

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 to 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 that:

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

Beyond these factors, CEQA Guidelines Section 15126.6(e) requires the analysis of a “no project” alternative and CEQA Guidelines Section 15126.6(f)(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 Project-level and cumulative impacts that cannot be feasibly mitigated with respect to on-site noise during construction, on-site vibration during construction (pursuant to the threshold for human annoyance), and off-site vibration (pursuant to the threshold for human annoyance) during construction. In addition, as evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, cumulative noise impacts from off-site haul trucks would be significant and unavoidable.

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 the potential alternatives, the alternatives to the Project listed below were selected for evaluation. The rationale for selecting the range or alternatives was based on the likelihood of the alternatives being able to avoid or substantially lessen one or more of the potentially significant impacts, the intent to revitalize the Project Site by developing a high-quality mixed-use development that provides new multi-family housing and neighborhood-serving retail and restaurant uses that serve the community and promote walkability.

- Alternative 1: No Project/No Build Alternative.
- Alternative 2: Zoning Compliant Alternative.
- Alternative 3: Reduced Density Alternative.
- Alternative 4: Community Plan Update–Compliant Alternative.

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, and such potential alternatives are also discussed 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:

- **Alternatives to Eliminate Significant Noise and Vibration Impacts During Construction:** As discussed in Section IV.E, Noise, of this Draft EIR, the Project's only significant and unavoidable impacts would be due to noise and vibration that would occur during Project construction for limited durations from the operation of construction equipment and haul trucks. As CEQA Guidelines Section 15126.6(a) requires that alternatives in an EIR seek to avoid or significantly lessen significant impacts of the project, alternatives were considered to avoid the significant short-term Project-level and cumulative construction noise and vibration impacts. Based on the thresholds upon which the construction noise and vibration analysis is based, a substantial reduction in the intensity of construction activities would be necessary to reduce construction-related impacts to a less-than-significant level. In addition, significant construction noise and vibration impacts within the Project Site would be expected to occur with any development scenario because construction activities, and the need to grade and excavate the Project Site, would inherently generate substantial noise and vibration. Also, the Project Site is an infill site surrounded by a mix of existing multi-family residential and commercial uses. Thus, reducing temporary construction noise and vibration impacts below a level of significance at adjacent uses is technologically infeasible. Furthermore, any reduction in the intensity of construction activities on an hourly or daily basis would actually increase the overall duration of the construction period. Therefore, alternatives to avoid or substantially lessen the Project's only significant impacts (short-term noise and vibration impacts during construction) were rejected as infeasible.
- **Alternative Project 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 Hollywood that is generally comprised of

residential, retail, restaurant, office, and entertainment-related uses. These uses make the Project Site particularly suitable for development of a mixed-use development that provides new market rate and affordable multi-family housing and neighborhood-serving retail and restaurant uses that serve the community and promote walkability. The Project Site is also well-served by transit. Further, 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. If an alternative site in the Hollywood area that could accommodate the Project could be found, it would be expected that the significant and unavoidable impacts associated with construction noise and on- and off-site vibration due to construction would also occur, due to the anticipated proximity of existing residential and other noise-sensitive receptors that are characteristic of Hollywood. Additionally, development of the Project at an alternative site could potentially produce other environmental impacts (considering the mixes of uses in the Hollywood area) that would otherwise not occur at the current Project Site and result in greater environmental impacts when compared with the Project. For example, given the age of many of the structures in the Hollywood area, an alternative site could contain historic buildings that could be impacted by development. Therefore, an alternative site is not considered feasible as the Project Applicant does not own another suitable site that would allow the achievement of 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.

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.¹ 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.

¹ *State of California, CEQA Guidelines Section 15126.6 (c).*

- b. Post-mitigation significant and non-significant environmental impacts of the alternative and the Project are compared for each environmental issue area as follows:
- Less: Where the net impact of the alternative would be clearly less adverse or more beneficial than the impact of the Project, the comparative impact is said to be “less.”
 - Greater: Where the 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 the impacts of each of the analyzed alternatives is provided below in Table V-1 on page V-6.

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: Zoning Compliant Alternative	Alternative 3: Reduced Density Alternative	Alternative 4: Community Plan Update–Compliant Alternative
A. AIR QUALITY					
<i>Construction</i>					
<i>Regional Emissions</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Localized Emissions</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Toxic Air Contaminants</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>					
<i>Regional Emissions</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Localized Emissions</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Toxic Air Contaminants</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
B. CULTURAL RESOURCES					
<i>Historic Resources</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Archaeological Resources</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (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: Zoning Compliant Alternative	Alternative 3: Reduced Density Alternative	Alternative 4: Community Plan Update–Compliant Alternative
<i>Paleontological Resources</i>	Less Than Significant With Mitigation	Less (No Impact)	Less (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)
C. GREENHOUSE GAS EMISSIONS					
<i>Greenhouse Gas Emissions</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
D. LAND USE					
<i>Land Use Consistency</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Land Use Compatibility</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
E. NOISE					
<i>Construction²</i>					
<i>On-Site Noise</i>	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
<i>Off-Site Noise</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)

² Cumulative on- and off-site noise impacts and cumulative on- and off-site vibration impacts with respect to human annoyance during Project construction 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: Zoning Compliant Alternative	Alternative 3: Reduced Density Alternative	Alternative 4: Community Plan Update–Compliant Alternative
<i>On-Site Vibration (Building Damage)</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>On-Site Vibration (Human Annoyance)</i>	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
<i>Off-Site Vibration (Building Damage)</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Off-Site Vibration (Human Annoyance)</i>	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
<i>Operation</i>					
<i>On-Site Noise</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Off-Site Noise</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
F. PUBLIC SERVICES					
<i>Fire Protection</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	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: Zoning Compliant Alternative	Alternative 3: Reduced Density Alternative	Alternative 4: Community Plan Update–Compliant Alternative
<i>Police Protection</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Schools</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Parks and Recreation</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Libraries</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	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: Zoning Compliant Alternative	Alternative 3: Reduced Density Alternative	Alternative 4: Community Plan Update–Compliant Alternative
G. TRANSPORTATION					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>					
<i>Intersection Levels of Service</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Regional Transportation System</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Emergency Access</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Public Transit, Bicycle, and Pedestrian Facilities</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Parking</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
H. TRIBAL CULTURAL RESOURCES					
<i>Tribal Cultural Resources</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (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: Zoning Compliant Alternative	Alternative 3: Reduced Density Alternative	Alternative 4: Community Plan Update–Compliant Alternative
I. UTILITIES AND SERVICE SYSTEMS					
<i>Water Supply and Infrastructure</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Wastewater</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
J. ENERGY CONSERVATION AND INFRASTRUCTURE					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<hr/> <i>Source: Eystone Environmental, 2019.</i>					

V. Alternatives

A. Alternative 1: No Project/No Build Alternative

1. Description of the Alternative

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines 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 that the Project would not be approved and no new development would occur within the Project Site. Thus, the physical conditions of the Project Site would generally remain as they are today. The Project Site would continue to be occupied by six commercial buildings totaling approximately 61,816 square feet of floor area and surface parking. No new construction would occur.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

The No Project/No Build Alternative would not alter the six existing commercial buildings and surface parking or require any construction activities on the Project Site. Therefore, Alternative 1 would not result in any construction emissions associated with construction worker and construction truck traffic, fugitive dust from demolition and excavation, or the use of heavy-duty construction equipment, and construction-related regional and localized air quality impacts would not occur. As such, no construction-related air quality impacts associated with regional and localized emissions would occur under Alternative 1, and impacts would be less than the less-than-significant impacts of the Project.

(b) Toxic Air Contaminants

Since construction activities would not occur on the Project Site, the No Project/No Build Alternative would not result in diesel particulate emissions during construction that could generate substantial toxic air contaminant (TAC) emissions. 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 when compared to 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 additional operational emissions related to vehicular traffic or the consumption of electricity and natural gas beyond what is currently generated by the six existing commercial buildings on the Project Site. Therefore, no operational air quality impacts associated with regional and localized emissions would occur under Alternative 1. Thus, such operational impacts associated with regional and localized emissions under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(b) Toxic Air Contaminants

As set forth in Section IV.A, Air Quality, of this Draft EIR, the Project would result in some TAC emissions, primarily from mobile source emissions. Since the No Project/No Build Alternative would not result in new development or increase the intensity of the existing uses on the Project Site, no new increase in mobile source emissions would occur. No operational impacts associated with TACs would occur under the No Project/No Build Alternative, and such impacts would be less when compared to the less-than-significant impacts of Project.

b. Cultural Resources

(1) Historical Resources

As analyzed in Section IV.B, Cultural Resources, of this Draft EIR, there are no historical resources on the Project Site. In addition, no construction activities would occur under the No Project/No Build Alternative. Therefore, Alternative 1 would not result in any impacts to historical resources, and impacts would be less when compared to the less-than-significant impacts of Project.

(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 when compared to 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 when compared to the Project, which would be less than significant with mitigation.

c. Greenhouse Gas Emissions

The No Project/No Build Alternative would not develop new uses on the Project Site. Therefore, no new greenhouse gas (GHG) emissions would be generated under Alternative 1 and new impacts associated with global climate change would not occur. As such, impacts associated with GHG emissions under the No Project/No Build would be less when compared to the less-than-significant impacts of the Project.

d. Land Use

Under the No Project/No Build Alternative, there would be no changes to the physical or operational characteristics of the six existing on-site commercial buildings. Thus, no new land use approvals or permits would be required. However, as discussed in Section IV.D, Land Use, of this Draft EIR, the Project Site is currently zoned [Q]C4-1VL-SN by the Los Angeles Municipal Code (LAMC). The C4 zoning designation is currently inconsistent with the existing Commercial Manufacturing land use designation for the Project Site. Although no new impacts associated with consistency with land use regulations and plans would occur under Alternative 1, the Project Site's zoning designation would continue to be inconsistent with the existing City of Los Angeles General Plan land use designation for the Project Site. Impacts would be less than the less-than-significant impacts of the Project.

In addition, since the No Project/No Build Alternative would not develop new land uses on the Project Site, the existing on-site and/or off-site land uses would not be altered, and existing land use relationships would remain. Therefore, no impacts related to land

use compatibility would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

e. Noise

(1) Construction

Construction activities would not occur on the Project Site under the No Project/No Build Alternative. Therefore, no construction-related noise or vibration would be generated on-site or off-site. As such, Alternative 1 would eliminate the Project's significant and unavoidable on-site noise impacts during construction, on-site vibration impacts with respect to human annoyance during construction, and off-site vibration impacts with respect to human annoyance during construction from haul trucks. In addition, the Project's significant and unavoidable cumulative on- and off-site noise impacts, and cumulative on- and off-site vibration impacts with respect to human annoyance during Project construction would not occur under the No Project/No Build Alternative. Therefore, 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 develop 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 to the Project Site or the Project vicinity. As such, no impacts associated with on-site or off-site operational noise would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

f. Public Services

(1) Fire Protection

No construction or changes to existing land uses and operations on-site would occur under Alternative 1. Therefore, there would be no potential to increase the level of activity on the Project Site or increase the service population for the Los Angeles Fire Department (LAFD) stations that would serve the Project Site such that the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service. No impacts to fire protection and emergency services would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Police Protection

No construction or changes to existing land uses and operations on-site would occur under Alternative 1. Therefore, there would be no potential to increase the level of activity on the Project Site or increase the service population for the Los Angeles Police Department (LAPD) station that would serve the Project Site such that the addition of a new police station or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service. No impacts to police protection services would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(3) Schools

The No Project/No Build Alternative would not construct new development or increase operations on-site. Therefore, there would be no potential to increase the population of school-aged children in the attendance boundaries of the schools within the Los Angeles Unified School District (LAUSD) that serve the Project Site such that the addition of new school facilities or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service. 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 school services.

(4) Parks and Recreation

The No Project/No Build Alternative would not construct new development or increase operations on-site. Therefore, Alternative 1 would not generate additional demand for parks and recreational facilities in the Project vicinity such that the addition of new parks and recreational facilities or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service. No impacts to parks and recreational facilities 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.

(5) Libraries

The No Project/No Build Alternative would not construct new development or increase operations on-site. Therefore, Alternative 1 would not increase the library service population such that the addition of new library facilities or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service. 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 library services.

g. Transportation

(1) Construction

Since the No Project/No Build Alternative would not include the demolition of the six existing commercial buildings, or the development of a new building, construction activities would not occur on the Project Site. Therefore, Alternative 1 would not generate vehicle trips associated with heavy-duty construction equipment, haul trucks, or construction worker vehicles. As such, no construction-related traffic impacts would occur under the No Project/No Build Alternative, and impacts would be less than the Project's less-than-significant Project-level and cumulative construction traffic impacts. In addition, since construction activities would not occur under Alternative 1, there would be no potential for access and safety, bus/transit, and on-street parking impacts during construction. Therefore, impacts under the No Project/No Build Alternative would also be less than the Project's less-than-significant construction-related impacts to access and safety, bus/transit, and on-street parking. 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

Since the No Project/No Build Alternative would not develop new or additional land uses on the Project Site, Alternative 1 would not generate any additional vehicle trips or alter existing access to or circulation within the Project Site during operation. Therefore, no impacts would occur with respect to operational traffic, including intersection levels of service; public transit, bicycle, and pedestrian facilities, and parking; the regional transportation system; emergency access. Therefore, impacts under the No Project/No Build Alternative would be less when compared to the Project, which would be less than significant.

h. 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 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.

i. 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 the existing land uses or site operations on the Project Site. 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 the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the wastewater flow on the Project 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.

j. 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 the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the long-term energy demand on the Project Site. 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 on-site construction noise impacts, on-site construction vibration impacts with respect to human annoyance, and off-site construction vibration impacts with respect for human annoyance. Alternative 1 would also eliminate the Project's cumulative on- and off-site construction noise impacts, as well as the Project's cumulative on- and off-site construction vibration impacts with respect to human annoyance. Impacts associated with the remaining environmental issues would be less than those of the Project.

4. Relationship of the Alternative to Project Objectives

Under the No Project/No Build Alternative, the six existing commercial buildings and surface parking 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 or the Project objectives. Specifically, Alternative 1 would not meet the following Project basic objectives:

- To provide a diverse mix of new housing units, including restricted affordable units that would help to meet the demand for new affordable and market-rate housing opportunities in the Hollywood community and City.

- To redevelop a currently under-utilized site with a Project that is compatible in scale and design with the mixed-use character of the surrounding area.
- To promote local and regional mobility objectives by providing a mix of residential and neighborhood-serving commercial uses in an area that is supported by a variety of recreational amenities and commercial services, and is in close proximity to public transportation.
- To meet the objectives of the City's Walkability Checklist and Citywide Design Guidelines by creating a street-level identity for the Project Site and improving the pedestrian experience through the introduction of neighborhood-serving commercial uses on the ground floor level.
- To create economic vitality in the community through construction jobs, and permanent full-time on-site jobs.

Overall, the No Project/No Build Alternative would not meet the Project's underlying purpose to revitalize the infill Project Site by developing a high-quality mixed-use development that provides new multi-family housing and neighborhood-serving retail and restaurant uses that serve the Hollywood community and promote walkability.

V. Alternatives

B. Alternative 2: Zoning Compliant Alternative

1. Description of the Alternative

Alternative 2, the Zoning Compliant Alternative, would remove the six existing commercial buildings totaling approximately 61,816 square feet of floor area and surface parking to construct a three-story commercial building with approximately 72,604 square feet of total floor area and a maximum FAR of 1.5:1 in accordance with the Project Site's existing [Q]C4-1VL-SN zoning designation, compared to 260,250 square feet of floor area and a FAR of 5.39:1 with the Project. The proposed building would have a maximum height of 45 feet, compared to 99 feet 1 inch with the Project, and would contain approximately 15,000 square feet of high-turnover restaurant uses on the ground floor and 57,604 square feet of retail uses on Level 2 and Level 3. Alternative 2 would include more retail and restaurant uses than the Project, and no residential units compared to 276 with the Project. Alternative 2 would be required to provide a minimum of 145 vehicle parking spaces based on a rate of two spaces per 1,000 square feet pursuant to LAMC Section 12.21-A.4(x)(3), compared to the minimum of 358 required by the Project. In addition, the Zoning Compliant Alternative would provide a minimum of 72 bicycle parking spaces (36 long-term and 36 short-term) in accordance with LAMC Section 12.21-A.16(a)(2), which is less than the minimum of 182 provided by the Project. The required vehicle and bicycle parking spaces would be located at grade and within two subterranean parking levels, compared to four subterranean levels with the Project. Construction of Alternative 2 would require less excavation and grading since only two subterranean levels would be constructed. Accordingly, the overall total amount of construction activities and duration under Alternative 2 would be less than that of the Project.

