

VI. Alternatives to the Project

A. Introduction

1. Introduction

CEQA requires that EIRs include the identification and evaluation of a reasonable range of alternatives that are designed to reduce the significant environmental impacts of the Project while still meeting the general Project objectives. The *State CEQA Guidelines* also set forth the intent and extent of alternatives analysis to be provided in an EIR. Those considerations are discussed below.

a) Alternatives to the Project

Section 15126.6(a) of the *State CEQA Guidelines* states the following:

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 comparable 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 lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

b) Purpose

Section 15126.6(b) of the *State CEQA Guidelines* states the following:

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of project objectives, or would be more costly.

c) Selection of a Reasonable Range of Alternatives

Section 15126.6(c) of the *State CEQA Guidelines* states the following:

The range of potential alternatives to the project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

d) Level of Detail

The *State CEQA Guidelines* do not require the same level of detail in the alternative analysis as in the analysis of the Project. Section 15126.6(d) of the *State CEQA Guidelines* reads:

The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.

e) Assumptions and Methodology

The design, construction, and operation of the alternatives can influence the assessment and/or probability of impacts for those alternatives. For example, a project may have the potential to generate impacts, but considerations in project design may afford the opportunity to avoid or reduce such impacts. The alternatives analysis is presented as a comparative analysis to the Project and the Flexibility Option, and assumes that all applicable mitigation measures proposed for the Project and the Flexibility Option would apply to each alternative. Each alternative is considered in light of the Project objectives to determine whether the alternative would feasibly attain most of the basic Project objectives, and whether it would avoid or substantially lessen any of the significant impacts of the Project and the Flexibility Option. Unless otherwise specified, references

to the “Project” throughout this analysis, apply to both the Project and the Flexibility Option, as discussed in **Chapter II, Project Description**, of this Draft EIR. However, where numerical factors are cited and may differ, such as students generated, vehicle miles traveled (VMT), or solid waste output, the analysis presents and discusses the numerical factors for both the Project and the Flexibility Option separately.

Impacts associated with the alternatives are compared to Project-related impacts and are classified as greater, less, or essentially similar to (or comparable to) the level of impacts associated with the Project. Environmental issues that were analyzed in the Initial Study and found that there is no substantial evidence that the Project could cause significant environmental effects are not included in the analysis of alternatives.

f) Project Objectives

As discussed in **Section II, Project Description**, of this Draft EIR, the underlying purpose of the Project is to create a fully-integrated, accessible, vertical community that enhances the City’s economic base, provides community serving amenities for the existing community, and is respectful of the existing surrounding neighborhoods. As set forth in **Section II, Project Description**, the Project’s basic objectives are below:

- Promote the Arts District neighborhood as a creative environment with a visually-distinctive building that complements the distinct urban community, providing public art/façade treatments and art-production and gallery space;
- Provide infill redevelopment with an integrated mixed-use project that is economically viable and serves the needs of the Arts District community with new live/work, commercial, and art/production opportunities;
- Encourage walkability and pedestrian safety in the Arts District with a project that would incorporate pedestrian-scaled improvements including lighting and landscaping, ground-floor commercial spaces and an inviting publicly accessible plaza and pedestrian paseo mid-block between Mateo and Imperial Streets that complements existing and future pedestrian activity in the Arts District;
- Contribute towards meeting the City’s housing demands by increasing housing supply within the multi-modal, transit-accessible Arts District with live/work units, including affordable live/work units for Very Low Income households;
- Support regional mobility goals and local regional growth policies by encouraging a mixed-use development in and around activity centers so as to reduce vehicle trips and public infrastructure costs, and provide easy access and amenities for pedestrians and bicyclists; and

- Promote fiscal benefits, economic development, and job creation in the City through the construction and operation of a mixed-use development providing live/work units for a range of household types and an array of commercial spaces that attracts a diverse residents and visitors to the City's Arts District, and which generates local tax revenue and supports local businesses.

