project, similar peak level haul truck activity would occur during the grading/excavation, foundation, and building construction phases, and peak worker activity would occur during the building construction phase, as summarized in Appendix P of this Draft EIR. Also like the Project, Alternative 2 would implement a Construction Traffic Management Plan requiring construction-related trips to be scheduled outside of commuter weekday peak hours to the extent feasible. Therefore, construction-related activities would not contribute a substantial amount of traffic during the weekday morning and afternoon peak periods. As with the Project, construction traffic associated with Alternative 2 would not result in any significant traffic impacts at the study intersections during peak construction activities, and such impacts would be similar to the Project based on the similar number of construction workers and haul trips.

While construction of Alternative 2 may involve temporary lane closures, Alternative 2 would implement similar project design features as the Project, including a Construction Traffic Management Plan to ensure pedestrian and traffic safety and access. Therefore, as with the Project, access and safety impacts during construction would be less than significant.

(2) Operation

The following discussion is based on the Alternatives Traffic Memo provided in Appendix P of this Draft EIR.

Alternative 2 is expected to generate 3,151 net daily trips, with 438 A.M. peak-hour trips (367 inbound/71 outbound) and 416 P.M. peak-hour trips (91 inbound/325 outbound), which is less than under the Project. In order to determine the operating conditions of the street system, traffic associated with Alternative 2 was assigned to the local roadway system based on trip distribution and assignment characteristics consistent with the Project.

(a) Existing Conditions With Alternative 2

Alternative 2 would result in significant impacts to the same three intersections as the Project under Existing With Alternative 2 conditions (i.e., Intersection Nos. 5, 8, and 9). Similar to the Project, impacts at Intersection Nos. 8 and 9 could be mitigated to a less-than-significant level; however, the impact at Intersection No. 5 during the P.M. peak hour would be significant and unavoidable, as under the Project.

(b) Future Conditions With Alternative 2

The Future With Alternative 2 scenario would involve significant impacts at Intersection Nos. 5, 8, and 9, like the Project, but Alternative 2 would eliminate the Project's impact at Intersection No. 31. As is the case with the Project, with mitigation, the significant impact at Intersection No. 9 during the P.M. peak hour would be reduced to a less-than-significant level; however, the significant impacts at Intersection No. 5 during the P.M. peak hour and Intersection No. 8 during the A.M. peak hour would remain. Therefore, similar to the Project, impacts with respect to intersection levels of service under Alternative 2 would remain significant and unavoidable, although reduced in comparison to the Project.

(c) Regional Transportation System, Access and Circulation, and Bicycle, Pedestrian, and Vehicular Safety

With the reduced number of trips and smaller on-site population, impacts to the regional transportation system, access and circulation, and bicycle, pedestrian, and vehicular safety would be less than the less-than-significant impacts of the Project.

k. Tribal Cultural Resources

As previously discussed, Alternative 2 would require excavation to depths of up to 25 feet in portions of the Project Site outside of Metro's excavation area, similar to the Project. Therefore, the potential for Alternative 2 to uncover subsurface tribal cultural resources would be similar to that of the Project. As discussed in Section IV.K, Tribal Cultural Resources, of this Draft EIR, no confirmed Native American resources have been identified within the Project area or a surrounding 0.5-mile search radius. More specifically, following written notification of the Project by the City on January 6, 2017, government-to-

government consultation was requested by the Gabrieleño Band of Mission Indians—Kizh Nation on January 10 and initiated by the City on March 23, 2017. Upon review of the documents submitted during the subsequent consultation, the City, acting in good faith and after a reasonable effort, did not find substantial evidence of an existing tribal cultural resource within the Project area. Based on their correspondence, the City concluded that mutual agreement could not be reached between the Tribe and City for purposes of AB 52, and as such, the City closed the tribal consultation on October 19, 2018, in fulfillment of its AB 52 requirements. The Tribe responded to the City (on the same day) and requested that the Tribe be consulted if the Project results in ground disturbance. The City responded on November 15, 2018, and confirmed that consultation for the Project had occurred and closed. Additionally, the City responded that the Tribe may submit comments on the EIR as long as the comments are received prior to approval of the document. Furthermore, monitoring of Metro's construction site has not yielded any Native American cultural resources. This information suggests that subsurface conditions within the Project Site have little potential to support the presence of unanticipated cultural resources or tribal cultural resources. While the City has no basis under CEQA to impose any related mitigation measures, the City has established a standard condition of approval under its police power and land use authority to address any inadvertent discovery of a tribal cultural resource. For purposes of this analysis, it is assumed the City would impose this condition on the Project, or any alternative to the Project, as part of its land use approvals. Accordingly, impacts to tribal cultural resources would be less than significant and similar to the impacts of the Project.

I. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 2 would generate a short-term demand for water. This demand would be less than the Project's since the amount of new construction and the duration of construction would be reduced under Alternative 2. As evaluated in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of construction. Accordingly, the temporary and intermittent demand for water during construction of Alternative 2 could be met by the City's available water supplies. Similarly, the existing Los Angeles Department of Water and Power (LADWP) water infrastructure would be adequate to provide the water flow necessary to serve Alternative 2.

Furthermore, as with the Project, the design and installation of new service connections under Alternative 2 would be required to meet applicable City standards. The connections and installation of on-site water distribution lines would primarily involve trenching to place the lines belowground, which could temporarily affect access in adjacent rights-of-way. However, as previously discussed and like the Project, a Construction Traffic Management Plan would be implemented to ensure adequate and safe access remains available within and near the Project Site during construction. Therefore, impacts on water supply and infrastructure associated with construction activities would be less than significant under Alternative 2 and less than the less-than-significant impacts of the Project.

(b) Operation

Based on the approximately 26 percent reduction in development, Alternative 2 would generate a lower water demand than the Project. Specifically, Alternative 2 would generate an estimated demand for 136,695 gallons per day (gpd) of water prior to required water savings, as shown in Appendix P of this Draft EIR, which is less than the 157,106 gpd of demand generated by the Project. As concluded in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, and the Water Supply Assessment (WSA) prepared for the Project, the estimated water demand for the Project would not exceed the available supplies projected by LADWP. Therefore, the estimated water demand under Alternative 2 also would be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040. In addition, the existing water distribution infrastructure would be adequate to serve Alternative 2, similar to the Project. Furthermore, the Applicant would construct the necessary on-site water infrastructure and off-site connections to the LADWP water system pursuant to applicable City requirements under Alternative 2 to accommodate the new building. Thus, impacts to water supply under Alternative 2 would be less than significant, and less than the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, construction activities for Alternative 2 would result in wastewater generation from construction workers on-site. However, construction workers would typically utilize portable restrooms, which would not contribute wastewater flows to the City's wastewater system. Thus, wastewater generation from construction activities under Alternative 2 would not cause a measurable increase in wastewater flows.

As with the Project, Alternative 2 would require the construction of new on-site infrastructure to serve the new building. Construction impacts associated with wastewater

infrastructure would primarily be confined to trenching for utility lines and connections to the public infrastructure. Although no upgrades to the public main are anticipated, minor off-site work associated with additional lateral connections to the public main line(s) may be required. Similar to the Project, a Construction Traffic Management Plan would be implemented during construction of Alternative 2 to reduce temporary pedestrian and traffic impacts. Therefore, construction-related impacts to the wastewater system under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

Based on the approximately 26 percent reduction in development, Alternative 2 would generate less wastewater than the Project. Specifically, as shown in Appendix P of this Draft EIR, Alternative 2 would generate an estimated 81,396 gpd of wastewater, which is less than the 108,749 gpd generated by the Project. As provided in Section IV.L.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the Project-generated wastewater could be accommodated by the existing treatment capacity of the Hyperion Water Reclamation Plant (HWRP). Therefore, since the wastewater generated by Alternative 2 would be less than that of the Project, wastewater generated by Alternative 2 could also be accommodated at the HWRP, and impacts with respect to treatment capacity would be less than significant.

Also like the Project, sewer service for Alternative 2 would be provided utilizing existing and potentially additional sewer connections to the sewer lines in the adjacent streets. Given that Alternative 2 would result in reduced wastewater generation compared to the Project, it is anticipated that there would be sufficient capacity within the sewer main lines serving the Project Site to serve Alternative 2. Furthermore, additional detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and a connection permit for Alternative 2 during the permitting process. All related sanitary sewer connections and on-site infrastructure under Alternative 2 would be designed and constructed in accordance with applicable standards.

Thus, impacts with regard to wastewater generation and infrastructure capacity under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

(3) Solid Waste

(a) Construction

Construction of Alternative 2 would involve demolition and building construction activities. The amount of demolition waste generated by Alternative 2 would be similar to

the Project, while the amount of construction waste would be less due to the reduction in total floor area. Specifically, as shown in Appendix P of this Draft EIR, Alternative 2 would generate an estimated 4,102 tons of construction and demolition waste prior to recycling (1,026 tons when applying the 75 percent diversion rate specified in the project design features), compared to 4,454 tons with the Project (1,113 tons with diversion). Construction and demolition wastes would be recycled or collected by private waste haulers and taken to City-certified waste processing facilities for sorting and final distribution, including disposal at the County's unclassified landfill. Since construction and demolition waste would be hauled by a private construction contractor permitted by the City, Alternative 2 would not result in the need for an additional solid waste collection route. Similar to the Project, construction of Alternative 2 would not conflict with any applicable State or City solid waste regulations. As such, solid waste impacts during construction of Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project

(b) Operation

During its operation, Alternative 2 would generate municipal solid waste typical of residential, office, and retail developments. Similar to the Project, solid waste generated by Alternative 2 would be recycled or collected by private waste haulers contracted by the Applicant and permitted by the City and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles. The transport of solid waste generated by Alternative 2 to waste management/disposal facilities would continue to occur along existing solid waste routes of travel. As such, as with the Project, Alternative 2 would not result in the need for additional solid waste collection routes to adequately handle waste generated by operations.

Alternative 2 would generate less solid waste than the Project due to the reduction in development. Specifically, as shown in Appendix P of this Draft EIR, Alternative 2 would generate an estimated 820 tons of solid waste per year prior to recycling, which is less than the 1,109 tons per year generated by the Project. When applying the 75 percent diversion rate specified in the project design features, Alternative 2 would send an estimated 205 tons of solid waste per year to landfills, compared to 277 tons per year under the Project. Therefore, the existing landfills serving the Project Site would have adequate capacity to accommodate the disposal needs of Alternative 2. Since the solid waste generated by Alternative 2 would be less than that of the Project, Alternative 2 would not result in the need for an additional recycling or disposal facility to adequately handle waste generated. Furthermore, as with the Project, Alternative 2 would not conflict with applicable solid waste policies and objectives. As such, solid waste impacts during operation of Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

m. Energy Conservation and Infrastructure

(1) Construction

Similar to the Project, construction activities associated with Alternative 2 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy demand associated with Alternative 2 would be less than that of the Project due to the reduction in the overall amount of construction as well as the duration of construction. In addition, LADWP has confirmed that the existing infrastructure and supplies in the Project area would have sufficient capacity to serve the Project Site. Furthermore, as with the Project, construction activities would not use energy in a manner that is wasteful, inefficient, or unnecessary and would not be expected to have an adverse impact on available energy resources or the existing infrastructure. Therefore, impacts on energy resources associated with short-term construction activities would be less than significant under Alternative 2 and less than the less-than-significant impacts of the Project.

(2) Operation

As with the Project, operation of Alternative 2 would generate demand for electricity, natural gas, and petroleum-based fuels, although the overall demand would be less than the Project's due to the reduction in floor area. Specifically, as shown in Appendix P of this Draft EIR, Alternative 2 would consume an estimated 4,953 megawatt-hours (MWh) of electricity and 4,209,137 cubic feet (cf) of natural gas annually. In addition, Alternative 2 would generate fewer daily vehicle trips than the Project. Accordingly, under Alternative 2, the total energy consumption would be less than that of the Project. Nonetheless, Alternative 2 would implement the same project design features as the Project, which would improve energy efficiency and reduce impacts related to the consumption of energy resources. Accordingly, as with the Project, electricity, natural gas, and petroleum-based fuel usage under Alternative 2 would not be wasteful, inefficient, or unnecessary. Furthermore, Alternative 2 would be located in proximity to a variety of public transit options and would incorporate features to reduce vehicle trips, thereby reducing transportation fuel usage. Therefore, impacts to energy resources under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above, Alternative 2 would not entirely eliminate the Project's significant and unavoidable impacts related to on-site construction noise, on- and off-site construction vibration (related to human annoyance), and operational intersection levels of service, although Alternative 2 would eliminate the Project's traffic impact at Intersection

No. 31 under future conditions.[22] Cumulative impacts with respect to on- and off-site construction noise and off-site construction vibration (related to human annoyance) would also remain significant and unavoidable.[23] All other impacts (aesthetics; air quality; cultural resources; GHG emissions; hazards and hazardous materials; land use; operational noise; population, housing, and employment; public services; other issues related to transportation/traffic; tribal cultural resources; utilities and service systems; and energy conservation and infrastructure) would be less than or similar to those of the Project.

4. Relationship of the Alternative to Project Objectives

Given the similar land use mix as the Project, albeit at an approximately 26 percent reduction, Alternative 2 would meet the underlying purpose of the Project to develop a former surface parking lot within a vibrant area of Downtown Los Angeles with a transit-oriented, high-density project that will generate new economic opportunities for the Downtown area, but it would do so to a lesser extent than the Project. In addition, Alternative 2 would achieve the following Project objectives to the same extent as the Project:

- Reconfigure the existing parking structure on-site to provide sufficient vehicle and long-term bicycle parking and ensure the parking needs of the Project's tenants and visitors are met, while avoiding an over-supply;
- Create a landmark high-rise project that complements the aesthetic character of the area through high quality urban planning and architectural design; and
- Incorporate the principles of smart growth and environmental sustainability by capitalizing on the Project Site's location within the established Downtown Los Angeles employment hub, proximity to transit and walkable streets, and the presence of existing infrastructure needed to service the proposed uses, while incorporating sustainable design components that emphasize resource conservation and efficiency.

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[22] *The Project's on-site construction noise impact and on-site construction vibration impact (with respect to human annoyance) would only be significant and unavoidable if Related Project No. 121 (Times Mirror Square project) is completed and occupied before or during Project construction.*

[23] *Cumulative on-site construction noise impacts would only be significant and unavoidable if construction of Related Project No. 121 (Times Mirror Square project) occurs concurrently with Project construction. Additionally, should peak construction traffic associated with the Times Mirror Square project be completed prior to commencement of Project construction, the cumulative off-site construction noise impact may not occur.*

However, due to the reduction in development, Alternative 2 would meet the following objectives to a lesser extent than the Project:

- Revitalize a former surface parking lot to create a high-density mixed-use project with immediate proximity to existing and future transit lines, employment opportunities, shops, restaurants, and entertainment uses;

- Expand and diversify the supply of housing, retail, and commercial space within the Downtown area to further revitalize the northern end of the Broadway corridor.

- Provide new housing, retail, and commercial space with a balance of uses at a density consistent with the site's existing zoning designation to help meet market demands for housing and commercial space within the Downtown area.

- Enhance the pedestrian activity and street life in the area by providing ground floor retail uses and associated outdoor amenities that work harmoniously with the future station portal for the Metro Regional Connector line that will be located on the site;

- Maximize the Project's landscaped public open space at the grade level to create extensive pedestrian connections between the future station portal and the surrounding area;

- Reinforce public investment in and use of public transit by maximizing development density adjacent to existing and future major transit lines, including the Metro Regional Connector line;

- Maximize the creation of new construction jobs in the City with the development of a new high-rise building; and

- Maximize revenues to the City in the form of additional sales, business license, documentary transfer, and property taxes.

Overall, Alternative 2 would not achieve the Project objectives to the same extent as the Project.

V. Alternatives

C. Alternative 3A: Office Alternative A

1. Description of the Alternative

Alternative 3A, the Office Alternative A (411,000 square feet), involves the development of a 16-story office building of up to 269 feet in height, with a total of 411,000 square feet of floor area comprised of 401,000 square feet of office space and 10,000 square feet of ground floor retail uses. Based on a total of 420,810 square feet of floor area (including the Metro portal), the Project Site would have an FAR of 3.56:1.

All other aspects of Alternative 3A would be substantially similar to the Project. The building design would be similar to the Project, with a podium extending over the on-site Metro portal, although the shifted footprints of the various building volumes would be tempered. A landscaped passage or paseo would form a pedestrian pathway from the Metro portal across the site to Spring Street. Amenities such as a fitness center and common rooms would be provided for office tenants, but the outdoor pool and residential amenity decks would not be developed. Lighting would include low-level exterior lights at the perimeter of the building, in the canopy over the Metro portal, and in the paseo, as needed, for aesthetic, security, and wayfinding purposes. Signage could include general ground level and wayfinding pedestrian signage around the perimeter of the building and in the paseo, building identification signs, and other sign types, and Metro signage would be integrated with the overall signage concept. The existing parking structure would be reconfigured to provide vehicular and long-term bicycle parking spaces (plus additional short-term bicycle parking spaces to be provided outside and adjacent to the parking structure and the new building, as well as within the Metro plaza). A total of 411 of the vehicular spaces in the parking structure would be required tenant parking for Alternative 3A, and surplus parking spaces would continue to be available for other off-site uses. Access to the parking structure would continue to occur via one existing driveway on Broadway and two existing driveways on Spring Street. In addition, one new driveway on Spring Street would provide access to the loading area for the new building.

Similar to the Project, Alternative 3A would require grading and excavation to a maximum depth of 25 feet in areas of the Project Site where Metro is not excavating as part of its construction of the 2nd Street/Broadway rail station and portal. Construction of Alternative 3A would last approximately 33 months (compared to 39 months for the Project).

2. Environmental Impacts

a. Aesthetics (Visual Character, Views, Light/Glare, and Shading)

As previously discussed, SB 743 (PRC Section 21099(d)) sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: "[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." This state law supersedes the aesthetic impact thresholds in the 2006 *L.A. CEQA Thresholds Guide*, including those established for aesthetics, obstruction of views, shading, and nighttime illumination. The related City of Los Angeles Department of City Planning ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the *L.A. CEQA Threshold Guide* shall not be considered an impact for infill projects within TPAs pursuant to CEQA."

The Office Alternative A is considered an employment center project on an infill site within a transit priority area. Accordingly, PRC Section 21099 applies to Alternative 3A. Therefore, like the Project, Alternative 3A cannot result in significant impacts to the environment with respect to aesthetic impacts. The following analysis regarding aesthetics/visual character, views, light and glare, and shading is provided for informational purposes only.

(1) Construction

(a) Views and Visual Character

Similar to the Project, while construction activities associated with Alternative 3A would alter the visual character of the Project Site as well as views of and across the Project Site on a short-term basis, the appearance of the site during construction would be typical of construction sites in urban areas, and aside from vertical building construction, not substantially different than existing conditions on-site (i.e., ongoing construction activities associated with Metro's rail station and portal). In addition, the Alternative would implement the same project design features as the Project, including the installation of temporary construction fencing along the periphery of the Project Site to screen construction activity from view at street level and the maintenance of any pedestrian walkways and construction fencing accessible or visible to the public in a visually attractive manner (i.e., free of trash, graffiti, and peeling postings and a uniform paint color or graphic treatment) throughout the construction period. In general, construction-related aesthetics/visual character and view impacts would be comparable to those of the Project,

although the duration of such impacts would be shorter under this Alternative due to the shorter construction period.

(b) Light and Glare

Similarly, light and glare associated with construction of Alternative 3A would not substantially alter the visual character of the Project area or adversely impact day or nighttime views. As with the Project, a project design feature would be implemented to ensure appropriate shielding of outdoor lighting during construction. Construction impacts related to artificial light and glare would be comparable to those of the Project, although the duration of such impacts would be shorter under this Alternative due to the shorter construction period.

(c) Conclusion

Overall, while construction would alter the visual character of the Project Site on a temporary basis, construction activities associated with Alternative 3A would not substantially degrade the existing visual character or quality of the site and its surroundings. While impacts would be similar to those of the Project, in accordance with SB 743 and ZI No. 2452, any impact related to aesthetic character, visual resources, shade and shadow, light and glare, and scenic vistas would not be considered significant.

(2) Operation

(a) Views

As with the Project, the introduction of a high-rise building under Alternative 3A could affect short-range focal views, although to a lesser extent given the shorter building height (269 feet) as compared to the Project (449 feet). Given the presence of existing (and proposed) intervening development, including the existing parking structure on-site, substantial obstruction of public views of nearby visual resources would not be anticipated, similar to the Project. Regarding views of the Downtown Los Angeles skyline and San Gabriel Mountains, as is the case with the Project, the height and mass of the building would be visible and could intermittently block longer-range views from certain vantage points, but the proposed development would blend in and be consistent with Downtown's urban development, becoming part of the skyline. Nonetheless, given the reduced building height, view impacts would be reduced as compared to the Project.

(b) Visual Character

Like the Project, the height and scale of the proposed building under Alternative 3A would be consistent with development in the surrounding area and Downtown Los Angeles

as a whole, although shorter than the Project building. Also similar to the Project, Alternative 3A would be designed in a contemporary architectural style that would incorporate a variety of buildings materials and façade articulation, with a podium extending over the on-site Metro portal, although the shifted footprints of the stacked building volumes would not vary to the same extent as the Project. Proposed landscaping and open space areas, including the ground floor paseo, would also improve the visual environment on-site. Furthermore, like the Project, proposed signage would comply with the standards and goals of the Historic Broadway Sign Supplemental Use District and complement the building architecture. Nonetheless, the visual character impacts associated with Alternative 3A would be reduced compared to those of the Project due to the shorter building height.

(c) Light and Glare

Similar to the Project, lighting associated with Alternative 3A would comply with applicable City requirements, including LAMC lighting standards, as well as current energy standards and codes. Exterior lighting would be shielded and/or directed toward Project Site areas to minimize light spillover onto adjacent sensitive uses. Also like the Project, the proposed lighting sources would not generate artificial light levels that are out of character with the surrounding area, which is densely developed and characterized by a high degree of human activity and ambient light during the day and night. With respect to glare, glass used in the building façade would be low-reflective in order to minimize glare from reflected sunlight, and all vehicular parking would be contained within the existing parking structure. As such, impacts related to light and glare would be substantially similar to the Project's impacts.

(d) Shading

With regard to shading, the reduced building height of Alternative 3A would produce shorter shadows than the Project. Thus, shading impacts under Alternative 3A would be less than those of the Project.

(e) Conclusion

Based on the above, impacts with respect to aesthetics/visual character, views, and shading would be reduced compared to the Project while light and glare impacts would be substantially similar. Furthermore, pursuant to SB 743 and ZI No. 2452, such impacts would not be considered significant.

b. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

As with the Project, construction of Alternative 3A has the potential to create air quality impacts through the use of heavy-duty construction equipment, vehicle trips generated from construction workers traveling to and from the Project Site, and fugitive dust emissions resulting from earthwork and construction activities. As discussed in Section IV.B, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Under Alternative 3A, the overall amount and duration of construction would be reduced in comparison to the Project due to the reduction in floor area of 267,591 square feet. Similarly, the maximum intensity of construction activity, including the equipment mix, number of construction workers, and daily truck trips, would be reduced compared to the Project, specifically during the building construction phase, as summarized in Appendix P of this Draft EIR. However, construction-related air emissions are largely driven by earthwork activities, which would be the same under Alternative 3A as under the Project given the similar grading and excavation work required. As such, regional and localized impacts associated with the maximum daily earthwork would be similar to the Project, as maximum daily conditions are used for measuring significance. Therefore, impacts associated with regional and localized construction emissions under Alternative 3A would be less than significant and similar to the Project's less-than-significant impacts.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 3A would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.B, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. Given the similar amount and intensity of earthwork, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 3A would be similar to the less-than-significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Similar to the Project, operational regional air pollutant emissions associated with Alternative 3A would be generated by vehicle trips to/from the Project Site and the consumption of electricity and natural gas. As previously discussed, Alternative 3A would include a substantially reduced amount of office space, slightly more retail space, and no residential uses. As such, the number of daily trips generated by the Office Alternative A would be less than that generated by the Project. As vehicular emissions depend on the number of trips, the overall pollutant emissions generated by this Alternative would be less than the emissions generated by the Project. With the overall reduction in development, both area sources and stationary sources would generate less on-site operational air emissions compared to the Project. As shown in Appendix P of this Draft EIR, overall operational emissions under Alternative 3A would be lower than under the Project due to the relative reduction in floor area and vehicle trips.

Therefore, under Alternative 3A, total contributions to regional air pollutant emissions during operation would be less than under the Project. Accordingly, regional air quality impacts under Alternative 3A would be less than significant and less than the less-than-significant impacts of the Project.

With regard to on-site localized emissions, as with the Project, Alternative 3A would not introduce any major new sources of air pollution within the Project Site. Therefore, also similar to the Project, localized impacts from on-site emission sources associated with Alternative 3A would be less than significant. However given the reduction in floor area, fewer on-site operational air emissions would be generated compared to the Project, and impacts would be reduced accordingly, as shown in Appendix P of this Draft EIR. Localized operational impacts from mobile sources are determined primarily by peak-hour intersection traffic volumes. As discussed above, Alternative 3A would result in fewer peak-hour trips than the Project. Because the localized carbon monoxide (CO) hotspot analysis for the Project did not result in any significant impacts, localized impacts under Alternative 3A also would be less than significant, and such impacts would be less than the those of the Project.

(b) Toxic Air Contaminants

As discussed in Section IV.B, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include diesel particulate matter from delivery trucks. Under Alternative 3A, the number of deliveries and associated diesel particulate matter emissions would be reduced compared to the Project due to the overall decrease in development. Similar to the Project, the uses associated with Alternative 3A

are not considered land uses that generate substantial TAC emissions. Also similar to the Project, Alternative 3A would not release substantial amounts of TACs and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Thus, TAC impacts under Alternative 3A would be less than significant and less than the less-than-significant impacts of the Project.

c. Cultural Resources

(1) Historical Resources

As previously discussed, there are no historic resources on the Project Site; however, there are seven known historic resources within one block of the Project Site. Although Alternative 3A would introduce a new visual element to the area, the proposed building would be physically separated from the Douglas Building and the Victor Clothing Company by a parking garage and surface parking lots and from the Times-Plant Complex, the Mirror Building, the Executive Building, the Higgins Building, and the Irvine-Byrne Building by West 2nd Street, South Spring Street, and South Broadway. As with the Project, Alternative 3A would not result in a substantial adverse change to the immediate surroundings of the nearby historic resources to a degree that their integrity or significance as resources would be materially impaired. As the Irvine-Byrne Building and Victory Clothing Company (located south of the Project Site) are the two northernmost contributors to the Broadway Theater and Commercial District, Alternative 3A also would not impair the Historic District. The historic buildings that are individually significant, as well as the Historic District, would continue to be eligible for listing as historic resources defined by CEQA. As such, the Alternative would not cause direct or indirect impacts to historic resources. Impacts to historic resources would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Archaeological Resources

As previously described, similar to the Project, Alternative 3A would require excavation of up to 25 feet below ground surface in portions of the Project Site outside of Metro's excavation area. Accordingly, excavation activities would be largely limited to the disturbance of artificial fill and unlikely to encounter sensitive subsurface materials (i.e., native, undisturbed soils with a potential to contain resources). As such, the potential to uncover subsurface archaeological resources during construction of Alternative 3A would be similar to the Project. Impacts to archaeological resources would be less than significant and similar to the less-than-significant impacts of the Project.