2. Environmental Impacts

a. 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 and through vehicle

trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. Alternative 2 would require less excavation, grading and building construction since the number of subterranean levels would be reduced to two levels and the overall building square footage would be 187,646 square feet less than the Project. Therefore, the overall amount of construction activities and duration under Alternative 2 would be less than that of the Project. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar to those of the Project on days when maximum construction activities occur. Because maximum daily conditions are used for measuring significance, regional impacts on these days would be similar to those of the Project and would not be significant. Therefore, impacts associated with regional construction emissions under Alternative 2 would be less than significant and similar to the Project's less than significant impacts.

Construction activities under Alternative 2 would be located at similar distances from sensitive receptors as the Project. Since air emissions and fugitive dust from these construction activities would be similar to those of the Project on maximum construction activity days, localized emissions under Alternative 2 would also be similar to those of the Project. Therefore, as with the Project, localized impacts under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

(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.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. Overall construction emissions generated by Alternative 2 would be less than those of the Project because Alternative 2 would construct a building with 187,646 fewer square feet and would require the construction of only two subterranean levels compared to the four subterranean levels proposed by the Project. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 2 would be less when compared 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 2 would be generated by vehicle trips to the Project Site and the consumption of electricity and natural gas. As discussed below in Subsection V.B.2.g.(2) on page V-36, development of Alternative 2 would result in a significant decrease in trip generation

compared to both Project options. As vehicular emissions depend on the number of trips, vehicular sources under Alternative 2 would result in a decrease in air emissions compared to the Project. The total floor area of 72,604 square feet proposed under Alternative 2 is substantially less than the 260,250 square feet of total floor area proposed by the Project. Therefore, Alternative 2 would demand considerably less electricity when compared to the Project, and would therefore generate less air pollutant emissions. In addition, retail uses typically have a reduced demand for natural gas compared to residential uses as retail uses do not typically consume natural gas associated with kitchen uses. Therefore, air quality impacts associated with regional operational emissions under Alternative 2 would be less than significant and such impacts would be less than those of the Project since total emissions would be less.

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 2 would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, localized impacts from on-site emission sources associated with Alternative 2 would also be less than significant. Such impacts would be less than those of the Project due to the overall decrease in total floor area. Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. As discussed in Section IV.A, Air Quality, of this Draft EIR, while the potential localized CO concentrations at nearby intersections could marginally increase as a result of the increased Project traffic, localized CO concentrations would remain well below SCAQMD significance thresholds. As previously discussed above, based on the uses proposed under Alternative 2, the number of net new peak-hour vehicle trips generated would decrease compared to both Project options. Thus, the localized CO concentrations under Alternative 2 would also be below significance thresholds. As such, localized 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 associated with the Project's retail and restaurant uses. However, the retail and restaurant uses associated with the Project, and similarly with Alternative 2, are not considered land uses that generate substantial TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not proposed by the Project or Alternative 2. Alternative 2 would eliminate the multi-family residential uses proposed by the Project and develop ground level restaurant uses and retail uses on the upper levels. Alternative 2 would result in some TAC emissions, primarily from mobile source emissions, which as discussed above, would be less than the mobile source emissions generated by both Project options. Alternative 2 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, as with the Project, potential TAC impacts under Alternative 2 would be less than significant and such impacts would be less than those of the Project since mobile source emissions would be less.

b. Cultural Resources

(1) Historical Resources

Alternative 2 would remove the six existing commercial buildings and surface parking on-site to construct a three-story commercial building on the Project Site. As previously stated, there are no historical resources on the Project Site. Therefore, Alternative 2 would not demolish, relocate or alter any historical resources located on the Project Site. Similar to the Project, Alternative 2 would alter the immediate surroundings of historical resources in the vicinity by constructing a new building on the Project Site. Such resources include the Hollywood Palladium Theater, CBS Columbia Square, the Hollywood Legion Stadium, the Fonda Theatre, 1616 Vista Del Mar Street, the Hollywood Boulevard Commercial and Entertainment District, the Home Savings and Loan building, Pete's Flowers/Morgan Camera sign, the Earl Carroll Theater, and the 6200 Block of Leland Way,. The analysis in Section IV.B, Cultural Resources, of this Draft EIR concludes that the building height, scale, and contemporary style of the Project would not impact the integrity of adjacent historical resources in a manner that would materially impair their significance as historical resources. Like the Project, the proposed building under Alternative 2 would be contemporary in style. However, the proposed building under Alternative 2 would be smaller in scale and massing than the Project. Therefore, impacts to historical resources would be less than significant and less than the impacts of the Project, which would be less than significant.

(2) Archaeological Resources

Alternative 2 would construct two subterranean levels rather than the four subterranean levels proposed by the Project. Therefore, the potential for Alternative 2 to uncover subsurface archaeological resources would be reduced when compared to that of the Project. Nonetheless, Alternative 2 would comply with the same regulatory requirements as the Project in the event that archaeological resources are uncovered during site grading activities. Therefore, impacts to archaeological resources would remain less than significant, and would be less than the less-than-significant impacts of the Project.

(3) Paleontological Resources

Alternative 2 would construct two subterranean levels rather than the four subterranean levels proposed by the Project. Therefore, the potential for Alternative 2 to uncover subsurface paleontological resources would be reduced when compared to that of the Project. Nonetheless, Alternative 2 would comply with the same regulatory requirements and would implement the same mitigation measure as the Project in the event paleontological resources are uncovered during site grading activities. Therefore, impacts to paleontological resources would remain less than significant with mitigation, but would be less than the impacts of the Project, which also would be less than significant with mitigation.

c. Greenhouse Gas Emissions

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. The total floor area of 72,604 square feet proposed under Alternative 2 is substantially less than the 260,250 square feet of total floor area proposed by the Project. Therefore, Alternative 2 would demand considerably less electricity when compared to the Project. In addition, retail uses typically have a reduced demand for natural gas compared to residential uses as retail uses do not typically consume natural gas associated with kitchen uses. In addition, Alternative 2 would have a reduced demand for water. Therefore, under Alternative 2, the total energy and water consumption would be reduced compared to the Project. Furthermore, as discussed under Subsection V.B.2.g.(2) on page V-36, the number of trips generated by the retail and restaurant uses would be significantly less than the number of trips generated by both Project options. Thus, the amount of GHG emissions generated by Alternative 2 would be less than the amount generated by the Project. As with the Project, Alternative 2 would incorporate project design features that would reduce GHG emissions and would be designed to comply with the City's Green Building Ordinance, as applicable, and would be capable of meeting the standards of the U.S. Green Building Council's LEED® Certified or equivalent green building standards. With compliance with the City's Green Building Ordinance and the implementation of comparable sustainability features as the Project, it is anticipated that Alternative 2 would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans. 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.

d. Land Use

(1) Land Use Consistency

As previously described, Alternative 2 would develop a three-story commercial building with retail and restaurant uses, as permitted by the Project Site's existing [Q]C4-1VL-SN (Commercial with Q Condition, Height District 1-VL, Hollywood Signage Supplemental Use District). The proposed building under Alternative 2 would have a total floor area of approximately 72,604 square feet and a maximum height of 45 feet. Thus, Alternative 2 would comply with zoning designation's maximum height limit of 45 feet, as well as with the maximum floor area ratio (FAR) of 1.5:1. Although Alternative 2 would comply with the existing zoning requirements, similar to existing conditions, the zoning designation for the Project Site is not consistent with the existing General Plan land use designation of Commercial Manufacturing, which corresponds to the CM (Commercial Manufacturing) and P (Parking) zoning designations. However, the CM zoning designation allows for retail and restaurant uses. Therefore, the retail and restaurant uses proposed under Alternative 2 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 Southern California Association of Governments' (SCAG) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), the General Plan Framework Element, the Hollywood Community Plan, the Hollywood Redevelopment Plan, and the LAMC. As such, impacts related to land use consistency would be less than significant and less than the less-than-significant impacts of the Project since Alternative 2 would require fewer discretionary actions.

(2) Land Use Compatibility

Alternative 2 would develop retail and restaurant uses that are permitted by the Project Site's existing [Q]C4-1VL-SN zoning designation. The proposed uses under Alternative 2 would be compatible with and would complement existing and future development in the Project area, which is generally comprised of commercial and mixed uses. The proposed building under Alternative 2 would be three stories and would have a height of 45 feet, which would be compatible with the varied heights of the buildings in the Project vicinity. Therefore, Alternative 2 would not substantially and adversely change the existing land use relationships between the Project Site and existing off-site uses or disrupt, divide, or isolate any existing neighborhoods or communities. Impacts associated with land use compatibility would be less than significant and less than the less-than-significant impacts of the Project due to the decrease in building height proposed under Alternative 2.

e. Noise

(1) Construction

Alternative 2 would involve the same general phases of construction as the Project (i.e., site grading and excavation, building construction, and finishing/landscape installation), but would not require the amount of excavation and soil export as the Project since Alternative 2 would construct only two subterranean levels rather than the four subterranean levels proposed by the Project. 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. Since Alternative 2 would not require the extent of site excavation and soil export necessary under the Project, the amount and the 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 when 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. Therefore, noise and vibration impacts due to on-site construction activities under Alternative 2 would also be similar to those that would occur under the Project. Alternative 2 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 during construction. However, as with the Project, construction of Alternative 2 would result in significant and unavoidable on-site construction noise impacts, on-site construction vibration impacts (pursuant to the threshold for human annoyance), and off-site construction vibration impacts (pursuant to the threshold for human annoyance) from haul trucks. Moreover, similar to the Project, Alternative 2 would result in cumulative on- and off-site construction noise impacts, as well as potentially significant on- and off-site cumulative construction vibration impacts related to human annoyance.

As with the Project, on-site construction vibration impacts associated with potential building damage would be less than significant under Alternative 2. In addition, temporary off-site construction noise and vibration impacts (pursuant to the threshold for building damage) from haul trucks under Alternative 2 would be less than significant and similar to the impacts of the Project.

(2) Operation

As described in Section IV.E, Noise of this Draft EIR, sources of operational noise include: a) on-site stationary noise sources such as outdoor mechanical equipment (i.e., HVAC equipment), activities associated with the outdoor landscaped courtyards, parking

facilities, and loading dock/trash collection areas; and b) off-site mobile (roadway traffic) noise sources. Similar to the Project, on-site mechanical equipment used during operation of Alternative 2 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 decibels (dBA). In addition, under Alternative 2, the proposed loading dock and trash collection areas would be enclosed and located on the ground level, similar to the Project. Thus, noise impacts from mechanical equipment, loading docks, and trash collection areas would also be similar to the Project. Unlike the Project, Alternative 2 would not include outdoor residential spaces within the Project Site. Therefore, noise levels associated with activities within the outdoor spaces would be less than those of the Project. Alternative 2 would provide significantly fewer vehicle parking spaces compared to the Project. Like the Project, the vehicle parking spaces would be located within a subterranean parking garage. Thus, the noise impacts from parking operations would be less than that of the Project. Given that under Alternative 2, the noise levels associated with activities within outdoor spaces and with parking operations would be less than those of the Project, the overall composite noise levels generated by Alternative 2 would be less than the Project. As such, on-site noise impacts under Alternative 2 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 decrease in daily vehicle trips compared to the Project as discussed below in Subsection V.B.2.g.(2) on page V-36. The decrease in vehicle trips would result in a decrease in off-site traffic-related noise levels under Alternative 2. Therefore, off-site noise impacts would be less than significant and less when compared to the Project's less-than-significant impacts.

f. Public Services

(1) Fire Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 2 would be similar to that of the Project. However, the overall duration of construction would be reduced compared to the Project due to the reduced amount of excavation and total building square footage. Similar to the Project, construction activities under Alternative 2 would have the potential to result in accidental on-site fires from such sources as the operation of mechanical equipment and the use of flammable construction materials. 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 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 also 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, although construction activities would be short-term and temporary for the area, construction activities could temporarily affect emergency response for emergency vehicles along Argyle Avenue, Gower Street, Sunset Boulevard, and other main connectors 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. Furthermore, like the Project, a Construction Traffic Management Plan, including a Worksite Traffic Control Plan, would be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. 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 shorter.

(b) Operation

As discussed in Section IV.F.1, Public Services—Fire Protection of this Draft EIR, the Project Site would be served by Fire Station No. 27, the “first-in” station, as well as Fire Station No. 82. Alternative 2 would develop retail and restaurant uses on the Project Site and would not include any residential uses. Therefore, Alternative 2 would not generate a new residential population in the service areas of Fire Station No. 27 or No. 82 that would demand fire protection and emergency medical services provided by the LAFD. However, the 15,000 square feet of high-turnover restaurant uses and the 57,604 square feet of retail uses proposed under Alternative 2 would generate approximately 197 employees on-site.³ Alternative 2 would generate a smaller fire service population when compared to the approximately 673 residents and 73 employees generated by the Project for the Grocery Store Option.⁴ Thus, 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

³ *Based on the employee generation rates provided by the Los Angeles Unified School District, 2016 Developer Fee Justification Study, March 2017, Table 14. For the retail and restaurant uses, the rate of 0.00271 employees per average square foot for “Neighborhood Shopping Center” land uses is applied.*

⁴ *The Retail/Restaurant Option generates the same residential population but a smaller employee population than the Grocery Store Option.*

area. LAFD has not established response time standards for emergency response, nor adopted National Fire Protection Association (NFPA) standard of 5 minutes for EMS response and 5 minutes, 20 seconds for fire suppression response. Roadway congestion, intersection level of service (LOS), weather conditions, and construction traffic along a response route can affect response time. Generally, multi-lane arterial roadways allow emergency vehicles to travel at higher rates of speed and permit other traffic to maneuver out of the path of an emergency vehicle. Additionally, the LAFD, in collaboration with Los Angeles Department of Transportation (LADOT), has developed a Fire Preemption System (FPS), which automatically turns traffic lights to green for emergency vehicles traveling along designated City streets to aid in emergency response. The City of Los Angeles has over 205 miles of major arterial routes that are equipped with FPS.

According to the LAFD, although response time is considered in assessment of the adequacy of fire protection services, it is one factor among several that the LAFD utilizes in evaluating its ability to respond to fires and life and health safety emergencies, along with a variety of other criteria, including required fire flow, response distance from existing fire stations, and the LAFD's judgement for needs in an area. If the number of incidents in a given area increases, it is the LAFD's responsibility to assign new staff and equipment and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. In conformance with the requirements stated in the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal, App. 4th 833 ruling, the obligation to provide adequate fire protection services is the responsibility of the City. The City has and will continue to meet its legal constitutional obligations to provide adequate public safety services, including fire protection and emergency medical services.

Therefore, impacts related to fire protection services such that the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service would be less than significant under Alternative 2 and less than the less-than-significant impacts of the Project due to a reduction in the residential service population compared to the Project.

(2) Police Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 2 would be similar to that of the Project. However, the overall duration of construction would be reduced compared to the Project due to the reduced amount of excavation and total building square footage. Similar to the Project, the demand for police protection services during construction of Alternative 2 would be offset by the removal of the existing commercial uses on the Project Site. In addition, the daytime population at the Project Site during construction would be temporary in nature. Alternative 2 would implement the same

project design features as the Project, which include 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 2 could also affect emergency response for police vehicles along Sunset Boulevard, Vine Street, and main connectors 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 Project Site during construction activities. 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 shorter.

(b) Operation

Alternative 2 would develop retail and restaurant uses on the Project Site and would generate a police service population of approximately 218 persons based on the police service population conversion factor of 3 persons per 1,000 square feet of floor area provided in the *L.A. CEQA Thresholds Guide*. This estimate is less than the Project's estimated police service population of 909 persons for the Grocery Store Option. Therefore, Alternative 2 would increase the existing police service population of the Hollywood Community Police Station, but to a lesser extent than the Project. Like the Project, Alternative 2 would not cause a significant change to the current officer-to-resident ratio for the Hollywood Area. Furthermore, Alternative 2 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 2. Furthermore, as discussed in Section IV.F.2, Public Services—Police Protection, of this Draft EIR, consistent with the *City of Hayward v. Board of 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 public safety services (including 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 less.