2. Alternatives Considered but Rejected as Infeasible

As set forth in *State 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 *State CEQA Guidelines* Section 15126.6(c), 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:

- **Alternate Project Site:** The Project Applicant already owns the Project Site, and its location is conducive to the development of a mixed-use project with new market rate and affordable live/work units with art-production and commercial space within the Arts District. The Project Applicant cannot reasonably acquire, control, or access an alternate site in a timely fashion that would result in implementation of a project with similar uses and size in the Arts District. If an alternate site in the Arts District that could accommodate the Project could be found, similar impacts would occur. Additionally, development of the Project at an alternate site could potentially produce other environmental impacts 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 area, an alternate site could contain historic buildings that could be impacted by development. Therefore, an alternate site is not considered feasible as the Project Applicant does not own another suitable site that would achieve the underlying purpose and objectives of the Project, and an alternate site would not likely avoid the Project's significant impacts. Thus, this alternative was rejected from further consideration.

3. Alternatives to the Project

The four alternatives analyzed for the Project include the following:

- Alternative 1: No Project
- Alternative 2a: Reduced Density
- Alternative 2b: Reduced Density Option
- Alternative 3: Commercial Use with Aboveground Parking
- Alternative 4: Existing Zoning – Industrial Use

These alternatives were included for analysis because of their potential to avoid or substantially lessen the Project's significant impacts. **Table VI-1, Project and Alternative Components Comparison**, shows the differences between the various components of the alternatives.

**Table VI-1
Project and Alternative Components Comparison**

Use	Project	Project Flex Option	Alt 1 No Project	Alt 2a Reduced Density	Alt 2b Reduced Density Option	Alt 3 Commercial Use with Aboveground Parking	Alt 4 Existing Zoning Industrial Use
Industrial Floor Area	0 sf	0 sf	26,740 sf	0 sf	0 sf	0 sf	67,200 sf
Commercial Floor Area and Art Production Related Uses	23,380 sf	45,873 sf	0 sf	17,535 sf	34,405 sf	23,380 sf	0 sf
Residential Floor Area	170,075 sf	147,882 sf	0 sf	127,481 sf	110,911 sf	0 sf	0 sf
Office (workspace within live/work units)	3,900 sf	3,600 sf	0 sf	3,000 sf	2,700 sf	0 sf	0 sf
Total Floor Area	197,355 sf	197,355 sf	0 sf	148,016 sf	148,016 sf	23,380 sf	67,200 sf
Live/work: Studio and 1-Bedroom	159	135	—	119	101	—	—
Live/work: 2 -Bedroom	26		—	20		—	—
Live/work: 3-Bedroom		24			18		
Total Live/Work Dwelling Units	185	159	—	139	119	—	—
Affordable (Very Low Income) Units	20	18	—	15	13	—	—
Maximum Stories	8	8	1	6	6	2	1-2
Maximum Height	116 feet	116 feet	20 feet	83 feet	83 feet	31 feet	30 feet
Open Space	15,320 sf	14,870 sf	—	11,490 sf	11,153 sf	0	0 sf
Parking Spaces	287	287	9	215	215	47	134
Subterranean parking levels	3	3	0	2	2	0	1
Notes: sf = square feet Source: EcoTierra Consulting, 2020.							

4. Alternatives Analysis Format

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in detail to determine if the overall environmental impacts would be less than, similar to, or greater than the corresponding impacts of the Project. Additionally, each alternative is evaluated to determine if the Project objectives, described above, would be achieved.¹ The alternatives were evaluated as follows:

- The alternatives analysis compares the potential environmental impacts of the four alternatives with those of the Project and the Flex Option for each of the environmental topics analyzed in detail in **Section IV, Environmental Impact Analysis**, of this Draft EIR, assuming that the alternative would implement the

¹ CEQA Guidelines Section 15126.6(c).

same project design features and mitigation measures identified in **Section IV, Environmental Impact Analysis**, of this Draft EIR, as applicable.

- Post-mitigated significant and non-significant environmental impacts associated with each alternative are compared to Project-related impacts and are classified as follows:
 - Less: Where the net impact of the alternative would be clearly less adverse or more beneficial than the impact of the Project, comparative impact is said to be “less.”
 - Greater: Where the net impact of the alternative would be clearly 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.”
- The comparative analysis of the impacts followed by a general discussion of whether the underlying purpose and basic project objectives are feasibly and substantially attained by the alternative.