(3) Paleontological Resources

Similar to the Project, Alternative 3A would require excavation of up to 25 feet below ground surface in portions of the Project Site outside of Metro's excavation area. Accordingly, excavation activities would be largely limited to the disturbance of artificial fill and unlikely to encounter sensitive subsurface materials, and the possibility of discovering paleontological artifacts that were not recovered during prior construction or other human activity would be low. Nevertheless, as is the case with the Project, the potential to uncover previously unidentified paleontological resources remains. This potential impact would be reduced to a less-than-significant level with mitigation. Therefore, impacts to paleontological resources under Alternative 3A would be similar to the less-than-significant with mitigation impacts of the Project.

d. Greenhouse Gas Emissions

As discussed in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, the significance of GHG impacts is determined based on compliance with a GHG emissions reduction plan. Similar to the Project, Alternative 3A would be designed to comply with the requirements of the CALGreen Code, SCAG's 2016–2040 RTP/SCS, CARB's *Climate Change Scoping Plan*, the City of Los Angeles' LA Green Plan/ClimateLA and Sustainable pLAn, and the Los Angeles Green Building Code. Also like the Project, Alternative 3A would include sustainable design components such as drought tolerant landscaping, energy efficient lighting, electric vehicle charging infrastructure, and permeable pavement in the paseo. With regulatory compliance and implementation of comparable sustainability features, Alternative 3A would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans, similar to the Project. However, an emissions comparison indicates Alternative 3A would generate fewer GHG emissions than the Project, as shown in Appendix P of this Draft EIR. GHG emissions from a development project are determined in large part by the number of daily trips generated and energy consumption from proposed land uses. Under Alternative 3A, the trip generation and energy and water consumption would be reduced compared to the Project due to the reduction in development. Thus, the amount of GHG emissions generated by Alternative 3A would be less than under the Project. Accordingly, Alternative 3A would better meet regulatory goals/targets to reduce GHG emissions. Thus, impacts related to GHG emissions under Alternative 3A would be less than significant and less than the less-than-significant impacts of the Project.

e. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners would be used, handled, and stored on the Project Site during construction of Alternative 3A, requiring proper management and disposal. The use of such materials would be slightly less than under the Project due to the reduced amount of construction. Nevertheless, like the Project, Alternative 3A would fully comply with all applicable federal, state, and local requirements, as well as manufacturers' instructions concerning the use, handling, storage, and disposal of hazardous materials. As discussed in detail in Section IV.E, Hazards and Hazardous Materials, of this Draft EIR, several USTs have been removed from the site in the past. In addition, residual contamination of soil and/or groundwater as a result of a former release (which received a no further action letter) is present on-site and, based on an evaluation of past sampling results, exceeds current cleanup standards for certain contaminants. Grading and excavation could uncover or disturb any previously unknown or unidentified USTs or residual contamination, including soil and/or groundwater that was determined to be within historical cleanup standards but may now exceed current standards. Similar to the Project, such impacts would be mitigated to a less-than-significant level.

Based on the age of the parking structure, ACMs and LBP are unlikely to be encountered on the Project Site. Nevertheless, in the event ACMs or LBP are encountered on-site, such materials would be handled in accordance with all applicable regulations and requirements.

Like the Project, Alternative 3A would require excavation to depths up to 25 feet and is not expected to encounter groundwater, which occurs on-site at a depth of approximately 110 to 140 feet below ground surface. If construction dewatering is required, or if groundwater is encountered, it is anticipated to be short-term and limited to shallow/perched groundwater. Any groundwater encountered would be sampled for possible contamination and handled in accordance with applicable groundwater discharge requirements.

Based on the above, potential construction-related impacts associated with hazards and hazardous materials under Alternative 3A would be less than significant and less than the less-than-significant impacts of the Project due to the reduced level of construction activities.

(2) Operation

Similar to the Project, Alternative 3A would not include the use of materials containing ACM, LBP, or PCBs and would not involve the installation of any USTs. However, also like the Project, Alternative 3A may include the installation of ASTs for use with emergency generators. If ASTs are included, their installation would comply with all applicable regulatory requirements. Additionally, the operation of Alternative 3A would involve the limited use of potentially hazardous materials typical of those used in commercial developments, including cleaning agents, paints, pesticides, and other materials used for landscaping. Such use would be reduced compared to the Project due to the overall reduction in development. In addition, as with the Project, all hazardous materials on the Project Site would be acquired, handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, state, and local requirements.

Based on the above, potential impacts related to hazards and hazardous materials during operation of Alternative 3A would be less than significant with mitigation and less than the Project's less-than-significant impacts with mitigation due to the decrease in development.

f. Land Use

(1) Land Use Consistency

As previously described, Alternative 3A would develop office and retail uses, but no residential uses, with less overall floor area than the Project. Accordingly, the floor area ratio and density would be reduced compared to the Project; specifically, the Project Site would have an FAR of 3.56:1 (including the Metro portal), compared to the Project's FAR of 5.83:1. Nonetheless, similar to the Project, with approval of the other discretionary approvals and implementation of design features discussed throughout this Draft EIR (which would also be implemented as part of Alternative 3A to the extent applicable), Alternative 3A would be generally consistent with the overall intent of the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site, including the City's General Plan, the Community Plan, and the LAMC. Thus, impacts related to land use consistency would be less than significant and generally similar to the less-than-significant impacts of the Project.

(2) Land Use Compatibility

Alternative 3A includes office and retail uses like the Project, which would be compatible with and would complement existing and future office and retail development in the surrounding area and would not substantially or adversely change the existing land use

relationships between the Project Site and adjacent properties. Furthermore, like the Project, Alternative 3A would not physically divide an established community. As such, impacts associated with land use compatibility would be less than significant and similar to the less-than-significant impacts of the Project.

g. Noise

(1) Construction

Alternative 3A would involve the same general phases of construction as the Project (i.e., demolition, site grading and excavation, foundation, building construction, and paving/concrete/landscape installation). As with the Project, construction of Alternative 3A would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Due to the reduction in development associated with Alternative 3A, the amount and the overall duration of construction would be reduced. However, as summarized in Appendix P of this Draft EIR, the maximum daily intensity of construction activities (based on equipment mix) would be similar to the Project during the demolition, grading/excavation, and paving/concrete/landscape installation phases, all of which would generate greater noise at the nearest sensitive receptor (Receptor Location R6, where a significant Project impact was identified) than the building construction phase. Accordingly, maximum on-site construction noise and vibration levels at Receptor R6 during the noisiest phases would be similar to the Project. Similarly, since Alternative 3A would require the same amount of excavation and soil export as the Project as well as similar foundation work, the number of haul trips during the grading/excavation and foundation phases (i.e., two of the phases involving the highest number of construction trucks) would be similar. Therefore, noise and vibration impacts due to off-site truck trips under Alternative 3A would be similar to those occurring under the Project. Alternative 3A would comply with the same applicable regulatory requirements and implement the same project design features and mitigation measures as the Project to reduce on-site noise and vibration levels. As with the Project, construction of Alternative 3A would result in significant and unavoidable impacts with respect to on-site construction noise, on- and off-site construction vibration (related to human annoyance), and cumulative impacts with respect to on- and off-site construction noise and off-site construction vibration (related to human annoyance).[24,25]

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[24] *The Project's on-site construction noise impact and on-site construction vibration impact (with respect to human annoyance) would only be significant and unavoidable if Related Project No. 121 (Times Mirror Square project) is completed and occupied before or during Project construction.*

[25] *Cumulative on-site construction noise impacts would only be significant and unavoidable if construction of Related Project No. 121 (Times Mirror Square project) occurs concurrently with Project construction.* *(Footnote continued on next page)*

(2) Operation

As discussed in Section IV.G, Noise, of this Draft EIR, sources of operational noise under the Project include: (a) on-site stationary noise sources, including outdoor mechanical equipment, loading dock and trash compactors, parking, and activities within the proposed outdoor spaces; and (b) off-site mobile (roadway traffic) noise sources. Alternative 3A would introduce noise from similar on- and off-site sources as the Project, although noise associated with the use of outdoor spaces would be reduced since the outdoor pool and residential amenity decks would not be developed. Additionally, it is anticipated that with the overall reduction in floor area, the amount of building mechanical equipment and associated noise levels would be reduced. Similar to the Project, on-site mechanical equipment used during operation of Alternative 3A would comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. In addition, as the loading dock and trash collection areas for Alternative 3A would have a similar design and location as the Project, noise impacts from loading and trash collection activities would be similar to the Project. Overall, operational on-site noise impacts would be less than significant and less than the less-than-significant impacts of the Project.

With regard to off-site noise sources, Alternative 3A would result in a reduction in daily vehicle trips compared to the Project as discussed below. The reduction in vehicle trips would result in a decrease in off-site traffic-related noise levels under Alternative 3A. Therefore, as with the Project, off-site noise impacts under Alternative 3A would be less than significant.

h. Population, Housing, and Employment

(1) Construction

As discussed in Section IV.H, Population, Housing, and Employment, of this Draft EIR, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by a particular development. Many construction workers are highly specialized (e.g., crane operators, steel workers, masons) and move from job site to job site as dictated by the demand for their skills. With the reduced amount of construction under Alternative 3A

Additionally, should peak construction traffic associated with the Times Mirror Square project be completed prior to commencement of Project construction, the cumulative off-site construction noise impact may not occur.

compared to the Project, fewer construction workers would be needed during the building construction phase, which involves the most workers of any phase. Therefore, population impacts related to household growth in the City of Los Angeles or the SCAG region as a result of construction worker relocation under Alternative 3A would be less than significant and less than the less-than-significant impacts of the Project

(2) Operation

As previously described, Alternative 3A would develop 401,000 square feet of office uses and 10,000 square feet of retail uses, but unlike the Project, would not include residential uses. As such, this Alternative would not contribute directly to population growth in the region. However, this Alternative would not advance the City's goal of generating more housing for the region in a developed, infill location.

The proposed office and retail uses would generate an estimated 1,755 employees, which is less than the 2,322 employees generated by the Project.[26] Many of these positions are likely be filled by persons already residing in the vicinity of Downtown or in neighboring areas/cities and who generally would not relocate their households due to such employment opportunities. In the event some jobs are filled by persons from outside the area who relocate for their job, limited indirect population growth and associated housing demand could occur, although such demand would be less than under the Project. This demand could be met by existing vacancies in the surrounding housing market, as well as by the substantial number of new units currently planned Downtown. As such, similar to the Project, Alternative 3A would not induce substantial population growth or exceed SCAG's population forecast for the City or the SCAG region.

Overall, impacts related to population, housing, and employment under this Alternative would be less than significant and less than less-than-significant impacts of the Project due to the reduced amount of development and lack of residential uses.

[26] *Based on employment generation rates of 4.31/1,000 square feet of office space (Large High Rise Commercial Office category) and 2.71/1,000 square feet of commercial retail space (Neighborhood Shopping Center category); source: Los Angeles Unified School District's 2016 Developer Fee Justification Study, Table 15, March 2017.*

i. Public Services

(1) Police Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 3A would be similar to those of the Project. However, the overall duration of construction would be reduced compared to the Project due to the reduced amount of development. Alternative 3A would implement the same project design feature as the Project, which includes temporary security measures such as fencing, lighting, and locked entry to reduce the potential for theft and vandalism on the Project Site, thereby reducing the demand for police protection services. Construction activities under Alternative 3A could also affect emergency response for police vehicles along adjacent streets due to delays caused by traffic during the construction phase. However, given the permitted hours of construction and the nature of construction projects, most, if not all, of the construction worker trips would occur outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. In addition, as with the Project, a Construction Traffic Management Plan, including a worksite traffic control plan, would be implemented during construction to ensure adequate and safe access is available within and near the Project Site during construction activities. Furthermore, CVC Section 21806 allows drivers of emergency vehicles to use a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, construction-related impacts to police protection services under Alternative 3A would be less than significant and similar to the less-than-significant impacts of the Project, although the construction duration would be shorter.

(b) Operation

Based on 401,000 square feet of office uses and 10,000 square feet of retail uses, as well as the police service population factors provided in the *L.A. CEQA Thresholds Guide*, Alternative 3A would generate a police service population of approximately of approximately 1,634 persons consisting solely of employees. This estimate is less than the Project's estimated police service population of 2,492 persons and would not include a residential population. Therefore, Alternative 3A would increase the demand for police services provided by the Central Community Police Station, but to a lesser extent than the Project. Additionally, Alternative 3A would not affect the current officer-to-resident ratio for the Central Area. Furthermore, Alternative 3A would implement the same project design features as the Project requiring on-site security features, appropriate security lighting, and the prevention of concealed spaces. The project design features would help offset the increase in demand for police protection services generated by Alternative 3A. Furthermore, as discussed in Section IV.I.1, Public Services—Police Protection, of this

Draft EIR, consistent with the *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police services is the responsibility of the City; at this time, LAPD has not identified the need for any new station construction due to development in the service area. Thus, as with the Project, Alternative 3A would not result in the need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service. Moreover, although traffic generated by Alternative 3A would have the potential to affect emergency vehicle response to the Project Site and surrounding properties due to delays caused by the additional traffic, drivers of police emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Therefore, the impact on police protection services would be less than significant and less than the less-than-significant impacts of the Project since the police service population generated by Alternative 3A would be reduced.

(2) Fire Protection

(a) Construction

Similar to the Project, construction activities under Alternative 3A would have the potential to result in accidental fires from such sources as the operation of mechanical equipment and the use of flammable construction materials. However, in compliance with OSHA and Fire and Building Code requirements, construction managers and personnel would be trained in emergency response and fire safety operations. Additionally, fire suppression equipment specific to construction would be maintained on-site. Construction would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous waste. Thus, compliance with regulatory requirements would effectively reduce the potential for construction activities to expose people to the risk of fire or explosion, including that related to hazardous materials.

Additionally, access to the Project Site and the surrounding vicinity could be impacted by construction activities under Alternative 3A, such as temporary lane closures, roadway/access improvements, and the construction of utility line connections. Furthermore, construction activities would generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic, which could temporarily affect emergency response for emergency vehicles along adjacent streets. However, as with the Project, construction worker and haul truck trips would be expected to occur largely outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. Additionally, like the Project, a Construction Traffic Management

Plan would be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Furthermore, CVC Section 21806 allows drivers of emergency vehicles to use a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, construction-related impacts related to fire protection services under Alternative 3A would be less than significant and similar to the less-than-significant impacts of the Project, although the construction duration would be shorter.

(b) Operation

As discussed in Section IV.I.2, Public Services—Fire Protection, of this Draft EIR, the Project Site would be served by Fire Station No. 9, the "first-in" station, located approximately 1 mile to the southwest. Fire Station Nos. 4, 10, 3, and 11 would also be available to serve Alternative 3A in the event of an emergency. Based on categorization as an Industrial and Commercial land use like the Project, Alternative 3A would meet the required response distance from a fire station with an engine and truck company. However, based on the reduced floor area and associated occupancy of the Alternative, the demand for fire protection and emergency medical services would be reduced compared to the Project. With respect to response times, similar to the Project, emergency access would be maintained, and traffic generated by Alternative 2 would not impair the LAFD from responding to emergencies at the Project Site or the surrounding area. Average response times are anticipated to continue to meet National Fire Protection Association (NFPA) response time standards, which although not formally adopted are not considered deficient. In addition, similar to the Project, Alternative 3A would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Also like the Project, the Alternative would implement a project design feature involving the installation of a fire flow pump system, as needed, in order to meet water pressure demands. Furthermore, as discussed in Section IV.I.2, Public Services—Fire Protection, of this Draft EIR, consistent with the *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate fire protection services is the responsibility of the City; at this time, LAFD has not identified the need for any new station construction due to development in the service area. Therefore, impacts related to fire protection services would be less than significant under Alternative 3A and less than the less-than-significant impacts of the Project due to the reduction in floor area.

(3) Schools

(a) Construction

Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by Alternative 3A. Therefore, the construction employment generated by Alternative 3A would not result in a notable increase in the residential population or a corresponding demand for schools in the vicinity of the Project Site. Impacts on school facilities during construction under Alternative 3A would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

As Alternative 3A does not include the development of residential uses, it would not directly generate school-aged children and a corresponding demand for school services. Therefore, implementation of Alternative 3A would not result in a direct increase in the number of students within the service area of the LAUSD. However, as shown in Appendix P of this Draft EIR, the proposed office and retail uses would be expected to generate an estimated 395 students, consisting of 214 elementary school students, 58 middle school students, and 122 high school students, which is less than the 569 students generated by the Project. Furthermore, pursuant to SB 50, the Applicant would be required to pay development fees to the LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of project-related school impacts. Therefore, payment of applicable development school fees to the LAUSD would offset the impact of additional student enrollment at schools serving the Project area. Impacts related to schools would be less than significant under Alternative 3A and less than the less-than-significant impacts of the Project.

(4) Libraries

(a) Construction

As previously discussed, construction workers are not likely to relocate their households as a consequence of construction. Therefore, construction employment generated by Alternative 3A would not result in a notable increase in the residential population or a corresponding demand for library services in the vicinity of the Project Site.

In addition, it is unlikely that construction workers would visit libraries near the Project Site on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times

are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. As such, impacts to library facilities and services during construction of Alternative 3A would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

Residents are considered the primary users of library facilities, and as discussed previously, Alternative 3A does not include residential uses. In addition, the reduced amount of overall development would result in fewer employees than the Project (i.e., 1,755 employees vs. 2,322 employees). Thus, both direct and indirect demand for library services under Alternative 3A would be less than the less-than-significant impacts of the Project.

(5) Parks and Recreation

(a) Construction

As discussed previously, the likelihood that construction workers would relocate their households as a consequence of working on-site is negligible. Therefore, the construction workers associated with Alternative 3A would not result in a notable increase in the residential population in the Project vicinity or a corresponding permanent demand for parks and recreational facilities in the vicinity.

As with the Project, during construction of Alternative 3A, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. Furthermore, while there is a potential for construction workers to spend their lunch breaks at the parks and recreational facilities near the Project Site, lunch breaks typically are not long enough for workers to take advantage of such facilities and return to work within the allotted time (e.g., 30 to 60 minutes). Therefore, it is unlikely that construction workers would utilize nearby parks and recreational facilities during construction of Alternative 3A.

In addition, as with the Project, construction of Alternative 3A would not be expected to result in access restrictions to City parks and recreation facilities in the vicinity of the Project Site, nor interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity.

Based on the above analysis, construction of Alternative 3A would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services or interfere with existing park usage. Therefore, impacts on parks and recreational facilities during construction of Alternative 3A would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

Alternative 3A would not generate residents who would utilize nearby parks and/or recreational facilities. In addition, while it is possible that employees of Alternative 3A may utilize local parks and recreational facilities during their time spent at work, employees are more likely to utilize parks and recreational facilities near their places of residence. Therefore, Alternative 3A would result in a reduced demand for public parks and recreation services compared to the Project, and operation of Alternative 3A would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services or interfere with existing park usage. Impacts to park and recreation facilities would be less than significant under Alternative 3A and less than the less-than-significant impacts of the Project.

j. Transportation/Traffic

(1) Construction

As with the Project, construction of Alternative 3A would generate trips from heavy-duty construction equipment, haul trucks, and construction worker trips. In addition to the duration of construction being shorter than under the Project, the intensity of construction activity, including the equipment mix, number of construction workers, and daily truck trips, would be reduced compared to the Project, specifically during the building construction phase, as summarized in Appendix P of this Draft EIR. Given that the building construction phase involves the greatest number of construction workers (by far, compared to the other construction phases), this phase would still represent the maximum potential for traffic impacts, similar to the Project. Also like the Project, Alternative 3A would implement a Construction Traffic Management Plan that would require construction-related trips to be scheduled outside of commuter weekday peak hours to the extent feasible. Therefore, construction-related activities would not contribute a substantial amount of traffic during the weekday morning and afternoon peak periods. As with the Project, construction traffic associated with Alternative 3A would not result in any significant traffic impacts at the study intersections during peak construction activities, and such impacts would be reduced compared to the Project based on the reduced number of construction workers and haul trips.

Like the Project, construction of Alternative 3A may involve temporary lane closures. Alternative 3A would implement similar project design features as the Project, which include a Construction Traffic Management Plan to ensure pedestrian and traffic safety and access. Therefore, as with the Project, access and safety impacts during construction would be less than significant.

(2) Operation

The following discussion is based on the Alternatives Traffic Memo provided in Appendix P of this Draft EIR.

Alternative 3A is estimated to generate 2,942 daily trips with 419 A.M. peak-hour trips (368 inbound/51 outbound) and 397 P.M. peak-hour trips (74 inbound/323 outbound), which is less than under the Project. In order to determine the operating conditions of the street system, traffic associated with Alternative 3A was assigned to the local roadway system based on trip distribution and assignment characteristics consistent with the Project.

(a) Existing Conditions With Alternative 3A

Alternative 3A would result in significant impacts to the same three intersections as the Project under Existing With Alternative 3A conditions (i.e., Intersection Nos. 5, 8, and 9). Similar to the Project, impacts at Intersection Nos. 8 and 9 could be mitigated to a less-than-significant level; however, the impact at Intersection No. 5 during the P.M. peak hour would be significant and unavoidable, also similar to the Project.

(b) Future Conditions With Alternative 3A

The Future With Alternative 3A scenario would result in significant impacts at Intersection Nos. 5, 8, and 9, like the Project, but Alternative 3A would eliminate the Project's impact at Intersection No. 31. As is the case with the Project, when mitigation is applied, the significant impact at Intersection No. 9 during the P.M. peak hour would be reduced to a less than significant level; however, the significant impacts at Intersection No. 5 during the P.M. peak hour and Intersection No. 8 during the A.M. peak hour would remain. Therefore, similar to the Project, impacts with respect to intersection level of service under Alternative 3A would remain significant and unavoidable, although reduced in comparison to the Project.

(c) Regional Transportation System, Access and Circulation, and Bicycle, Pedestrian, and Vehicular Safety

With the reduced number of trips and smaller on-site population, impacts to the regional transportation system, access and circulation, and bicycle, pedestrian, and vehicular safety would be less than the less-than-significant impacts of the Project.

k. Tribal Cultural Resources

As previously discussed, Alternative 3A would require excavation to depths of up to 25 feet in portions of the Project Site outside of Metro's excavation area, similar to the Project. Therefore, the potential for Alternative 3A to uncover subsurface tribal cultural resources would be similar to that of the Project. As discussed in Section IV.K, Tribal Cultural Resources, of this Draft EIR, no confirmed Native American resources have been identified within the Project area or a surrounding 0.5-mile search radius. More specifically, following written notification of the Project by the City on January 6, 2017, government-to-government consultation was requested by the Gabrieleño Band of Mission Indians—Kizh Nation on January 10 and initiated by the City on March 23, 2017. Upon review of the documents submitted during the subsequent consultation, the City, acting in good faith and after a reasonable effort, did not find substantial evidence of an existing tribal cultural resource within the Project area. Based on their correspondence, the City concluded that mutual agreement could not be reached between the Tribe and City for purposes of AB 52, and as such, the City closed the tribal consultation on October 19, 2018, in fulfillment of its AB 52 requirements. The Tribe responded to the City (on the same day) and requested that the Tribe be consulted if the Project results in ground disturbance. The City responded on November 15, 2018, and confirmed that consultation for the Project had occurred and closed. Additionally, the City responded that the Tribe may submit comments on the EIR as long as the comments are received prior to approval of the document. Furthermore, monitoring of Metro's construction site has not yielded any Native American cultural resources. This information suggests that subsurface conditions within the Project Site have little potential to support the presence of unanticipated cultural resources or tribal cultural resources. While the City has no basis under CEQA to impose any related mitigation measures, the City has established a standard condition of approval under its police power and land use authority to address any inadvertent discovery of a tribal cultural resource. For purposes of this analysis, it is assumed the City would impose this condition on the Project, or any alternative to the Project, as part of its land use approvals. Accordingly, impacts to tribal cultural resources would be less than significant and similar to the impacts of the Project.

I. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 3A would generate a short-term demand for water. This demand would be less than the Project's due to the reduction in the amount and duration of construction under Alternative 3A. As evaluated in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of construction. Since the water demand for construction activities would be reduced, the temporary and intermittent demand for water during construction under Alternative 3A would also be expected to be met by the City's available water supplies. Similarly, the existing LADWP water infrastructure would be adequate to provide the water flow necessary to serve Alternative 3A.

Furthermore, as with the Project, the design and installation of new service connections under Alternative 3A would be required to meet applicable City standards. The connections and installation of on-site water distribution lines would primarily involve trenching to place the lines below ground, which could temporarily affect access in adjacent rights-of-way. However, as previously discussed and like the Project, a Construction Traffic Management Plan would be implemented to ensure adequate and safe access remains available within and near the Project Site during construction. Therefore, impacts on water supply and infrastructure associated with short-term construction activities would be less than significant under Alternative 3A and would be less than the less-than-significant impacts of the Project.

(b) Operation

Based on 401,000 square feet of office uses, 10,000 square feet of retail uses, a fitness center, common rooms, new landscaping, and a cooling tower, and using LASAN wastewater generation rates and information provided by LADWP, Alternative 3A would result in an estimated demand for approximately 119,093 gpd prior to required water savings, as shown in Appendix P of this Draft EIR, which is less than the Project's water demand of 157,106 gpd. As concluded in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, and the WSA prepared for the Project, the estimated water demand for the Project would not exceed the available supplies projected by LADWP. Therefore, the estimated water demand under Alternative 3A would also be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040. In addition, the existing water distribution infrastructure

would be adequate to serve Alternative 3A since the water demand would be lower than that of the Project. Furthermore, the Applicant would construct the necessary on-site water infrastructure and off-site connections to the LADWP water system pursuant to applicable City requirements under Alternative 3A to accommodate the new building. Thus, impacts to water supply under Alternative 3A would be less than significant and less than the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, during construction of Alternative 3A, existing sewer laterals would be capped and no sewage would enter the public sewer system. Temporary facilities such as portable toilet and hand wash areas would be provided by the contractor at the Project Site, and sewage from these facilities would be collected and hauled off-site. As such, wastewater generation from construction activities associated with Alternative 3A would not cause a measurable increase in wastewater flows.

Additionally, as with the Project, Alternative 3A may include construction activities associated with the installation of new or relocated sewer connections. Such activities would be confined to trenching in order to place the sewer lines below surface and would be limited to the on-site wastewater conveyance infrastructure and minor off-site work associated with connections to the City's sewer lines in the streets adjacent to the Project Site. Similar to the Project, a Construction Traffic Management Plan would be implemented during the construction of Alternative 3A to reduce impacts to pedestrian and traffic flow, including emergency vehicle access, which could occur due to temporary off-site utility work. Therefore, construction-related impacts to the wastewater system under Alternative 3A would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

Based on 401,000 square feet of office uses, 10,000 square feet of retail uses, a fitness center, common rooms, new landscaping, and a cooling tower, and using LASAN wastewater generation rates, Alternative 3A would generate an estimated 72,282 gpd of wastewater, as shown in Appendix P of this Draft EIR, which is less than the 108,749 gpd generated by the Project. As provided in Section IV.L.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the Project-generated wastewater could be accommodated by the existing capacity of the HWRP. Therefore, since the wastewater generated by Alternative 3A would be less than that of the Project, wastewater generated by Alternative 3A could also be accommodated by the existing capacity of the HWRP, and impacts with respect to treatment capacity would be less than significant.