(3) Schools

(a) Construction

Similar to the Project, Alternative 2 would generate part-time and full-time jobs associated with its construction between the start of construction and full buildout. However, 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 resident 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

Alternative 2 does not include the development of residential uses. Thus, Alternative 2 would not directly generate school-aged children and a corresponding demand for school services. Therefore, implementation of Alternative 2 would not result in a direct increase in the number of students within the service area of the LAUSD. As such, the increased demand for school services provided by the LAUSD would be reduced under Alternative 2 compared to the Project. In addition, the number of students that could be indirectly generated by Alternative 2 as a result of employment opportunities associated with the proposed retail and restaurant uses would not be anticipated to be substantial because most employees would likely reside in the Project vicinity. Furthermore, pursuant to Senate Bill 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 2 and less than the less-than-significant impacts of the Project.

(4) Parks and Recreation

(a) Construction

Similar to the Project, construction of Alternative 2 would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, 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 2 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 of the Project Site.

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 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 any parks and recreational facilities near the Project Site during the 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 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 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

Residents are considered the primary users of parks and recreation facilities. Alternative 2 would develop retail and restaurant uses and would not include the development of residential uses. Thus, implementation of Alternative 2 would not result in on-site residents who would utilize nearby parks and/or recreational facilities. In addition, while it is possible that employees of Alternative 2 may utilize local parks and recreational facilities, the increased demand would be negligible and would be partially off-set by the

reduction in employees attributed to the removal of the existing uses on the Project Site. Therefore, Alternative 2 would result in a reduced demand for public parks and recreation services compared to the Project, and the operation 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. 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.

(5) Libraries

(a) Construction

Similar to the Project, construction of Alternative 2 would result in a temporary increase of construction workers on the Project Site. 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 Project construction. Therefore, construction employment generated by Alternative 2 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 Project-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 (e.g., 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. Alternative 2 would develop retail and restaurant uses and would not include the development of residential uses. Thus, implementation of Alternative 2 would not result in a direct increase in the number of residents. In addition, as employees of Alternative 2 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 2 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. As such, any indirect or direct demand for library services generated by the

employees of Alternative 2 would be negligible. Impacts on library facilities and services would be less than significant and less than the less-than-significant impacts of the Project.

g. Transportation

(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. Alternative 2 would require less excavation and soil export than the Project since Alternative 2 would construct two subterranean levels compared to the four subterranean levels proposed by the Project. In addition, the total amount of building construction under Alternative 2 would be significantly less than the Project. Therefore, the number of haul truck and worker trips and the overall duration of the construction period for Alternative 2 would be reduced when compared to the Project. Similar to the Project, peak haul truck activity would occur during the excavation and grading phase, and peak worker activity would occur during the building 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. Additionally, as with the Project, Alternative 2 would implement a Construction Traffic Management Plan that would require delivery of construction materials and hauling/transport of oversize loads to non-peak travel periods to the extent possible. Therefore, construction-related activities would not contribute a substantial amount of traffic during the weekday morning and afternoon peak periods.

Like the Project, construction of Alternative 2 would be contained within the boundaries of the Project Site, but construction fences would encroach into the public right-of-way (e.g., sidewalk and roadways) and result in the narrowing of the northbound lane on Argyle Avenue and the eastbound lane on Selma Avenue adjacent to the Project Site. The use of the public right-of-way on Argyle Avenue and Selma Avenue and sidewalk closures would also require temporary rerouting of pedestrian traffic. However, as with the Project, Alternative 2 would ensure that roadways would continue to provide two travel lanes with one in each direction. Alternative 2 would also implement a Construction Traffic Management Plan, which would require appropriate construction traffic controls during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways, ensure pedestrian and bicyclist safety along the affected sidewalks and temporary walkways, and maintain emergency access to the Project Site. Therefore, as with the Project, access and safety impacts during construction would be less than significant under Alternative 2.

Similar to the Project, Alternative 2 would require the temporary relocation of the Metro bus layover stop adjacent to the Project Site on Selma Avenue and the temporary

removal of up to six metered parking spaces on Argyle Avenue adjacent to the Project Site. However, as with the Project, the temporary relocations and removals required under Alternative 2 would be coordinated with Metro and LADOT, and would not result in changes to bus service or parking such that a substantial inconvenience to riders and users would occur. In addition, Alternative 2 would also implement a Construction Traffic Management Plan that would prohibit construction workers and construction-related vehicles from parking on adjacent streets. Thus, similar to the Project, construction-related impacts associated with transit and parking are anticipated to be less than significant under Alternative 2.

Based on the above, impacts to transportation during construction would be less than significant under Alternative 2 and less than the less-than-significant impacts of the Project, due to the reduction in the number of haul truck and worker trips and the shorter duration of construction.

(2) Operation

Alternative 2 would generate a total of 1,159 net daily vehicle trips, with 65 net new morning peak-hour trips and 96 net new afternoon peak-hour trips.⁵ Thus, Alternative 2 would generate significantly fewer trips when compared to the 2,013 net daily vehicle trips (170 morning peak hour and 179 afternoon peak hour) generated by the Project's Retail/Restaurant Option, as well as the 1,971 net daily vehicle trips (117 morning peak hour and 192 afternoon peak hour) generated by the Project's Grocery Store Option.⁶ As discussed in Section IV.G, Transportation, of this Draft EIR, intersection levels of service impacts at all study intersections would be less than significant under Existing with Project Conditions and Future With Project Conditions for the Project's Retail/Restaurant Option and Grocery Store Option. Since Alternative 2 would generate far fewer vehicle trips than the both Project options, Alternative 2 would not result in significant impacts at any of the intersections within the study area. As such, intersection levels of service impacts under Alternative 2 would be less than significant and less than the Project's impacts.

Due to the significant decrease in the number of vehicle trips generated by Alternative 2 compared to those generated by the Project under both options, Alternative 2 would not add more than 50 peak-hour trips at the Los Angeles County Congestion Management Program (CMP) arterial monitoring intersections closest to the Project Site or more than 150 trips in either direction during either the A.M. or P.M. peak hour to the

⁵ *Gibson Transportation Consulting, Inc., Traffic Analysis of Project Alternatives for the Modera Argyle Project, Hollywood California, March 9, 2018. See Appendix N.1 of this Draft EIR.*

⁶ *Gibson Transportation Consulting, Inc., Traffic Analysis of Project Alternatives for the Modera Argyle Project, Hollywood California, March 9, 2018. See Appendix N.1 of this Draft EIR.*

identified CMP mainline freeway monitoring location. Similarly, the trips generated by Alternative 2 would not cause the capacity of the transit system to be substantially exceeded and would not create a significant impact on the transit systems serving the Project Site. Therefore, impacts to CMP arterial monitoring stations, CMP mainline freeway monitoring locations, and the existing public transit system would be less than significant and less than the less-than-significant impacts of the Project.

Similar to the Project, the existing emergency access to the Project Site and surrounding uses would be maintained during operation of Alternative 2. In addition, the access and circulation plan proposed under Alternative 2 would be similar to that of the Project. Since Alternative 2 would generate significantly fewer trips than the Project and would not result in significant impacts at any of the study intersections, impacts to emergency access under Alternative 2 would be less than significant and less than the Project impacts, which would be less than significant.

Because the Zoning Compliant Alternative would be smaller than the Project, less demand for public transit would be anticipated. The Zoning Compliant Alternative would also be required to conform to City standards related to sight distance, sidewalks, and/or pedestrian movement controls to protect vehicle, bicycle, and pedestrian safety. In addition, proposed parking under Alternative 2 would meet or exceed LAMC parking requirements for retail and restaurant uses. Therefore, impacts to public transit, bicycle, and pedestrian facilities; and parking would be less than significant and similar to the less-than-significant impacts of the Project.

h. Tribal Cultural Resources

As discussed in Section IV.K, Tribal Cultural Resources, of this Draft EIR, a Sacred Lands File (SLF) search was conducted for the Project, and results were negative for any recorded tribal cultural resources on the Project Site. In compliance with the requirements of Assembly Bill (AB) 52, the City provided formal notification of the Project to the California Native American tribes that requested notification. One response was received by the City on June 20, 2017 from Mr. Andrew Salas, Chairman of the Gabrieleño Band of Mission Indians—Kizh Nation. Consultation occurred between the City and the representatives from the Gabrieleño Band of Mission Indians—Kizh Nation in June 2017. In July 2018, the City followed up with Chairman Salas requesting any additional information regarding the potential for tribal cultural resources in the vicinity of the Project Site. The tribal government responded with two historic maps showing trading routes and village locations in the Hollywood area, as well as with suggested mitigation measures. The Tribe also asserted that due to the Project's location near two major trade routes, they consider the Project Site to have a high potential for buried resources, but did not identify any known resources on-site. While it is evident from the information provided by Chairman Salas, Mr. Teutimez, and the Tribe that the Hollywood area has been traditionally occupied and

utilized for its resources by the Gabrieleño, government-to-government consultation initiated by the City, acting in good faith and after a reasonable effort, has not resulted in the identification of a known tribal cultural resources within or near the Project Site that would be impacted. As such, with the close of tribal consultation by the City on February 22, 2019, the City has fulfilled the requirements of AB 52.

In addition, the Tribal Cultural Resources (TCR) Report prepared for the Project, which included record searches and the independent analysis of correspondence and materials relative to potential tribal cultural resources on the Project Site, concluded that there is no record or evidence of tribal cultural resources on the Project Site or in its vicinity. Nonetheless, the City has established a standard condition of approval to address inadvertent discovery of tribal cultural resources and reduce any potential impacts to less than significant. As such, Project impacts to tribal cultural resources would be less than significant.

Alternative 2 would construct two subterranean levels compared to the four subterranean levels proposed by the Project. Therefore, the potential for Alternative 2 to uncover subsurface tribal cultural resources would be reduced when compared to that of the Project. In addition, the City's standard condition of approval would also be applicable to Alternative 2. Accordingly, impacts to tribal cultural resources would be less than the less-than-significant 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 temporary demand for water. This demand would be less than the Project due to the reduction in the amount of excavation, building construction, and duration of construction that would be required under Alternative 2. As evaluated in Section IV.1.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project's temporary and intermittent demand for water during construction would be less than the net new water consumption of the Project at buildout and 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 2 would also be expected to be met by the City's available water supplies. Similarly, the existing City of Los Angeles Department of Water and Power (LADWP) water infrastructure would be adequate to provide the water flow necessary to serve Alternative 2 during construction. Furthermore, as with the Project, the design and installation of new service connections under Alternative 2 would be required to

meet applicable City standards. Therefore, impacts on water supply and infrastructure associated with short-term construction activities would be less than significant under Alternative 2, and would be less than the less-than-significant impacts of the Project.

(b) Operation

Alternative 2 would develop approximately 57,604 square feet of retail uses and 15,000 square feet of high-turnover restaurant uses on the Project Site. As shown in Table V-2 on page V-40, Alternative 2 would result in a net water demand of approximately 16,289 gallons per day for the Project Site when accounting for the removal of existing uses, which is lower than the net water demand of approximately 46,172 gallons per day for the Project's Retail/Restaurant Option and approximately 29,304 gallons per day for the Project's Grocery Store Option analyzed in Section IV.I.1, Utilities and Service Systems—Water Supply and Infrastructure of this Draft EIR. The estimated water demand for the Project would not exceed the available supplies projected by LADWP. Therefore, the estimated net water demand under Alternative 2 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 2 since the water demand would be lower than both Project options, for which the existing infrastructure was found to be adequate. 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, during construction of Alternative 2, 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 2 would not cause a measurable increase in wastewater flows. Therefore, construction of the Project would not exceed wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board (LARWQCB) or substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the City's Integrated Resources Plan (IRP).

Additionally, as with the Project, Alternative 2 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

**Table V-2
Estimated Water Consumption/Wastewater Generation for Alternative 2**

Land Use	Unit	Generation Factor^a	Total Water Demand/Wastewater Generation (gpd)
Existing			
Retail	14,000 sf	0.025 gpd/sf	350
Office	15,182 sf	0.12 gpd/sf	1,822
Warehouse	32,634 sf	0.03 gpd/sf	979
<i>Total Existing</i>			<i>3,151</i>
Proposed			
Restaurant	600 seats ^b	30 gpd/seat	18,000
Retail	57,604 sf	0.025 gpd/sf	1,440
<i>Subtotal</i>			<i>19,440</i>
Total Net Water Demand/Wastewater Generation			16,289
<p><i>gpd = gallons per day</i> <i>sf = square feet</i> ^a <i>Sewage generation calculations are based on generation factors provided by City of Los Angeles Bureau of Sanitation (LASAN).</i> ^b <i>The estimated number of seats is based on a total of 15,000 square feet of restaurant space, divided by approximately 25 square feet per seat.</i> Source: <i>Eyestone Environmental, 2018.</i></p>			

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 2 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 2 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

Alternative 2 would develop approximately 57,604 square feet of retail uses and approximately 15,000 square feet of high-turnover restaurant uses on the Project Site. As shown in Table V-2, development of Alternative 2 would result in a net decrease in wastewater flows from the Project Site compared to the Project. Alternative 2 would generate a net of approximately 16,289 gallons per day of wastewater after accounting for the removal of existing uses, which is lower than the net wastewater generation of

approximately 46,027 gallons per day for the Project's Retail/Restaurant Option and approximately 29,159 gallons per day for the Project's Grocery Store Option analyzed in Section IV.1.2, Utilities and Service Systems—Wastewater of this Draft EIR. Similar to the Project, the wastewater generated by Alternative 2 would be accommodated by the existing capacity of the Hyperion Water Reclamation Plant (HWRP) and impacts with respect to treatment capacity would be less than significant.

As with the Project, sewer service for Alternative 2 would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site, which include three existing sanitary sewer connections from Argyle Avenue and Selma Avenue. Similar to the Project, Alternative 2 would include one sewer connection to the existing 8-inch sewer main on Argyle Avenue and one sewer connection to the 8-inch sewer main on Selma Avenue. Given that Alternative 2 would result in a net decrease in total average daily wastewater compared to that of the Project, it is anticipated that there would be sufficient capacity in the existing 8-inch sewer mains on Argyle Avenue and Selma Avenue to serve the wastewater flows of 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 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.

j. 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 consumed would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. In addition, LADWP has confirmed that the existing electrical supply and infrastructure in the Project area would have the capacity to serve the Project Site. Furthermore, as with the Project, construction activities would require energy demand 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 2 and less than the less-than-significant impacts of the Project.

(2) Operation

As with the Project, operation of Alternative 2 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions. The total floor area of 72,604 square feet proposed under Alternative 2 is substantially less than the 260,250 square feet of total floor area proposed by the Project. Therefore, Alternative 2 would demand considerably less electricity when compared to the Project. In addition, retail uses typically have a reduced demand for natural gas compared to residential uses as retail uses do not typically consume natural gas associated with kitchen uses. In addition, as previously discussed, Alternative 2 would generate 1,159 net daily vehicle trips compared to the 2,013 net daily vehicle trips generated by the Project's Retail/Restaurant Option and the 1,971 net daily vehicle trips generated by the Project's Grocery Store Option.⁷ Thus, the associated consumption of petroleum-based fuels under Alternative 2 would be much lower when compared to the Project. Accordingly, under Alternative 2, the total energy consumption would be less than that of the Project. Similar to the Project, Alternative 2 would implement the same project design features as the Project, which would improve energy efficiency and reduce impacts on consumption of energy resources. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels 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 eliminate the Project's significant and unavoidable on-site construction noise impacts, on-site construction vibration (pursuant to the threshold for human annoyance) impacts, and off-site construction vibration (pursuant to the threshold for human annoyance) impacts. In addition, Alternative 2 would not eliminate the Project's potentially significant cumulative on- and off-site construction noise impacts, as well as potentially significant cumulative on- and off-site construction vibration impacts related to human annoyance. All other impacts would be less than or similar to those of the Project.