Based on the information and analysis presented in **Section IV, Environmental Impact Analysis, Table VI-2, Summary of Alternatives’ Impacts**, below summarizes the results of the CEQA analysis for each resource area addressed therein.

**Table VI-2
Summary of Alternatives' Impacts**

Impact Area	Project / Flexibility Option	Alternative 1: No Project	Alternative 2a: Reduced Density	Alternative 2b: Reduced Density Option	Alternative 3: Commercial Use with Aboveground Parking	Alternative 4: Existing Zoning – Industrial Use
A. Air Quality						
<i>Construction</i>						
<i>Regional / Local Emissions</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>TACs</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>						
<i>Regional / Local Emissions</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>TACs</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
B. Cultural Resources						
<i>Historical</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Archaeological</i>	Less Than Significant With Mitigation	Less (No Impact)	Less (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)
C. Geology and Soils						
<i>Geology</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)

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<i>Paleontological</i>	Less Than Significant With Mitigation	Less (No Impact)	Less (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)	Less (Less Than Significant)	Less (Less Than Significant With Mitigation)
D. Greenhouse Gas Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
E. Hazards and Hazardous Materials	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)
F. Hydrology and Water Quality						
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Greater (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
G. Land Use and Planning	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Greater (Less Than Significant)	Greater (Less Than Significant)

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Impact Area	Project / Flexibility Option	Alternative 1: No Project	Alternative 2a: Reduced Density	Alternative 2b: Reduced Density Option	Alternative 3: Commercial Use with Aboveground Parking	Alternative 4: Existing Zoning – Industrial Use
H. Noise						
<i>Construction Noise</i>	Less Than Significant With Mitigation	Less (No Impact)	Similar (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)
<i>Construction Vibration</i>	Significant and Unavoidable	Less (No Impact)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)	Less (Less Than Significant)	Less (Significant and Unavoidable)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
I. Population and Housing						
<i>Indirect</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Direct</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)
J. Public Services						
<i>Fire Protection</i>						
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Police Protection</i>						

**Table VI-2
Summary of Alternatives' Impacts**

Impact Area	Project / Flexibility Option	Alternative 1: No Project	Alternative 2a: Reduced Density	Alternative 2b: Reduced Density Option	Alternative 3: Commercial Use with Aboveground Parking	Alternative 4: Existing Zoning – Industrial Use
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Schools						
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	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)	Less (Less Than Significant)
Parks and Recreation						
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	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)	Less (Less Than Significant)
Libraries						
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	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)	Less (Less Than Significant)
K. Transportation						

**Table VI-2
Summary of Alternatives' Impacts**

Impact Area	Project / Flexibility Option	Alternative 1: No Project	Alternative 2a: Reduced Density	Alternative 2b: Reduced Density Option	Alternative 3: Commercial Use with Aboveground Parking	Alternative 4: Existing Zoning – Industrial Use
<i>Plan Consistency</i>	Less Than Significant	Greater (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Greater (Less Than Significant)	Greater (Less Than Significant)
<i>VMT Analysis (Project)</i>	Less Than Significant	Greater (Significant and Unavoidable)	Greater (Less Than Significant)	Greater (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>VMT Analysis (Flexibility Option)</i>	Less Than Significant	Greater (Significant and Unavoidable)	Greater (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Hazardous Design Features</i>	No Impact	Less (No Impact)	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)
<i>Emergency Access</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
L. Tribal Cultural Resources	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
M. Utilities and Service Systems						
<i>Water</i>						
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Wastewater</i>						

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Summary of Alternatives' Impacts**

Impact Area	Project / Flexibility Option	Alternative 1: No Project	Alternative 2a: Reduced Density	Alternative 2b: Reduced Density Option	Alternative 3: Commercial Use with Aboveground Parking	Alternative 4: Existing Zoning – Industrial Use
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Treatment</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Conveyance</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Solid Waste</i>						
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Dry Utilities</i>						
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
N. Energy Conservation						
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less	Less	Less	Less