Also like the Project, sewer service for Alternative 3A would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site. Given that Alternative 3A would result in reduced wastewater generation compared to that of the Project, it is anticipated that there would be sufficient capacity within the sewer main lines serving the Project Site to serve Alternative 3A. Furthermore, additional detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for Alternative 3A during the permitting process. All related sanitary sewer connections and on-site infrastructure under Alternative 3A would be designed and constructed in accordance with applicable standards.

Thus, impacts with regard to wastewater generation and infrastructure capacity under Alternative 3A would be less than significant and less than the less-than-significant impacts of the Project.

(3) Solid Waste

(a) Construction

Construction of Alternative 3A would involve demolition and building construction activities. The amount of demolition waste generated by Alternative 3A would be similar to the Project, while the amount of construction waste would be less due to the reduction in total floor area. Specifically, as shown in Appendix P of this Draft EIR, Alternative 3A would generate an estimated 3,899 tons of construction and demolition waste prior to recycling (975 tons when applying the 75 percent diversion rate specified in the project design features), compared to 4,454 tons with the Project (1,113 tons with diversion). Construction and demolition wastes would be recycled or collected by private waste haulers and taken to City-certified waste processing facilities for sorting and final distribution, including disposal at the County's unclassified landfill. Since construction and demolition waste would be hauled by a private construction contractor permitted by the City, Alternative 3A would not result in the need for an additional solid waste collection route. Similar to the Project, construction of Alternative 3A would not conflict with any applicable State or City solid waste regulations. As such, solid waste impacts during construction of Alternative 3A would be less than significant and less than the less-than-significant impacts of the Project

(b) Operation

During its operation, Alternative 3A would generate municipal solid waste typical of office and retail developments. Similar to the Project, solid waste generated by Alternative 3A would be recycled or collected by private waste haulers contracted by the Applicant and permitted by the City and taken for disposal at one of the County's Class III

landfills open to the City of Los Angeles. The transport of solid waste generated by Alternative 3A to waste management/disposal facilities would continue to occur along existing solid waste routes of travel. As such, as with the Project, Alternative 3A would not result in the need for additional solid waste collection routes to adequately handle waste generated by operations.

Alternative 3A would generate less solid waste than the Project due to the reduction in development and the elimination of residential uses. Specifically, as shown in Appendix P of this Draft EIR, Alternative 3A would result in an estimated 665 tons per year of solid waste (166 tons per year when factoring in 75 percent diversion per the project design features), which is less than the Project's solid waste generation of 1,109 tons per year (277 tons per year when factoring in 75 percent diversion). Therefore, because the existing landfills serving the Project Site have adequate capacity to accommodate the Project, they would also have capacity to accommodate Alternative 3A. In addition, since the solid waste generated by Alternative 3A would be less than that of the Project, Alternative 3A would not result in the need for an additional recycling or disposal facility to adequately handle waste generated. Furthermore, as with the Project, Alternative 3A would not conflict with applicable solid waste policies and objectives. As such, solid waste impacts during operation of Alternative 3A would be less than significant and less than the less-than-significant impacts of the Project.

m. Energy Conservation and Infrastructure

(1) Construction

Similar to the Project, construction activities associated with Alternative 3A would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. This energy demand would be reduced compared to the Project due to the reduction in the overall amount and duration of construction. In addition, LADWP has confirmed existing infrastructure and supplies in the Project area would be sufficient to serve the Project Site. Furthermore, as with the Project, construction activities would not use energy in a manner that is not wasteful, inefficient, or unnecessary and would not be expected to have an adverse impact on available energy resources or the existing infrastructure. Therefore, impacts on energy resources associated with short-term construction activities would be less than significant under Alternative 3A and less than the less-than-significant impacts of the Project.

(2) Operation

As with the Project, operation of Alternative 3A would generate demand for electricity, natural gas, and petroleum-based fuels relative to existing conditions, although

the overall demand would be less than the Project's due to the reduction in floor area. Specifically, as shown in Appendix P of this Draft EIR, Alternative 3A would consume an estimated 4,762 MWh of electricity and 3,607,486 cf of natural gas annually. In addition, Alternative 3A would generate fewer daily vehicle trips than the Project. Accordingly, under Alternative 3A, the total energy consumption would be less than that of the Project. Nonetheless, Alternative 3A would implement the same project design features as the Project, which would improve energy efficiency and reduce impacts related to the consumption of energy resources. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 3A would not be wasteful, inefficient, or unnecessary. Furthermore, Alternative 3A would be located in proximity to a variety of public transit options and would incorporate features to reduce vehicle trips, thereby reducing transportation fuel usage. Therefore, impacts to energy resources under Alternative 3A would be less than significant and less than the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above, Alternative 3A would not entirely eliminate the Project's significant and unavoidable impacts related to on-site construction noise, on- and off-site construction vibration (related to human annoyance), and operational intersection levels of service, although Alternative 3A would eliminate the Project's traffic impact at Intersection No. 31 under future conditions.[27] Cumulative impacts with respect to on- and off-site construction noise and off-site construction vibration (related to human annoyance) would also remain significant and unavoidable.[28] All other impacts (aesthetics; air quality; cultural resources; GHG emissions; hazards and hazardous materials; land use; operational noise; population, housing, and employment; public services; other issues related to transportation/traffic; tribal cultural resources; utilities and service systems; and energy conservation and infrastructure) would be less than or similar to those of the Project.

[27] *The Project's on-site construction noise impact and on-site construction vibration impact (with respect to human annoyance) would only be significant and unavoidable if Related Project No. 121 (Times Mirror Square project) is completed and occupied before or during Project construction.*

[28] *Cumulative on-site construction noise impacts would only be significant and unavoidable if construction of Related Project No. 121 (Times Mirror Square project) occurs concurrently with Project construction. Additionally, should peak construction traffic associated with the Times Mirror Square project be completed prior to commencement of Project construction, the cumulative off-site construction noise impact may not occur.*

4. Relationship of the Alternative to Project Objectives

Alternative 3A would develop similar office and retail uses as the Project, with less overall development, and would not include any residential uses. As such, Alternative 3A would meet the underlying purpose of the Project to develop a former surface parking lot within a vibrant area of Downtown Los Angeles with a transit-oriented, high-density project that will generate new economic opportunities for the Downtown area, but it would do so to a lesser extent than the Project. In addition, Alternative 3A would not meet the following Project objectives pertaining to residential uses:

- Revitalize a former surface parking lot to create a high-density mixed-use project with immediate proximity to existing and future transit lines, employment opportunities, shops, restaurants, and entertainment uses;
- Expand and diversify the supply of housing, retail, and commercial space within the Downtown area to further revitalize the northern end of the Broadway corridor.
- Provide new housing, retail, and commercial space with a balance of uses at a density consistent with the site's existing zoning designation to help meet market demands for housing and commercial space within the Downtown area.

Alternative 3A would meet the following Project objectives to a lesser extent than the Project because of the reduced amount of development:

- Maximize the Project's landscaped public open space at the grade level to create extensive pedestrian connections between the future station portal and the surrounding area;
- Reinforce public investment in and use of public transit by maximizing development density adjacent to existing and future major transit lines, including the Metro Regional Connector line;
- Maximize the creation of new construction jobs in the City with the development of a new high-rise building; and
- Maximize revenues to the City in the form of additional sales, business license, documentary transfer, and property taxes.

Alternative 3A would, however, fully meet the following Project objectives:

- Reconfigure the existing parking structure on-site to provide sufficient vehicle and long-term bicycle parking and ensure the parking needs of the Project's tenants and visitors are met, while avoiding an over-supply;

- Create a landmark high-rise project that complements the aesthetic character of the area through high quality urban planning and architectural design; and

- Incorporate the principles of smart growth and environmental sustainability by capitalizing on the Project Site's location within the established Downtown Los Angeles employment hub, proximity to transit and walkable streets, and the presence of existing infrastructure needed to service the proposed uses, while incorporating sustainable design components that emphasize resource conservation and efficiency.

Furthermore, Alternative 3A would meet the following Project objective to a slightly greater extent than the Project due to the minor increase in retail development:

- Enhance the pedestrian activity and street life in the area by providing ground floor retail uses and associated outdoor amenities that work harmoniously with the future station portal for the Metro Regional Connector line that will be located on the site.

Overall, Alternative 3A would not achieve the Project objectives to the same extent as the Project.

V. Alternatives

D. Alternative 3B: Office Alternative B

1. Description of the Alternative

Alternative 3B, the Office Alternative B (590,000 square feet), involves the development of a 26-story office building of up to 419 feet in height, with a total of 590,000 square feet of floor area comprised of 580,000 square feet of office space and 10,000 square feet of ground floor retail uses.[29] Based on a total of 599,810 square feet of floor area (including the Metro portal), the Project Site would have an FAR of 5.08:1.

All other aspects of Alternative 3B would be substantially similar to the Project. The building design would be similar to the Project, with a podium extending over the on-site Metro portal, although the shifted footprints of the various building volumes would be tempered. A landscaped passage or paseo would form a pedestrian pathway from the Metro portal across the site to Spring Street. Amenities such as a fitness center and common rooms would be provided for office tenants, but the outdoor pool and residential amenity decks would not be developed. Lighting would include low-level exterior lights at the perimeter of the building, in the canopy over the Metro portal, and in the paseo, as needed, for aesthetic, security, and wayfinding purposes. Signage could include general ground level and wayfinding pedestrian signage around the perimeter of the building and in the paseo, building identification signs, and other sign types, and Metro signage would be integrated with the overall signage concept. The existing parking structure would be reconfigured to provide vehicular and long-term bicycle parking spaces (plus additional short-term bicycle parking spaces to be provided outside and adjacent to the parking structure and the new building, as well as within the Metro plaza). A total of 590 of the vehicular spaces in the parking structure would be required tenant parking for Alternative 3B, and surplus parking spaces would continue to be available for other off-site uses. Access to the parking structure would continue to occur via one existing driveway on Broadway and two existing driveways on Spring Street. In addition, one new driveway on Spring Street would provide access to the loading area for the new building.

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[29] *While the alternatives analysis herein already includes an Office Alternative (i.e., Alternative 3A, the Office Alternative A (411,000 square feet), described above), a second variation was defined in order to maximize the FAR on-site without triggering any new or greater significant traffic impacts than would occur under the Project. Alternative 3B, the Office Alternative B (590,000 square feet) represents this scenario.*

Similar to the Project, Alternative 3B would require grading and excavation to a maximum depth of 25 feet in areas of the Project Site where Metro is not excavating as part of its construction of the 2nd Street/Broadway rail station and portal. Construction of Alternative 3B would last approximately 37 months (compared to 39 months for the Project).

2. Environmental Impacts

a. Aesthetics (Visual Character, Views, Light/Glare, and Shading)

As previously discussed, SB 743 (PRC Section 21099(d)) sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: "[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." This state law supersedes the aesthetic impact thresholds in the 2006 *L.A. CEQA Thresholds Guide*, including those established for aesthetics, obstruction of views, shading, and nighttime illumination. The related City of Los Angeles Department of City Planning ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the *L.A. CEQA Threshold Guide* shall not be considered an impact for infill projects within TPAs pursuant to CEQA."

The Office Alternative B is considered an employment center project on an infill site within a transit priority area. Accordingly, PRC Section 21099 applies to Alternative 3B. Therefore, like the Project, Alternative 3B cannot result in significant impacts to the environment with respect to aesthetic impacts. The following analysis regarding aesthetics/visual character, views, light and glare, and shading is provided for informational purposes only.

(1) Construction

(a) Views and Visual Character

Similar to the Project, while construction activities associated with Alternative 3B would alter the visual character of the Project Site as well as views of and across the Project Site on a short-term basis, the appearance of the site during construction would be typical of construction sites in urban areas, and aside from vertical building construction, not substantially different than existing conditions on-site (i.e., ongoing construction activities associated with Metro's rail station and portal). In addition, the Alternative would

implement the same project design features as the Project, including the installation of temporary construction fencing along the periphery of the Project Site to screen construction activity from view at street level and the maintenance of any pedestrian walkways and construction fencing accessible or visible to the public in a visually attractive manner (i.e., free of trash, graffiti, and peeling postings and a uniform paint color or graphic treatment) throughout the construction period. In general, construction-related aesthetics/visual character and view impacts would be comparable to those of the Project, although the duration of such impacts would be shorter under this Alternative due to the slightly shorter (by two months) construction period.

(b) Light and Glare

Similarly, light and glare associated with construction of Alternative 3B would not substantially alter the visual character of the Project area or adversely impact day or nighttime views. As with the Project, a project design feature would be implemented to ensure appropriate shielding of outdoor lighting during construction. Construction impacts related to artificial light and glare would be comparable to those of the Project, although the duration of such impacts would be shorter under this Alternative due to the slightly shorter construction period.

(c) Conclusion

Overall, while construction would alter the visual character of the Project Site on a temporary basis, construction activities associated with Alternative 3B would not substantially degrade the existing visual character or quality of the site and its surroundings. While impacts would be similar to those of the Project, in accordance with SB 743 and ZI No. 2452, any impact related to aesthetic character, visual resources, shade and shadow, light and glare, and scenic vistas would not be considered significant.

(2) Operation

(a) Views

As with the Project, the introduction of a high-rise building under Alternative 3B could affect short-range focal views, although to a slightly lesser extent given the slightly shorter building height (419 feet) as compared to the Project (449 feet). Given the presence of existing (and proposed) intervening development, including the existing parking structure on-site, substantial obstruction of public views of nearby visual resources would not be anticipated, similar to the Project. Regarding views of the Downtown Los Angeles skyline and San Gabriel Mountains, as is the case with the Project, the height and mass of the building would be visible and could intermittently block longer-range views from certain vantage points, but the proposed development would blend in and be consistent

with Downtown's urban development, becoming part of the skyline. Nonetheless, given the minor reduction in building height, view impacts would be slightly reduced as compared to the Project.

(b) Visual Character

Like the Project, the height and scale of the proposed building under Alternative 3B would be consistent with development in the surrounding area and Downtown Los Angeles as a whole, although shorter than the Project building. Also similar to the Project, Alternative 3B would be designed in a contemporary architectural style that would incorporate a variety of buildings materials and façade articulation, with a podium extending over the on-site Metro portal, although the shifted footprints of the stacked building volumes would not vary to the same extent as the Project. Proposed landscaping and open space areas, including the ground floor paseo, would also improve the visual environment on-site. Furthermore, like the Project, proposed signage would comply with the standards and goals of the Historic Broadway Sign Supplemental Use District and complement the building architecture. Nonetheless, the visual character impacts associated with Alternative 3B would be slightly reduced compared to those of the Project due to the shorter building height.

(c) Light and Glare

Similar to the Project, lighting associated with Alternative 3B would comply with applicable City requirements, including LAMC lighting standards, as well as current energy standards and codes. Exterior lighting would be shielded and/or directed toward Project Site areas to minimize light spillover onto adjacent sensitive uses. Also like the Project, the proposed lighting sources would not generate artificial light levels that are out of character with the surrounding area, which is densely developed and characterized by a high degree of human activity and ambient light during the day and night. With respect to glare, glass used in the building façade would be low-reflective in order to minimize glare from reflected sunlight, and all vehicular parking would be contained within the existing parking structure. As such, impacts related to light and glare would be substantially similar to the Project's impacts.

(d) Shading

With regard to shading, the reduced building height of Alternative 3B would produce shorter shadows than the Project. Thus, shading impacts under Alternative 3B would be less than those of the Project.

(e) Conclusion

Based on the above, impacts with respect to aesthetics/visual character, views, and shading would be reduced compared to the Project while light and glare impacts would be substantially similar. Furthermore, pursuant to SB 743 and ZI No. 2452, such impacts would not be considered significant.

b. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

As with the Project, construction of Alternative 3B has the potential to create air quality impacts through the use of heavy-duty construction equipment, vehicle trips generated from construction workers traveling to and from the Project Site, and fugitive dust emissions resulting from earthwork and construction activities. As discussed in Section IV.B, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Under Alternative 3B, the overall amount of construction would be reduced in comparison to the Project due to the reduction in floor area of 88,591 square feet, and the duration of construction would be slightly reduced, as summarized in Appendix P of this Draft EIR. Similarly, the maximum intensity of construction activity, including the equipment mix, number of construction workers, and daily truck trips, would be reduced compared to the Project, specifically during the building construction phase. Regardless, construction-related air emissions are largely driven by earthwork activities, which would be the same under Alternative 3B as under the Project given the similar grading and excavation work required. As such, regional and localized impacts associated with the maximum daily earthwork would be similar to the Project, as maximum daily conditions are used for measuring significance. Therefore, impacts associated with regional and localized construction emissions under Alternative 3B would be less than significant and similar to the Project's less-than-significant impacts.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 3B would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.B, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. Given the similar amount and

intensity of earthwork, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 3B would be similar to the less-than-significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Similar to the Project, operational regional air pollutant emissions associated with Alternative 3B would be generated by vehicle trips to/from the Project Site and the consumption of electricity and natural gas. Although Alternative 3B would include less overall floor area than the Project, it would involve more office space, slightly more retail space, and no residential uses, which together would generate fewer daily trips (3,814 trips) than the Project (4,006 trips). As vehicular emissions depend on the number of trips, the overall pollutant emissions generated by this Alternative would be less than the emissions generated by the Project. With the overall reduction in development, both area sources and stationary sources would generate less on-site operational air emissions compared to the Project, as shown in Appendix P of this Draft EIR.

Therefore, under Alternative 3B, total contributions to regional air pollutant emissions during operation would be less than under the Project. Accordingly, regional air quality impacts under Alternative 3B would be less than significant and less than the less-than-significant impacts of the Project.

With regard to on-site localized emissions, like the Project, Alternative 3B would not introduce any major new sources of air pollution within the Project Site. Given the reduction in total floor area, fewer on-site operational air emissions would be generated compared to the Project, and impacts would be reduced accordingly, as also shown in Appendix P of this Draft EIR. Therefore, also similar to the Project, localized impacts from on-site emission sources associated with Alternative 3B would be less than significant. Localized operational impacts from mobile sources are determined primarily by peak-hour intersection traffic volumes. As discussed below, Alternative 3B would result in one more trip during the A.M. peak period than the Project and two fewer trips during the P.M. peak period. Because the localized carbon monoxide (CO) hotspot analysis for the Project did not result in any significant impacts and given the negligible difference in peak-hour trips, localized impacts under Alternative 3B also would be less than significant. Overall, localized air quality impacts would be less than those of the Project.

(b) Toxic Air Contaminants

As discussed in Section IV.B, Air Quality, of this Draft EIR, the primary sources of air toxics associated with Project operations include diesel particulate matter from delivery

trucks. Under Alternative 3B, the number of deliveries and associated diesel particulate matter emissions would be reduced compared to the Project due to the overall decrease in development. Similar to the Project, the uses associated with Alternative 3B are not considered land uses that generate substantial TAC emissions. Also similar to the Project, Alternative 3B would not release substantial amounts of TACs and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Thus, TAC impacts under Alternative 3B would be less than significant and less than the less-than-significant impacts of the Project.

c. Cultural Resources

(1) Historical Resources

As previously discussed, there are no historic resources on the Project Site; however, there are seven known historic resources within one block of the Project Site. Although Alternative 3B would introduce a new visual element to the area, the proposed building would be physically separated from the Douglas Building and the Victor Clothing Company by a parking garage and surface parking lots and from the Times-Plant Complex, the Mirror Building, the Executive Building, the Higgins Building, and the Irvine-Byrne Building by West 2nd Street, South Spring Street, and South Broadway. As with the Project, Alternative 3B would not result in a substantial adverse change to the immediate surroundings of the nearby historic resources to a degree that their integrity or significance as resources would be materially impaired. As the Irvine-Byrne Building and Victory Clothing Company (located south of the Project Site) are the two northernmost contributors to the Broadway Theater and Commercial District, Alternative 3B also would not impair the Historic District. The historic buildings that are individually significant, as well as the Historic District, would continue to be eligible for listing as historic resources defined by CEQA. As such, the Alternative would not cause direct or indirect impacts to historic resources. Impacts to historic resources would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Archaeological Resources

As previously described, similar to the Project, Alternative 3B would require excavation of up to 25 feet below ground surface in portions of the Project Site outside of Metro's excavation area. Accordingly, excavation activities would be largely limited to the disturbance of artificial fill and unlikely to encounter sensitive subsurface materials (i.e., native, undisturbed soils with a potential to contain resources). As such, the potential to uncover subsurface archaeological resources during construction of Alternative 3B would be similar to the Project. Impacts to archaeological resources would be less than significant and similar to the less-than-significant impacts of the Project.

(3) Paleontological Resources

Similar to the Project, Alternative 3B would require excavation of up to 25 feet below ground surface in portions of the Project Site outside of Metro's excavation area. Accordingly, excavation activities would be largely limited to the disturbance of artificial fill and unlikely to encounter sensitive subsurface materials, and the possibility of discovering paleontological artifacts that were not recovered during prior construction or other human activity would be low. Nevertheless, as is the case with the Project, the potential to uncover previously unidentified paleontological resources remains. This potential impact would be reduced to a less-than-significant level with mitigation. Therefore, impacts to paleontological resources under Alternative 3B would be similar to the less-than-significant with mitigation impacts of the Project.

d. Greenhouse Gas Emissions

As discussed in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, the significance of GHG impacts is determined based on compliance with a GHG emissions reduction plan. Similar to the Project, Alternative 3B would be designed to comply with the requirements of the CALGreen Code, SCAG's 2016–2040 RTP/SCS, CARB's *Climate Change Scoping Plan*, the City of Los Angeles' LA Green Plan/ClimateLA and Sustainable pLAn, and the Los Angeles Green Building Code. Also like the Project, Alternative 3B would include sustainable design components such as drought tolerant landscaping, energy efficient lighting, electric vehicle charging infrastructure, and permeable pavement in the paseo. With regulatory compliance and implementation of comparable sustainability features, Alternative 3B would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans, similar to the Project. However, an emissions comparison indicates Alternative 3B would generate fewer GHG emissions than the Project, as shown in Appendix P of this Draft EIR. GHG emissions from a development project are determined in large part by the number of daily trips generated and energy consumption from proposed land uses. Under Alternative 3B, the trip generation and energy and water consumption would be reduced compared to the Project due to the reduction in development. As such, the amount of GHG emissions generated by Alternative 3B would be less than under the Project. Accordingly, Alternative 3B would better meet regulatory goals/targets to reduce GHG emissions. Thus, impacts related to GHG emissions under Alternative 3B would be less than significant and less than the less-than-significant impacts of the Project.

e. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners would be used, handled, and stored on the Project Site during construction of Alternative 3B, requiring proper management and disposal. The use of such materials would be slightly less than under the Project due to the reduced amount of construction. Nevertheless, like the Project, Alternative 3B would fully comply with all applicable federal, state, and local requirements, as well as manufacturers' instructions concerning the use, handling, storage, and disposal of hazardous materials. As discussed in detail in Section IV.E, Hazards and Hazardous Materials, of this Draft EIR, several USTs have been removed from the site in the past. In addition, residual contamination of soil and/or groundwater as a result of a former release (which received a no further action letter) is present on-site and, based on an evaluation of past sampling results, exceeds current cleanup standards for certain contaminants. Grading and excavation could uncover or disturb any previously unknown or unidentified USTs or residual contamination, including soil and/or groundwater that was determined to be within historical cleanup standards but may now exceed current standards. Similar to the Project, such impacts would be mitigated to a less-than-significant level.

Based on the age of the parking structure, ACMs and LBP are unlikely to be encountered on the Project Site. Nevertheless, in the event ACMs or LBP are encountered on-site, such materials would be handled in accordance with all applicable regulations and requirements.

Like the Project, Alternative 3B would require excavation to depths up to 25 feet and is not expected to encounter groundwater, which occurs on-site at a depth of approximately 110 to 140 feet below ground surface. If construction dewatering is required, or if groundwater is encountered, it is anticipated to be short-term and limited to shallow/ perched groundwater. Any groundwater encountered would be sampled for possible contamination and handled in accordance with applicable groundwater discharge requirements.

Based on the above, potential construction-related impacts under Alternative 3B would be less than significant with mitigation, and slightly less than the Project's less-than-significant impacts with mitigation of the Project due to the reduced level of construction activities and associated use of hazardous materials.

(2) Operation

Similar to the Project, Alternative 3B would not include the use of materials containing ACM, LBP, or PCBs and would not involve the installation of any USTs. However, also like the Project, Alternative 3B may include the installation of ASTs for use with emergency generators. If ASTs are included, their installation would comply with all applicable regulatory requirements. Additionally, the operation of Alternative 3B would involve the limited use of potentially hazardous materials typical of those used in commercial developments, including cleaning agents, paints, pesticides, and other materials used for landscaping. Such use would be slightly reduced compared to the Project due to the overall reduction in development. In addition, as with the Project, all hazardous materials on the Project Site would be acquired, handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, state, and local requirements.

Based on the above, potential impacts related to hazards and hazardous materials during operation of Alternative 3B would be less than significant and less than the Project's less-than-significant impacts due to the decrease in development and associated use of hazardous materials.

f. Land Use

(1) Land Use Consistency

As previously described, Alternative 3B would develop office and retail uses, but no residential uses, with less overall floor area than the Project. Accordingly, the floor area ratio and density would be reduced compared to the Project; specifically, the Project Site would have an FAR of 5.08:1 (including the Metro portal), compared to the Project's FAR of 5.83:1. Nonetheless, similar to the Project, with approval of the other discretionary approvals and implementation of design features discussed throughout this Draft EIR (which would also be implemented as part of Alternative 3B to the extent applicable), Alternative 3B would be generally consistent with the overall intent of the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site, including the City's General Plan, the Community Plan, and the LAMC. Thus, impacts related to land use consistency would be less than significant and generally similar to the less-than-significant impacts of the Project.