⁷ *Gibson Transportation Consulting, Inc., Traffic Analysis of Project Alternatives for the Modera Argyle Project, Hollywood California, March 9, 2018. See Appendix N.1 of this Draft EIR.*

4. Relationship of the Alternative to Project Objectives

Alternative 2 would remove the six existing commercial buildings on the Project Site and develop retail and restaurant uses as permitted by the existing zoning. As such, Alternative 2 would not meet the Project's underlying purpose of revitalizing the Project Site by developing a high-quality mixed-use development that provides new multi-family housing and neighborhood-serving retail and restaurant uses that serve the community and promote walkability. Specifically, Alternative 2 would not develop residential uses to meet the following basic Project objectives:

- To provide a diverse mix of new housing units, including restricted affordable units that would help to meet the demand for new affordable and market-rate housing opportunities in the Hollywood community and City.
- To promote local and regional mobility objectives by providing a mix of residential and neighborhood-serving commercial uses in an area that is supported by a variety of recreational amenities and commercial services, and is in close proximity to public transportation.

However, Alternative 2 would satisfy the following objectives by redeveloping an infill site and constructing a high-quality building that would be compatible with the surrounding area. Alternative 2 would site restaurant uses on the ground floor to encourage pedestrian activity, and new retail and restaurant uses would provide employment opportunities that would boost economic vitality in the Hollywood area:

- To redevelop a currently under-utilized site with a Project that is compatible in scale and design with the mixed-use character of the surrounding area.
- To meet the objectives of the City's Walkability Checklist and Citywide Design Guidelines by creating a street-level identity for the Project Site and improving the pedestrian experience through the introduction of neighborhood-serving commercial uses on the ground floor level.
- To create economic vitality in the community through construction jobs, and permanent full-time on-site jobs.

Although Alternative 2 would meet three of the Project objectives, it would not meet the objectives related to providing a mixed-use development or new housing opportunities. Moreover, Alternative 2 would not meet the underlying purpose of the Project.

V. Alternatives

C. Alternative 3: Reduced Density Alternative

1. Description of the Alternative

Alternative 3, the Reduced Density Alternative, would remove the six existing commercial buildings totaling approximately 61,816 square feet of floor area and surface parking to develop the Project Site with similar uses as the Project, but at a reduced density. Specifically, under Alternative 3, the proposed housing units would be reduced from 276 units to 207 units. Affordable housing units would not be provided under Alternative 3 because a density bonus would not be requested. In addition, the commercial uses (restaurant and retail) would be reduced by 25 percent to approximately 18,000 square feet of floor area compared to 24,000 square feet with the Project. Like the Project, the Reduced Density Alternative would develop neighborhood-serving commercial uses on the ground floor, with all residential dwelling units located on the upper levels. Total floor area developed under Alternative 3 would be reduced to approximately 195,869 square feet compared to 260,250 square feet with the Project and building height would be reduced to 6 stories and a maximum height of approximately 85 feet compared to 7 stories and 99 feet 1 inch with the Project. Architectural elements, lighting and signage, and access to and within the Project Site under Alternative 3 would be similar to that of the Project. Similar to the Project, Alternative 3 would include a request for a zone and height district change on the Project Site from the existing [Q]C4-1VL-SN zone to the (T)(Q)C4-2D-SN zone to remove the Project Site's existing Q condition prohibiting residential uses (per Ordinance No. 165,662), and to establish Height District No. 2 with a base FAR of 4.5:1. However, the Reduced Density Alternative would only achieve a FAR of approximately 4.05:1.

The total number of vehicle and bicycle parking spaces required under Alternative 3 would be less than the amount required by the Project due to the reduction in residential units and commercial floor area. Vehicle and bicycle parking for the proposed uses would be provided on the ground level and within three subterranean parking levels. Since the number of subterranean levels proposed under Alternative 3 would be reduced by one level compared to the Project, the amount of excavation and soil export would also be reduced. Thus, the overall total amount of construction activities and duration under Alternative 3 would be less than that of the Project.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

The Reduced Density Alternative would involve the same amount of demolition and grading as the Project, but the amount of excavation, soil export, and new construction would be reduced. As with the Project, construction of Alternative 3 would generate air emissions through the use of heavy-duty construction equipment and haul truck and construction worker trips. Under Alternative 3, the overall amount of excavation and building construction would be less than what is proposed under the Project due to the elimination of one subterranean level, the reduction in total floor area, and the elimination of one aboveground level. Therefore, the overall amount of construction activities and duration under Alternative 3 would be less than that of the Project. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days when maximum construction activities occur. Because maximum daily conditions are used for measuring impact significance, regional impacts on these days would be similar to those of the Project and would not be significant. Therefore, impacts associated with regional construction emissions under Alternative 3 would be less than significant and similar to the Project's less than significant impacts.

Construction activities under Alternative 3 would be located at similar distances from sensitive receptors as the Project. Since air emissions and fugitive dust from these construction activities would be similar to those of the Project on maximum construction activity days, localized emissions under Alternative 3 would also be similar to those of the Project. Therefore, as with the Project, localized impacts under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Toxic Air Contaminants

As with the Project, construction of the Reduced Density Alternative 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.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. Overall construction emissions generated by Alternative 3 would be less than those of the Project since the amount of excavation and building construction required under the Reduced Density Alternative would be reduced compared to the Project. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

The Reduced Density Alternative would reduce the total square footage of uses on the Project Site from 261,159 square feet as proposed by the Project to approximately 195,869 square feet. As discussed below in Subsection V.C.2.g.(2) on page V-58, the number of net new daily vehicle trips generated by the Reduced Density Alternative would be less than the number of trips generated by both Project options. Operational regional air pollutant emissions associated with Alternative 3 would be generated by vehicle trips to the Project Site, which are the largest contributors to operational air pollutant emissions, and the consumption of electricity and natural gas. Since the amount of vehicular emissions is based on the number of trips generated, the vehicular emissions generated by Alternative 3 would be less than the emissions generated by the Project because the number of vehicular trips is less. In addition, since the amount of residential, retail and restaurant uses would be reduced under Alternative 3, it is reasonable to conclude that the consumption of electricity and natural gas would also be reduced compared to the Project. Therefore, under Alternative 3, total contributions to regional air pollutant emissions during operation would be less than the Project's contribution. Accordingly, regional air quality impacts under Alternative 3 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 3 would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, localized impacts from on-site emission sources associated with Alternative 3 would also be less than significant. Such impacts would be less than those of the Project due to the reduction in overall floor area, which would result in less on-site operational air emissions compared to the Project. Localized mobile source operational impacts are determined primarily by peak-hour intersection traffic volumes. As discussed in Section IV.A, Air Quality, of this Draft EIR, while the potential localized CO concentrations at nearby intersections could marginally increase as a result of the increased Project traffic, localized CO concentrations would remain well below SCAQMD significance thresholds. As discussed above, the number of net new peak-hour vehicle trips generated by Alternative 3 would be less than the vehicle trips generated by both Project options. Thus, the localized CO concentrations under Alternative 3 would also be below significance thresholds. As such, localized impacts under Alternative 3 would be less than significant, and less than the less-than-significant impacts of the Project.

(b) Toxic Air Contaminants

Similar to the Project, the Reduced Density Alternative would not include any substantial TAC sources as defined in the guidance documents. Alternative 3 would result in some TAC emissions, primarily from mobile source emissions, which as discussed

above, would be less than the mobile source emissions generated by both Project options. Therefore, TAC impacts would be less than significant under Alternative 3 and less than the less-than-significant TAC impacts of the Project.

b. Cultural Resources

(1) Historical Resources

The Reduced Density Alternative would remove the six existing commercial buildings and surface parking on-site to construct a three-story commercial building on the Project Site. As previously stated, there are no historical resources on the Project Site. Therefore, Alternative 3 would not demolish, relocate or alter any historical resources located on the Project Site. Similar to the Project, Alternative 3 would alter the immediate surroundings of historical resources in the vicinity by constructing a new building on the Project Site. Such resources include the Hollywood Palladium Theater, CBS Columbia Square, the Hollywood Legion Stadium, the Fonda Theatre, 1616 Vista Del Mar Street, the Hollywood Boulevard Commercial and Entertainment District, the Home Savings and Loan building, Pete's Flowers/Morgan Camera sign, the Earl Carroll Theater, and the 6200 Block of Leland Way. The analysis in Section IV.B, Cultural Resources, of this Draft EIR concludes that the building height, scale, and contemporary style of the Project would not impact the integrity of adjacent historical resources in a manner that would materially impair their significance as historical resources. The design of proposed building under the Reduced Density Alternative would be similar to that of the Project in terms architectural style, and building materials and colors, but would be reduced in height by one level. Thus, overall impacts to historical resources would be less than significant and less than the impacts of the Project, which would be less than significant.

(2) Archaeological Resources

The Reduced Density Alternative would construct three subterranean levels compared to the four subterranean levels proposed by the Project. Therefore, the potential for Alternative 3 to uncover subsurface archaeological resources would be less when compared to that of the Project. Alternative 3 would comply with the same regulatory requirements as the Project in the event that archaeological resources are uncovered. Thus, impacts to archaeological resources under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

(3) Paleontological Resources

The Reduced Density Alternative would construct three subterranean levels compared to the four subterranean levels proposed by the Project. Therefore, the potential for Alternative 3 to uncover subsurface paleontological resources would be less when

compared to that of the Project. Alternative 3 would comply with the same regulatory requirements and implement the same mitigation measures as the Project in the event that paleontological resources are uncovered. Thus, impacts to paleontological resources under Alternative 3 would be less than significant with mitigation, and would be less than the impacts of the Project, which would be less than significant with mitigation.

c. Greenhouse Gas Emissions

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 the Reduced Density Alternative, the trip generation and energy and water consumption from proposed land uses would be reduced compared to the Project due to the reduction of the proposed building and uses by approximately 25 percent. Thus, the amount of GHG emissions generated by Alternative 3 would be less than the amount generated by the Project. As with the Project, the Reduced Density Alternative would incorporate project design features that would reduce GHG emissions and would be designed to comply with the City's Green Building Ordinance, as applicable, and would be capable of meeting the standards of the U.S. Green Building Council's LEED® Certified or equivalent green building standards. With compliance with the City's Green Building Ordinance and the implementation of comparable sustainability features as the Project, it is anticipated that Alternative 3 would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans. Thus, impacts related to GHG emissions under the Reduced Density Alternative would be less than significant and less than the less-than-significant impacts of the Project.

d. Land Use

(1) Land Use Consistency

As previously discussed, the Reduced Density Alternative would develop the same uses as the Project at a reduced density. Accordingly, the floor area ratio, density, and building height would be reduced compared to the Project. Alternative 3 would require similar discretionary approvals as the Project, but would not require a further increase in the maximum permitted FAR or a density bonus. Under Alternative 3, the proposed 195,869 square feet of new floor area would result in a FAR of approximately 4.05:1, which is less than the maximum permitted FAR of 4.5:1 allowed by the proposed zone and height district change. In addition, the proposed 207 dwelling units would be within the maximum base density of 242 dwelling units for the 48,403 square-foot Project Site. Similar to the Project, with approval of the requested discretionary approvals and implementation of the project design features discussed throughout the EIR (which would also be implemented as part of Alternative 3), the Reduced Density Alternative would also 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 SCAG's 2016–2040 RTP/SCS, the General Plan Framework Element, the Hollywood Community Plan, the Hollywood Redevelopment Plan, and the LAMC. Thus, impacts related to land use consistency would be less than significant and less than the less-than-significant impacts of the Project since Alternative 3 would not require approval of an additional FAR or density increase.

(2) Land Use Compatibility

The Reduced Density Alternative includes the same types of uses as the Project. Therefore, similar to the Project, the uses proposed under Alternative 3 would be compatible with and would complement existing and future development in the Hollywood area and would not substantially or adversely change the existing land use relationships between the Project Site and adjacent land uses. As previously described, building density, height, and floor area would be reduced under the Reduced Density Alternative. Nevertheless, similar to the Project, Alternative 3 would be substantially compatible with existing character of the surrounding area, which includes a mix of low-, mid-, and high-rise buildings. Furthermore, like the Project, Alternative 3 also would not physically divide an established community. As such, overall impacts associated with land use compatibility would be less than significant, and substantially similar to those of the Project.

e. Noise

(1) Construction

The Reduced Density Alternative would involve the same general phases of construction as the Project (i.e., site grading and excavation, building construction, and finishing/landscape installation). The types of construction activities under Alternative 3 would be substantially similar to the Project, although the duration of construction and the amount of new building construction would be reduced due to the reduction in total floor area and building height, and the reduction in the number subterranean levels. As with the Project, construction of Alternative 3 would generate noise and vibration from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Under Alternative 3, on- and off-site construction activities and the associated construction noise and vibration levels would be expected to be similar during maximum activity days to that of the Project. Although the overall duration of construction activities would decrease under Alternative 3 when compared to the Project, the daily intensity of construction activities would remain the same. Thus, noise and vibration levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Accordingly, noise and vibration impacts due to on- and off-site construction activities under the Reduced Density Alternative would also be similar to those that would occur under the Project. Alternative 3 would comply with the same applicable regulatory

requirements and implement the same project design features and mitigation measures as the Project to reduce noise and vibration levels during construction. However, similar to the Project, construction of Alternative 3 would result in significant and unavoidable on-site noise impacts during construction, on-site vibration impacts during construction (pursuant to the threshold for human annoyance), and off-site vibration impacts (pursuant to the threshold for human annoyance) during construction from haul trucks. Moreover, similar to the Project, the Reduced Density Alternative would result in cumulative on- and off-site construction noise impacts, as well as potentially significant on- and off-site cumulative construction vibration impacts related to human annoyance.

As with the Project, vibration impacts associated with potential building damage from on-site construction activities would be less than significant under Alternative 3. In addition, temporary noise and vibration impacts (pursuant to the threshold for building damage) from off-site construction traffic generated by Alternative 3 would be less than significant and similar to the impacts of the Project.

(2) Operation

As discussed in Section IV.E, Noise, of this Draft EIR, sources of operational noise include: (a) on-site stationary noise sources such as outdoor mechanical equipment (i.e., HVAC equipment), activities associated with the proposed outdoor spaces, parking facilities, and trash collection areas, and (b) offsite mobile (roadway traffic) noise sources. The Reduced Density Alternative would introduce noise from similar on-site noise sources as the Project. Under Alternative 3, it is anticipated that with the overall reduction in total floor area and uses, the noise levels from building mechanical equipment would also be reduced. In addition, similar to the Project, on-site mechanical equipment used during operation of Alternative 3 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. The Reduced Density Alternative would also include outdoor space areas within the Project Site, and such areas would be located at similar distances from offsite noise sensitive receptors as the Project. Therefore, noise levels associated with activities within the outdoor spaces would be similar to those of the Project. The proposed loading dock and trash collection areas for Alternative 3 would also be located in similar areas as the Project. Thus, noise impacts from loading dock and trash collection areas would also be similar to the Project. Alternative 3 would provide parking within only three subterranean levels compared to the four subterranean levels proposed by the Project, and would include fewer parking spaces than the Project. However, since the parking levels for both the Project and Alternative 3 would be underground, potential noise associated with parking facilities would be substantially similar. Based on this comparative analysis, the overall composite noise levels generated by Alternative 3 would be substantially similar to the Project. As such, on-site operational noise impacts under

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

With regard to off-site noise sources, the Reduced Density Alternative would result in a reduction in daily vehicle trips compared to the Project as discussed below in Subsection V.C.2.g.(2) on page V-58. The reduction in vehicle trips would result in a decrease in off-site traffic-related noise levels under Alternative 3. Therefore, off-site noise impacts would be less than significant and less than the Project's less-than-significant impacts.

f. Public Services

(1) Fire Protection

(a) Construction

As previously discussed, the total floor area and building height of the proposed building under the Reduced Density Alternative would be reduced compared to that of the Project. Therefore, the overall duration of construction for Alternative 3 would be shorter than the duration of construction for the Project. As is the case with the Project, construction activities under Alternative 3 would have the potential to result in accidental on-site fires by exposing combustible materials to fire risks from such sources as the operation of mechanical equipment and the use of flammable construction materials. 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 related to hazardous materials.