(2) Land Use Compatibility

Alternative 3B includes similar office and retail uses to the Project, which would be compatible with and would complement existing and future office and retail development in the surrounding area and would not substantially or adversely change the existing land use

relationships between the Project Site and adjacent properties. Furthermore, like the Project, Alternative 3B would not physically divide an established community. As such, impacts associated with land use compatibility would be less than significant and similar to the less-than-significant impacts of the Project.

g. Noise

(1) Construction

Alternative 3B would involve the same general phases of construction as the Project (i.e., demolition, site grading and excavation, foundation, building construction, and paving/concrete/landscape installation). As with the Project, construction of Alternative 3B would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Due to the reduction in development associated with Alternative 3B, the amount and the overall duration of construction would be reduced. However, as summarized in Appendix P of this Draft EIR, the maximum daily intensity of construction activities (based on equipment mix) under Alternative 3B would be similar to that of the Project during the demolition, grading/excavation, and paving/concrete/ landscape installation phases, all of which would generate greater noise at the nearest sensitive receptor (Receptor Location R6, where a significant Project impact was identified) than the building construction phase. Accordingly, maximum on-site construction noise and vibration levels at Receptor R6 during the noisiest phases would be similar to the Project. Moreover, since Alternative 3B would require the same amount of excavation and soil export as the Project as well as similar foundation work, the number of haul trips during the grading/excavation and foundation phases (i.e., two of the phases involving the highest number of construction trucks)) would be similar. Therefore, noise and vibration impacts due to off-site truck trips under Alternative 3B would be similar to those occurring under the Project. Alternative 3B would comply with the same applicable regulatory requirements and implement the same project design features and mitigation measures as the Project to reduce on-site noise and vibration levels. As with the Project, construction of Alternative 3B would result in significant and unavoidable impacts with respect to on-site construction noise, on- and off-site construction vibration (related to human annoyance), and cumulative impacts with respect to on- and off-site construction noise and off-site construction vibration (related to human annoyance).[30,31]

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[30] *The Project's on-site construction noise impact and on-site construction vibration impact (with respect to human annoyance) would only be significant and unavoidable if Related Project No. 121 (Times Mirror Square project) is completed and occupied before or during Project construction.*

[31] *Cumulative on-site construction noise impacts would only be significant and unavoidable if construction of Related Project No. 121 (Times Mirror Square project) occurs concurrently with Project construction.* *(Footnote continued on next page)*

(2) Operation

As discussed in Section IV.G, Noise, of this Draft EIR, sources of operational noise under the Project include: (a) on-site stationary noise sources, including outdoor mechanical equipment, loading dock and trash compactors, parking, and activities within the proposed outdoor spaces; and (b) off-site mobile (roadway traffic) noise sources. Alternative 3B would introduce noise from similar on- and off-site sources as the Project, although noise associated with the use of outdoor spaces would be reduced since the outdoor pool and residential amenity decks would not be developed. Additionally, it is anticipated that with the overall reduction in floor area, the amount of building mechanical equipment and associated noise levels would be reduced. Similar to the Project, on-site mechanical equipment used during operation of Alternative 3B would comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. In addition, as the loading dock and trash collection areas for Alternative 3B would have a similar design and location as the Project, noise impacts from loading and trash collection activities would be similar to the Project. Overall, operational on-site noise impacts would be less than significant and less than the less-than-significant impacts of the Project.

With regard to off-site noise sources, Alternative 3B would result in a reduction in daily vehicle trips compared to the Project as discussed further below. The reduction in vehicle trips would result in a decrease in off-site traffic-related noise levels under Alternative 3B. As with the Project, off-site noise impacts under Alternative 3B would be less than significant.

h. Population, Housing, and Employment

(1) Construction

As discussed in Section IV.H, Population, Housing, and Employment, of this Draft EIR, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by a particular development. Many construction workers are highly specialized (e.g., crane operators, steel workers, masons) and move from job site to job site as dictated by the demand for their skills. With the reduced amount of construction under Alternative 3B

Additionally, should peak construction traffic associated with the Times Mirror Square project be completed prior to commencement of Project construction, the cumulative off-site construction noise impact may not occur.

compared to the Project, fewer total construction workers would be needed, specifically during the building construction phase. Therefore, population impacts related to household growth in the City of Los Angeles or the SCAG region as a result of construction worker relocation under Alternative 3B would be less than significant and less than the less-than-significant impacts of the Project

(2) Operation

As previously described, Alternative 3B would develop 580,000 square feet of office uses and 10,000 square feet of retail uses, but unlike the Project, would not include residential uses. As such, this Alternative would not contribute directly to population growth in the region. However, this Alternative would not advance the City's goal of generating more housing for the region in a developed, infill location.

The proposed office and retail uses would generate an estimated 2,527 employees, which is more than the 2,322 employees generated by the Project.[32] Many of these positions are likely be filled by persons already residing in the vicinity of Downtown or in neighboring areas/cities and who generally would not relocate their households due to such employment opportunities. In the event some jobs are filled by persons from outside the area who relocate for their job, limited indirect population growth and associated housing demand could occur, and such demand would be slightly more than under the Project. However, this demand could be met by existing vacancies in the surrounding housing market, as well as by the substantial number of new units currently planned Downtown. As such, similar to the Project, Alternative 3B would not induce substantial population growth or exceed SCAG's population forecast for the City or the SCAG region.

Overall, impacts related to population, housing, and employment under this Alternative would be less than significant and less than less-than-significant impacts of the Project due to the lack of residential uses and associated population growth.

[32] *Based on employment generation rates of 4.31/1,000 square feet of office space (Large High Rise Commercial Office category) and 2.71/1,000 square feet of commercial retail space (Neighborhood Shopping Center category); source: Los Angeles Unified School District's 2016 Developer Fee Justification Study, Table 15, March 2017.*

i. Public Services

(1) Police Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 3B would be similar to those of the Project. However, the overall duration of construction would be slightly reduced compared to the Project due to the reduced amount of development. Alternative 3B would implement the same project design feature as the Project, which includes temporary security measures such as fencing, lighting, and locked entry to reduce the potential for theft and vandalism on the Project Site, thereby reducing the demand for police protection services. Construction activities under Alternative 3B could also affect emergency response for police vehicles along adjacent streets due to delays caused by traffic during the construction phase. However, given the permitted hours of construction and the nature of construction projects, most, if not all, of the construction worker trips would occur outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. In addition, as with the Project, a Construction Traffic Management Plan, including a worksite traffic control plan, would be implemented during construction to ensure adequate and safe access is available within and near the Project Site during construction activities. Furthermore, CVC Section 21806 allows drivers of emergency vehicles to use a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, construction-related impacts to police protection services under Alternative 3B would be less than significant and similar to the less-than-significant impacts of the Project, although the construction duration would be slightly shorter.

(b) Operation

Based on 580,000 square feet of office uses and 10,000 square feet of retail uses, as well as the police service population factors provided in the *L.A. CEQA Thresholds Guide*, Alternative 3B would generate a police service population of approximately of approximately 2,350 persons consisting solely of employees. This estimate is less than the Project's estimated police service population of 2,492 persons and would not include a residential population. Therefore, Alternative 3B would increase the demand for police services provided by the Central Community Police Station, but to a lesser extent than the Project. Additionally, Alternative 3B would not affect the current officer-to-resident ratio for the Central Area. Furthermore, Alternative 3B would implement the same project design features as the Project requiring on-site security features, appropriate security lighting, and the prevention of concealed spaces. The project design features would help offset the increase in demand for police protection services generated by Alternative 3B.

Furthermore, as discussed in Section IV.I.1, Public Services—Police Protection, of this Draft EIR, consistent with the *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police services is the responsibility of the City; at this time, LAPD has not identified the need for any new station construction due to development in the service area. Thus, as with the Project, Alternative 3B would not result in the need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service. Moreover, although traffic generated by Alternative 3B would have the potential to affect emergency vehicle response to the Project Site and surrounding properties due to delays caused by the additional traffic, drivers of police emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Therefore, the impact on police protection services would be less than significant and less than the less-than-significant impacts of the Project since the police service population generated by Alternative 3B would be reduced.

(2) Fire Protection

(a) Construction

Similar to the Project, construction activities under Alternative 3B would have the potential to result in accidental fires from such sources as the operation of mechanical equipment and the use of flammable construction materials. However, in compliance with OSHA and Fire and Building Code requirements, construction managers and personnel would be trained in emergency response and fire safety operations. Additionally, fire suppression equipment specific to construction would be maintained on-site. Construction would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous waste. Thus, compliance with regulatory requirements would effectively reduce the potential for construction activities to expose people to the risk of fire or explosion, including that related to hazardous materials.

Additionally, access to the Project Site and the surrounding vicinity could be impacted by construction activities under Alternative 3B, such as temporary lane closures, roadway/access improvements, and the construction of utility line connections. Furthermore, construction activities would generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic, which could temporarily affect emergency response for emergency vehicles along adjacent streets. However, as with the Project, construction worker and haul truck trips would be expected to occur largely outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for

traffic-related conflicts. Additionally, like the Project, a Construction Traffic Management Plan would be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Furthermore, CVC Section 21806 allows drivers of emergency vehicles to use a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, construction-related impacts related to fire protection services under Alternative 3B would be less than significant and similar to the less-than-significant impacts of the Project, although the construction duration would be slightly shorter.

(b) Operation

As discussed in Section IV.I.2, Public Services—Fire Protection, of this Draft EIR, the Project Site would be served by Fire Station No. 9, the "first-in" station, located approximately 1 mile to the southwest. Fire Station Nos. 4, 10, 3, and 11 would also be available to serve Alternative 3B in the event of an emergency. Based on categorization as an Industrial and Commercial land use like the Project, Alternative 3B would meet the required response distance from a fire station with an engine and truck company. However, based on the reduced floor area and associated occupancy of the Alternative, the demand for fire protection and emergency medical services would be reduced compared to the Project. With respect to response times, similar to the Project, emergency access would be maintained, and traffic generated by Alternative 2 would not impair the LAFD from responding to emergencies at the Project Site or the surrounding area. Average response times are anticipated to continue to meet National Fire Protection Association (NFPA) response time standards, which although not formally adopted are not considered deficient. In addition, similar to the Project, Alternative 3B would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Also like the Project, the Alternative would implement a project design feature involving the installation of a fire flow pump system, as needed, in order to meet water pressure demands. Furthermore, as discussed in Section IV.I.2, Public Services—Fire Protection, of this Draft EIR, consistent with the *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate fire protection services is the responsibility of the City; at this time, LAFD has not identified the need for any new station construction due to development in the service area. Therefore, impacts related to fire protection services would be less than significant under Alternative 3B and less than the less-than-significant impacts of the Project due to the reduction in floor area.

(3) Schools

(a) Construction

Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by Alternative 3B. Therefore, the construction employment generated by Alternative 3B would not result in a notable increase in the residential population or a corresponding demand for schools in the vicinity of the Project Site. Impacts on school facilities during construction under Alternative 3B would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

As Alternative 3B does not include the development of residential uses, it would not directly generate school-aged children and a corresponding demand for school services. Therefore, implementation of Alternative 3B would not result in a direct increase in the number of students within LAUSD's service area. However, as shown in Appendix P of this Draft EIR, the proposed office and retail uses would be expected to generate 568 students, consisting of 308 elementary school students, 83 middle school students, and 176 high school students, which is comparable to the 569 students generated by the Project. Furthermore, pursuant to SB 50, the Applicant would be required to pay development fees to the LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of project-related school impacts. Therefore, payment of applicable development school fees to the LAUSD would offset the impact of additional student enrollment at schools serving the Project area. Impacts related to schools would be less than significant under Alternative 3B and similar to the less-than-significant impacts of the Project.

(4) Libraries

(a) Construction

As previously discussed, construction workers are not likely to relocate their households as a consequence of construction. Therefore, construction employment generated by Alternative 3B would not result in a notable increase in the residential population or a corresponding demand for library services in the vicinity of the Project Site.

In addition, it is unlikely that construction workers would visit libraries near the Project Site on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times

are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. As such, impacts to library facilities and services during construction of Alternative 3B would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

Alternative 3B would result in more on-site employees than the Project (i.e., 2,527 employees vs. 2,322 employees). However, residents are considered the primary users of library facilities, and as discussed previously, Alternative 3B does not include residential uses. Thus, while indirect demand for library services would be greater than the Project under Alternative 3B, direct demand for library services would be less. Overall, impacts would be less than significant and less than under the Project.

(5) Parks and Recreation

(a) Construction

As discussed previously, the likelihood that construction workers would relocate their households as a consequence of working on-site is negligible. Therefore, the construction workers associated with Alternative 3B would not result in a notable increase in the residential population in the Project vicinity or a corresponding permanent demand for parks and recreational facilities in the vicinity.

As with the Project, during construction of Alternative 3B, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. Furthermore, while there is a potential for construction workers to spend their lunch breaks at the parks and recreational facilities near the Project Site, lunch breaks typically are not long enough for workers to take advantage of such facilities and return to work within the allotted time (e.g., 30 to 60 minutes). Therefore, it is unlikely that construction workers would utilize nearby parks and recreational facilities during construction of Alternative 3B.

In addition, as with the Project, construction of Alternative 3B would not be expected to result in access restrictions to City parks and recreation facilities in the vicinity of the Project Site, nor interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity.

Based on the above analysis, construction of Alternative 3B would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services or interfere with existing park usage. Therefore, impacts on parks and recreational facilities during construction of Alternative 3B would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

Alternative 3B would not generate residents who would utilize nearby parks and/or recreational facilities. In addition, while it is possible that employees of Alternative 3B may utilize local parks and recreational facilities during their time spent at work, employees are more likely to utilize parks and recreational facilities near their places of residence. Therefore, Alternative 3B would result in a reduced demand for public parks and recreation services compared to the Project, and operation of Alternative 3B would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services or interfere with existing park usage. Impacts to park and recreation facilities would be less than significant under Alternative 3B and less than the less-than-significant impacts of the Project.

j. Transportation/Traffic

(1) Construction

As with the Project, construction of Alternative 3B would generate trips from heavy-duty construction equipment, haul trucks, and construction worker trips. While the duration of construction would be slightly shorter than under the Project, the intensity of construction activity, including the equipment mix, number of construction workers, and daily truck trips, would be reduced compared to the Project, specifically during the building construction phase, as summarized in Appendix P of this Draft EIR. Given that the building construction phase involves the greatest number of construction workers (by far, compared to the other construction phases), this phase would still represent the maximum potential for traffic impacts, similar to the Project. Also like the Project, Alternative 3B would implement a Construction Traffic Management Plan that would require construction-related trips to be scheduled outside of commuter weekday peak hours to the extent feasible. Therefore, construction-related activities would not contribute a substantial amount of traffic during the weekday morning and afternoon peak periods. As with the Project, construction traffic associated with Alternative 3B would not result in any significant traffic impacts at the study intersections during peak construction activities, and such impacts would be reduced compared to the Project based on the reduced number of haul trips and construction workers.

Like the Project, construction of Alternative 3B may involve temporary lane closures. Alternative 3B would implement similar project design features as the Project, which include a Construction Traffic Management Plan to ensure pedestrian and traffic safety and access. Therefore, as with the Project, access and safety impacts during construction would be less than significant.

(2) Operation

The following discussion is based on the Alternatives Traffic Memo provided in Appendix P of this Draft EIR.

Alternative 3B is estimated to generate 3,814 daily trips with 561 A.M. peak-hour trips (493 inbound/68 outbound) and 539 P.M. peak-hour trips (98 inbound/441 outbound). In comparison with the Project, this represents more inbound trips and fewer outbound trips during the weekday A.M. peak hour (but a total of only one more trip), fewer inbound trips and more outbound trips during the weekday P.M. peak hour (but a total of only two fewer trips), and fewer trips over a 24-hour weekday daily period. In order to determine the operating conditions of the street system, traffic associated with Alternative 3B was assigned to the local roadway system based on trip distribution and assignment characteristics consistent with the Project.

(a) Existing Conditions With Alternative 3B

Alternative 3B would result in significant impacts to the same three intersections as the Project under Existing With Alternative 3B conditions (i.e., Intersection Nos. 5, 8, and 9). Similar to the Project, impacts at Intersection Nos. 8 and 9 could be mitigated to a less-than-significant level; however, the impact at Intersection No. 5 during the P.M. peak hour would be significant and unavoidable.

(b) Future Conditions With Alternative 3B

The Future With Alternative 3B scenario would result in significant impacts to the same four intersections as the Project (i.e., Intersection Nos. 5, 8, 9, and 31). As is the case with the Project, when mitigation is applied, the significant impacts at Intersection Nos. 9 and 31 would be reduced to a less-than-significant level. However, the significant impacts at Intersection No. 5 during the P.M. peak hour and Intersection No. 8 during the A.M. peak hour would remain. Therefore, impacts with respect to intersection level of service under Alternative 3B would remain significant and unavoidable, and such impacts would be the same as under the Project.

(c) Regional Transportation System, Access and Circulation, and Bicycle, Pedestrian, and Vehicular Safety

With the reduced number of trips and smaller on-site population, impacts to the regional transportation system, access and circulation, and bicycle, pedestrian, and vehicular safety would be less than the less-than-significant impacts of the Project.

k. Tribal Cultural Resources

As previously discussed, Alternative 3B would require excavation to depths of up to 25 feet in portions of the Project Site outside of Metro's excavation area, similar to the Project. Therefore, the potential for Alternative 3B to uncover subsurface tribal cultural resources would be similar to that of the Project. As discussed in Section IV.K, Tribal Cultural Resources, of this Draft EIR, no confirmed Native American resources have been identified within the Project area or a surrounding 0.5-mile search radius. More specifically, following written notification of the Project by the City on January 6, 2017, government-to-government consultation was requested by the Gabrieleño Band of Mission Indians—Kizh Nation on January 10 and initiated by the City on March 23, 2017. Upon review of the documents submitted during the subsequent consultation, the City, acting in good faith and after a reasonable effort, did not find substantial evidence of an existing tribal cultural resource within the Project area. Based on their correspondence, the City concluded that mutual agreement could not be reached between the Tribe and City for purposes of AB 52, and as such, the City closed the tribal consultation on October 19, 2018, in fulfillment of its AB 52 requirements. The Tribe responded to the City (on the same day) and requested that the Tribe be consulted if the Project results in ground disturbance. The City responded on November 15, 2018, and confirmed that consultation for the Project had occurred and closed. Additionally, the City responded that the Tribe may submit comments on the EIR as long as the comments are received prior to approval of the document. Furthermore, monitoring of Metro's construction site has not yielded any Native American cultural resources. This information suggests that subsurface conditions within the Project Site have little potential to support the presence of unanticipated cultural resources or tribal cultural resources. While the City has no basis under CEQA to impose any related mitigation measures, the City has established a standard condition of approval under its police power and land use authority to address any inadvertent discovery of a tribal cultural resource. For purposes of this analysis, it is assumed the City would impose this condition on the Project, or any alternative to the Project, as part of its land use approvals. Accordingly, impacts to tribal cultural resources would be less than significant and similar to the impacts of the Project.

I. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar the Project, construction activities associated with Alternative 3B would generate a short-term demand for water. This demand would be less than the Project's due to the reduction in the amount and duration of construction under Alternative 3B. As evaluated in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of construction. Since the water demand for construction activities would be reduced, the temporary and intermittent demand for water during construction under Alternative 3B would also be expected to be met by the City's available water supplies. Similarly, the existing LADWP water infrastructure would be adequate to provide the water flow necessary to serve Alternative 3B.

Furthermore, as with the Project, the design and installation of new service connections under Alternative 3B would be required to meet applicable City standards. The connections and installation of on-site water distribution lines would primarily involve trenching to place the lines below ground, which could temporarily affect access in adjacent rights-of-way. However, as previously discussed and like the Project, a Construction Traffic Management Plan would be implemented to ensure adequate and safe access remains available within and near the Project Site during construction. Therefore, impacts on water supply and infrastructure associated with short-term construction activities would be less than significant under Alternative 3B and would be less than the less-than-significant impacts of the Project.

(b) Operation

Based on 580,000 square feet of office uses, 10,000 square feet of retail uses, a fitness center, common rooms, new landscaping, and a cooling tower, and using LASAN wastewater generation rates and information provided by LADWP, Alternative 3B would result in an estimated demand for approximately 154,973 gpd prior to required water savings, as shown in Appendix P of this Draft EIR, which is less than the Project's water demand of 157,106 gpd. As concluded in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, and the WSA prepared for the Project, the estimated water demand for the Project would not exceed the available supplies projected by LADWP. Therefore, the estimated water demand under Alternative 3B would also be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040. In addition, the existing water distribution infrastructure

would be adequate to serve Alternative 3B since the water demand would be lower than that of the Project. Furthermore, the Applicant would construct the necessary on-site water infrastructure and off-site connections to the LADWP water system pursuant to applicable City requirements under Alternative 3B to accommodate the new building. Thus, impacts to water supply under Alternative 3B would be less than significant and less than the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, during construction of Alternative 3B, existing sewer laterals would be capped and no sewage would enter the public sewer system. Temporary facilities such as portable toilet and hand wash areas would be provided by the contractor at the Project Site, and sewage from these facilities would be collected and hauled off-site. As such, wastewater generation from construction activities associated with Alternative 3B would not cause a measurable increase in wastewater flows.

Additionally, as with the Project, Alternative 3B may include construction activities associated with the installation of new or relocated sewer connections. Such activities would be confined to trenching in order to place the sewer lines below surface and would be limited to the on-site wastewater conveyance infrastructure and minor off-site work associated with connections to the City's sewer lines in the streets adjacent to the Project Site. Similar to the Project, a Construction Traffic Management Plan would be implemented during the construction of Alternative 3B to reduce impacts to pedestrian and traffic flow, including emergency vehicle access, which could occur due to temporary off-site utility work. Therefore, construction-related impacts to the wastewater system under Alternative 3B would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

Based on 580,000 square feet of office uses, 10,000 square feet of retail uses, a fitness center, common rooms, new landscaping, and a cooling tower, and using LASAN wastewater generation rates, Alternative 3B would generate an estimated 102,712 gpd of wastewater, as shown in Appendix P of this Draft EIR, which is slightly less than the 108,749 gpd generated by the Project. As provided in Section IV.L.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the Project-generated wastewater could be accommodated by the existing capacity of the HWRP. Therefore, since the wastewater generated by Alternative 3B would be less than that of the Project, wastewater generated by Alternative 3B could also be accommodated by the existing capacity of the HWRP, and impacts with respect to treatment capacity would be less than significant.

Also like the Project, sewer service for Alternative 3B would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site. Given that Alternative 3B would result in reduced wastewater generation compared to that of the Project, it is anticipated that there would be sufficient capacity within the sewer main lines serving the Project Site to serve Alternative 3B. Furthermore, additional detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for Alternative 3B during the permitting process. All related sanitary sewer connections and on-site infrastructure under Alternative 3B would be designed and constructed in accordance with applicable standards.

Thus, impacts with regard to wastewater generation and infrastructure capacity under Alternative 3B would be less than significant and less than the less-than-significant impacts of the Project.

(3) Solid Waste

(a) Construction

Construction of Alternative 3B would involve demolition and building construction activities. The amount of demolition waste generated by Alternative 3B would be similar to the Project, while the amount of construction waste would be less due to the reduction in total floor area. Specifically, as shown in Appendix P of this Draft EIR, Alternative 3B would generate an estimated 4,247 tons of construction and demolition waste prior to recycling (1,062 tons when applying the 75 percent diversion rate specified in the project design features), compared to 4,454 tons with the Project (1,113 tons with diversion). Construction and demolition wastes would be recycled or collected by private waste haulers and taken to City-certified waste processing facilities for sorting and final distribution, including disposal at the County's unclassified landfill. Since construction and demolition waste would be hauled by a private construction contractor permitted by the City, Alternative 3B would not result in the need for an additional solid waste collection route. Similar to the Project, construction of Alternative 3B would not conflict with any applicable State or City solid waste regulations. As such, solid waste impacts during construction of Alternative 3B would be less than significant and less than the less-than-significant impacts of the Project

(b) Operation

During its operation, Alternative 3B would generate municipal solid waste typical of office and retail developments. Similar to the Project, solid waste generated by Alternative 3B would be recycled or collected by private waste haulers contracted by the Applicant and permitted by the City and taken for disposal at one of the County's Class III landfills open to

the City of Los Angeles. The transport of solid waste generated by Alternative 3B to waste management/disposal facilities would continue to occur along existing solid waste routes of travel. As such, as with the Project, Alternative 3B would not result in the need for additional solid waste collection routes to adequately handle waste generated by operations.

Alternative 3B would generate less solid waste than the Project due to the reduction in development and the elimination of residential uses. Specifically, as shown in Appendix P of this Draft EIR, Alternative 3B would result in an estimated 950 tons per year of solid waste (238 tons per year when factoring in 75 percent diversion per the project design features), which is less than the Project's solid waste generation of 1,109 tons per year (277 tons per year when factoring in 75 percent diversion). Therefore, because the existing landfills serving the Project Site have adequate capacity to accommodate the Project, they would also have capacity to accommodate Alternative 3B. In addition, since the solid waste generated by Alternative 3B would be less than that of the Project, Alternative 3B would not result in the need for an additional recycling or disposal facility to adequately handle waste generated. Furthermore, as with the Project, Alternative 3B would not conflict with applicable solid waste policies and objectives. As such, solid waste impacts during operation of Alternative 3B would be less than significant and less than the less-than-significant impacts of the Project.

m. Energy Conservation and Infrastructure

(1) Construction

Similar to the Project, construction activities associated with Alternative 3B would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. This energy demand would be reduced compared to the Project due to the reduction in the overall amount and duration of construction. In addition, LADWP has confirmed existing infrastructure and supplies in the Project area would be sufficient to serve the Project Site. Furthermore, as with the Project, construction activities would not use energy in a manner that is not wasteful, inefficient, or unnecessary and would not be expected to have an adverse impact on available energy resources or the existing infrastructure. Therefore, impacts on energy resources associated with short-term construction activities would be less than significant under Alternative 3B and less than the less-than-significant impacts of the Project.

(2) Operation

As with the Project, operation of Alternative 3B would generate demand for electricity, natural gas, and petroleum-based fuels relative to existing conditions, although

the overall demand would be less than the Project's due to the reduction in floor area. Specifically, as shown in Appendix P of this Draft EIR, Alternative 3B would consume an estimated 6,836 MWh of electricity and 5,211,324 cf of natural gas annually. In addition, Alternative 3B would generate fewer daily vehicle trips than the Project. Accordingly, under Alternative 3B, the total energy consumption would be less than that of the Project. Nonetheless, Alternative 3B would implement the same project design features as the Project, which would improve energy efficiency and reduce impacts related to the consumption of energy resources. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 3B would not be wasteful, inefficient, or unnecessary. Furthermore, Alternative 3B would be located in proximity to a variety of public transit options and would incorporate features to reduce vehicle trips, thereby reducing transportation fuel usage. Therefore, impacts to energy resources under Alternative 3B would be less than significant and less than the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above, Alternative 3B would not eliminate the Project's significant and unavoidable impacts related to on-site construction noise, on- and off-site construction vibration (related to human annoyance), and operational intersection levels of service.[33] Cumulative impacts with respect to on- and off-site construction noise and off-site construction vibration (related to human annoyance) would also remain significant and unavoidable.[34] All other impacts (aesthetics; air quality; cultural resources; GHG emissions; hazards and hazardous materials; land use; operational noise; population, housing, and employment; public services; other issues related to transportation/traffic; tribal cultural resources; utilities and service systems; and energy conservation and infrastructure) would be less than or similar to those of the Project.

[33] *The Project's on-site construction noise impact and on-site construction vibration impact (with respect to human annoyance) would only be significant and unavoidable if Related Project No. 121 (Times Mirror Square project) is completed and occupied before or during Project construction.*

[34] *Cumulative on-site construction noise impacts would only be significant and unavoidable if construction of Related Project No. 121 (Times Mirror Square project) occurs concurrently with Project construction. Additionally, should peak construction traffic associated with the Times Mirror Square project be completed prior to commencement of Project construction, the cumulative off-site construction noise impact may not occur.*

4. Relationship of the Alternative to Project Objectives

Alternative 3B would develop similar office and retail uses as the Project, but would not include any residential uses. As such, Alternative 3B would meet the underlying purpose of the Project to develop a former surface parking lot within a vibrant area of Downtown Los Angeles with a transit-oriented, high-density project that will generate new economic opportunities for the Downtown area, but would not meet the following Project objectives pertaining to residential uses:

- Revitalize a former surface parking lot to create a high-density mixed-use project with immediate proximity to existing and future transit lines, employment opportunities, shops, restaurants, and entertainment uses;
- Expand and diversify the supply of housing, retail, and commercial space within the Downtown area to further revitalize the northern end of the Broadway corridor.
- Provide new housing, retail, and commercial space with a balance of uses at a density consistent with the site's existing zoning designation to help meet market demands for housing and commercial space within the Downtown area.

Alternative 3B would meet the following Project objectives, though to a lesser extent than the Project because of the reduced amount of overall development:

- Maximize the Project's landscaped public open space at the grade level to create extensive pedestrian connections between the future station portal and the surrounding area;
- Reinforce public investment in and use of public transit by maximizing development density adjacent to existing and future major transit lines, including the Metro Regional Connector line;
- Maximize the creation of new construction jobs in the City with the development of a new high-rise building; and
- Maximize revenues to the City in the form of additional sales, business license, documentary transfer, and property taxes.

Alternative 3B would, however, fully meet the following Project objectives:

- Reconfigure the existing parking structure on-site to provide sufficient vehicle and long-term bicycle parking and ensure the parking needs of the Project's tenants and visitors are met, while avoiding an over-supply;

- Create a landmark high-rise project that complements the aesthetic character of the area through high quality urban planning and architectural design; and

- Incorporate the principles of smart growth and environmental sustainability by capitalizing on the Project Site's location within the established Downtown Los Angeles employment hub, proximity to transit and walkable streets, and the presence of existing infrastructure needed to service the proposed uses, while incorporating sustainable design components that emphasize resource conservation and efficiency.

Furthermore, Alternative 3B would meet the following Project objective to a slightly greater extent than the Project due to the minor increase in retail development:

- Enhance the pedestrian activity and street life in the area by providing ground floor retail uses and associated outdoor amenities that work harmoniously with the future station portal for the Metro Regional Connector line that will be located on the site.

Overall, Alternative 3B would not achieve the Project objectives to the same extent as the Project.

V. Alternatives

E. Alternative 4A: Residential Alternative A (With Podium)

1. Description of the Alternative

Alternative 4A, the Residential Alternative A (with podium), proposes a 56-story building of up to 569 feet in height, with 680 residential units comprised of 190 studio units, 257 one-bedroom units, 229 two-bedroom units, and 4 three-bedroom (penthouse) units, plus 10,000 square feet of ground floor retail uses. Alternative 4A would consist of a single tower over a podium, which would extend over the Metro portal. Based on a total of 708,306 square feet of floor area (including the Metro portal), the Project Site would have an FAR of 6.00:1.

Based on the number and size of dwelling units, Alternative 4A would provide at least 74,025 square feet of open space in accordance with LAMC requirements. Amenity decks offering a variety of social and community spaces would be provided on various levels and would include landscaped terraces, rooftop gardens, gathering spaces including barbeque and outdoor dining areas, and a swimming pool. Indoor recreational spaces would include a fitness center, two common rooms, and a lounge. Private balconies would be provided on various levels for some of the residences. In addition, to meet the open space requirement, some recreational facilities could be developed on the roof of the existing parking garage located in the southern portion of the Project Site.

The other aspects of Alternative 4A would be substantially similar to the Project. A landscaped passage or paseo would form a pedestrian pathway from the Metro portal across the site to Spring Street. Lighting would include low-level exterior lights at the perimeter of the building, in the canopy over the Metro portal, and in the paseo, as needed, for aesthetic, security, and wayfinding purposes. Signage would include general ground level and wayfinding pedestrian signage around the perimeter of the building and in the paseo, building identification signs, and other sign types, and Metro signage would be integrated with the overall signage concept. The existing parking structure would be reconfigured to provide vehicular and long-term bicycle parking spaces (plus additional short-term bicycle parking spaces to be provided outside and adjacent to the parking structure and the new building, as well as within the Metro plaza). A total of 635 of the vehicular spaces in the parking structure would be required tenant parking for Alternative 4A, and surplus parking spaces would continue to be available for other off-site uses.

Access to the parking structure would continue to occur via one existing driveway on Broadway and two existing driveways on Spring Street. In addition, one new driveway on Spring Street is proposed to access the loading area for the new building.

Similar to the Project, Alternative 4A would require grading and excavation to a maximum depth of 25 feet, including in areas of the Project Site where Metro is not excavating as part of its construction of the 2nd Street/Broadway rail station and portal. Construction of Alternative 4A would last approximately 57 months (compared to 39 months for the Project).

2. Environmental Impacts

a. Aesthetics (Visual Character, Views, Light/Glare, and Shading)

As previously discussed, like the Project, PRC Section 21099 and ZI No. 2452 apply to Alternative 4A. Therefore, like the Project, Alternative 4A cannot result in significant impacts to the environment with respect to aesthetic impacts. The following analysis regarding aesthetics/visual character, views, light and glare, and shading is provided for informational purposes only.

(1) Construction

(a) Views and Visual Character

Similar to the Project, while construction activities associated with Alternative 4A would alter the visual character of the Project Site as well as views of and across the Project Site on a short-term basis, the appearance of the site during construction would be typical of construction sites in urban areas, and aside from vertical building construction, not substantially different than existing conditions on-site (i.e., ongoing construction activities associated with Metro's rail station and portal). In addition, the Alternative would implement the same project design features as the Project, including the installation of temporary construction fencing along the periphery of the Project Site to screen construction activity from view at street level and the maintenance of any pedestrian walkways and construction fencing accessible or visible to the public in a visually attractive manner (i.e., free of trash, graffiti, and peeling postings and a uniform paint color or graphic treatment) throughout the construction period. While aesthetics/visual character and view impacts would be comparable to those of the Project, given the relative increase in building floor area and the taller building height, the duration of construction and associated impacts would last 18 months longer under this Alternative.

(b) Light and Glare

Light and glare associated with construction of Alternative 4A would not substantially alter the visual character of the Project area or adversely impact day or nighttime views. As with the Project, a project design feature would be implemented to ensure appropriate shielding of outdoor lighting during construction. Impacts related to artificial light and glare during construction would be comparable to those of the Project, although the duration of construction would be longer under this Alternative.

(c) Conclusion

Overall, while construction would alter the visual character of the Project Site on a temporary basis, construction activities associated with Alternative 4A would not substantially degrade the existing visual character or quality of the site and its surroundings. Impacts would be generally equivalent to those of the Project. In accordance with SB 743 and ZI No. 2452, any impact related to aesthetic character, visual resources, shade and shadow, light and glare, and scenic vistas would not be considered significant.

(2) Operation

(a) Views

As with the Project, the introduction of a high-rise building under Alternative 4A could affect short-range focal views, although to a greater extent given the taller building height (569 feet) as compared to the Project (449 feet). Given the presence of existing (and proposed) intervening development, including the existing parking structure on-site, substantial obstruction of public views of nearby visual resources would not be anticipated, similar to the Project. Regarding views of the Downtown Los Angeles skyline and San Gabriel Mountains, as is the case with the Project, the height and mass of the building would be visible and could intermittently block longer-range views from certain vantage points, but the proposed development would blend in and be consistent with Downtown's urban development, becoming part of the skyline.[35] However, given the increased building height, view impacts would be greater than under the Project.

[35] *It is noted that Related Project No. 121, located directly north of the Project Site across 2nd Street, involves a 37-story (495-foot) tower and a 53-story (665-foot) tower.*

(b) Visual Character

Like the Project, the height and scale of the proposed building under Alternative 4A would be consistent with development in the surrounding area and Downtown Los Angeles as a whole, although taller than the Project building. Also similar to the Project, Alternative 4A would be designed in a contemporary architectural style that would incorporate a variety of buildings materials and façade articulation, with a podium extending over the on-site Metro portal, although the tower would not incorporate as many shifted building volumes as the Project. As such, the building would exhibit less horizontal and vertical articulation to break up the building planes and reduce visual massing, although the height and massing of the building would still shift away from Broadway toward Spring Street. Proposed landscaping and open space areas, including the ground floor paseo, would also improve the visual environment on-site. Furthermore, like the Project, proposed signage would comply with the standards and goals of the Historic Broadway Sign Supplemental Use District and complement the building architecture. However, the visual character impacts associated with Alternative 4A would be greater compared to those of the Project due to the taller building height.

(c) Light and Glare

Similar to the Project, lighting associated with Alternative 4A would comply with applicable City requirements, including LAMC lighting standards, as well as current energy standards and codes. Exterior lighting would be shielded and/or directed toward Project Site areas to minimize light spillover onto adjacent sensitive uses. Also like the Project, the proposed lighting sources would not generate artificial light levels that are out of character with the surrounding area, which is densely developed and characterized by a high degree of human activity and ambient light during the day and night. With respect to glare, glass used in the building façade would be low-reflective in order to minimize glare from reflected sunlight, and all vehicular parking would be contained within the existing parking structure. As such, impacts related to light and glare would be substantially similar to the Project's impacts.

(d) Shading

With respect to shading, Alternative 4A would generate longer shadows than the Project due to the increased building height. However, given the number and density of mid- and high-rise buildings and the presence of mature trees throughout the urban Project area, shading is a common and expected occurrence. Like the Project, Alternative 4A would cast shadows on shade-sensitive uses, but such shadows would be limited and brief as they move throughout the day. Impacts from shading would be greater than under the Project.

(e) Conclusion

Based on the above, Alternative 4A would result in greater impacts related to aesthetics/visual character, views, and shading than the Project and similar impacts with respect to light and glare. However, pursuant to SB 743 and ZI No. 2452, such impacts would not be considered significant.

b. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

As with the Project, construction of Alternative 4A would generate air emissions through the use of heavy-duty construction equipment and haul truck and construction worker trips. The amount of excavation and soil export would be similar to the Project, resulting in a similar earthwork phase, but the intensity and duration of building construction would be greater due to the increased floor area and taller building height. Specifically, the intensity of activity on maximum activity days during building construction would be higher than under the Project, based on the equipment mix and number of haul truck trips, as summarized in Appendix P of this Draft EIR. As such, the intensity of air emissions and fugitive dust from site preparation and construction activities would be slightly higher on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, regional and localized impacts on these days would be greater than those of the Project. As also shown in Appendix P, construction emissions of most criteria pollutants under this Alternative would be slightly higher due to additional equipment and truck trips required during building construction activities. However, emissions would remain below significance thresholds. Therefore, impacts associated with regional and localized construction emissions under Alternative 4A would be less than significant but greater than the Project's less-than-significant impacts.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 4A would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.B, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. Given the similar amount and intensity of earthwork, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 4A would be similar to the less-than-significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Similar to the Project, operational regional air pollutant emissions associated with Alternative 4A would be generated by vehicle trips to/from the Project Site and the consumption of electricity and natural gas. As discussed further below, development of Alternative 4A would result in fewer daily trips than the Project. Accordingly, air emissions from vehicular sources would be less than under the Project. However, the operation of residential uses generate more emissions than office uses for certain pollutants. As shown in Appendix P of this Draft EIR, overall operational emissions of most criteria pollutants under Alternative 4A would be greater than under the Project due to the relative increase in residential floor area compared to the Project.

Specifically, in comparison to the Project, regional emissions of VOC, CO, SO_X, and $PM_{2.5}$ would be greater, while emissions of NO_X and SO_2 would be comparable and PM_{10} would be reduced. However, all of these emissions would fall below the regional significance thresholds for criteria pollutants. Therefore, like the Project, air quality impacts associated with regional operational emissions under Alternative 4A would be less than significant. Overall, impacts would be slightly greater than under the Project.

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 4A would not introduce any major new sources of air pollution within the Project Site. Nonetheless, as shown in Appendix P of this Draft EIR, localized emissions under Alternative 4A would be greater than the under Project mainly due to the increased amount of residential floor area. However, localized emissions under this Alternative would still fall below the significance thresholds. Therefore, localized impacts from on-site emission sources associated with Alternative 4A would also be less than significant although greater than those of the Project. Localized mobile source operational impacts are determined mainly by peak-hour traffic volumes. Based on the land uses proposed under Alternative 4A, the number of peak-hour trips generated would be less than under the Project. Therefore, localized mobile source emissions would be less than less-than-significant impacts of the Project.

(b) Toxic Air Contaminants

As discussed in Section IV.B, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations would be diesel particulate matter from delivery trucks. The residential and retail uses associated with Alternative 4A are not considered land uses that generate substantial TAC emissions. Furthermore, these uses are not associated with a substantial number of delivery trucks. Therefore, similar to the Project, Alternative 4A would not release substantial amounts of TACs and would be

consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Accordingly, as with the Project, potential TAC impacts under Alternative 4A would be less than significant and similar to the less-than-significant impacts of the Project.

c. Cultural Resources

(1) Historical Resources

As previously discussed, there are no historic resources on the Project Site; however, there are seven known historic resources within one block of the Project Site. Although Alternative 4A would introduce a new visual element to the area, the proposed building would be physically separated from the Douglas Building and the Victor Clothing Company by a parking garage and surface parking lots and from the Times-Plant Complex, the Mirror Building, the Executive Building, the Higgins Building, and the Irvine-Byrne Building by West 2nd Street, South Spring Street, and South Broadway. As with the Project, Alternative 4A would not result in a substantial adverse change to the immediate surroundings of the nearby historic resources to a degree that their integrity or significance as resources would be materially impaired. As the Irvine-Byrne Building and Victory Clothing Company (located south of the Project Site) are the two northernmost contributors to the Broadway Theater and Commercial District (Historic District), Alternative 4A also would not impair the Historic District. The historic buildings that are individually significant, as well as the Historic District, would continue to be eligible for listing as historic resources defined by CEQA. As such, Alternative 4A would not cause direct or indirect impacts to historic resources. Impacts to historic resources would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Archaeological Resources

As previously described, similar to the Project, Alternative 4A would require excavation of up to 25 feet below ground surface in portions of the Project Site outside of Metro's excavation area. Accordingly, excavation activities would be largely limited to the disturbance of artificial fill and unlikely to encounter sensitive subsurface materials (i.e., native, undisturbed soils with a potential to contain resources). As such, the potential to uncover subsurface archaeological resources during construction of Alternative 4A would be similar to the Project. Impacts to archaeological resources would be less than significant and similar to the less-than-significant impacts of the Project.

(3) Paleontological Resources

Similar to the Project, Alternative 4A would require excavation of up to 25 feet below ground surface in portions of the Project Site outside of Metro's excavation area.

Accordingly, excavation activities would be largely limited to the disturbance of artificial fill and unlikely to encounter sensitive subsurface materials, and the possibility of discovering paleontological artifacts that were not recovered during prior construction or other human activity would be low. Nevertheless, as is the case with the Project, the potential to uncover previously unidentified paleontological resources remains. This potential impact would be reduced to a less-than-significant level with mitigation. Therefore, impacts to paleontological resources under Alternative 4A would be similar to the less-than-significant with mitigation impacts of the Project.

d. Greenhouse Gas Emissions

As discussed in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, the significance of GHG impacts is determined based on compliance with a GHG emissions reduction plan. As with the Project, Alternative 4A would be designed to comply with the requirements of the CALGreen Code, SCAG's 2016–2040 RTP/SCS, CARB's *Climate Change Scoping Plan*, the City of Los Angeles' LA Green Plan/ClimateLA and Sustainable pLAn, and the Los Angeles Green Building Code. Also like the Project, Alternative 4A would include sustainable design components such as drought tolerant landscaping, energy efficient lighting, electric vehicle charging infrastructure, and permeable pavement in the paseo. With regulatory compliance and implementation of sustainability features comparable to the Project's, Alternative 4A would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans, similar to the Project. However, an emissions comparison indicates Alternative 4A would generate fewer GHG emissions than the Project, as shown in Appendix P of this Draft EIR. GHG emissions from a development project are determined in large part by the number of daily trips generated and energy consumption from proposed land uses. Construction-related GHG emissions under this Alternative would be greater than under the Project as the overall construction schedule would be extended by 18 months. With regard to Project operations, under Alternative 4A, the trip generation, energy demand, and water consumption would be reduced compared to the Project. The reduction in operational GHG emission would more than offset the increase in construction GHG emissions. Thus, the amount of GHG emissions generated by Alternative 4A would be less than the amount generated by the Project. Accordingly, Alternative 4A would better meet regulatory goals/targets to reduce GHG emissions. Thus, impacts related to GHG emissions under Alternative 4A would be less than significant and less than the less-than-significant impacts of the Project.

e. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners would be used, handled, and stored on the Project Site during construction of Alternative 4A, requiring proper management and disposal. The use of such materials could be slightly more than under the Project due to the slightly increased amount of construction. Nevertheless, like the Project, Alternative 4A would fully comply with all applicable federal, state, and local requirements, as well as manufacturers' instructions concerning the use, handling, storage, and disposal of hazardous materials.

As discussed in detail in Section IV.E, Hazards and Hazardous Materials, of this Draft EIR, several USTs have been removed from the site in the past. In addition, residual contamination of soil and/or groundwater as a result of a former release (which received a no further action letter) is present on-site and, based on an evaluation of past sampling results, exceeds current cleanup standards for certain contaminants. Grading and excavation could uncover or disturb previously unknown or unidentified USTs or residual contamination, including soil and/or groundwater that was determined to be within historical cleanup standards but that may now exceed current standards. Similar to the Project, such impacts would be mitigated to a less-than-significant level.

Based on the age of the parking structure, ACMs and LBP are unlikely to be encountered on the Project Site. Nevertheless, in the event ACMs or LBP are encountered on site, such materials would be handled in accordance with all applicable regulations and requirements.

Like the Project, Alternative 4A would require excavation to depths up to 25 feet and is not expected to encounter groundwater, which occurs on-site at a depth of approximately 110 to 140 feet below ground surface. If construction dewatering is required, or if groundwater is encountered, it is anticipated to be short-term and limited to shallow/ perched groundwater. Any groundwater encountered would be sampled for possible contamination and handled in accordance with applicable groundwater discharge requirements.

Based on the above, potential construction-related impacts associated with hazards and hazardous materials under Alternative 4A would be less than significant, but greater than the less-than-significant impacts of the Project due to the larger building being constructed.

(2) Operation

Similar to the Project, Alternative 4A would not include the use of materials containing ACM, LBP, or PCBs and would not involve the installation of any USTs. However, like the Project, Alternative 4A may include the installation of ASTs for use with emergency generators. If ASTs are installed, their installation would comply with all applicable regulatory requirements. Additionally, the operation of Alternative 4A would involve the limited use of potentially hazardous materials typical of those used in residential developments such as Alternative 4A, including cleaning agents, paints, pesticides, and other materials used for landscaping. Such use may be slightly greater than under the Project due to the minor increase in development. However, as with the Project, all hazardous materials on the Project Site would be acquired, handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, state, and local requirements.

Based on the above, potential impacts related to hazards and hazardous materials during operation of Alternative 4A would be less than significant with mitigation, but slightly greater than the Project's less-than-significant impacts with mitigation due to the increase in development.

f. Land Use

(1) Land Use Consistency

As described above, Alternative 4A would develop residential and retail uses, and the total floor area would be slightly greater compared to the Project. Accordingly, the floor area ratio and density would be greater, and the Project Site would have an FAR of 6.00:1 (including the Metro portal), compared to the Project's FAR of 5.83:1. However, the FAR would still be consistent with the maximum FAR permitted by the site's zoning. Additionally, Alternative 4A would require the same discretionary approvals as the Project. Like the Project, with approval of the requested discretionary approvals and implementation of design features discussed throughout this Draft EIR (which would also be implemented as part of Alternative 4A to the extent applicable), the Alternative would be generally consistent with the overall intent of the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site, including the City's General Plan, the Community Plan, and the LAMC. Thus, impacts related to land use consistency would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Land Use Compatibility

Alternative 4A includes residential and retail uses like the Project, which would be compatible with and would complement existing and future development in the surrounding area and would not substantially or adversely change the existing land use relationships between the Project Site and adjacent properties. Furthermore, like the Project, Alternative 4A would not physically divide an established community. As such, impacts associated with land use compatibility would be less than significant and similar to the less-than-significant impacts of the Project.

g. Noise

(1) Construction

Alternative 4A would involve the same general phases of construction as the Project (i.e., demolition, site grading and excavation, foundation, building construction, and paving/concrete/landscape installation), but due to the minor increase in floor area and the taller building height, the overall amount and duration of construction would be greater, as summarized in Appendix P of this Draft EIR. As with the Project, construction of Alternative 4A would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. It is noted that construction activities during the demolition, grading/excavation, and paving/concrete/landscape installation phases for Alternative 4A would be comparable to the Project, and under Project conditions, these phases were projected to generate greater noise levels at the nearest sensitive receptor (Receptor Location R6, where a significant Project impact was identified) than the building construction phase. However, Alternative 4A would require more construction equipment as well as more haul truck trips during the building construction phase than assumed for the Project and thus would generate greater noise during that phase as well. Accordingly, noise and vibration levels during maximum activity days, which are used for measuring impact significance, could be greater than those of the Project. Furthermore, the building construction phase under Alternative 4A would involve more truck trips than the Project and would represent the phase with the greatest number of such trips. Therefore, noise and vibration impacts due to off-site construction activities under Alternative 4A would be greater than those that would occur under the Project. Alternative 4A would comply with the same applicable regulatory requirements and implement the same project design features and mitigation measures as the Project to reduce on-site noise and vibration levels. As with the Project, construction of Alternative 4A would result in significant and unavoidable impacts with respect to on-site construction noise, on- and off-site construction vibration (related to human annoyance), and cumulative impacts with respect to on- and

off-site construction noise and off-site construction vibration (related to human annoyance). Such impacts would be greater than under the Project.[36,37]

(2) Operation

As discussed in Section IV.G, Noise, of this Draft EIR, sources of operational noise under the Project include: (a) on-site stationary noise sources, including outdoor mechanical equipment, loading dock and trash compactors, parking, and activities within the proposed outdoor spaces; and (b) off-site mobile (roadway traffic) noise sources. Alternative 4A would introduce noise from similar on- and off-site noise sources as the Project. Like the Project, on-site mechanical equipment used during operation of Alternative 4A would comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. In addition, as the loading dock and trash collection areas for Alternative 4A would have a similar design and location as the Project, noise impacts from loading and trash collection activities would be similar to the Project. However, it is anticipated that with the increase in residential units and associated residential population, the noise levels resulting from use of the on-site outdoor spaces would be greater. Overall, operational on-site noise impacts would be less than significant, but greater than the less-than-significant impacts of the Project.

With regard to off-site noise sources, Alternative 4A would result in a reduction in daily vehicle trips compared to the Project as discussed below. The reduction in vehicle trips would result in a decrease in off-site traffic-related noise levels under Alternative 4A compared to the Project. Therefore, as with the Project, off-site noise impacts under Alternative 4A would be less than significant.

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[36] *The Project's on-site construction noise impact and on-site construction vibration impact (with respect to human annoyance) would only be significant and unavoidable if Related Project No. 121 (Times Mirror Square project) is completed and occupied before or during Project construction.*

[37] *Cumulative on-site construction noise impacts would only be significant and unavoidable if construction of Related Project No. 121 (Times Mirror Square project) occurs concurrently with Project construction. Additionally, should peak construction traffic associated with the Times Mirror Square project be completed prior to commencement of Project construction, the cumulative off-site construction noise impact may not occur.*

h. Population, Housing, and Employment

(1) Construction

As discussed in Section IV.H, Population, Housing, and Employment, of this Draft EIR, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by a particular development. Many construction workers are highly specialized (e.g., crane operators, steel workers, masons) and move from job site to job site as dictated by the demand for their skills. Despite the slightly greater amount of construction, taller building height, and longer construction period under Alternative 4A compared to the Project, the same number of construction workers would be needed. Therefore, population impacts related to household growth in the City of Los Angeles or the SCAG region as a result of construction worker relocation under Alternative 4A would be less than significant and similar to the Project.

(2) Operation

Alternative 4A would develop 680 residential dwelling units, which would generate a residential population of 1,660 persons, compared to 107 dwelling units and a residential population of 261 persons with the Project.[38] The residential population of 1,660 persons would represent approximately 0.14 percent of the projected growth in the SCAG region between 2016 and 2025 (i.e., the Project's baseline and buildout years), and 0.68 percent of the projected growth in the City during the same period, which would be greater than the Project. However, as is the case with the Project, the new residential population would fall well within the forecasts for the City and region. The 680 residential units would represent approximately 0.14 percent of the projected housing growth in the SCAG region between 2016 and 2025 and 0.58 percent of the projected housing growth in the City during the same period, which is also greater than the Project. These new units would assist the City in meeting its fair share of the regional housing need identified by SCAG (82,002 units for the years 2013 to 2021 or an average of about 10,250 units per year), to a greater extent than the Project.

[38] *Based on an average rate of 2.44 persons per household for multi-family units in accordance with the 2015 American Community Survey 5-Year Average Estimate (2011-2015), per correspondence with Jack Tsao, Los Angeles Department of City Planning, March 29, 2017. Although the City has begun using a factor of 2.43 residents per multi-family housing unit based on 2016 Census American Community Survey 5-Year Estimate data, the higher 2015 rate is utilized herein as it was in use at the time the Project's NOP was published as well as to provide a conservative estimate of Project impacts.*

Alternative 4A would also include 10,000 square feet of retail uses. These uses would be expected to generate 27 employees, which is less than the 2,322 employees generated by the Project.[39] Many of these positions are likely be filled by persons already residing in the vicinity of Downtown or in neighboring areas/cities and who generally would not relocate their households due to such employment opportunities. In the event some jobs are filled by persons from outside the area who relocate for their job, limited indirect population growth and associated housing demand could occur, though such demand would be far less than under the Project. As is the case with the Project, this demand could be met by a combination of Alternative 4A's on-site dwelling units, existing vacancies in the surrounding housing market, as well as by the substantial number of new units currently planned Downtown. As such, similar to the Project, Alternative 4A would not induce substantial population growth or exceed SCAG's population forecast for the City or the SCAG region.

Overall, impacts related to population, housing, and employment under this Alternative would be less than significant, but greater than less-than-significant impacts of the Project due to the increased number of residential units. However, this Alternative would incrementally advance the City's goal of generating more housing for the region in a developed, infill location to a better extent than the Project.

i. Public Services

(1) Police Protection

(a) Construction

Alternative 4A would implement the same project design features as the Project, including temporary security measures such as fencing, lighting, and locked entry to reduce the potential for theft and vandalism on the Project Site, thereby reducing the demand for police protection services. Construction activities under Alternative 4A could affect emergency response for police vehicles along adjacent streets due to delays caused by traffic during the construction phase. However, given the permitted hours of construction and nature of construction projects, most, if not all, of the construction worker trips would occur outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. In addition, a Construction Traffic Management Plan, including a worksite traffic control plan, would be implemented during Project construction to ensure that adequate and safe access is available within and near the

[39] *Based on an employment generation rate of 2.71/1,000 square feet of commercial retail space (Neighborhood Shopping Center category); source: Los Angeles Unified School District's 2016 Developer Fee Justification Study, Table 15, March 2017.*

Project Site during construction activities. Furthermore, CVC Section 21806 allows drivers of emergency vehicles to use a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, construction-related impacts to police protection services under Alternative 4A would be less than significant and similar to the less-than-significant impacts of the Project, although the construction duration would be longer.