Additionally, access to the Project Site and the surrounding vicinity could be impacted by construction activities under Alternative 3, such as temporary lane closures, roadway/access improvements, and the construction of utility line connections. Furthermore, construction activities also 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, although construction activities would be short-term and temporary for the area, construction activities could temporarily affect emergency response for emergency vehicles along Argyle Avenue, Gower Street, Sunset Boulevard, and other main connectors 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. Furthermore, 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. Therefore, construction-related impacts related to fire protection services under Alternative 3 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 with the Project, the Reduced Density Alternative would introduce a new residential population to the Project Site that would contribute to an increase in demand for LAFD fire protection and emergency medical services. This increased demand for LAFD fire protection and emergency medical services would be reduced compared to that of the Project due to the decrease in the number of residential dwelling units and the reduction in size of the retail and restaurant uses proposed. LAFD has not established response time standards for emergency response, nor adopted National Fire Protection Association (NFPA) standard of 5 minutes for EMS response and 5 minutes, 20 seconds for fire suppression response. Roadway congestion, intersection level of service (LOS), weather conditions, and construction traffic along a response route can affect response time. Generally, multi-lane arterial roadways allow emergency vehicles to travel at higher rates of speed and permit other traffic to maneuver out of the path of an emergency vehicle. Additionally, the LAFD, in collaboration with Los Angeles Department of Transportation (LADOT), has developed a Fire Preemption System (FPS), which automatically turns traffic lights to green for emergency vehicles traveling along designated City streets to aid in emergency response. The City of Los Angeles has over 205 miles of major arterial routes that are equipped with FPS.

According to the LAFD, although response time is considered in assessment of the adequacy of fire protection services, it is one factor among several that LAFD utilizes in evaluating its ability to respond to fires and life and health safety emergencies, along with a variety of other criteria, including required fire flow, response distance from existing fire stations, and the LAFD's judgement for needs in an area. If the number of incidents in a given area increases, it is the LAFD's responsibility to assign new staff and equipment and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. In conformance with the requirements stated in the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal, App. 4th 833 ruling, the obligation to provide adequate fire protection services is the responsibility of the City. The City has and will continue to meet its legal constitutional obligations to provide adequate public safety services, including fire protection and emergency medical services. Therefore, as Alternative 3 would generate a smaller residential and employee population on the Project Site compared to the Project, overall impacts such that the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain fire protection

services during operation of Alternative 3 would be less than significant, and would be less than those of the Project.

(2) Police Protection

(a) Construction

The types of construction activities would be similar under the Reduced Density Alternative, although the extent of such activities and overall duration of construction would be reduced, compared to the Project due to the reduction in overall amount of excavation and building construction. Similar to the Project, the demand for police protection services during construction of Alternative 3 would be offset by the removal of the existing commercial uses on the Project Site. In addition, the daytime population at the Project Site during construction would be temporary in nature. As with the Project, Alternative 3 would implement temporary security measures such as fencing, lighting, and locked entry to secure the Project Site during construction and reduce the potential for theft and vandalism on the Project Site, thereby reducing the demand for police protection services. Similar to the Project, construction activities under Alternative 3 could also affect emergency response for police vehicles along Sunset Boulevard, Vine Street, and main connectors 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 Project Site during construction activities. Therefore, construction-related impacts to police protection services under Alternative 3 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 with the Project, Alternative 3 would introduce new residential and employee populations to the Project Site that would contribute to an increase in demand for police protection services provided by the Hollywood Community Police Station. This increased demand in police protection services would be reduced compared to the Project due to the reduction in the number of residential units and the total floor area of retail and restaurant uses. Alternative 3 would generate a smaller residential and employee population on the Project Site compared to the Project. Thus, although Alternative 3 would increase the existing police service population of the Hollywood Community Police Station, the service population increase would be less than that of the Project. Like the Project, Alternative 3 would not result in a significant change to the current officer-to-resident ratio for the Hollywood Area. Furthermore, similar to the Project, Alternative 3 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 3. As Alternative 3 would generate a smaller residential and employee population on the Project Site compared to the Project, Alternative 3 would also 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. Furthermore, as discussed in Section IV.F.2, Public Services—Police Protection, of this Draft EIR, consistent with the *City of Hayward v. Board of 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 public safety services (including 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. 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 3 would be less.

(3) Schools

(a) Construction

Similar to the Project, the Reduced Density Alternative would generate part-time and full-time jobs associated with its construction between the start of construction and full buildout. However, 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 3. Therefore, the construction employment generated by Alternative 3 would not result in a notable increase in the resident population or a corresponding demand for schools in the vicinity of the Project Site. Impacts on school facilities during construction under Alternative 3 would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

The Reduced Density Alternative would include only 207 residential units compared to the Project's 276 residential units. Thus, Alternative 3 would generate a reduced number of new students at the Project Site compared to the Project. In addition, the number of students that could be indirectly generated by Alternative 3 as a result of employment opportunities associated with the proposed retail and restaurant uses would not be anticipated to be substantial because, as with the Project, most employees would likely reside in the Project vicinity. Furthermore, as with the Project, pursuant to Senate Bill 50, the Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits, and payment of these fees is considered

mitigation of Project-related school impacts pursuant to Government Code Section 65995. 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 3 and less than the less-than-significant impacts of the Project.

(4) Parks and Recreation

(a) Construction

Similar to the Project, construction of the Reduced Density Alternative would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, 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 3 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 of the Project Site.

As with the Project, during construction of Alternative 3, 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 any parks and recreational facilities near the Project Site during the construction of Alternative 3.

In addition, as with the Project, construction of Alternative 3 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 3 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 3 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. The Reduced Density Alternative would develop a reduced number of dwelling units compared to the Project. Therefore, Alternative 3 would generate fewer residents at the Project Site that could demand parks and recreation services. In addition, as with the Project, Alternative 3 would include open space and recreational amenities that Project residents would utilize to meet their recreational needs. Thus, Alternative 3 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 3 may utilize local parks and recreational facilities, the increased demand would be negligible and would be off-set by the net reduction in employees attributed to the removal of the existing uses on the Project Site. Therefore, the Reduced Density Alternative would result in a reduced demand for public parks and recreation services compared to the Project. Impacts to park and recreation facilities would be less than significant under Alternative 3 and less than the less-than-significant impacts of the Project.

(5) Libraries

(a) Construction

Similar to the Project, construction of the Reduced Density Alternative would result in a temporary increase of construction workers on the Project Site. 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 Project construction. Therefore, construction employment generated by Alternative 3 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 Project-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 (e.g., 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 3 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. The Reduced Density Alternative would develop a reduced number of dwelling units compared to the Project. Therefore, Alternative 3 would generate fewer residents at the Project Site that could demand library services. In addition, employees and the potential indirect population generation attributable to those employees would generate minimal demand for library services since employees of Alternative 3 would be more likely to use library facilities near their homes during non-work hours. Furthermore, some of the employment opportunities generated by Alternative 3 would be filled by people already residing in the vicinity of the Project Site. Thus, impacts to libraries would be reduced under Alternative 3 compared to the Project. Nevertheless, like the Project, Alternative 3 would pay a \$200 per capita fee to be used for library staff, books, computers, and other materials as a condition of approval. As such, impacts on libraries facilities and services under the Reduced Density Alternative would be less than significant, and less than the less-than-significant impacts of the Project.

g. Transportation

(1) Construction

As with the Project, construction of the Reduced Density Alternative would generate additional trips from heavy-duty construction equipment, haul trucks, and construction worker trips. Alternative 3 would reduce the total floor area, building height, and number of subterranean levels for the proposed building. Therefore, the overall amount of construction and the duration of the construction period for the Reduced Density Alternative would be reduced when compared to the Project. Similar to the Project, peak haul truck activity would occur during the excavation and grading phase, and peak worker activity would occur during the building 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. Additionally, as with the Project, Alternative 3 would implement a Construction Traffic Management Plan that would require delivery of construction materials and hauling/transport of oversize loads to non-peak travel periods to the extent possible. Therefore, construction-related activities would not contribute a substantial amount of traffic during the weekday morning and afternoon peak periods.

Like the Project, construction of Alternative 3 would be contained within the boundaries of the Project Site, but construction fences would encroach into the public right-of-way (e.g., sidewalk and roadways) and result in the narrowing of the northbound lane on Argyle Avenue and the eastbound lane on Selma Avenue adjacent to the Project Site. The use of the public right-of-way on Argyle Avenue and Selma Avenue and sidewalk closures

would also require temporary rerouting of pedestrian traffic. However, as with the Project, Alternative 3 would ensure that roadways would continue to provide two travel lanes with one in each direction. The Reduced Density Alternative would also implement a Construction Traffic Management Plan, which would require appropriate construction traffic controls during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways, ensure pedestrian and bicyclist safety along the affected sidewalks and temporary walkways, and maintain emergency access to the Project Site. Therefore, as with the Project, access and safety impacts during construction would be less than significant under Alternative 3.

Similar to the Project, Alternative 3 would require the temporary relocation of the Metro bus layover stop adjacent to the Project Site on Selma Avenue and the temporary removal of up to six metered parking spaces on Argyle Avenue adjacent to the Project Site. However, as with the Project, the temporary relocations and removals required under Alternative 3 would be coordinated with Metro and LADOT, and would not result in changes to bus service or parking such that a substantial inconvenience to riders and users would occur. In addition, Alternative 3 would also implement a Construction Traffic Management Plan that would prohibit construction workers and construction-related vehicles from parking on adjacent streets. Thus, similar to the Project, construction-related impacts associated with transit and parking are anticipated to be less than significant under Alternative 3.

Based on the above, impacts to transportation during construction would be less than significant under Alternative 3 and less than the less-than-significant impacts of the Project, due to the reduction in the number of haul truck trips and the shorter duration of construction.

(2) Operation

The Reduced Density Alternative would generate a total of 1,207 net daily vehicle trips, with 106 net new morning peak-hour trips and 112 net new afternoon peak-hour trips.⁸ Thus, Alternative 3 would generate fewer trips when compared to the 2,013 net daily vehicle trips (170 morning peak hour and 179 afternoon peak hour) generated by the Project's Retail/Restaurant Option, as well as the 1,971 net daily vehicle trips (117 morning peak hour and 192 afternoon peak hour) generated by the Project's Grocery Store Option.⁹ As discussed in Section IV.G, Transportation, of this Draft EIR, intersection levels of

⁸ *Gibson Transportation Consulting, Inc., Traffic Analysis of Project Alternatives for the Modera Argyle Project, Hollywood California, March 9, 2018. See Appendix N.1 of this Draft EIR.*

⁹ *Gibson Transportation Consulting, Inc., Traffic Analysis of Project Alternatives for the Modera Argyle Project, Hollywood California, March 9, 2018. See Appendix N.1 of this Draft EIR.*

service impacts at all study intersections would be less than significant under Existing with Project Conditions and Future With Project Conditions for the Project's Retail/Restaurant Option and Grocery Store Option. Since Alternative 3 would generate fewer vehicle trips than both Project options, Alternative 3 would also not result in significant impacts at any of the intersections within the study area. Therefore, intersection levels of service impacts under the Reduced Density Alternative would be less than significant and less than the less-than-significant impacts of the Project due to the reduction in both the number of proposed dwelling units and floor area of proposed retail and restaurant uses.

Due to the significant decrease in the number of vehicle trips generated by the Reduced Density Alternative compared to those generated by the Project under both options, Alternative 3 would not add more than 50 peak-hour trips at the CMP arterial monitoring intersections closest to the Project Site, or more than 150 trips in either direction during either the A.M. or P.M. peak hour to the identified CMP mainline freeway monitoring location. Similarly, the trips generated by Alternative 3 would not cause the capacity of the transit system to be substantially exceeded and would not create a significant impact on the transit systems serving the Project Site. Therefore, impacts to CMP arterial monitoring stations, CMP mainline freeway monitoring locations, and the existing public transit system would be less than significant and less than the less-than-significant impacts of the Project.

Similar to the Project, the existing emergency access to the Project Site and surrounding uses would be maintained during operation of Alternative 3. In addition, the access and circulation plan proposed under Alternative 3 would be similar to that of the Project. Since Alternative 3 would generate significantly fewer trips than the Project and would not result in significant impacts at any of the study intersections, impacts to emergency access under Alternative 3 would be less than significant and less than the Project impacts, which would be less than significant.

Because the Reduced Density Alternative would be smaller than the Project, less demand for public transit would be anticipated. The Reduced Density Alternative would also be required to conform to City standards related to sight distance, sidewalks, and/or pedestrian movement controls to protect vehicle, bicycle, and pedestrian safety. In addition, proposed parking under Alternative 3 would meet or exceed LAMC parking requirements for residential, retail, and restaurant uses. Therefore, impacts to public transit, bicycle, and pedestrian facilities; and parking would be less than significant and similar to the less-than-significant impacts of the Project.

h. Tribal Cultural Resources

As discussed in Section IV.K, Tribal Cultural Resources, of this Draft EIR, an SLF search was conducted for the Project, and results were negative for any recorded tribal cultural resources on the Project Site. In compliance with the requirements of AB 52, the

City provided formal notification of the Project to the California Native American tribes that requested notification. One response was received by the City on June 20, 2017 from Mr. Andrew Salas, Chairman of the Gabrieleño Band of Mission Indians—Kizh Nation. Consultation occurred between the City and the representatives from the Gabrieleño Band of Mission Indians—Kizh Nation in June 2017. In July 2018, the City followed up with Chairman Salas requesting any additional information regarding the potential for tribal cultural resources in the vicinity of the Project Site. The Tribe responded with two historic maps showing trading routes and village locations in the Hollywood area, as well as with suggested mitigation measures. The Tribe also asserted that due to the Project's location near two major trade routes, they consider the Project Site to have a high potential for buried resources, but did not identify any known resources on-site. While it is evident from the information provided by Chairman Salas, Mr. Teutimez, and the Tribe that the Hollywood area has been traditionally occupied and utilized for its resources by the Gabrieleño, government-to-government consultation initiated by the City, acting in good faith and after a reasonable effort, has not resulted in the identification of a known tribal cultural resources within or near the Project Site that would be impacted. As such, with the close of tribal consultation by the City on February 22, 2019, the City has fulfilled the requirements of AB 52.

In addition, the TCR Report prepared for the Project, which included record searches and the independent analysis of correspondence and materials relative to potential tribal cultural resources on the Project Site, concluded that there is no record or evidence of tribal cultural resources on the Project Site or in its vicinity. Nonetheless, the City has established a standard condition of approval to address inadvertent discovery of tribal cultural resources and reduce any potential impacts to less than significant. As such, Project impacts to tribal cultural resources would be less than significant.

The Reduced Density Alternative would construct three subterranean levels in lieu of the four subterranean levels proposed by the Project. Therefore, the potential for Alternative 3 to uncover subsurface tribal cultural resources would be reduced when compared to that of the Project. Moreover, the City's standard condition of approval regarding inadvertent discovery of TCRs would be applied to the Reduced Density Alternative. Accordingly, impacts to tribal cultural resources would be less than the less-than-significant impacts of the Project.

i. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities associated with the Reduced Density Alternative would generate a short-term demand for water. This demand would be less than the Project since the amount of excavation and building construction required under Alternative 3 would be reduced. As evaluated in Section IV.I.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 under the Reduced Density Alternative would be less, the temporary and intermittent demand for water during construction under Alternative 3 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 the Reduced Density Alternative during construction. Furthermore, as with the Project, the design and installation of new service connections under Alternative 3 would be required to meet applicable City standards. Therefore, impacts on water supply and infrastructure associated with short-term construction activities would be less than significant under the Reduced Density Alternative, and less than the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of the Reduced Density Alternative would generate an increased demand for water relative to existing conditions. However, based on the reduction in total development, water demand for Alternative 3 would be less than the Project's estimated increase in water demand. The estimated water demand for the Project would not exceed the available supplies projected by LADWP. Thus, the estimated net water demand under Alternative 3 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 the Reduced Density Alternative since the water demand would be lower than that of the Project, for which the existing infrastructure was found to be adequate. Thus, impacts to water supply under the Reduced Density Alternative during operation 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 the Reduced Density Alternative, 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 offsite. As such, wastewater generation from construction activities associated with Alternative 3 would not cause a measurable increase in wastewater flows. Therefore, construction of the Project would not exceed wastewater treatment requirements of the LARWQCB or substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the IRP.