(b) Operation

Based on 680 residential units and 10,000 square feet of retail uses, as well as the police service population factors provided in the *L.A. CEQA Thresholds Guide*, Alternative 4A would generate an estimated police service population of approximately of 2,074 persons, consisting of 2,044 residents and 30 employees, as shown in Appendix P of this Draft EIR. This estimate is less than the Project's total estimated police service population of 2,492 persons, although the residential population would be substantially higher than the Project's 334 residents. With Alternative 4A's residential service population, the officer-to resident ratio for the Central Area would be reduced from 9.3 to 8.8 officers per 1,000 residents. While this decrease would be greater than occurring under the Project, the officer-to-resident ratio in the Central Area would still be substantially higher than the citywide ratio of 2.5 officers per 1,000 residents. Furthermore, Alternative 4A would implement the same project design features as the Project requiring on-site security features, appropriate lighting to ensure security, and the prevention of concealed spaces. The project design features would help offset the increase in demand for police protection services generated by Alternative 4A. Furthermore, as discussed in Section IV.I.1, Public Services—Police Protection, of this Draft EIR, consistent with the *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police services is the responsibility of the City; at this time, LAPD has not identified the need for any new station construction due to development in the service area. Thus, as with the Project, Alternative 4A would not result in the need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service. Moreover, although traffic generated by Alternative 4A would have the potential to affect emergency vehicle response to the Project Site and surrounding properties due to delays caused by the additional traffic, drivers of police emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Therefore, the impact on police protection services would be less than significant, but greater than the Project due to the increased police service population.

(2) Fire Protection

(a) Construction

Similar to the Project, construction activities under Alternative 4A would have the potential to result in accidental fires from such sources as the operation of mechanical equipment and the use of flammable construction materials. However, in compliance with OSHA and Fire and Building Code requirements, construction managers and personnel would be trained in emergency response and fire safety operations. Additionally, fire suppression equipment specific to construction would be maintained on-site. Construction would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous waste. Thus, compliance with regulatory requirements would effectively reduce the potential for construction activities to expose people to the risk of fire or explosion, including that related to hazardous materials.

Additionally, access to the Project Site and the surrounding vicinity could be impacted by construction activities under Alternative 4A, such as temporary lane closures, roadway/access improvements, and the construction of utility line connections. Furthermore, construction activities would generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, construction activities could temporarily affect emergency response for emergency vehicles along adjacent streets due to delays caused by traffic during the construction phase. However, as with the Project, construction worker and haul truck trips would be expected to occur outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. Additionally, like the Project, a Construction Traffic Management Plan would be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Furthermore, CVC Section 21806 allows drivers of emergency vehicles to use a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, construction-related impacts related to fire protection services under Alternative 4A would be less than significant and similar to the less-than-significant impacts of the Project, although the construction duration would be longer.

(b) Operation

As discussed in Section IV.I.2, Public Services—Fire Protection of this Draft EIR, the Project Site would be served by Fire Station No. 9, the “first-in” station, located approximately 1 mile to the southwest. Fire Station Nos. 4, 10, 3, and 11 would also be available to serve Alternative 4A in the event of an emergency. Alternative 4A would develop 680 residential units and 10,000 square feet of retail uses, for a total floor area of

698,496 square feet (708,306 square feet including the Metro portal). It is assumed this land use mix would be categorized as High Density Residential by LAFD, thus requiring a maximum response distance of 1.5 miles from an engine company and 2 miles from a truck company, which would be met. Based on the slight increase in floor area compared to the Project but the overall reduction in total occupancy, the demand for fire protection and emergency medical services would be roughly the same as under the Project. With respect to response times, similar to the Project, emergency access would be maintained, and traffic generated by Alternative 2 would not impair the LAFD from responding to emergencies at the Project Site or the surrounding area. Average response times are anticipated to continue to meet National Fire Protection Association (NFPA) response time standards, which although not formally adopted are not considered deficient. In addition, similar to the Project, Alternative 4A would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Also like the Project, the Alternative would implement a project design feature involving the installation of a fire flow pump system, as needed, in order to meet water pressure demands. Furthermore, as discussed in Section IV.I.2, Public Services—Fire Protection, of this Draft EIR, consistent with the *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate fire protection services is the responsibility of the City; at this time, LAFD has not identified the need for any new station construction due to development in the service area. Therefore, impacts related to fire protection would be less than significant under Alternative 4A and similar to those of the Project.

(3) Schools

(a) Construction

Due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by Alternative 4A. Therefore, the construction employment generated by Alternative 4A would not result in a notable increase in the residential population or a corresponding demand for schools in the vicinity of the Project Site. Impacts on school facilities during construction under Alternative 4A would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

The 680 residential units and 10,000 square feet of retail uses associated with Alternative 4A are estimated to generate a total of 290 students, consisting of

157 elementary school students, 43 middle school students, and 90 high school students, as shown in Appendix P of this Draft EIR, which is less than the 569 students generated by the Project. Furthermore, pursuant to SB 50, the Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of Project-related school impacts. Therefore, payment of applicable development school fees to the LAUSD would offset the impact of additional student enrollment at schools serving the Project area. Impacts related to schools would be less than significant under Alternative 4A and less than the less-than-significant impacts of the Project.

(4) Libraries

(a) Construction

As discussed above, construction workers are not likely to relocate their households as a consequence of Project construction. Therefore, construction employment generated by Alternative 4A would not result in a notable increase in the resident population or a corresponding demand for library services in the vicinity of the Project Site.

In addition, it is unlikely that construction workers would visit area libraries on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. As such, impacts to library facilities and services during construction of Alternative 4A would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

Residents are considered the primary users of library facilities. Alternative 4A would develop 680 residential units compared to the Project's 107 residential units. As previously discussed, the 680 residential units would result in a residential service population of 1,660 persons, which is greater than the Project's residential service population of 261 persons. Therefore, Alternative 4A would generate a greater demand for library services. With regard to the potential for employees to use nearby library facilities, they would be more likely to use library facilities near their homes during non-work hours, and given that some of the employment opportunities generated by Alternative 4A would be filled by people already residing in the vicinity of the Project Site, employees and the

potential indirect population generation attributable to those employees would generate minimal demand for library services. Overall, impacts on library facilities would be less than significant, but greater than the Project due to the increase in residential service population.

(5) Parks and Recreation

(a) Construction

As discussed above, the likelihood that construction workers would relocate their households as a consequence of working on the Project is negligible. Therefore, the construction workers associated with Alternative 4A would not result in a notable increase in the residential population of the Project vicinity or a corresponding permanent demand for parks and recreational facilities in the vicinity.

As with the Project, during construction of Alternative 4A, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. Furthermore, while there is a potential for construction workers to spend their lunch breaks at the parks and recreational facilities near the Project Site, lunch breaks typically are not long enough for workers to take advantage of such facilities and return to work within the allotted time (e.g., 30 to 60 minutes). Therefore, it is unlikely that construction workers would utilize parks and recreational facilities near the Project Site during construction of Alternative 4A.

In addition, as with the Project, construction of Alternative 4A would not be expected to result in access restrictions to City parks and recreation facilities in the vicinity of the Project Site, nor interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity.

Based on the above analysis, construction of Alternative 4A would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services or interfere with existing park usage. Therefore, impacts on parks and recreational facilities during construction of Alternative 4A would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

Residents are considered the primary users of parks and recreation facilities. As previously indicated, Alternative 4A would generate an estimated 1,660 residents compared to the Project's 261 residents. Thus, implementation of Alternative 4A would generate a greater demand for nearby parks and recreational facilities. This demand would

be partially offset by the increase in open space on-site as compared to the Project. Thus, Alternative 4A would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities. Similar to the Project, while it is possible that employees of Alternative 4A may utilize local parks and recreational facilities, the increased demand would be negligible as it is anticipated that employees and visitors would primarily utilize on-site open space during their time spent at the Project Site, resulting in a negligible demand for surrounding parks and recreational facilities. Also similar to the Project, Alternative 4A would pay a Dwelling Unit Construction Tax in accordance with LAMC Section 21.10.3(a)(1) to offset impacts to parks. Therefore, impacts to park and recreation facilities would be less than significant under Alternative 4A, but greater than the less-than-significant impacts of the Project.

j. Transportation/Traffic

(1) Construction

As with the Project, construction of Alternative 4A would generate trips from heavy-duty construction equipment, haul trucks, and construction worker trips. Because Alternative 4A would develop a taller building with a slightly increased floor area, the number of haul truck trips (during the building construction phase) and the overall duration of the construction period would be greater than under the Project, as summarized in Appendix P of this Draft EIR. As with the Project, the building construction phase would represent the maximum potential for traffic impacts, and while the number of construction workers during that phase would be comparable to the Project, the overall potential for traffic impacts would be slightly greater under Alternative 4A due to the increase in truck trips.[40] Also like the Project, Alternative 4A would implement a Construction Traffic Management Plan that would require construction-related traffic to be scheduled outside of commuter weekday peak hours to the extent feasible. Therefore, construction-related activities would not contribute a substantial amount of traffic during the weekday morning and afternoon peak periods. Construction traffic associated with Alternative 4A would not result in any significant traffic impacts at the study intersections during peak construction activities, and such impacts would be slightly greater than those of the Project, and the duration of construction would be longer.

[40] *Alternative 4A is estimated to require up to 60 truck trips per day during the building construction phase, compared to the Project's 50 truck trips per day. Using a passenger car equivalent (PCE) factor of 2.5 based on standard traffic engineering practice, this translates to an additional 50 PCE vehicle trips per day or an average of less than 5 PCE trips per hour during a typical construction workday. Accordingly, the potential for traffic impacts would only be slightly greater under Alternative 4A.*

Like the Project, construction of Alternative 4A may involve temporary lane closures. Alternative 4A would implement similar project design features as the Project, which include a Construction Traffic Management Plan to ensure pedestrian and traffic safety and access. Therefore, as with the Project, access and safety impacts during construction would be less than significant.

(2) Operation

The following discussion is based on the Alternatives Traffic Memo provided in Appendix P of this Draft EIR.

Alternative 4A is estimated to generate 3,478 net daily trips, with 253 A.M. peak-hour trips (53 inbound/200 outbound) and 321 P.M. peak-hour trips (205 inbound/116 outbound), which is less than under the Project. In order to determine the operating conditions of the street system, traffic associated with Alternative 4A was assigned to the local roadway system based on trip distribution and assignment characteristics consistent with the Project.

(a) Existing Conditions With Alternative 4A

Alternative 4A would not result in significant impacts at any intersections under the Existing With Alternative 4A scenario. Thus, Alternative 4A would eliminate the Project's significant and unavoidable impact at Intersection No. 5.

(b) Future Conditions With Alternative 4A

Alternative 4A would result in a significant impact at Intersection No. 8 under Future With Alternative 4A conditions. This impact would be reduced to a less-than-significant level with the same mitigation measure proposed as part of the Project. Therefore, impacts relative to intersection levels of service under Alternative 4A would be less than significant with mitigation, and Alternative 4A would eliminate the Project's significant and unavoidable impacts at Intersection Nos. 5 and 8.

(c) Regional Transportation System, Access and Circulation, and Bicycle, Pedestrian, and Vehicular Safety

With the reduced number of trips and total population (both residential and employee), impacts to the regional transportation system, access and circulation, and bicycle, pedestrian, and vehicular safety would be less than the less-than-significant impacts of the Project.

k. Tribal Cultural Resources

As previously discussed, Alternative 4A would require excavation to depths of up to 25 feet in portions of the Project Site outside of Metro's excavation area, similar to the Project. Therefore, the potential for Alternative 4A to uncover subsurface tribal cultural resources would be similar to that of the Project. As discussed in Section IV.K, Tribal Cultural Resources, of this Draft EIR, no confirmed Native American resources have been identified within the Project area or a surrounding 0.5-mile search radius. More specifically, following written notification of the Project by the City on January 6, 2017, government-to-government consultation was requested by the Gabrieleño Band of Mission Indians—Kizh Nation on January 10 and initiated by the City on March 23, 2017. Upon review of the documents submitted during the subsequent consultation, the City, acting in good faith and after a reasonable effort, did not find substantial evidence of an existing tribal cultural resource within the Project area. Based on their correspondence, the City concluded that mutual agreement could not be reached between the Tribe and City for purposes of AB 52, and as such, the City closed the tribal consultation on October 19, 2018, in fulfillment of its AB 52 requirements. The Tribe responded to the City (on the same day) and requested that the Tribe be consulted if the Project results in ground disturbance. The City responded on November 15, 2018, and confirmed that consultation for the Project had occurred and closed. Additionally, the City responded that the Tribe may submit comments on the EIR as long as the comments are received prior to approval of the document. Furthermore, monitoring of Metro's construction site has not yielded any Native American cultural resources. This information suggests that subsurface conditions within the Project Site have little potential to support the presence of unanticipated cultural resources or tribal cultural resources. While the City has no basis under CEQA to impose any related mitigation measures, the City has established a standard condition of approval under its police power and land use authority to address any inadvertent discovery of a tribal cultural resource. For purposes of this analysis, it is assumed the City would impose this condition on the Project, or any alternative to the Project, as part of its land use approvals. Accordingly, impacts to tribal cultural resources would be less than significant and similar to the impacts of the Project.

l. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 4A would generate a short-term demand for water. This demand would be slightly greater than that of the Project since the amount and duration of construction required under Alternative 4A would be greater. As evaluated in Section IV.L.1, Utilities and Service Systems—Water

Supply and Infrastructure, of this Draft EIR, the Project's demand for water during operation could be met by the City's available supplies normal, single-dry, and multiple-dry years. Therefore, it can be concluded the water demand for construction activities associated with Alternative 4A could also be met by the City's available water supplies, particularly since construction-related demand would be a fraction of that generated during operations. Similarly, the existing LADWP water infrastructure would be adequate to provide the water flow necessary to serve Alternative 4A.

Furthermore, as with the Project, the design and installation of new service connections under Alternative 4A would be required to meet applicable City standards. The connections and installation of on-site water distribution lines would primarily involve trenching to place the lines below ground, which could temporarily affect access in adjacent rights-of-way. However, as previously discussed and like the Project, a Construction Traffic Management Plan would be implemented to ensure adequate and safe access remains available within and near the Project Site during construction. Therefore, impacts on water supply and infrastructure associated with construction activities would be less than significant under Alternative 4A, but slightly greater than the less-than-significant impacts of the Project.

(b) Operation

Based on 680 multi-family residential units, 10,000 square feet of retail uses, a fitness center, common rooms, and new landscaping, and using wastewater generation rates provided by LASAN and information provided by LADWP, Alternative 4A would generate demand for approximately 85,521 gallons of water per day, as shown in Appendix P of this Draft EIR, which is less than the Project's water demand of 157,106 gpd. It is noted that this Alternative would not require a cooling tower and instead would use an air-cooled variable refrigerant flow (VRF) system, which would not require water.[41] As concluded in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, and the WSA prepared for the Project, the estimated water demand for the Project would not exceed the available supplies projected by LADWP. Therefore, the estimated water demand under Alternative 4A would also be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040. In addition, the existing water distribution infrastructure would be adequate to serve Alternative 4A since the water demand would be lower than the Project uses. Furthermore, similar to the Project, the Applicant would construct the necessary on-site water infrastructure and off-site connections to the LADWP water system

[41] *VRF systems are increasingly popular based on cost-effectiveness and flexibility. Given the limited rooftop area for mechanical equipment under this Alternative, it is not certain sufficient room would be available for a cooling tower; thus a VRF system is proposed. Source: Gensler, 2018.*

pursuant to applicable City requirements to accommodate the new building. Thus, impacts to water supply under Alternative 4A would be less than significant and less than the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, during construction of Alternative 4A, existing sewer laterals would be capped and no sewage would enter the public sewer system. Temporary facilities such as portable toilet and hand wash areas would be provided by the contractor at the Project Site, and sewage from these facilities would be collected and hauled off-site. As such, wastewater generation from construction activities associated with Alternative 4A would not cause a measurable increase in wastewater flows.

Additionally, as with the Project, Alternative 4A may include construction activities associated with the installation of new or relocated sewer connections. Such activities would be confined to trenching in order to place the sewer lines below surface and would be limited to the on-site wastewater conveyance infrastructure and minor off-site work associated with connections to the City's sewer lines in the streets adjacent to the Project Site. Similar to the Project, a Construction Traffic Management Plan would be implemented during the construction of Alternative 4A to reduce impacts to pedestrian and traffic flow, including emergency vehicle access, which could occur due to temporary off-site utility work. Therefore, construction-related impacts to the wastewater system under Alternative 4A would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

Based on 680 multi-family residential units, 10,000 square feet of retail uses, a fitness center, common rooms, and new landscaping, and using wastewater generation rates provided by LASAN, Alternative 4A would generate an estimated 81,742 gallons per day of wastewater, as shown in Appendix P of this Draft EIR, which is less than the 108,749 gpd generated by the Project. As provided in Section IV.L.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the Project-generated wastewater could be accommodated by the existing capacity of the HWRP. Therefore, since the wastewater generated by Alternative 4A would be less than that of the Project, wastewater generated by Alternative 4A could also be accommodated by the existing capacity of the HWRP, and impacts with respect to treatment capacity would be less than significant.

As with the Project, sewer service for Alternative 4A would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project

Site. Given that Alternative 4A would result in a reduced wastewater generation compared to the Project, it is anticipated that there would be sufficient capacity within the sewer main lines serving the Project Site to serve Alternative 4A. Furthermore, additional detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for Alternative 4A during the permitting process. All related sanitary sewer connections and on-site infrastructure under Alternative 4A would be designed and constructed in accordance with applicable standards.

Thus, impacts with regard to wastewater generation and infrastructure capacity under Alternative 4A would be less than significant and less than the less-than-significant impacts of the Project.

(3) Solid Waste

(a) Construction

Construction of Alternative 4A would involve demolition and building construction activities. The amount of demolition waste generated by Alternative 4A would be similar to the Project, but the amount of construction waste would be greater due to the increased floor area and since construction of residential uses results in more waste than commercial or office uses. Specifically, as shown in Appendix P of this Draft EIR, Alternative 4A would generate an estimated 4,629 tons of construction and demolition waste prior to recycling (1,157 tons when applying the 75 percent diversion rate specified in the project design features), compared to 4,454 tons with the Project (1,113 tons with diversion). The resulting waste would represent only 0.002 percent of the Azusa Land Reclamation Landfill's remaining disposal capacity of 57.56 million tons. Furthermore, construction and demolition wastes would be recycled or collected by private waste haulers contracted by the Applicant and taken to City-certified waste processing facilities for sorting and final distribution, including disposal at the County's unclassified landfill. Since construction and demolition waste would be hauled by a private construction contractor permitted by the City, Alternative 4A would not result in the need for an additional solid waste collection route. Similar to the Project, construction of Alternative 4A would not conflict with any applicable state or City solid waste regulations. As such, solid waste impacts during construction of Alternative 4A would be less than significant, but greater than the less-than-significant impacts of the Project due to the increase in construction waste.

(b) Operation

During its operation, Alternative 4A would generate municipal solid waste typical of residential and retail developments. Similar to the Project, solid waste generated by Alternative 4A would be recycled or collected by private waste haulers contracted by the

Applicant and permitted by the City and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles. The transport of solid waste generated by Alternative 4A to waste management/disposal facilities would continue to occur along existing solid waste routes of travel. As such, as with the Project, Alternative 4A would not result in the need for additional solid waste collection routes to adequately handle waste generated by operations.

As residential uses typically generate more waste than office uses, Alternative 4A would generate more solid waste compared to the Project due to the increased number of residential units. Specifically, Alternative 4A would generate an estimated 1,541 tons per year of solid waste (385 tons per year when factoring in 75 percent diversion per the project design features), which is greater than the Project's solid waste generation of 1,109 tons per year (277 tons per year when factoring in 75 percent diversion). However, this increase would represent only 0.002 percent of the remaining capacity of the Class III landfills open to the City of Los Angeles. Additionally, although Alternative 4A would generate more solid waste than the Project, it would not result in the need for an additional recycling or disposal facility to adequately handle waste generated. Furthermore, like the Project, Alternative 4A would not conflict with applicable solid waste policies and objectives. As such, solid waste impacts during operation of Alternative 4A would be less than significant, but greater than under the Project.

m. Energy Conservation and Infrastructure

(1) Construction

Similar to the Project, construction activities associated with Alternative 4A would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be slightly greater than under the Project due to the increase in the overall amount of construction and duration of construction; however, energy consumption during construction would be substantially less than during operation. In addition, LADWP has confirmed that the supply and existing infrastructure in the Project area would have the capacity to serve the Project Site. Furthermore, as with the Project, construction activities would not use energy in a manner that is wasteful, inefficient, or unnecessary and would not be expected to have an adverse impact on available energy resources or the existing infrastructure. Therefore, impacts on energy resources associated with short-term construction activities would be less than significant under Alternative 4A, but greater than the less-than-significant impacts of the Project.

(2) Operation

As with the Project, operation of Alternative 4A would generate demand for electricity, natural gas, and petroleum-based fuels. However, with the change in the land use mix, overall energy usage would be less than under the Project. Specifically, as shown in Appendix P of this Draft EIR, Alternative 4A would consume an estimated 2,803 MWh of electricity and 5,699,552 cf of natural gas annually; thus, electricity usage would be substantially less than that of the Project (8,094 MWh), while natural gas usage would be slightly higher than under the Project (5,690,050 cf). In addition, Alternative 4A would generate fewer daily vehicle trips than the Project, thus involving less petroleum-based fuels. Alternative 4A would implement the same project design features as the Project, which would improve energy efficiency and reduce impacts on consumption of energy resources. Accordingly, like the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 4A would not be wasteful, inefficient, or unnecessary. Furthermore, Alternative 4A would be located in proximity to a variety of public transit options and would incorporate features to reduce vehicle trips, thereby reducing transportation fuel usage. Therefore, impacts to energy resources under Alternative 4A would be less than significant and less than the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above, Alternative 4A would eliminate the Project's significant and unavoidable impacts with respect to operational intersection levels of service at all intersections under both existing and future conditions, but would not eliminate the Project's significant and unavoidable impacts related to on-site construction noise and on- and off-site construction vibration (related to human annoyance).[42] Cumulative impacts with respect to on- and off-site construction noise and off-site construction vibration (related to human annoyance) would also remain significant and unavoidable.[43] Impacts with respect to aesthetics during operations, operational air quality, hazards and hazardous materials, noise, population, police protection, libraries, parks, and solid waste would be greater than the Project, but would remain less than significant. All other impacts

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[42] *The Project's on-site construction noise impact and on-site construction vibration impact (with respect to human annoyance) would only be significant and unavoidable if Related Project No. 121 (Times Mirror Square project) is completed and occupied before or during Project construction.*

[43] *Cumulative on-site construction noise impacts would only be significant and unavoidable if construction of Related Project No. 121 (Times Mirror Square project) occurs concurrently with Project construction. Additionally, should peak construction traffic associated with the Times Mirror Square project be completed prior to commencement of Project construction, the cumulative off-site construction noise impact may not occur.*

(aesthetics during construction; toxic air contaminants; cultural resources; GHG emissions; land use; fire protection; schools; other issues related to transportation/traffic; tribal cultural resources; water supply; wastewater; and energy conservation and infrastructure) would be less than or similar to those of the Project. Based on the elimination of some of the Project's significant and unavoidable impacts, Alternative 4A would have an overall reduced level of impact than the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 4A would meet the underlying purpose of the Project to develop a former surface parking lot within a vibrant area of Downtown Los Angeles with a transit-oriented, high-density project that will generate new economic opportunities for the Downtown area, but would do so to a lesser extent than the Project due to the limited employment-generating uses. In addition, Alternative 4A would achieve the following Project objectives to the same extent as the Project:

- Create a landmark high-rise project that complements the aesthetic character of the area through high quality urban planning and architectural design;
- Incorporate the principles of smart growth and environmental sustainability by capitalizing on the Project Site's location within the established Downtown Los Angeles employment hub, proximity to transit and walkable streets, and the presence of existing infrastructure needed to service the proposed uses, while incorporating sustainable design components that emphasize resource conservation and efficiency;
- Enhance the pedestrian activity and street life in the area by providing ground floor retail uses and associated outdoor amenities that work harmoniously with the future station portal for the Metro Regional Connector line that will be located on the site;
- Maximize the Project's landscaped public open space at the grade level to create extensive pedestrian connections between the future station portal and the surrounding area; and
- Reinforce public investment in and use of public transit by maximizing development density adjacent to existing and future major transit lines, including the Metro Regional Connector line; and
- Maximize the creation of new construction jobs in the City with the development of a new high-rise building.

- Reconfigure the existing parking structure on-site to provide sufficient vehicle and long-term bicycle parking and ensure the parking needs of the Project's tenants and visitors are met, while avoiding an over-supply.

In addition, Alternative 4A would meet the following objectives to a slightly greater extent than the Project due to the minor increase in development:

- Reinforce public investment in and use of public transit by maximizing development density adjacent to existing and future major transit lines, including the Metro Regional Connector line; and

- Revitalize a former surface parking lot to create a high-density mixed-use project with immediate proximity to existing and future transit lines, employment opportunities, shops, restaurants, and entertainment uses.

Alternative 4A would meet the housing and retail aspects of the following objectives to a greater extent than the Project, but would not meet the aspects pertaining to office space:

- Expand and diversify the supply of housing, retail, and commercial space within the Downtown area to further revitalize the northern end of the Broadway corridor.

- Provide new housing, retail, and commercial space with a balance of uses at a density consistent with the site's existing zoning designation to help meet market demands for housing and commercial space within the Downtown area.

- Maximize revenues to the City in the form of additional sales, business license, documentary transfer, and property taxes.

Overall, Alternative 4A would achieve the Project objectives to approximately the same extent as the Project.

V. Alternatives

F. Alternative 4B: Residential Alternative B (Without Podium)

1. Description of the Alternative

Alternative 4B, the Residential Alternative B (without podium), proposes a 56-story building of up to 580 feet in height, with 680 residential units comprised of 190 studio units, 257 one-bedroom units, 229 two-bedroom units, and 4 three-bedroom (penthouse) units, plus 10,000 square feet of ground floor retail uses. Alternative 4B would consist of a single tower with no podium. Accordingly, the building would not extend over the Metro portal within the Project Site, and the Metro plaza would be open to the sky. Based on a total of 708,306 square feet of floor area (including the Metro portal), the Project Site would have an FAR of 6.00:1.[44]

Based on the number and size of dwelling units, Alternative 4B would provide at least 74,025 square feet of open space in accordance with Code requirements. Amenity decks offering a variety of social and community spaces would be provided on various levels and would include landscaped terraces, rooftop gardens, gathering spaces including barbeque and outdoor dining areas, and a swimming pool. Indoor recreational spaces would include a fitness center, two common rooms, and a lounge. Private balconies would be provided on various levels for some of the residences. In addition, to meet the open space requirement, some recreational facilities could be developed on the roof of the existing parking garage located in the southern portion of the Project Site.

The other aspects of Alternative 4B would be substantially similar to the Project. A landscaped passage or paseo would form a pedestrian pathway from the Metro portal across the site to Spring Street. Lighting would include low-level exterior lights at the perimeter of the building, in the canopy over the Metro portal, and in the paseo, as needed, for aesthetic, security, and wayfinding purposes. Signage would include general ground level and wayfinding pedestrian signage around the perimeter of the building and in the paseo, building identification signs, and other sign types, and Metro signage would be

[44] *Under this Alternative, only the Metro portal (4,050 square feet) rather than the entire Metro plaza (9,810 square feet) would count towards FAR due to the elimination of the podium, which effectively serves as a ceiling over the plaza under the Project and the other Alternatives.*

integrated with the overall signage concept. The existing parking structure would be reconfigured to provide vehicular and long-term bicycle parking spaces (plus additional short-term bicycle parking spaces to be provided outside and adjacent to the parking structure and the new building, as well as within the Metro plaza). A total of 635 of the vehicular spaces in the parking structure would be required tenant parking for Alternative 4B, and surplus parking spaces would continue to be available for other off-site uses. Access to the parking structure would continue to occur via one existing driveway on Broadway and two existing driveways on Spring Street. In addition, one new driveway on Spring Street is proposed to access the loading area for the new building.

Similar to the Project, Alternative 4B would require grading and excavation to a maximum depth of 25 feet, including in areas of the Project Site where Metro is not excavating as part of its construction of the 2nd Street/Broadway rail station and portal. Construction of Alternative 4B would last approximately 55 months (compared to 39 months for the Project).

2. Environmental Impacts

a. Aesthetics (Visual Character, Views, Light/Glare, and Shading)

As previously discussed, like the Project, PRC Section 21099 and ZI No. 2452 apply to Alternative 4B. Therefore, like the Project, Alternative 4B cannot result in significant impacts to the environment with respect to aesthetic impacts. The following analysis regarding aesthetics/visual character, views, light and glare, and shading is provided for informational purposes only.

(1) Construction

(a) Views and Visual Character

Similar to the Project, while construction activities associated with Alternative 4B would alter the visual character of the Project Site as well as views of and across the Project Site on a short-term basis, the appearance of the site during construction would be typical of construction sites in urban areas, and aside from vertical building construction, not substantially different than existing conditions on-site (i.e., ongoing construction activities associated with Metro's rail station and portal). In addition, the Alternative would implement the same project design features as the Project, including the installation of temporary construction fencing along the periphery of the Project Site to screen construction activity from view at street level and the maintenance of any pedestrian walkways and construction fencing accessible or visible to the public in a visually attractive

manner (i.e., free of trash, graffiti, and peeling postings and a uniform paint color or graphic treatment) throughout the construction period. While aesthetics/visual character and view impacts would be comparable to those of the Project, given the relative increase in building floor area and the taller building height, the duration of construction and associated impacts would be longer under this Alternative.

(b) Light and Glare

Light and glare associated with construction of Alternative 4B would not substantially alter the visual character of the Project area or adversely impact day or nighttime views. As with the Project, a project design feature would be implemented to ensure appropriate shielding of outdoor lighting during construction. Impacts related to artificial light and glare during construction would be comparable to those of the Project, although the duration of construction would be longer under this Alternative.

(c) Conclusion

Overall, while construction would alter the visual character of the Project Site on a temporary basis, construction activities associated with Alternative 4B would not substantially degrade the existing visual character or quality of the site and its surroundings. Impacts would be generally equivalent to those of the Project. In accordance with SB 743 and ZI No. 2452, any impact related to aesthetic character, visual resources, shade and shadow, light and glare, and scenic vistas would not be considered significant.

(2) Operation

(a) Views

As with the Project, the introduction of a high-rise building under Alternative 4B could affect short-range focal views, although to a greater extent given the taller building height (580 feet) as compared to the Project (449 feet). Given the presence of existing (and proposed) intervening development, including the existing parking structure on-site, substantial obstruction of public views of nearby visual resources would not be anticipated, similar to the Project. Regarding views of the Downtown Los Angeles skyline and San Gabriel Mountains, as is the case with the Project, the height and mass of the building would be visible and could intermittently block longer-range views from certain vantage points, but the proposed development would blend in and be consistent with Downtown's

urban development, becoming part of the skyline.[45] However, given the increased building height, view impacts would be greater than under the Project.

(b) Visual Character

Like the Project, the height and scale of the proposed building under Alternative 4B would be consistent with development in the surrounding area and Downtown Los Angeles as a whole, although taller than the Project building. Also similar to the Project, Alternative 4B would be designed in a contemporary architectural style that would incorporate a variety of buildings materials and façade articulation, although the tower would not incorporate as many shifted building volumes as the Project. As such, the building would exhibit less horizontal and vertical articulation to break up the building planes and reduce visual massing, although the height and massing of the building would still shift away from Broadway toward Spring Street. Proposed landscaping and open space areas, including the ground floor paseo, would also improve the visual environment on-site. Furthermore, like the Project, proposed signage would comply with the standards and goals of the Historic Broadway Sign Supplemental Use District and complement the building architecture. However, the visual character impacts associated with Alternative 4B would be greater compared to those of the Project due to the taller building height.

(c) Light and Glare

Similar to the Project, lighting associated with Alternative 4B would comply with applicable City requirements, including LAMC lighting standards, as well as current energy standards and codes. Exterior lighting would be shielded and/or directed toward Project Site areas to minimize light spillover onto adjacent sensitive uses. Also like the Project, the proposed lighting sources would not generate artificial light levels that are out of character with the surrounding area, which is densely developed and characterized by a high degree of human activity and ambient light during the day and night. With respect to glare, glass used in the building façade would be low-reflective in order to minimize glare from reflected sunlight, and all vehicular parking would be contained within the existing parking structure. As such, impacts related to light and glare would be substantially similar to the Project's impacts.

(d) Shading

With respect to shading, Alternative 4B would generate longer shadows than the Project due to the increased building height. However, given the number and density of

[45] *It is noted that Related Project No. 121, located directly north of the Project Site across 2nd Street, involves a 37-story (495-foot) tower and a 53-story (665-foot) tower.*

mid- and high-rise buildings and the presence of mature trees throughout the urban Project area, shading is a common and expected occurrence. Like the Project, Alternative 4B would cast shadows on shade-sensitive uses, but such shadows would be limited and brief as they move throughout the day. Impacts from shading would be greater than under the Project.

(e) Conclusion

Based on the above, Alternative 4B would result in greater impacts related to aesthetics/visual character, views, and shading than the Project and similar impacts with respect to light and glare. However, pursuant to SB 743 and ZI No. 2452, such impacts would not be considered significant.

b. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

As with the Project, construction of Alternative 4B would generate air emissions through the use of heavy-duty construction equipment and haul truck and construction worker trips. The amount of excavation and soil export would be similar to the Project, resulting in a similar earthwork phase, but the intensity and duration of building construction would be greater due to the increased floor area and taller building height. Specifically, the intensity of activity on maximum activity days during building construction would be higher than under the Project, based on the equipment mix and number of haul truck trips, as summarized in Appendix P of this Draft EIR. As such, the intensity of air emissions and fugitive dust from site preparation and construction activities would be slightly higher on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, regional and localized impacts on these days would be greater than those of the Project. As also shown in Appendix P, construction emissions of most criteria pollutants under this Alternative would be slightly higher due to additional equipment and truck trips required during building construction activities. However, emissions would remain below significance thresholds. Therefore, impacts associated with regional and localized construction emissions under Alternative 4B would be less than significant but greater than the Project's less-than-significant impacts.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 4B would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As

discussed in Section IV.B, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. Given the similar amount and intensity of earthwork, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 4B would be similar to the less-than-significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Similar to the Project, operational regional air pollutant emissions associated with Alternative 4B would be generated by vehicle trips to/from the Project Site and the consumption of electricity and natural gas. As discussed further below, development of Alternative 4B would result in fewer daily trips than the Project. Accordingly, air emissions from vehicular sources would be less than under the Project. However, the operation of residential uses generate more emissions than office uses for certain pollutants. As shown in Appendix P of this Draft EIR, overall operational emissions of most criteria pollutants under Alternative 4B would be greater than under the Project due to the relative increase in residential floor area compared to the Project.

Specifically, in comparison to the Project, the emissions of VOC, CO, and $PM_{2.5}$ would be greater, while emissions of NO_X and SO_X would be comparable and PM_{10} would be lower. However, all of these emissions would fall below the regional significance thresholds for criteria pollutants. Therefore, like the Project, air quality impacts associated with regional operational emissions under Alternative 4B would be less than significant. Overall, impacts would be slightly greater than under the Project.

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 4B would not introduce any major new sources of air pollution within the Project Site. Nonetheless, as shown in Appendix P of this Draft EIR, localized emissions under Alternative 4B would be greater than the under Project mainly due to the increased amount of residential floor area. However, localized emissions under this Alternative would still fall below the significance thresholds. Therefore, localized impacts from on-site emission sources associated with Alternative 4B would also be less than significant although greater than those of the Project. Localized mobile source operational impacts are determined mainly by peak-hour traffic volumes. Based on the land uses proposed under Alternative 4B, the number of peak-hour trips generated would be less than under the Project. Therefore, localized mobile source emissions would be less than less-than-significant impacts of the Project.

(b) Toxic Air Contaminants

As discussed in Section IV.B, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations would be diesel particulate matter from delivery trucks. The residential and retail uses associated with Alternative 4B are not considered land uses that generate substantial TAC emissions. Furthermore, these uses are not associated with a substantial number of delivery trucks. Therefore, similar to the Project, Alternative 4B would not release substantial amounts of TACs and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Accordingly, as with the Project, potential TAC impacts under Alternative 4B would be less than significant and similar to the less-than-significant impacts of the Project.

c. Cultural Resources

(1) Historical Resources

As previously discussed, there are no historic resources on the Project Site; however, there are seven known historic resources within one block of the Project Site. Although Alternative 4B would introduce a new visual element to the area, the proposed building would be physically separated from the Douglas Building and the Victor Clothing Company by a parking garage and surface parking lots and from the Times-Plant Complex, the Mirror Building, the Executive Building, the Higgins Building, and the Irvine-Byrne Building by West 2nd Street, South Spring Street, and South Broadway. As with the Project, Alternative 4B would not result in a substantial adverse change to the immediate surroundings of the nearby historic resources to a degree that their integrity or significance as resources would be materially impaired. As the Irvine-Byrne Building and Victory Clothing Company (located south of the Project Site) are the two northernmost contributors to the Broadway Theater and Commercial District (Historic District), Alternative 4B also would not impair the Historic District. The historic buildings that are individually significant, as well as the Historic District, would continue to be eligible for listing as historic resources defined by CEQA. As such, Alternative 4B would not cause direct or indirect impacts to historic resources. Impacts to historic resources would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Archaeological Resources

As previously described, similar to the Project, Alternative 4B would require excavation of up to 25 feet below ground surface in portions of the Project Site outside of Metro's excavation area. Accordingly, excavation activities would be largely limited to the disturbance of artificial fill and unlikely to encounter sensitive subsurface materials (i.e., native, undisturbed soils with a potential to contain resources). As such, the potential to

uncover subsurface archaeological resources during construction of Alternative 4B would be similar to the Project. Impacts to archaeological resources would be less than significant and similar to the less-than-significant impacts of the Project.

(3) Paleontological Resources

Similar to the Project, Alternative 4B would require excavation of up to 25 feet below ground surface in portions of the Project Site outside of Metro's excavation area. Accordingly, excavation activities would be largely limited to the disturbance of artificial fill and unlikely to encounter sensitive subsurface materials, and the possibility of discovering paleontological artifacts that were not recovered during prior construction or other human activity would be low. Nevertheless, as is the case with the Project, the potential to uncover previously unidentified paleontological resources remains. This potential impact would be reduced to a less-than-significant level with mitigation. Therefore, impacts to paleontological resources under Alternative 4B would be similar to the less-than-significant with mitigation impacts of the Project.

d. Greenhouse Gas Emissions

As discussed in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, the significance of GHG impacts is determined based on compliance with a GHG emissions reduction plan. As with the Project, Alternative 4B would be designed to comply with the requirements of the CALGreen Code, SCAG's 2016–2040 RTP/SCS, CARB's *Climate Change Scoping Plan*, the City of Los Angeles' LA Green Plan/ClimateLA and Sustainable pLAn, and the Los Angeles Green Building Code. also like the Project, Alternative 4B would include sustainable design components such as drought tolerant landscaping, energy efficient lighting, electric vehicle charging infrastructure, and permeable pavement in the paseo. With regulatory compliance and implementation of sustainability features comparable to the Project's, Alternative 4B would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans, similar to the Project. However, an emissions comparison indicates Alternative 4B would generate fewer GHG emissions than the Project, as shown in Appendix P of this Draft EIR. Construction-related GHG emissions under this Alternative would be greater than under the Project as the overall construction schedule would be extended by 16 months. With regard to Project operations, under Alternative 4B, the trip generation, energy demand, and water consumption would be reduced compared to the Project. The reduction in operational GHG emission would more than offset the increase in construction GHG emissions. Thus, the amount of GHG emissions generated by Alternative 4B would be less than the amount generated by the Project. Accordingly, Alternative 4B would better meet regulatory goals/targets to reduce GHG emissions. Thus, impacts related to GHG emissions under Alternative 4B would be less than significant and less than the less-than-significant impacts of the Project.

e. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners would be used, handled, and stored on the Project Site during construction of Alternative 4B, requiring proper management and disposal. The use of such materials could be slightly more than under the Project due to the slightly increased amount of construction. Nevertheless, like the Project, Alternative 4B would fully comply with all applicable federal, state, and local requirements, as well as manufacturers' instructions concerning the use, handling, storage, and disposal of hazardous materials.

As discussed in detail in Section IV.E, Hazards and Hazardous Materials, of this Draft EIR, several USTs have been removed from the site in the past. In addition, residual contamination of soil and/or groundwater as a result of a former release (which received a no further action letter) is present on-site and, based on an evaluation of past sampling results, exceeds current cleanup standards for certain contaminants. Grading and excavation could uncover or disturb previously unknown or unidentified USTs or residual contamination, including soil and/or groundwater that was determined to be within historical cleanup standards but that may now exceed current standards. Similar to the Project, such impacts would be mitigated to a less-than-significant level.

Based on the age of the parking structure, ACMs and LBP are unlikely to be encountered on the Project Site. Nevertheless, in the event ACMs or LBP are encountered on site, such materials would be handled in accordance with all applicable regulations and requirements.

Like the Project, Alternative 4B would require excavation to depths up to 25 feet and is not expected to encounter groundwater, which occurs on-site at a depth of approximately 110 to 140 feet below ground surface. If construction dewatering is required, or if groundwater is encountered, it is anticipated to be short-term and limited to shallow/ perched groundwater. Any groundwater encountered would be sampled for possible contamination and handled in accordance with applicable groundwater discharge requirements.

Based on the above, potential construction-related impacts associated with hazards and hazardous materials under Alternative 4B would be less than significant, but greater than the less-than-significant impacts of the Project due to the larger building being constructed.

(2) Operation

Similar to the Project, Alternative 4B would not include the use of materials containing ACM, LBP, or PCBs and would not involve the installation of any USTs. However, like the Project, Alternative 4B may include the installation of ASTs for use with emergency generators. If ASTs are installed, their installation would comply with all applicable regulatory requirements. Additionally, the operation of Alternative 4B would involve the limited use of potentially hazardous materials typical of those used in residential developments such as Alternative 4B, including cleaning agents, paints, pesticides, and other materials used for landscaping. Such use may be slightly greater than under the Project due to the minor increase in development. However, as with the Project, all hazardous materials on the Project Site would be acquired, handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, state, and local requirements.

Based on the above, potential impacts related to hazards and hazardous materials during operation of Alternative 4B would be less than significant with mitigation, but slightly greater than the Project's less-than-significant impacts with mitigation due to the increase in development.

f. Land Use

(1) Land Use Consistency

As described above, Alternative 4B would develop residential and retail uses, and the total floor area would be greater than under the Project. Accordingly, the floor area ratio and density would be greater, and the Project Site would have an FAR of 6.00:1 (including the Metro portal), compared to the Project's FAR of 5.83:1. However, the FAR would still be consistent with the maximum FAR permitted by the site's zoning. Additionally, Alternative 4B would require the same discretionary approvals as the Project. Like the Project, with approval of the requested discretionary approvals and implementation of design features discussed throughout this Draft EIR (which would also be implemented as part of Alternative 4B to the extent applicable), the Alternative would be generally consistent with the overall intent of the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site, including the City's General Plan, the Community Plan, and the LAMC. Thus, impacts related to land use consistency would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Land Use Compatibility

Alternative 4B includes residential and retail uses like the Project, which would be compatible with and would complement existing and future development in the surrounding area and would not substantially or adversely change the existing land use relationships between the Project Site and adjacent properties. Furthermore, like the Project, Alternative 4B would not physically divide an established community. As such, impacts associated with land use compatibility would be less than significant and similar to the less-than-significant impacts of the Project.

g. Noise

(1) Construction

Alternative 4B would involve the same general phases of construction as the Project (i.e., demolition, site grading and excavation, foundation, building construction, and paving/concrete/landscape installation), but due to the minor increase in floor area and the taller building height, the overall amount and duration of construction would be greater. As with the Project, construction of Alternative 4B would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. It is noted that construction activities during the demolition, grading/excavation, and paving/concrete/landscape installation phases for Alternative 4B would be comparable to the Project, and under Project conditions, these phases were projected to generate greater noise levels at the nearest sensitive receptor (Receptor Location R6, where a significant Project impact was identified) than the building construction phase. However, as summarized in Appendix P of this Draft EIR, Alternative 4B would require more construction equipment as well as more haul truck trips during the building construction phase than assumed for the Project and thus would generate greater noise during that phase as well. Accordingly, noise and vibration levels during maximum activity days, which are used for measuring impact significance, could be greater than those of the Project. Furthermore, the building construction phase under Alternative 4B would involve more truck trips than the Project and would represent the phase with the greatest number of such trips. Therefore, noise and vibration impacts due to off-site construction activities under Alternative 4B would be greater than those that would occur under the Project. Alternative 4B would comply with the same applicable regulatory requirements and implement the same project design features and mitigation measures as the Project to reduce on-site noise and vibration levels. As with the Project, construction of Alternative 4B would result in significant and unavoidable impacts with respect to on-site construction noise, on- and off-site construction vibration (related to human annoyance), and cumulative impacts with

respect to on- and off-site construction noise and off-site construction vibration (related to human annoyance). Such impacts would be greater than under the Project.[46,47]

(2) Operation

As discussed in Section IV.G, Noise, of this Draft EIR, sources of operational noise under the Project include: (a) on-site stationary noise sources, including outdoor mechanical equipment, loading dock and trash compactors, parking, and activities within the proposed outdoor spaces; and (b) off-site mobile (roadway traffic) noise sources. Alternative 4B would introduce noise from similar on- and off-site noise sources as the Project. Like the Project, on-site mechanical equipment used during operation of Alternative 4B would comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. In addition, as the loading dock and trash collection areas for Alternative 4B would have a similar design and location as the Project, noise impacts from loading and trash collection activities would be similar to the Project. However, it is anticipated that with the increase in residential units and associated residential population, the noise levels resulting from use of the on-site outdoor spaces would be greater. Overall, operational on-site noise impacts would be less than significant, but greater than the less-than-significant impacts of the Project.

With regard to off-site noise sources, Alternative 4B would result in a reduction in daily vehicle trips compared to the Project as discussed below. The reduction in vehicle trips would result in a decrease in off-site traffic-related noise levels under Alternative 4B compared to the Project. Therefore, as with the Project, off-site noise impacts under Alternative 4B would be less than significant.

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[46] *The Project's on-site construction noise impact and on-site construction vibration impact (with respect to human annoyance) would only be significant and unavoidable if Related Project No. 121 (Times Mirror Square project) is completed and occupied before or during Project construction.*

[47] *Cumulative on-site construction noise impacts would only be significant and unavoidable if construction of Related Project No. 121 (Times Mirror Square project) occurs concurrently with Project construction. Additionally, should peak construction traffic associated with the Times Mirror Square project be completed prior to commencement of Project construction, the cumulative off-site construction noise impact may not occur.*

h. Population, Housing, and Employment

(1) Construction

As discussed in Section IV.H, Population, Housing, and Employment, of this Draft EIR, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by a particular development. Many construction workers are highly specialized (e.g., crane operators, steel workers, masons) and move from job site to job site as dictated by the demand for their skills. Despite the slightly greater amount of construction, taller building height, and longer construction period under Alternative 4B compared to the Project, the same number of construction workers would be needed. Therefore, population impacts related to household growth in the City of Los Angeles or the SCAG region as a result of construction worker relocation under Alternative 4B would be less than significant and similar to the Project.

(2) Operation

Alternative 4B would develop 680 residential dwelling units, which would generate a residential population of 1,660 persons, compared to 107 dwelling units and a residential population of 261 persons with the Project.[48] The residential population of 1,660 persons would represent approximately 0.14 percent of the projected growth in the SCAG region between 2016 and 2025 (i.e., the Project's baseline and buildout years), and 0.68 percent of the projected growth in the City during the same period, which would be greater than the Project. However, as is the case with the Project, the new residential population would fall well within the forecasts for the City and region. The 680 residential units would represent approximately 0.14 percent of the projected housing growth in the SCAG region between 2016 and 2025 and 0.58 percent of the projected housing growth in the City during the same period, which is also greater than the Project. These new units would assist the City in meeting its fair share of the regional housing need identified by SCAG (82,002 units for the years 2013 to 2021 or an average of about 10,250 units per year), to a greater extent than the Project.

[48] *Based on an average rate of 2.44 persons per household for multi-family units in accordance with the 2015 American Community Survey 5-Year Average Estimate (2011-2015), per correspondence with Jack Tsao, Los Angeles Department of City Planning, March 29, 2017. Although the City has begun using a factor of 2.43 residents per multi-family housing unit based on 2016 Census American Community Survey 5-Year Estimate data, the higher 2015 rate is utilized herein as it was in use at the time the Project's NOP was published as well as to provide a conservative estimate of Project impacts.*

Alternative 4B would also include 10,000 square feet of retail uses. These uses would be expected to generate 27 employees, which is less than the 2,322 employees generated by the Project.[49] Many of these positions are likely be filled by persons already residing in the vicinity of Downtown or in neighboring areas/cities and who generally would not relocate their households due to such employment opportunities. In the event some jobs are filled by persons from outside the area who relocate for their job, limited indirect population growth and associated housing demand could occur, though such demand would be far less than under the Project. As is the case with the Project, this demand could be met by a combination of Alternative 4B's on-site dwelling units, existing vacancies in the surrounding housing market, as well as by the substantial number of new units currently planned Downtown. As such, similar to the Project, Alternative 4B would not induce substantial population growth or exceed SCAG's population forecast for the City or the SCAG region.

Overall, impacts related to population, housing, and employment under this Alternative would be less than significant, but greater than less-than-significant impacts of the Project due to the increased number of residential units. However, this Alternative would incrementally advance the City's goal of generating more housing for the region in a developed, infill location to a better extent than the Project.

i. Public Services

(1) Police Protection

(a) Construction

Alternative 4B would implement the same project design feature as the Project, including temporary security measures such as fencing, lighting, and locked entry to reduce the potential for theft and vandalism on the Project Site, thereby reducing the demand for police protection services. Construction activities under Alternative 4B could affect emergency response for police vehicles along adjacent streets due to delays caused by traffic during the construction phase. However, given the permitted hours of construction and nature of construction projects, most, if not all, of the construction worker trips would occur outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. In addition, a Construction Traffic Management Plan, including a worksite traffic control plan, would be implemented during Project construction to ensure that adequate and safe access is available within and near the

[49] *Based on an employment generation rate of 2.71/1,000 square feet of commercial retail space (Neighborhood Shopping Center category); source: Los Angeles Unified School District's 2016 Developer Fee Justification Study, Table 15, March 2017.*

Project Site during construction activities. Furthermore, CVC Section 21806 allows drivers of emergency vehicles to use a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, construction-related impacts to police protection services under Alternative 4B would be less than significant and similar to the less-than-significant impacts of the Project, although the construction duration would be longer.

(b) Operation

Based on 680 residential units and 10,000 square feet of retail uses, as well as the police service population factors provided in the *L.A. CEQA Thresholds Guide*, Alternative 4B would generate an estimated police service population of approximately of 2,074 persons, consisting of 2,044 residents and 30 employees, as shown in Appendix P of this Draft EIR. This estimate is less than the Project's total estimated police service population of 2,492 persons, although the residential population would be substantially higher than the Project's 334 residents. With Alternative 4B's residential service population, the officer-to resident ratio for the Central Area would be reduced from 9.3 to 8.8 officers per 1,000 residents. While this decrease would be greater than occurring under the Project, the officer-to-resident ratio in the Central Area would still be substantially higher than the citywide ratio of 2.5 officers per 1,000 residents. Furthermore, Alternative 4B would implement the same project design features as the Project requiring on-site security features, appropriate lighting to ensure security, and the prevention of concealed spaces. The project design features would help offset the increase in demand for police protection services generated by Alternative 4B. Furthermore, as discussed in Section IV.I.1, Public Services—Police Protection, of this Draft EIR, consistent with the *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police services is the responsibility of the City; at this time, LAPD has not identified the need for any new station construction due to development in the service area. Thus, as with the Project, Alternative 4B would not result in the need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service. Moreover, although traffic generated by Alternative 4B would have the potential to affect emergency vehicle response to the Project Site and surrounding properties due to delays caused by the additional traffic, drivers of police emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Therefore, the impact on police protection services would be less than significant, but greater than the Project due to the increased police service population.

(2) Fire Protection

(a) Construction

Similar to the Project, construction activities under Alternative 4B would have the potential to result in accidental fires from such sources as the operation of mechanical equipment and the use of flammable construction materials. However, in compliance with OSHA and Fire and Building Code requirements, construction managers and personnel would be trained in emergency response and fire safety operations. Additionally, fire suppression equipment specific to construction would be maintained on-site. Construction would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous waste. Thus, compliance with regulatory requirements would effectively reduce the potential for construction activities to expose people to the risk of fire or explosion, including that related to hazardous materials.

Additionally, access to the Project Site and the surrounding vicinity could be impacted by construction activities under Alternative 4B, such as temporary lane closures, roadway/access improvements, and the construction of utility line connections. Furthermore, construction activities would generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, construction activities could temporarily affect emergency response for emergency vehicles along adjacent streets due to delays caused by traffic during the construction phase. However, as with the Project, construction worker and haul truck trips would be expected to occur outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. Additionally, like the Project, a Construction Traffic Management Plan would be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Furthermore, CVC Section 21806 allows drivers of emergency vehicles to use a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, construction-related impacts related to fire protection services under Alternative 4B would be less than significant and similar to the less-than-significant impacts of the Project, although the construction duration would be longer.