Additionally, as with the Project, Alternative 3 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 3 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 3 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

As with the Project, operation of the Reduced Density Alternative would generate an greater wastewater flows relative to existing conditions. However, based on the reduction in total development, wastewater generation under Alternative 3 would be less than the Project's estimated wastewater flow. Thus, as with the Project, it can be reasonably concluded that the wastewater generated by Alternative 3 would 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 3 would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site, which include are three existing sanitary sewer connections from Argyle Avenue and Selma Avenue. Similar to the Project, Alternative 2 would include one sewer connection to the existing 8-inch sewer main on Argyle Avenue and one sewer connection to the 8-inch sewer main on Selma Avenue. Given that wastewater flows generated by Alternative 3

would be less than the estimated wastewater flow of the Project, it is anticipated that there would be sufficient capacity within the existing 8-inch sewer mains on Argyle Avenue and Selma Avenue to serve Alternative 3. 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 3 during the permitting process. All related sanitary sewer connections and on-site infrastructure under Alternative 3 would be designed and constructed in accordance with applicable standards.

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

j. Energy Conservation and Infrastructure

(1) Construction

Similar to the Project, construction activities associated with the Reduced Density Alternative 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 reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. In addition, LADWP has confirmed that the existing electrical supply infrastructure in the Project area would have the capacity to serve the Project Site. Furthermore, as with the Project, construction activities would require energy demand 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 3 and less than the less-than-significant impacts of the Project.

(2) Operation

As with the Project, operation of the Reduced Density Alternative would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions. Based on the reduction in total development, electricity, natural gas, and petroleum-based fuel consumption for Alternative 3 would be less than the Project's estimated increase in electricity, natural gas, and petroleum-based fuel consumption. Specifically, Alternative 3 would reduce the number of residential units and the amount of total floor area for retail and restaurant uses, which would result in a reduction in the consumption of electricity and natural gas. In addition, as previously discussed, Alternative 3 would generate 1,207 net daily vehicle trips compared to the 2,013 net daily vehicle trips

generated by the Project's Retail/Restaurant Option and the 1,971 net daily vehicle trips generated by the Project's Grocery Store Option.¹⁰ Thus, the associated consumption of petroleum-based fuels under the Reduced Density Alternative would be reduced. Accordingly, under Alternative 3, the total energy consumption would be less than that of the Project. Similar to the Project, Alternative 3 would implement the same project design features as the Project, which would improve energy efficiency and reduce impacts on consumption of energy resources. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 3 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 the Reduced Density Alternative would be less than significant and less than the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above, the Reduced Density Alternative would not eliminate the Project's significant and unavoidable on-site construction noise impacts, on-site construction vibration (pursuant to the threshold for human annoyance) impacts, and off-site construction vibration (pursuant to the threshold for human annoyance) impacts. In addition, Alternative 3 would not eliminate the Project's potentially significant cumulative on- and off-site construction noise impacts, as well as potentially significant cumulative on- and off-site construction vibration impacts related to human annoyance. All other impacts would be less than significant and less than or similar to those of the Project.

4. Relationship of the Alternative to Project Objectives

Overall, the Reduced Density Alternative represents a reduced scope of development compared to the Project due to the reduction of residential dwelling units, retail and restaurant floor area, and building height and overall floor area. Furthermore, Alternative 3 would not achieve the following Project objectives to the same extent as the Project:

- To provide a diverse mix of new housing units, including restricted affordable units that would help to meet the demand for new affordable and market-rate housing opportunities in the Hollywood community and City.

¹⁰ Gibson Transportation Consulting, Inc., *Traffic Analysis of Project Alternatives for the Modera Argyle Project, Hollywood California, March 9, 2018*. See Appendix N.1 of this Draft EIR.

- To redevelop a site with a Project that is compatible in scale and design with the mixed-use character of the surrounding area.
- To promote local and regional mobility objectives by providing a mix of residential and neighborhood-serving commercial uses in an area that is supported by a variety of recreational amenities and commercial services, and is in close proximity to public transportation.
- To meet the objectives of the City's Walkability Checklist and Citywide Design Guidelines by creating a street-level identity for the Project Site and improving the pedestrian experience through the introduction of neighborhood-serving commercial uses on the ground floor level.
- To create economic vitality in the community through construction jobs, and permanent full-time on-site jobs.

Specifically, the Reduced Density Alternative would only develop 207 housing units, as compared to the Project's 276 units. In addition, affordable units would not be provided under Alternative 3, as the Reduced Density Alternative would not be seeking approval of a density bonus. Therefore, as compared to the Project, Alternative 3 would not provide the same number of new market and affordable housing units to help meet the demand for new housing in the Hollywood area and the City. While Alternative 3 would redevelop the currently under-utilized site and provide a mix of residential and neighborhood-serving commercial uses that is supported by public transportation, recreational amenities, and commercial services, it would provide fewer dwelling units (207 as compared to the Project's 276 units) and less neighborhood-serving commercial floor area (approximately 18,000 square feet of uses as compared to the 24,000 square feet proposed under the Retail/Restaurant Option and the 27,000 square feet proposed under the Grocery Store Option) in proximity to transit, and therefore would not promote local and regional mobility objectives to the same extent as the Project. Similar to the Project, Alternative 3 would create a street-level identity for the Project Site by siting the proposed neighborhood-serving commercial uses on the ground level fronting Argyle Avenue and Selma Avenue, and complying with the City's Walkability Checklist and Citywide Design Guidelines. However, by providing less neighborhood-serving commercial floor area, Alternative 3 would not meet this objective as fully as the Project. Similarly, the reduced size of the commercial component under Alternative 3 would result in fewer permanent full-time on-site jobs, when compared to the Project. Moreover, Alternative 3 would not avoid or substantially lessen any of the Project's significant impacts.

V. Alternatives

D. Alternative 4: Community Plan Update–Compliant Alternative

1. Description of the Alternative

Alternative 4, the Community Plan Update–Compliant Alternative, would remove the six existing commercial buildings totaling approximately 61,816 square feet of floor area and surface parking to develop a six-story mixed-use residential and commercial building containing approximately 217,814 square feet of total floor area, resulting in a maximum FAR of 4.5:1 in accordance with the [Q]C4-2D-SN-CPIO zone proposed for the Project Site under the draft proposed Hollywood Community Plan Update.¹¹ Specifically, Alternative 4 would develop approximately 15,000 square feet of ground-level high-turnover restaurant uses, 33,500 square feet of office uses, and 200 residential units, compared to 24,000 square feet of retail/restaurant uses and 270 residential units with the Project. The total proposed 48,500 square feet of commercial uses would achieve a 1:1 commercial FAR as required by the draft Hollywood Community Plan Update for projects containing residential uses. The proposed building under Alternative 4 would have a maximum height of approximately 85 feet compared to 99 feet 1 inch with the Project and four subterranean parking levels, similar to the Project. Architectural elements, lighting and signage, and access to and within the Project Site under Alternative 4 would be similar to that of the Project.

In accordance with LAMC requirements, Alternative 4 would provide 97 commercial parking spaces and approximately 300 residential parking spaces, compared to a minimum of 48 commercial spaces and 310 residential spaces. Alternative 4 would also provide a minimum of 164 bicycle parking spaces (140 long-term and 24 short-term) in accordance with LAMC requirements, which is less than the Project. Vehicle and bicycle parking would be provided on the ground floor and within the four subterranean levels.

The total amount of building construction required under Alternative 4 would be less than the Project since the total floor area and building height would be reduced (217,814 square feet compared to the 260,250 square feet proposed by the Project and six stories compared to the seven stories proposed by the Project). However, the amount of

¹¹ Note that at the time of the publication of this Draft EIR, the proposed Hollywood Community Plan Update exists in draft form, and has not yet been adopted by the City.

excavation and soil export would be similar since the number of subterranean levels proposed under Alternative 4 is the same as the Project. Thus, the overall construction duration under the Community Plan Update–Compliant Alternative would be slightly shorter than that of the Project.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

Alternative 4 would involve the same amount of demolition, excavation, and grading as the Project, but the amount of new construction would be reduced. As with the Project, construction of Alternative 4 would generate air emissions through the use of heavy-duty construction equipment and haul truck and construction worker trips. Under Alternative 4, the overall amount of building construction would be less than the Project due to the reduction in total floor area (217,814 square feet compared to the 260,250 square feet proposed by the Project) and building height (six stories compared to the seven stories proposed by the Project). Therefore, the overall amount of construction activities and duration under Alternative 4 would be less than that of the Project. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days when maximum construction activities occur. Because maximum daily conditions are used for measuring impact significance, regional impacts on these days would be similar to those of the Project and would not be significant. Therefore, impacts associated with regional construction emissions under Alternative 4 would be less than significant and similar to the Project's less-than-significant impacts.

Construction activities under Alternative 4 would be located at similar distances from sensitive receptors as the Project. Since air emissions and fugitive dust from these construction activities would be similar to those of the Project on maximum construction activity days, localized emissions under Alternative 4 would also be similar to those of the Project. Therefore, as with the Project, localized impacts under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Toxic Air Contaminants

As with the Project, construction of the Community Plan Update–Compliant Alternative 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.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions.

Overall construction emissions generated by Alternative 4 would be less than those of the Project since the total floor area and building height would be reduced. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 4 would be less than significant and less than 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 the Community Plan Update–Compliant Alternative would be generated by vehicle trips to the Project Site and the consumption of electricity and natural gas. As discussed below in Subsection V.D.2.g.(2) on page V-81, development of Alternative 4 would result in a reduction in net new daily vehicle trips compared to both Project options. As vehicular emissions depend on the number of vehicle trips, the overall pollutant emissions generated by Alternative 4 would be less than the emissions generated by the Project because the number of vehicular trips is less. Alternative 4 would construct fewer residential units than the Project but would develop 33,500 square feet of office uses in lieu of the 9,000 square feet of retail uses. Specifically, Alternative 4 would emit approximately 8 pounds per day of VOC, 14 pounds per day of NO_x, 42 pounds per day of CO, less than 1 pound per day of SO_x, 5 pounds per day of PM₁₀, and 2 pounds per day of PM_{2.5}.¹² These emissions are below the regional significance threshold for criteria pollutants. Therefore, like the Project, air quality impacts associated with regional operational emissions under Alternative 4 would be less than significant and less when compared to the Project since total emissions would be less.

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 4 would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, localized impacts from on-site emission sources associated with Alternative 4 would also be less than significant. Such impacts would be less than those of the Project due to the reduction in overall floor area, which would result in less on-site operational air emissions compared to the Project. Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. As discussed in Section IV.A, Air Quality, of this Draft EIR, while the potential localized CO concentrations at nearby intersections could marginally increase as a result of the increased Project traffic, localized CO concentrations would remain well below SCAQMD significance thresholds. As previously discussed above, based on the uses proposed under Alternative 4, the number of net new peak-hour vehicle trips generated would be less than the vehicle trips generated by both Project options.

¹² See Appendix N.2 of this Draft EIR for air quality worksheets associated with Alternative 4.

Thus, the localized CO concentrations under Alternative 4 would also be below significance thresholds. As such, localized impacts under Alternative 4 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.A, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include diesel particulate matter from delivery trucks associated with the Project's office and restaurant uses. However, the office and restaurant uses associated with the Project are not considered land uses that generate substantial TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not proposed by the Project or Alternative 4. Alternative 4 would include ground-floor restaurant uses and 33,500 of office uses, which are not associated with large amounts of delivery trucks and would not generate substantial TAC emissions. Alternative 4 would result in some TAC emissions, primarily from mobile source emissions, which as discussed above, would be less than the mobile source emissions generated by both Project options. Therefore, TAC impacts would be less than significant under Alternative 4 and less than the less-than-significant TAC impacts of the Project.

b. Cultural Resources

(1) Historical Resources

The Community Plan Update–Compliant Alternative would remove the six existing commercial buildings and surface parking on-site to construct a six-story mixed-use building on the Project Site. As previously stated, there are no historical resources on the Project Site. Therefore, Alternative 4 would not demolish, relocate or alter any historical resources located on the Project Site. Similar to the Project, Alternative 4 would alter the immediate surroundings of historical resources in the vicinity by constructing a new building on the Project Site. Such resources include the Hollywood Palladium Theater, CBS Columbia Square, the Hollywood Legion Stadium, the Fonda Theatre, 1616 Vista Del Mar Street, the Hollywood Boulevard Commercial and Entertainment District, the Home Savings and Loan building, Pete's Flowers/Morgan Camera sign, the Earl Carroll Theater, and the 6200 Block of Leland Way. The analysis in Section IV.B, Cultural Resources, of this Draft EIR concludes that the building height, scale, and contemporary style of the Project would not impact the integrity of adjacent historical resources in a manner that would materially impair their significance as historical resources. The design of proposed building under Alternative 4 would be similar to that of the Project in terms architectural style, and building materials and colors, but would be reduced in height by one level. Thus, overall impacts to historical resources would be less than significant and less than the impacts of the Project, which would be less than significant.

(2) Archaeological Resources

The Community Plan Update–Compliant Alternative would construct four subterranean parking levels, as would the Project. Therefore, the potential for Alternative 4 to uncover subsurface archaeological resources would be similar to that of the Project. Alternative 4 would also comply with the same regulatory requirements as the Project in the event that archaeological resources are uncovered. Thus, impacts to archaeological resources would be less than significant, and similar to the less-than-significant impacts of the Project.

(3) Paleontological Resources

The Community Plan Update–Compliant Alternative would construct four subterranean parking levels, as would the Project. Therefore, the potential for Alternative 4 to uncover subsurface paleontological resources would be similar to that of the Project. Alternative 4 would also comply with the same regulatory requirements and implement the same mitigation measure as the Project in the event that paleontological resources are uncovered. Thus, impacts to paleontological resources would be less than significant with mitigation, and similar to the impacts of the Project, which also would be less than significant with mitigation.

c. Greenhouse Gas Emissions

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. The residential, restaurant, and office uses proposed under Alternative 4 would have a greater demand for electricity, but would use less natural gas when compared to the Project.¹³ In addition, as discussed under Subsection V.D.2.g.(2) on page V-81, the number of trips generated by the residential, restaurant, and office uses would be less than the number of trips generated by the Project. Thus, the overall amount of GHG emissions generated by Alternative 4 would be less than the amount generated by the Project. As with the Project, the Community Plan Update–Compliant Alternative would incorporate project design features that would reduce GHG emissions and would be designed to comply with the City’s Green Building Ordinance, as applicable, and would be capable of meeting the standards of the U.S. Green Building Council’s LEED® Certified or equivalent green building standards. With compliance with the City’s Green Building Ordinance and the implementation of comparable sustainability features as the Project, it is anticipated that Alternative 4 would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans. Thus, impacts related to GHG

¹³ See Appendix N.2 of this Draft EIR for air quality worksheets associated with Alternative 4.

emissions under Alternative 4 would be less than significant, and less than the less-than-significant impacts of the Project.

d. Land Use

(1) Land Use Consistency

As previously described, the Community Plan Update–Compliant Alternative would develop a six-story building with residential, office, and restaurant uses on the Project Site in accordance with the Regional Center Commercial land use designation and [Q]C4-2D-SN-CPIO (Commercial, Height District 2 with Development Limitation, Signage Supplemental Use District, Community Plan Implementation Overlay) zone proposed for the Project Site under the draft Hollywood Community Plan Update. The [Q]C4-2D-SN-CPIO zone permits the development of multi-family residential, restaurant, and office uses proposed by Alternative 4. The proposed building under Alternative 4 would have a maximum height of approximately 85 feet, which is permitted under the proposed [Q]C4-2D-SN-CPIO zone since the zoning designation does not impose a height limit. Alternative 4 would also comply with the maximum 4.5:1 FAR permitted by the [Q]C4-2D-SN-CPIO zone and the draft Hollywood Community Plan Update, as well as the minimum commercial FAR requirement of 1:1 for projects containing residential uses (Alternative 4 would include approximately 48,500 square feet of commercial floor area on the approximately 48,403 square-foot Project Site). Since Alternative 4 would comply with the proposed land use and zoning requirements of the draft Hollywood Community Plan Update, Alternative 4 would also 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 SCAG’s 2016–2040 RTP/SCS regional plans, the General Plan Framework Element, the Hollywood Community Plan, the Hollywood Redevelopment Plan, and the LAMC. Therefore, assuming the adoption of the Hollywood Community Plan Update, impacts related to land use consistency would be less than significant, and less than the less-than-significant impacts of the Project since Alternative 4 would require fewer discretionary actions.

(2) Land Use Compatibility

The Community Plan Update–Compliant Alternative would develop residential, office, and restaurant uses that are permitted by the Project Site’s proposed Regional Center Commercial land use designation and [Q]C4-2D-SN-CPIO zone under the draft Hollywood Community Plan Update. The proposed uses under Alternative 4 would be compatible with and would complement existing and future development in the Project area, which is generally comprised of commercial and mixed uses. The proposed building under Alternative 4 would only have six stories and a maximum height of approximately 85 feet compared to the seven stories/99 feet proposed by the Project. Therefore, as with

the Project, Alternative 4 would not substantially and adversely change the existing land use relationships between the Project Site and existing off-site uses or disrupt, divide, or isolate any existing neighborhoods or communities. Impacts associated with land use compatibility would be less than significant and substantially similar to the impacts of the Project despite the decrease in building height.

e. Noise

(1) Construction

The Community Plan Update–Compliant Alternative would involve the same general phases of construction as the Project (i.e., site grading and excavation, building construction, and finishing/landscape installation). As with the Project, construction of Alternative 4 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Alternative 4 would require a similar amount of site excavation and soil export, but the amount of building construction would be slightly less since the total floor area and building height would be reduced when compared to the Project. Nevertheless, the amount and the overall duration of construction would be substantially similar when compared to the Project. Accordingly, noise and vibration levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Alternative 4 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 during construction. As with the Project, construction of Alternative 4 would result in significant and unavoidable on-site construction noise impacts, on-site construction vibration impacts (pursuant to the threshold for human annoyance), and off-site construction vibration impacts (pursuant to the threshold for human annoyance) from haul trucks. Moreover, similar to the Project, Alternative 4 would result in cumulative on- and off-site construction noise impacts, as well as potentially significant on- and off-site cumulative construction vibration impacts related to human annoyance.

As with the Project, on-site construction vibration impacts associated with potential building damage would be less than significant under Alternative 4. In addition, temporary off-site construction noise and vibration impacts (pursuant to the threshold for building damage) from haul trucks under Alternative 4 would be less than significant and similar to the impacts of the Project.

(2) Operation

As described in Section IV.E, Noise of this Draft EIR, sources of operational noise include: a) on-site stationary noise sources such as outdoor mechanical equipment (i.e., HVAC equipment), activities associated with the outdoor landscaped courtyards, parking

facilities, and loading dock/trash collection areas; and b) off-site mobile (roadway traffic) noise sources. Similar to the Project, on-site mechanical equipment used during operation of Alternative 4 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, under Alternative 4, the proposed loading dock and trash collection areas would be enclosed and located on the ground level, similar to the Project. Thus, noise impacts from mechanical equipment, loading docks, and trash collection areas would also be similar to the Project. Furthermore, like the Project, the Community Plan Update–Compliant Alternative would include outdoor residential spaces within the Project Site. Therefore, noise levels associated with activities within the outdoor spaces would likely be similar to those of the Project. Alternative 4 would provide more vehicle parking spaces compared to the Project; however, the potential noise associated with parking facilities would be substantially similar to that of the Project since all parking spaces would also be located within four subterranean levels. Therefore, the overall composite noise levels generated by Alternative 4 would be substantially similar to the Project. As such, on-site noise impacts under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

With regard to off-site noise sources, the Community Plan Update–Compliant Alternative would result in a decrease in daily vehicle trips compared to the Project as discussed below in Subsection V.D.2.g.(2) on page V-81. The reduction of vehicle trips would result in a decrease in off-site traffic-related noise levels under Alternative 4. Therefore, off-site noise impacts would be less than significant, and less when compared to the Project’s less-than-significant impacts.

f. Public Services

(1) Fire Protection

(a) Construction

As previously described, the total floor area and building height of the proposed building under the Community Plan Update–Compliant Alternative would be slightly reduced when compared to that of the Project, but the same number of subterranean parking levels would be constructed. Therefore, it is anticipated that the overall duration of construction for Alternative 4 would be substantially similar to the duration of construction for the Project. As is the case with the Project, construction activities under Alternative 4 would have the potential to result in accidental on-site fires by exposing combustible materials to fire risks from such sources as the operation of mechanical equipment and the use of flammable construction materials. 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 related to hazardous materials.

Additionally, access to the Project Site and the surrounding vicinity could be impacted by construction activities under Alternative 4, 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, although construction activities would be short-term and temporary for the area, construction activities could temporarily affect emergency response for emergency vehicles along Argyle Avenue, Gower Street, Sunset Boulevard, and other main connectors 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. Furthermore, 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. Therefore, construction-related impacts related to fire protection services under Alternative 4 would be less than significant, and similar to the less-than-significant impacts of the Project.

(b) Operation

As discussed in Section IV.F.1, Public Services—Fire Protection of this Draft EIR, the Project Site would be served by Fire Station No. 27, the “first-in” station, as well as Fire Stations No. 82. The Community Plan Update—Compliant Alternative would develop residential, office, and restaurant uses on the Project Site. Therefore, Alternative 4 would generate a new residential population in the service areas of Fire Station Nos. 27 and 82 that would demand fire protection and emergency medical services provided by the LAFD. Based on an average household size of 2.43 persons per household, the proposed 200 units would generate approximately 486 residents on the Project Site. In addition, the 15,000 square feet of restaurant uses, and 33,500 square feet of office uses proposed under Alternative 4 would generate approximately 202 employees on-site.¹⁴ Thus, Alternative 4 would generate a smaller fire service population when compared to the approximately 671 residents and 73 employees generated by the Project for the Grocery

¹⁴ *Based on the employee generation rates provided by the Los Angeles Unified School District, 2016 Developer Fee Justification Study, March 2017, Table 14. For the 15,000 square feet of restaurant uses, the rate of 0.00271 employees per average square foot for “Neighborhood Shopping Center” land uses is applied. For the 33,500 square feet of office uses, the rate of 0.00479 employees per average square feet for “Standard Commercial Office” land uses is applied.*

Store Option, with fewer residents and more employees.¹⁵ As such, the demand for fire protection and emergency medical services would be reduced when compared to the Project. LAFD has not established response time standards for emergency response, nor adopted National Fire Protection Association (NFPA) standard of 5 minutes for EMS response and 5 minutes, 20 seconds for fire suppression response. Roadway congestion, intersection level of service (LOS), weather conditions, and construction traffic along a response route can affect response time. Generally, multi-lane arterial roadways allow emergency vehicles to travel at higher rates of speed and permit other traffic to maneuver out of the path of an emergency vehicle. Additionally, the LAFD, in collaboration with Los Angeles Department of Transportation (LADOT), has developed a Fire Preemption System (FPS), which automatically turns traffic lights to green for emergency vehicles traveling along designated City streets to aid in emergency response. The City of Los Angeles has over 205 miles of major arterial routes that are equipped with FPS.

According to the LAFD, although response time is considered in assessment of the adequacy of fire protection services, it is one factor among several that LAFD utilizes in evaluating its ability to respond to fires and life and health safety emergencies, along with a variety of other criteria, including required fire flow, response distance from existing fire stations, and the LAFD's judgement for needs in an area. If the number of incidents in a given area increases, it is the LAFD's responsibility to assign new staff and equipment and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. In conformance with the requirements stated in the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal, App. 4th 833 ruling, the obligation to provide adequate fire protection services is the responsibility of the City. The City has and will continue to meet its legal constitutional obligations to provide adequate public safety services, including fire protection and emergency medical services. Therefore, impacts related to fire protection services such that the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service would remain less than significant under Alternative 4 and less than the less-than-significant impacts of the Project due to the reduction of the fire service population.

(2) Police Protection

(a) Construction

The types of construction activities under the Community Plan Update–Compliant Alternative would be similar to the Project. Therefore, the potential for theft and vandalism during construction activities at the Project Site would also be similar to the Project. Similar

¹⁵ *The Retail/Restaurant Option generates the same residential population but a smaller employee population than the Grocery Store Option.*

to the Project, the demand for police protection services during construction of Alternative 4 would be offset by the removal of the existing commercial uses on the Project Site. In addition, the daytime population at the Project Site during construction would be temporary in nature. As with the Project, Alternative 4 would implement temporary security measures such as fencing, lighting, and locked entry to secure the Project Site during construction. Therefore, similar to the Project, potential impacts associated with theft and vandalism during construction of Alternative 4 would be less than significant, and similar to the less-than-significant impacts of the Project.

As discussed in Section IV.F.2, Public Services—Police Protection, of this Draft EIR, construction activities under Alternative 4 could also affect emergency response for police vehicles along Sunset Boulevard, Vine Street, and main connectors 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 Project Site during construction activities. Therefore, construction-related impacts to police protection services under Alternative 4 would be less than significant and similar than the less-than-significant impacts of the Project.

(b) Operation

The Community Plan Update—Compliant Alternative would develop residential, office, and restaurant uses that would contribute to an increase in demand for police protection services provided by the Hollywood Community Police Station. Based on the police service population conversion factor of 3 persons per unit, the proposed 200 units would introduce approximately 600 new residents on the Project Site. The Project would also generate approximately 179 employees based on the police service population conversion factor of 3 persons per 1,000 square feet of floor area for the proposed restaurant uses and 4 persons per 1,000 square feet of office uses provided in the *L.A. CEQA Thresholds Guide*. This estimate is less than the Project's estimated police service population of 828 residents and 81 employees for the Grocery Store Option. Therefore, increase in demand for police protection services provided by the Hollywood Community Police Station under Alternative 4 is less when compared to the Project. Like the Project, Alternative 4 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 4. Furthermore, as discussed in Section IV.F.2, Public Services—Police Protection, of this Draft EIR, consistent with the *City of Hayward v. Board of 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 public safety services (including 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 4 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 4 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 Alternative 4 would generate a smaller police service population.

(3) Schools

(a) Construction

Similar to the Project, the Community Plan Update–Compliant Alternative would generate part-time and full-time jobs associated with its construction between the start of construction and full buildout. However, 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 4. Therefore, the construction employment generated by Alternative 4 would not result in a notable increase in the resident population or a corresponding demand for schools in the vicinity of the Project Site. Impacts on school facilities during construction under Alternative 4 would be less than significant and similar to the Project’s less-than-significant impacts.

(b) Operation

The Community Plan Update–Compliant Alternative would include 200 residential units compared to the Project’s 276 residential units. Thus, Alternative 4 would generate a reduced number of new students at the Project Site compared to the Project. In addition, the number of students that could be indirectly generated by Alternative 4 as a result of employment opportunities associated with the proposed restaurant and office uses would not be anticipated to be substantial because, as with the Project, most employees would likely reside in the Project vicinity. Furthermore, as with the Project, 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 4 and less than the less-than-significant impacts of the Project.

(4) Parks and Recreation

(a) Construction

Similar to the Project, construction of the Community Plan Update–Compliant Alternative would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, 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 4 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 of the Project Site.

As with the Project, during construction of Alternative 4, 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 any parks and recreational facilities near the Project Site during the construction of Alternative 4.

In addition, as with the Project, construction of Alternative 4 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 4 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 4 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. The Community Plan Update–Compliant Alternative would develop 200 residential units compared to the Project’s 276 residential units. Thus, implementation of Alternative 4 would generate fewer on-site residents at the Project Site who would utilize nearby parks and/or recreational facilities. In addition, while it is possible that employees of Alternative 4 may utilize local parks and recreational facilities, the increased demand would be negligible and would be partially off-set by the reduction in employees attributed to the removal of the existing uses on the Project Site. Therefore, Alternative 4 would result in a reduced demand for public parks and recreation services compared to the Project. Impacts to park and recreation facilities would be less than significant under Alternative 4 and less than the less-than-significant impacts of the Project.

(5) Libraries*(a) Construction*

Similar to the Project, construction of the Community Plan Update–Compliant Alternative would result in a temporary increase of construction workers on the Project Site. 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 Project construction. Therefore, construction employment generated by Alternative 4 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 Project-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 (e.g., 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 4 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. The Community Plan Update–Compliant Alternative would develop only 200 residential units compared to the Project’s 276 residential units. Therefore, Alternative 4 would generate fewer residents

at the Project Site that could demand library services. In addition, as employees of Alternative 4 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 4 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. Thus, impacts to libraries would be reduced under Alternative 4 compared to the Project. Nevertheless, like the Project, Alternative 3 would pay a \$200 per capita fee to be used for library staff, books, computers, and other materials as a condition of approval. As such, impacts on libraries facilities and services under the Community Plan Update–Compliant Alternative would be less than significant, and less than the less-than-significant impacts of the Project.

g. Transportation

(1) Construction

As with the Project, construction of the Community Plan Update–Compliant Alternative would generate additional trips from heavy-duty construction equipment, haul trucks, and construction worker trips. Alternative 4 would construct slightly less floor area and would reduce the building height by one level; however, Alternative 4 would also construct four levels of subterranean parking levels. Therefore, amount of excavation and soil export, grading, and building construction under Alternative 4 would be substantially similar to the Project. As such, the total number of haul truck trips and the overall duration of the construction period for Alternative 4 would also be similar when compared to the Project. Similar to the Project, peak haul truck activity would occur during the excavation and grading phase, and peak worker activity would occur during the building construction phase. The maximum number of daily haul trips and the maximum number of construction workers expected on-site during the building construction phase would be similar to the Project. 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. Additionally, as with the Project, Alternative 4 would implement a Construction Traffic Management Plan that would require delivery of construction materials and hauling/transport of oversize loads to non-peak travel periods to the extent possible. Therefore, construction-related activities would not contribute a substantial amount of traffic during the weekday morning and afternoon peak periods.

Like the Project, construction of Alternative 4 would be contained within the boundaries of the Project Site, but construction fences would encroach into the public right-of-way (e.g., sidewalk and roadways) and result in the narrowing of the northbound lane on Argyle Avenue and the eastbound lane on Selma Avenue adjacent to the Project Site. The use of the public right-of-way on Argyle Avenue and Selma Avenue and sidewalk

closures would also require temporary rerouting of pedestrian traffic. However, as with the Project, Alternative 4 would ensure that roadways would continue to provide two travel lanes with one in each direction. Alternative 4 would also implement a Construction Traffic Management Plan, which would require appropriate construction traffic controls during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways, ensure pedestrian and bicyclist safety along the affected sidewalks and temporary walkways, and maintain emergency access to the Project Site. Therefore, as with the Project, access and safety impacts during construction would be less than significant under Alternative 4.

Similar to the Project, Alternative 4 would require the temporary relocation of the Metro bus layover stop adjacent to the Project Site on Selma Avenue and the temporary removal of up to six metered parking spaces on Argyle Avenue adjacent to the Project Site. However, as with the Project, the temporary relocations and removals required under Alternative 4 would be coordinated with Metro and LADOT, and would not result in changes to bus service or parking such that a substantial inconvenience to riders and users would occur. In addition, Alternative 4 would also implement a Construction Traffic Management Plan that would prohibit construction workers and construction-related vehicles from parking on adjacent streets. Thus, similar to the Project, construction-related impacts associated with transit and parking are anticipated to be less than significant under Alternative 4.

Based on the above, impacts to traffic, access, and parking during construction would be less than significant under Alternative 4 and similar to the less-than-significant impacts of the Project.