(b) Operation

As discussed in Section IV.I.2, Public Services—Fire Protection of this Draft EIR, the Project Site would be served by Fire Station No. 9, the “first-in” station, located approximately 1 mile to the southwest. Fire Station Nos. 4, 10, 3, and 11 would also be available to serve Alternative 4B in the event of an emergency. Alternative 4B would develop 680 residential units and 10,000 square feet of retail uses, for a total floor area of

704,256 square feet (708,306 square feet including the Metro portal). It is assumed this land use mix would be categorized as High Density Residential by LAFD, thus requiring a maximum response distance of 1.5 miles from an engine company and 2 miles from a truck company, which would be met. Based on the slight increase in floor area compared to the Project but the overall reduction in total occupancy, the demand for fire protection and emergency medical services would be roughly the same as under the Project. With respect to response times, similar to the Project, emergency access would be maintained, and traffic generated by Alternative 2 would not impair the LAFD from responding to emergencies at the Project Site or the surrounding area. Average response times are anticipated to continue to meet National Fire Protection Association (NFPA) response time standards, which although not formally adopted are not considered deficient. In addition, similar to the Project, Alternative 4B would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Also like the Project, the Alternative would implement a project design feature involving the installation of a fire flow pump system, as needed, in order to meet water pressure demands. Furthermore, as discussed in Section IV.I.2, Public Services—Fire Protection, of this Draft EIR, consistent with the *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate fire protection services is the responsibility of the City; at this time, LAFD has not identified the need for any new station construction due to development in the service area. Therefore, impacts related to fire protection would be less than significant under Alternative 4B and similar to those of the Project.

(3) Schools

(a) Construction

Due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by Alternative 4B. Therefore, the construction employment generated by Alternative 4B would not result in a notable increase in the residential population or a corresponding demand for schools in the vicinity of the Project Site. Impacts on school facilities during construction under Alternative 4B would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

The 680 residential units and 10,000 square feet of retail uses associated with Alternative 4B are estimated to generate a total of 290 students, consisting of

157 elementary school students, 43 middle school students, and 90 high school students, as shown in Appendix P of this Draft EIR, which is less than the 569 students generated by the Project. Furthermore, pursuant to SB 50, the Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of Project-related school impacts. Therefore, payment of applicable development school fees to the LAUSD would offset the impact of additional student enrollment at schools serving the Project area. Impacts related to schools would be less than significant under Alternative 4B and less than the less-than-significant impacts of the Project.

(4) Libraries

(a) Construction

As discussed above, construction workers are not likely to relocate their households as a consequence of Project construction. Therefore, construction employment generated by Alternative 4B would not result in a notable increase in the resident population or a corresponding demand for library services in the vicinity of the Project Site.

In addition, it is unlikely that construction workers would visit area libraries on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. As such, impacts to library facilities and services during construction of Alternative 4B would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

Residents are considered the primary users of library facilities. Alternative 4B would develop 680 residential units compared to the Project's 107 residential units. The 680 residential units would result in a residential service population of 1,660 persons, which is greater than the Project's residential service population of 261 persons. Therefore, Alternative 4B would generate a greater demand for library services. With regard to the potential for employees to use nearby library facilities, they would be more likely to use library facilities near their homes during non-work hours, and given that some of the employment opportunities generated by Alternative 4B would be filled by people already residing in the vicinity of the Project Site, employees and the potential indirect population

generation attributable to those employees would generate minimal demand for library services. Overall, impacts on library facilities would be less than significant, but greater than the Project due to the increase in residential service population.

(5) Parks and Recreation

(a) Construction

As discussed above, the likelihood that construction workers would relocate their households as a consequence of working on the Project is negligible. Therefore, the construction workers associated with Alternative 4B would not result in a notable increase in the residential population of the Project vicinity or a corresponding permanent demand for parks and recreational facilities in the vicinity.

As with the Project, during construction of Alternative 4B, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. Furthermore, while there is a potential for construction workers to spend their lunch breaks at the parks and recreational facilities near the Project Site, lunch breaks typically are not long enough for workers to take advantage of such facilities and return to work within the allotted time (e.g., 30 to 60 minutes). Therefore, it is unlikely that construction workers would utilize parks and recreational facilities near the Project Site during construction of Alternative 4B.

In addition, as with the Project, construction of Alternative 4B would not be expected to result in access restrictions to City parks and recreation facilities in the vicinity of the Project Site, nor interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity.

Based on the above analysis, construction of Alternative 4B would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services or interfere with existing park usage. Therefore, impacts on parks and recreational facilities during construction of Alternative 4B would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

Residents are considered the primary users of parks and recreation facilities. As previously indicated, Alternative 4B would generate an estimated 1,660 residents compared to the Project's 261 residents. Thus, implementation of Alternative 4B would generate a greater demand for nearby parks and recreational facilities. This demand would be partially offset by the increase in open space on-site as compared to the Project. Thus,

Alternative 4B would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities. Similar to the Project, while it is possible that employees of Alternative 4B may utilize local parks and recreational facilities, the increased demand would be negligible as it is anticipated that employees and visitors would primarily utilize on-site open space during their time spent at the Project Site, resulting in a negligible demand for surrounding parks and recreational facilities. Also similar to the Project, Alternative 4B would pay a Dwelling Unit Construction Tax in accordance with LAMC Section 21.10.3(a)(1) to offset impacts to parks. Therefore, impacts to park and recreation facilities would be less than significant under Alternative 4B, but greater than the less-than-significant impacts of the Project.

j. Transportation/Traffic

(1) Construction

As with the Project, construction of Alternative 4B would generate trips from heavy-duty construction equipment, haul trucks, and construction worker trips. Because Alternative 4B would develop a taller building with a slightly increased floor area, the number of haul truck trips (during the building construction phase) and the overall duration of the construction period would be greater than under the Project, as summarized in Appendix P of this Draft EIR. As with the Project, the building construction phase would represent the maximum potential for traffic impacts, and while the number of construction workers during that phase would be comparable to the Project, the overall potential for traffic impacts would be slightly greater under Alternative 4B due to the increase in truck trips.[50] Also like the Project, Alternative 4B would implement a Construction Traffic Management Plan that would require construction-related traffic to be scheduled outside of commuter weekday peak hours to the extent feasible. Therefore, construction-related activities would not contribute a substantial amount of traffic during the weekday morning and afternoon peak periods. Construction traffic associated with Alternative 4B would not result in any significant traffic impacts at the study intersections during peak construction activities; however, such impacts would be slightly greater than those of the Project, and the duration of construction would be longer.

[50] *Alternative 4A is estimated to require up to 60 truck trips per day during the building construction phase, compared to the Project's 50 truck trips per day. Using a passenger car equivalent (PCE) factor of 2.5 based on standard traffic engineering practice, this translates to an additional 50 PCE vehicle trips per day or an average of less than 5 PCE trips per hour during a typical construction workday. Accordingly, the potential for traffic impacts would only be slightly greater under Alternative 4A.*

Like the Project, construction of Alternative 4B may involve temporary lane closures. Alternative 4B would implement similar project design features as the Project, which include a Construction Traffic Management Plan to ensure pedestrian and traffic safety and access. Therefore, as with the Project, access and safety impacts during construction would be less than significant.

(2) Operation

The following discussion is based on the Alternatives Traffic Memo provided in Appendix P of this Draft EIR.

Alternative 4B is estimated to generate 3,478 net daily trips, with 253 A.M. peak-hour trips (53 inbound/200 outbound) and 321 P.M. peak-hour trips (205 inbound/116 outbound), which is less than under the Project. In order to determine the operating conditions of the street system, traffic associated with Alternative 4B was assigned to the local roadway system based on trip distribution and assignment characteristics consistent with the Project.

(a) Existing Conditions With Alternative 4B

Alternative 4B would not result in significant impacts at any intersections under the Existing With Alternative 4B scenario. Thus, Alternative 4B would eliminate the Project's significant and unavoidable impact at Intersection No. 5.

(b) Future Conditions With Alternative 4B

Alternative 4B would result in a significant impact at Intersection No. 8 under Future With Alternative 4B conditions. This impact would be reduced to a less-than-significant level with the same mitigation measure proposed as part of the Project. Therefore, impacts relative to intersection levels of service under Alternative 4B would be less than significant with mitigation, and Alternative 4B would eliminate the Project's significant and unavoidable impacts at Intersection Nos. 5 and 8.

(c) Regional Transportation System, Access and Circulation, and Bicycle, Pedestrian, and Vehicular Safety

With the reduced number of trips and total population (both residential and employee), impacts to the regional transportation system, access and circulation, and bicycle, pedestrian, and vehicular safety would be less than the less-than-significant impacts of the Project.

k. Tribal Cultural Resources

As previously discussed, Alternative 4B would require excavation to depths of up to 25 feet in portions of the Project Site outside of Metro's excavation area, similar to the Project. Therefore, the potential for Alternative 4B to uncover subsurface tribal cultural resources would be similar to that of the Project. As discussed in Section IV.K, Tribal Cultural Resources, of this Draft EIR, no confirmed Native American resources have been identified within the Project area or a surrounding 0.5-mile search radius. More specifically, following written notification of the Project by the City on January 6, 2017, government-to-government consultation was requested by the Gabrieleño Band of Mission Indians—Kizh Nation on January 10 and initiated by the City on March 23, 2017. Upon review of the documents submitted during the subsequent consultation, the City, acting in good faith and after a reasonable effort, did not find substantial evidence of an existing tribal cultural resource within the Project area. Based on their correspondence, the City concluded that mutual agreement could not be reached between the Tribe and City for purposes of AB 52, and as such, the City closed the tribal consultation on October 19, 2018, in fulfillment of its AB 52 requirements. The Tribe responded to the City (on the same day) and requested that the Tribe be consulted if the Project results in ground disturbance. The City responded on November 15, 2018, and confirmed that consultation for the Project had occurred and closed. Additionally, the City responded that the Tribe may submit comments on the EIR as long as the comments are received prior to approval of the document. Furthermore, monitoring of Metro's construction site has not yielded any Native American cultural resources. This information suggests that subsurface conditions within the Project Site have little potential to support the presence of unanticipated cultural resources or tribal cultural resources. While the City has no basis under CEQA to impose any related mitigation measures, the City has established a standard condition of approval under its police power and land use authority to address any inadvertent discovery of a tribal cultural resource. For purposes of this analysis, it is assumed the City would impose this condition on the Project, or any alternative to the Project, as part of its land use approvals. Accordingly, impacts to tribal cultural resources would be less than significant and similar to the impacts of the Project.

l. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 4B would generate a short-term demand for water. This demand would be slightly greater than that of the Project since the amount and duration of construction required under Alternative 4B would be greater. As evaluated in Section IV.L.1, Utilities and Service Systems—Water

Supply and Infrastructure, of this Draft EIR, the Project's demand for water during operation could be met by the City's available supplies normal, single-dry, and multiple-dry years. Therefore, it can be concluded the water demand for construction activities associated with Alternative 4B could also be met by the City's available water supplies, particularly since construction-related demand would be a fraction of that generated during operations. Similarly, the existing LADWP water infrastructure would be adequate to provide the water flow necessary to serve Alternative 4B.

Furthermore, as with the Project, the design and installation of new service connections under Alternative 4B would be required to meet applicable City standards. The connections and installation of on-site water distribution lines would primarily involve trenching to place the lines below ground, which could temporarily affect access in adjacent rights-of-way. However, as previously discussed and like the Project, a Construction Traffic Management Plan would be implemented to ensure adequate and safe access remains available within and near the Project Site during construction. Therefore, impacts on water supply and infrastructure associated with construction activities would be less than significant under Alternative 4B, but slightly greater than the less-than-significant impacts of the Project.

(b) Operation

Based on 680 multi-family residential units, 10,000 square feet of retail uses, a fitness center, common rooms, and new landscaping, and using wastewater generation rates provided by LASAN and information provided by LADWP, Alternative 4B would generate demand for approximately 85,521 gallons of water per day, as shown in Appendix P of this Draft EIR, which is less than the Project's water demand 157,106 gpd. It is noted that this Alternative would not require a cooling tower and instead would use an air-cooled variable refrigerant flow (VRF) system, which would not require water.[51] As concluded in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, and the WSA prepared for the Project, the estimated water demand for the Project would not exceed the available supplies projected by LADWP. Therefore, the estimated water demand under Alternative 4B would also be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040. In addition, the existing water distribution infrastructure would be adequate to serve Alternative 4B since the water demand would be lower than the Project uses. Furthermore, similar to the Project, the Applicant would construct the necessary on-site water infrastructure and off-site connections to the LADWP water system pursuant to

[51] *VRF systems are increasingly popular based on cost-effectiveness and flexibility. Given the limited rooftop area for mechanical equipment under this Alternative, it is not certain sufficient room would be available for a cooling tower; thus a VRF system is proposed. Source: Gensler, 2018.*

applicable City requirements to accommodate the new building. Thus, impacts to water supply under Alternative 4B would be less than significant and less than the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, during construction of Alternative 4B, existing sewer laterals would be capped and no sewage would enter the public sewer system. Temporary facilities such as portable toilet and hand wash areas would be provided by the contractor at the Project Site, and sewage from these facilities would be collected and hauled off-site. As such, wastewater generation from construction activities associated with Alternative 4B would not cause a measurable increase in wastewater flows.

Additionally, as with the Project, Alternative 4B may include construction activities associated with the installation of new or relocated sewer connections. Such activities would be confined to trenching in order to place the sewer lines below surface and would be limited to the on-site wastewater conveyance infrastructure and minor off-site work associated with connections to the City's sewer lines in the streets adjacent to the Project Site. Similar to the Project, a Construction Traffic Management Plan would be implemented during the construction of Alternative 4B to reduce impacts to pedestrian and traffic flow, including emergency vehicle access, which could occur due to temporary off-site utility work. Therefore, construction-related impacts to the wastewater system under Alternative 4B would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

Based on 680 multi-family residential units, 10,000 square feet of retail uses, a fitness center, common rooms, and new landscaping, and using wastewater generation rates provided by LASAN, Alternative 4B would generate an estimated 81,742 gallons per day of wastewater, as shown in Appendix P of this Draft EIR, which is less than the 108,749 gpd generated by the Project. As provided in Section IV.L.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the Project-generated wastewater could be accommodated by the existing capacity of the HWRP. Therefore, since the wastewater generated by Alternative 4B would be less than that of the Project, wastewater generated by Alternative 4B could also be accommodated by the existing capacity of the HWRP, and impacts with respect to treatment capacity would be less than significant.

As with the Project, sewer service for Alternative 4B would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project

Site. Given that Alternative 4B would result in a reduced wastewater generation compared to the Project, it is anticipated that there would be sufficient capacity within the sewer main lines serving the Project Site to serve Alternative 4B. Furthermore, additional detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for Alternative 4B during the permitting process. All related sanitary sewer connections and on-site infrastructure under Alternative 4B would be designed and constructed in accordance with applicable standards.

Thus, impacts with regard to wastewater generation and infrastructure capacity under Alternative 4B would be less than significant and less than the less-than-significant impacts of the Project.

(3) Solid Waste

(a) Construction

Construction of Alternative 4B would involve demolition and building construction activities. The amount of demolition waste generated by Alternative 4B would be similar to the Project, but the amount of construction waste would be greater due to the increased floor area and since construction of residential uses results in more waste than commercial or office uses. Specifically, as shown in Appendix P of this Draft EIR, Alternative 4B would generate an estimated 4,640 tons of construction and demolition waste prior to recycling (1,160 tons when applying the 75 percent diversion rate specified in the project design features), compared to 4,454 tons with the Project (1,113 tons with diversion). The resulting waste would represent only 0.002 percent of the Azusa Land Reclamation Landfill's remaining disposal capacity of 57.56 million tons. Furthermore, construction and demolition wastes would be recycled or collected by private waste haulers contracted by the Applicant and taken to City-certified waste processing facilities for sorting and final distribution, including disposal at the County's unclassified landfill. Since construction and demolition waste would be hauled by a private construction contractor permitted by the City, Alternative 4B would not result in the need for an additional solid waste collection route. Similar to the Project, construction of Alternative 4B would not conflict with any applicable state or City solid waste regulations. As such, solid waste impacts during construction of Alternative 4B would be less than significant, but greater than the less-than-significant impacts of the Project due to the increase in construction waste.

(b) Operation

During its operation, Alternative 4B would generate municipal solid waste typical of residential and retail developments. Similar to the Project, solid waste generated by Alternative 4B would be recycled or collected by private waste haulers contracted by the

Applicant and permitted by the City and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles. The transport of solid waste generated by Alternative 4B to waste management/disposal facilities would continue to occur along existing solid waste routes of travel. As such, as with the Project, Alternative 4B would not result in the need for additional solid waste collection routes to adequately handle waste generated by operations.

As residential uses typically generate more waste than office uses, Alternative 4B would generate more solid waste compared to the Project due to the increased number of residential units. Specifically, as shown in Appendix P of this Draft EIR, Alternative 4B would generate an estimated 1,541 tons per year of solid waste (385 tons per year when factoring in 75 percent diversion per the project design features), which is greater than the Project's solid waste generation of 1,109 tons per year (277 tons per year when factoring in 75 percent diversion). However, this increase would represent only 0.002 percent of the remaining capacity of the Class III landfills open to the City of Los Angeles. Additionally, although Alternative 4B would generate more solid waste than the Project, it would not result in the need for an additional recycling or disposal facility to adequately handle waste generated. Furthermore, like the Project, Alternative 4B would not conflict with applicable solid waste policies and objectives. As such, solid waste impacts during operation of Alternative 4B would be less than significant, but greater than under the Project.

m. Energy Conservation and Infrastructure

(1) Construction

Similar to the Project, construction activities associated with Alternative 4B would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be slightly greater than under the Project due to the increase in the overall amount of construction and duration of construction; however, energy consumption during construction would be substantially less than during operation. In addition, LADWP has confirmed that the supply and existing infrastructure in the Project area would have the capacity to serve the Project Site. Furthermore, as with the Project, construction activities would not use energy in a manner that is wasteful, inefficient, or unnecessary and would not be expected to have an adverse impact on available energy resources or the existing infrastructure. Therefore, impacts on energy resources associated with short-term construction activities would be less than significant under Alternative 4B, but greater than the less-than-significant impacts of the Project.

(2) Operation

As with the Project, operation of Alternative 4B would generate demand for electricity, natural gas, and petroleum-based fuels. However, with the change in the land use mix, overall energy usage would be less than under the Project. Specifically, as shown in Appendix P of this Draft EIR, Alternative 4B would consume an estimated 2,803 MWh of electricity and 5,699,552 cf of natural gas annually; thus, electricity usage would be substantially less than that of the Project (8,094 MWh), while natural gas usage would be slightly higher than under the Project (5,690,050 cf). In addition, Alternative 4B would generate fewer daily vehicle trips than the Project, thus involving less petroleum-based fuels. Alternative 4B would implement the same project design features as the Project, which would improve energy efficiency and reduce impacts on consumption of energy resources. Accordingly, like the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 4B would not be wasteful, inefficient, or unnecessary. Furthermore, Alternative 4B would be located in proximity to a variety of public transit options and would incorporate features to reduce vehicle trips, thereby reducing transportation fuel usage. Therefore, impacts to energy resources under Alternative 4B would be less than significant and less than the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above, Alternative 4B would eliminate the Project's significant and unavoidable impacts with respect to operational intersection levels of service at all intersections under both existing and future conditions, but would not eliminate the Project's significant and unavoidable impacts related to on-site construction noise and on- and off-site construction vibration (related to human annoyance).[52] Cumulative impacts with respect to on- and off-site construction noise and off-site construction vibration (related to human annoyance) would also remain significant and unavoidable.[53] Impacts with respect to aesthetics during operations, operational air quality, hazards and hazardous materials, noise, population, police protection, libraries, parks, and solid waste would be greater than the Project, but would remain less than significant. All other impacts

[52] *The Project's on-site construction noise impact and on-site construction vibration impact (with respect to human annoyance) would only be significant and unavoidable if Related Project No. 121 (Times Mirror Square project) is completed and occupied before or during Project construction.*

[53] *Cumulative on-site construction noise impacts would only be significant and unavoidable if construction of Related Project No. 121 (Times Mirror Square project) occurs concurrently with Project construction. Additionally, should peak construction traffic associated with the Times Mirror Square project be completed prior to commencement of Project construction, the cumulative off-site construction noise impact may not occur.*

(aesthetics during construction; toxic air contaminants; cultural resources; GHG emissions; land use; fire protection; schools; other issues related to transportation/traffic; tribal cultural resources; water supply; wastewater; and energy conservation and infrastructure) would be less than or similar to those of the Project. Based on the elimination of some of the Project's significant and unavoidable impacts, Alternative 4B would have an overall reduced level of impact than the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 4B would meet the underlying purpose of the Project to develop a former surface parking lot within a vibrant area of Downtown Los Angeles with a transit-oriented, high-density project that will generate new economic opportunities for the Downtown area, but would do so to a lesser extent than the Project due to the limited employment-generating uses. In addition, Alternative 4B would achieve the following Project objectives to the same extent as the Project:

- Create a landmark high-rise project that complements the aesthetic character of the area through high quality urban planning and architectural design;
- Incorporate the principles of smart growth and environmental sustainability by capitalizing on the Project Site's location within the established Downtown Los Angeles employment hub, proximity to transit and walkable streets, and the presence of existing infrastructure needed to service the proposed uses, while incorporating sustainable design components that emphasize resource conservation and efficiency;
- Enhance the pedestrian activity and street life in the area by providing ground floor retail uses and associated outdoor amenities that work harmoniously with the future station portal for the Metro Regional Connector line that will be located on the site;
- Maximize the Project's landscaped public open space at the grade level to create extensive pedestrian connections between the future station portal and the surrounding area; and
- Reinforce public investment in and use of public transit by maximizing development density adjacent to existing and future major transit lines, including the Metro Regional Connector line; and
- Maximize the creation of new construction jobs in the City with the development of a new high-rise building.

- Reconfigure the existing parking structure on-site to provide sufficient vehicle and long-term bicycle parking and ensure the parking needs of the Project's tenants and visitors are met, while avoiding an over-supply.

In addition, Alternative 4B would meet the following objectives to a slightly greater extent than the Project due to the minor increase in development:

- Reinforce public investment in and use of public transit by maximizing development density adjacent to existing and future major transit lines, including the Metro Regional Connector line; and

- Revitalize a former surface parking lot to create a high-density mixed-use project with immediate proximity to existing and future transit lines, employment opportunities, shops, restaurants, and entertainment uses.

Alternative 4B would meet the housing and retail aspects of the following objectives to a greater extent than the Project, but would not meet the aspects pertaining to office space:

- Expand and diversify the supply of housing, retail, and commercial space within the Downtown area to further revitalize the northern end of the Broadway corridor.

- Provide new housing, retail, and commercial space with a balance of uses at a density consistent with the site's existing zoning designation to help meet market demands for housing and commercial space within the Downtown area.

- Maximize revenues to the City in the form of additional sales, business license, documentary transfer, and property taxes.

Overall, Alternative 4B would achieve the Project objectives to approximately the same extent as the Project.

V. Alternatives
E. Environmentally Superior Alternative

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

With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible alternatives includes Alternative 1, the No Project/No Build Alternative; Alternative 2, the Reduced Density Alternative; Alternative 3A, the Office Alternative A (411,000 square feet); Alternative 3B, the Office Alternative B (590,000 square feet); Alternative 4A, the Residential Alternative A (with podium), and Alternative 4B, the Residential Alternative B (without podium). Table V-1 beginning on page V-6 provides a comparative summary of the environmental impacts anticipated under each Alternative with the environmental impacts associated with the Project. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to CEQA Guidelines Section 15126.6(c), the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project/No Build Alternative would avoid all of the Project's significant environmental impacts, including the Project's significant and unavoidable impacts related to on-site construction noise, on- and off-site construction vibration (related to human annoyance), and operational intersection levels of service.[54] In addition, Alternative 1 would avoid the Project's significant and unavoidable cumulative impacts with respect to on- and off-site construction noise and off-site construction vibration.[55] However, the No Project/No Build Alternative would not

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[54] *The Project's on-site construction noise impact and on-site construction vibration impact (with respect to human annoyance) would only be significant and unavoidable if Related Project No. 121 (Times Mirror Square project) is completed and occupied before or during Project construction.*

[55] *Cumulative on-site construction noise impacts would only be significant and unavoidable if construction of Related Project No. 121 (Times Mirror Square project) occurs concurrently with Project construction. Additionally, should peak construction traffic associated with the Times Mirror Square project be*

(Footnote continued on next page)

meet any of the Project objectives or achieve the Project's underlying purpose to develop a former surface parking lot within a vibrant area of Downtown Los Angeles with a transit-oriented, high-density project that will generate new economic opportunities for the Downtown area.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative 4B, the Residential Alternative B (without podium), would be the Environmentally Superior Alternative. Alternative 4B would not avoid the Project's significant and unavoidable impacts related to on-site construction noise and on- and off-site construction vibration (related to human annoyance), nor would it avoid the significant and unavoidable cumulative impacts related to on- and off-site construction noise and off-site construction vibration, but it would eliminate the Project's significant and unavoidable traffic impacts with respect to operational intersection levels of service.[56,57,58] In addition, Alternative 4B's impacts would be less than the Project's relative to the following issues: greenhouse gas emissions; operational off-site noise; operational impacts on schools; operational traffic (all impact categories); and water supply and infrastructure wastewater, and energy conservation and infrastructure during operations. Alternative 4B's impacts would be the same as the Project's relative to the following issues: aesthetics during construction; toxic air contaminants; historic, archaeological, and paleontological resources; land use consistency and compatibility; construction-related population, housing, and employment; fire protection; construction phase impacts on police protection, schools, libraries, and parks and recreation; tribal cultural resources; and construction-related solid waste. Alternative 4B would, however, result in greater impacts than the Project with respect to the following: aesthetics during operations; regional and localized air emissions during construction and operations; hazards and hazardous materials; construction noise and vibration; operational on-site noise; operational population, housing, and employment; operational impacts on police protection, libraries, and parks and recreation; construction traffic; construction-related water supply; solid waste; and

completed prior to commencement of Project construction, the cumulative off-site construction noise impact may not occur.

[56] *The Project's on-site construction noise impact and on-site construction vibration impact (with respect to human annoyance) would only be significant and unavoidable if Related Project No. 121 (Times Mirror Square project) is completed and occupied before or during Project construction.*

[57] *Cumulative on-site construction noise impacts would only be significant and unavoidable if construction of Related Project No. 121 (Times Mirror Square project) occurs concurrently with Project construction. Additionally, should peak construction traffic associated with the Times Mirror Square project be completed prior to commencement of Project construction, the cumulative off-site construction noise impact may not occur.*

[58] *It is noted that Alternative 4A would result in the same significant and unavoidable impacts as Alternative 4B.*

construction-related energy conservation and infrastructure, but these impacts would remain less than significant or less than significant with mitigation. In addition, while some Project objectives would be met to a slightly greater or lesser extent, overall Alternative 4B would achieve the Project objectives to approximately the same extent as the Project.

It is further noted that Alternative 4A, the Residential Alternative A (with podium), would result in the same reductions in Project impacts as Alternative 4B. As shown in Table V-1 on page V-7, the impact comparisons (relative to Project impacts) for Alternative 4A are identical to those of Alternative 4B. However, when comparing Alternative 4A with Alternative 4B, the latter would have slightly reduced impacts, primarily due to elimination of the podium; thus, although Alternative 4A would be environmentally superior to the Project, Alternative 4B would be slightly more environmentally superior than Alternative 4A. In addition, similar to Alternative 4B, while some Project objectives would be met to a slightly greater or lesser extent, overall Alternative 4A would achieve the Project objectives to approximately the same extent as the Project. Nonetheless, both Alternative 4A and Alternative 4B are considered environmentally superior to the Project.