(2) Operation

The Community Plan Update–Compliant Alternative would generate a total of 1,767 net daily vehicle trips, with 178 net new morning peak-hour trips and 172 net new afternoon peak-hour trips.¹⁶ Alternative 4 would generate fewer total daily vehicle trips when compared to the 2,013 net daily vehicle trips generated by the Project’s Retail/Restaurant Option, as well as the 1,971 net daily vehicle trips generated by the Project’s Grocery Store Option.¹⁷ However, 178 morning peak-hour trips generated by Alternative 4 would be more than the 170 morning peak-hour trips generated by the Project’s Retail/Restaurant Option and the 117 morning peak-hour trips generated by the

¹⁶ *Gibson Transportation Consulting, Inc., Traffic Analysis of Project Alternatives for the Modera Argyle Project, Hollywood California, March 9, 2018. See Appendix N.1 of this Draft EIR.*

¹⁷ *Gibson Transportation Consulting, Inc., Traffic Analysis of Project Alternatives for the Modera Argyle Project, Hollywood California, March 9, 2018. See Appendix N.1 of this Draft EIR.*

Project's Grocery Store Option.¹⁸ Despite the increase in morning peak-hour trips compared to the Project, Alternative 4 would not result in any significant impacts at the study intersections during the morning peak period.¹⁹ As discussed in Section IV.G, Transportation, of this Draft EIR, the Project would not result in significant impacts at any of the study intersections during the afternoon peak period. Therefore, since the number of afternoon peak-hour trips generated by Alternative 4 would be less compared to the 179 afternoon peak-hour trips generated by the Project's Retail/Restaurant Option and the 192 afternoon peak-hour trips generated by the Project's Grocery Store Option, Alternative 4 also would not result in significant impacts during the afternoon peak period. Therefore, intersection levels of service impacts under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project since the total number of daily vehicle trips would be less.

Although Alternative 4 would generate slightly more morning peak-hour trips compared to the Project under both options, it is reasonable to conclude that morning peak-hour trips generated by Alternative 4 would add fewer than 50 peak-hour trips at each of the arterial monitoring intersections closest to the Project Site and fewer than 150 trips in either direction during either the morning or afternoon peak hour to the mainline freeway monitoring locations closest to the Project Site. In addition, due to the decrease in the number of total daily vehicle trips generated by Alternative 4 compared to those generated by both Project options, Alternative 4 would not cause the capacity of the transit system to be substantially exceeded and would not create a significant impact on the transit systems serving the Project Site. Therefore, impacts to CMP arterial monitoring stations, CMP mainline freeway monitoring locations, and the existing public transit system would be less than significant and less than the less-than-significant impacts of the Project.

Similar to the Project, the existing emergency access to the Project Site and surrounding uses would be maintained during operation of Alternative 4. In addition, the access and circulation plan proposed under Alternative 4 would be similar to that of the Project. Since Alternative 4 would generate fewer total daily vehicle trips than the Project and would not result in significant impacts at any of the study intersections, impacts to emergency access under Alternative 4 would be less than significant and less than the Project impacts, which would be less than significant.

Because the Community Plan Update-Compliant Alternative would be smaller than the Project, less demand for public transit would be anticipated. The Community Plan

¹⁸ Gibson Transportation Consulting, Inc., *Traffic Analysis of Project Alternatives for the Modera Argyle Project, Hollywood California, March 9, 2018. See Appendix N.1 of this Draft EIR.*

¹⁹ Gibson Transportation Consulting, Inc., *Traffic Analysis of Project Alternatives for the Modera Argyle Project, Hollywood California, March 9, 2018. See Appendix N.1 of this Draft EIR.*

Update–Compliant Alternative would also be required to conform to City standards related to sight distance, sidewalks, and/or pedestrian movement controls to protect vehicle, bicycle, and pedestrian safety. In addition, proposed parking under Alternative 4 would meet or exceed LAMC parking requirements for residential, retail, and restaurant uses. Therefore, impacts to public transit, bicycle, and pedestrian facilities; and parking would be less than significant and similar to the less-than-significant impacts of the Project.

h. Tribal Cultural Resources

As discussed in Section IV.K, Tribal Cultural Resources, of this Draft EIR, an SLF search was conducted for the Project, and results were negative for any recorded tribal cultural resources on the Project Site. In compliance with the requirements of AB 52, the City provided formal notification of the Project to the California Native American tribes that requested notification. One response was received by the City on June 20, 2017 from Mr. Andrew Salas, Chairman of the Gabrieleño Band of Mission Indians—Kizh Nation. Consultation occurred between the City and the representatives from the Gabrieleño Band of Mission Indians—Kizh Nation in June 2017. In July 2018, the City followed up with Chairman Salas requesting any additional information regarding the potential for tribal cultural resources in the vicinity of the Project Site. The Tribe responded with two historic maps showing trading routes and village locations in the Hollywood area, as well as with suggested mitigation measures. The Tribe also asserted that due to the Project's location near two major trade routes, they consider the Project Site to have a high potential for buried resources, but did not identify any known resources on-site. While it is evident from the information provided by Chairman Salas, Mr. Teutimez, and the Tribe that the Hollywood area has been traditionally occupied and utilized for its resources by the Gabrieleño, government-to-government consultation initiated by the City, acting in good faith and after a reasonable effort, has not resulted in the identification of a known tribal cultural resources within or near the Project Site that would be impacted. As such, with the close of tribal consultation by the City on February 22, 2019, the City has fulfilled the requirements of AB 52.

In addition, the TCR Report prepared for the Project, which included record searches and the independent analysis of correspondence and materials relative to potential tribal cultural resources on the Project Site, concluded that there is no record or evidence of tribal cultural resources on the Project Site or in its vicinity. Nonetheless, the City has established a standard condition of approval to address inadvertent discovery of tribal cultural resources and reduce any potential impacts to less than significant. As such, Project impacts to tribal cultural resources would be less than significant.

The Community Plan Update–Compliant Alternative would construct the same number of subterranean levels that are proposed by the Project. Thus, the potential for Alternative 4 to uncover subsurface tribal cultural resources would be similar when

compared to that of the Project. Moreover, the City's standard condition of approval regarding inadvertent discovery of TCRs would apply to Alternative 4. Accordingly, impacts to tribal cultural resources would be less than significant, and similar to the less-than-significant impacts of the Project.

i. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities associated with the Community Plan Update–Compliant Alternative would generate a short-term demand for water. This demand would be similar to that of the Project since the amount of excavation and building construction required under Alternative 4 would be substantially similar. As evaluated in Section IV.I.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 under the Community Plan Update–Compliant Alternative would be similar, the temporary and intermittent demand for water during construction under Alternative 4 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 the Community Plan Update–Compliant Alternative. Furthermore, as with the Project, the design and installation of new service connections under Alternative 4 would be required to meet applicable City standards. Therefore, impacts on water supply and infrastructure associated with short-term construction activities would be less than significant under the Community Plan Update–Compliant Alternative, and similar to the less-than-significant impacts of the Project.

(b) Operation

The Community Plan Update–Compliant Alternative would generate an increased demand for water relative to existing conditions. As shown in Table V-3 on page V-85, Alternative 4 would result in a net water demand of approximately 40,874 gallons per day for the Project Site when accounting for the removal of existing uses, which is lower than the net water demand of approximately 46,172 gallons per day for the Project's Retail/Restaurant Option as analyzed in Section IV.I.1, Utilities and Service Systems—Water Supply and Infrastructure of this Draft EIR.²⁰ Therefore, since the estimated net water demand under Alternative 4 would be less than the net water demand for the

²⁰ *The Retail/Restaurant Option results in a higher water demand than the Project's Grocery Store Option.*

**Table V-3
Estimated Water Consumption/Wastewater Generation for Alternative 4**

Land Use	Unit	Generation Factor^a	Total Water Demand/ Wastewater Generation (gpd)
Existing			
Retail	14,000 sf	0.025 gpd/sf	350
Office	15,182 sf	0.12 gpd/sf	1,822
Warehouse	32,634 sf	0.03 gpd/sf	979
<i>Total Existing</i>			3,151
Proposed^b			
Residential—Studio	33 du	75 gpd/du	2,475
Residential—1-bedroom	138 du	110 gpd/du	15,180
Residential—2-bedroom	29 du	150 gpd/du	4,350
Office	33,500 sf	0.12 gpd/sf	4,020
Restaurant	15,000 sf/ 600 seats ^c	30 gpd/seat	18,000
<i>Total Proposed</i>			44,025
Total Net Water Demand/ Wastewater Generation			40,874
<p><i>gpd = gallons per day</i> <i>sf = square feet</i> ^a <i>Sewage generation calculations are based on generation factors provided by City of Los Angeles Bureau of Sanitation (LASAN).</i> ^b <i>Assumes the same residential unit mix of 16.7 percent studio, 68.8 percent 1-bedroom, and 14.5 percent 2-bedroom as the Project.</i> ^c <i>The estimated number of seats is based on a total of 15,000 square feet of restaurant space, divided by approximately 25 square feet per seat.</i> <i>Source: Eystone Environmental, 2018.</i></p>			

Project's Retail/Restaurant Option, it is reasonable to conclude that the estimated net water demand for Alternative 4 would not exceed the available supplies projected by LADWP and 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 4 since the water demand would be less than the Project's Retail/Restaurant Option, for which the existing infrastructure was found to be adequate. 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 applicable City requirements under Alternative 4 to accommodate the new building. Thus, impacts to water supply under Alternative 4 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 the Community Plan Update–Compliant Alternative, 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 offsite. As such, wastewater generation from construction activities associated with Alternative 4 would not cause a measurable increase in wastewater flows. Therefore, construction of the Project would not exceed wastewater treatment requirements of the LARWQCB or substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the IRP.

Additionally, as with the Project, Alternative 4 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 4 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 4 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

The Community Plan Update–Compliant Alternative would develop 200 residential units, approximately 15,000 square feet of ground-level restaurant uses and approximately 33,500 square feet of office uses on the Project Site. As shown in Table V-3 on page V-85, development of Alternative 4 would result in an increase in wastewater flows from the Project Site relative to existing conditions. Alternative 4 would generate a net of approximately 40,874 gallons per day of wastewater after accounting for the removal of existing uses, which is lower than the net wastewater generation of approximately 46,027 gallons per day for the Project’s Retail/Restaurant Option, as provided in Section IV.1.2, Utilities and Service Systems—Wastewater of this Draft EIR.²¹ As such, it is reasonable to conclude that the wastewater generated by Alternative 4 would be

²¹ *The Retail/Restaurant Option generates a greater amount of wastewater than the Project’s Grocery Store Option.*

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 4 would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site, which include three existing sanitary sewer connections from Argyle Avenue and Selma Avenue. Similar to the Project, Alternative 4 would include one sewer connection to the existing 8-inch sewer main on Argyle Avenue and one sewer connection to the 8-inch sewer main on Selma Avenue. Given that Alternative 4 would result in a net flow of average daily wastewater that is less than that of the Project, it is anticipated that there would be sufficient capacity within the existing 8-inch sewer mains on Argyle Avenue and Selma Avenue to serve the wastewater flows of Alternative 4. 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 4 during the permitting process. All related sanitary sewer connections and on-site infrastructure under Alternative 4 would be designed and constructed in accordance with applicable standards.

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

j. Energy Conservation and Infrastructure

(1) Construction

Similar to the Project, construction activities associated with the Community Plan Update–Compliant Alternative 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. LADWP has confirmed that the existing electricity supply and infrastructure in the Project area would have the capacity to serve the Project Site. The energy consumed would be similar to the Project due to the similar amount of excavation and building construction. As with the Project, construction activities would require energy demand 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 4, and similar to the less-than-significant impacts of the Project.

(2) Operation

As with the Project, operation of the Community Plan Update–Compliant Alternative would generate an increased consumption of electricity, natural gas, and petroleum-based

fuels relative to existing conditions. The residential, restaurant, and office uses proposed under Alternative 4 would have a greater demand for electricity compared to the Project; however, Alternative 4 would result in a reduced demand for natural gas.²² As previously discussed, the residential, restaurant, retail, and office uses would generate approximately 1,767 net daily vehicle trips compared to the 2,013 net daily vehicle trips generated by the Project's Retail/Restaurant Option and the 1,971 net daily vehicle trips generated by the Project's Grocery Store Option.²³ Thus, the associated consumption of petroleum-based fuels under Alternative 4 would be lower when compared to the Project. Accordingly, under Alternative 4, the overall energy consumption would be lower than that of the Project. Similar to the Project, Alternative 4 would implement the same project design features as the Project, which would improve energy efficiency and reduce impacts on consumption of energy resources. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 4 would not be wasteful, inefficient, or unnecessary. Furthermore, Alternative 4 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 4 would be less than significant and less than the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above, the Community Plan Update–Compliant Alternative would not eliminate the Project's significant and unavoidable on-site construction noise impacts, on-site construction vibration (pursuant to the threshold for human annoyance) impacts, and off-site construction vibration (pursuant to the threshold for human annoyance) impacts. In addition, Alternative 4 would not eliminate the Project's potentially significant cumulative on- and off-site construction noise impacts, as well as potentially significant cumulative on- and off-site construction vibration impacts related to human annoyance. All other impacts would be less than or similar to those of the Project.

4. Relationship of the Alternative to Project Objectives

The Community Plan Update–Compliant Alternative would remove the six existing commercial buildings on the Project Site and develop residential, restaurant and office uses in accordance with the [Q]C4-2D-SN-CPIO zone proposed for the Project Site by the draft Hollywood Community Plan Update. As such, Alternative 4 would largely meet the

²² See Appendix N.2 of this Draft EIR for air quality worksheets associated with Alternative 4.

²³ Gibson Transportation Consulting, Inc., *Traffic Analysis of Project Alternatives for the Modera Argyle Project, Hollywood California, March 9, 2018*. See Appendix N.1 of this Draft EIR.

Project's underlying purpose of revitalizing the Project Site by developing a mixed-use development that provides new multi-family housing and neighborhood-serving retail and restaurant uses that serve the community and promote walkability. However, Alternative 4 would not meet the following Project objective to the same extent as the Project:

- To provide a diverse mix of new housing units, including restricted affordable units that would help to meet the demand for new affordable and market-rate housing opportunities in the Hollywood community and City.

Specifically, Alternative 4 would provide 200 residential dwelling units, as compared to the Project's 276 units and would not include affordable housing units, as no density bonus would be sought for the alternative. As a result, Alternative 4 would not meet the existing demand for housing in the City and Hollywood to the same extent as the Project.

However, Alternative 4 would satisfy the following objectives by developing a mix of residential and commercial uses on an infill site that is well served by public transportation, and by siting restaurant uses on the ground level to create a more pedestrian-friendly environment and enhance walkability:

- To redevelop a site with a Project that is compatible in scale and design with the mixed-use character of the surrounding area.
- To promote local and regional mobility objectives by providing a mix of residential and neighborhood-serving commercial uses in an area that is supported by a variety of recreational amenities and commercial services, and is in close proximity to public transportation.
- To meet the objectives of the City's Walkability Checklist and Citywide Design Guidelines by creating a street-level identity for the Project Site and improving the pedestrian experience through the introduction of neighborhood-serving commercial uses on the ground floor level.

In addition, Alternative 4 would meet the following objective by developing office and restaurant uses that would provide a greater number of short- and long-term employment opportunities compared to the Project:

- To create economic vitality in the community through construction jobs, and permanent full-time on-site jobs.

V. Alternatives

E. Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) 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 Zoning Compliant Alternative; Alternative 3, the Reduced Density Alternative; and Alternative 4, the Community Plan Update–Compliant Alternative. 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 noise during construction, on-site vibration during construction (pursuant to the threshold for human annoyance), and off-site vibration (pursuant to the threshold for human annoyance) during construction from haul trucks. In addition, Alternative 1 would avoid the Project’s significant cumulative on- and off-site construction noise impacts, as well as the Project’s potentially significant on- and off-site construction vibration impacts related to human annoyance. However, the No Project/No Build Alternative would not meet any of the Project objectives or achieve the Project’s underlying purpose of revitalizing the infill Project Site by constructing a mixed-use development that would provide new multi-family housing, and neighborhood-serving retail and restaurant uses to serve the Hollywood community and promote walkability.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative (Alternative 1—No Project/No Build Alternative), a comparative evaluation of the remaining alternatives indicates that Alternative 2, the Zoning Compliant Alternative, would be the Environmentally Superior Alternative. As discussed above, Alternative 2 would not avoid the Project’s significant and

unavoidable environmental impacts related to noise and vibration during construction. However, Alternative 2 would reduce more of the Project's less-than-significant impacts than any other alternative analyzed. Nevertheless, Alternative 2 would not construct a mixed-use development that would include residential uses, and thus, would not meet two of the Project's basic objectives. Therefore, Alternative 2 would not meet the underlying purpose of the Project or satisfy the Project objectives to the same extent as the Project.