**Table VI-2
Summary of Alternatives' Impacts**

Impact Area	Project / Flexibility Option	Alternative 1: No Project	Alternative 2a: Reduced Density	Alternative 2b: Reduced Density Option	Alternative 3: Commercial Use with Aboveground Parking	Alternative 4: Existing Zoning – Industrial Use
			(Less Than Significant)	(Less Than Significant)	(Less Than Significant)	(Less Than Significant)
O. Wildfire	No Impact	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)
<i>Source (Table): EcoTierra Consulting, 2020.</i>						

VI. Alternatives to the Project

B. Alternative 1 – No Project

1. Description

CEQA requires the alternatives analysis to include a No Project Alternative (Alternative 1). The purpose of analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving the Project with the impacts of not approving the Project (*State CEQA Guidelines* Section 15126.6(e)(1)). Pursuant to *State CEQA Guidelines* Section 15126.6(e)(2):

The “no project” analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans, and consistent with available infrastructure and community services.

In the event the Project is not approved, it is expected that the Project Site would remain in its current condition and no new development would occur for the foreseeable future. The Project Site would remain developed with an industrial building and an associated surface parking lot.

2. Comparative Analysis

Alternative 1 assumes the development of the Related Projects listed in **Section III.2, Related Projects**. The potential environmental impacts associated with Alternative 1 are described below and are compared to the environmental impacts that would result from the implementation of the Project and the Flexibility Option, as described in **Chapter IV, Environmental Impact Analysis**, of this Draft EIR. Unless otherwise specified, references to the “Project” throughout this analysis, apply to both the Project and the Flexibility Option, as discussed in **Chapter II, Project Description**, of this Draft EIR. However, where numerical factors are cited and may differ, such as students generated, VMT, or solid waste output, the analysis presents and discusses the numerical factors for both the Project and the Flexibility Option separately.

a) Air Quality

(1) Construction

(a) *Regional and Localized Air Quality Impacts*

Alternative 1 would not alter the existing industrial or warehouse buildings or surface parking lot or result in new construction. **Therefore, no construction-related air quality impacts associated with regional and localized emissions would occur under Alternative 1, and the impacts would be less than the less-than-significant impacts of the Project and the Flexibility Option.**

(b) *Toxic Air Contaminants*

As no construction activities would occur, Alternative 1 would not result in diesel particulate emissions that could generate substantial TACs. **Therefore, no impacts associated with the release of TACs would occur under Alternative 1, and the impacts would be less than the less-than-significant impacts of the Project and the Flexibility Option.**

(2) Operation

(a) *Regional and Localized Air Quality Impacts*

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

(b) *Toxic Air Contaminants*

As no new development or increase in the intensity of the existing uses on the Project Site would occur, Alternative 1 would not result in diesel particulate emissions that could generate substantial TACs beyond what is currently generated by the Project Site. **Therefore, no impacts associated with the release of TACs would occur under Alternative 1 and the impacts would be less than the less-than-significant operational TAC impacts of the Project and the Flexibility Option.**

b) Cultural Resources

(1) Historical Resources

Alternative 1 would not involve demolition or other construction activities, such as earthmoving or jackhammering that could directly impact onsite or adjacent historical resources. Additionally, no new development or uses would occur that could indirectly impact historical resources in the vicinity of the Project Site, including the Downtown Los Angeles Industrial Historic District and the National Biscuit Company Building. **Therefore, no impacts to historical resources would occur under Alternative 1, and the impacts would be less than the less-than-significant impacts of the Project and the Flexibility Option.**

(2) Archaeological Resources

No grading or other earthwork activities would occur under Alternative 1; therefore, there would be no potential for Alternative 1 to impact subsurface archaeological resources. **As such, no impacts to archaeological resources would occur and the impacts would be less than the Project's and the Flexibility Option's less-than-significant impacts with mitigation.**

c) Geology and Soils

(1) Geology and Soils

No new development would be introduced to the Project Site under Alternative 1, and no grading, excavation, or other earthwork activities would occur. Therefore, Alternative 1 would not directly or indirectly cause adverse effects related to geologic hazards such as fault rupture, strong seismic shaking, liquefaction, seismically induced settlement, soil stability, subsidence, or expansive soil. **As such, no impacts related to geology and soils would occur under Alternative 1, and the impacts would be less than the less-than-significant impacts of the Project and the Flexibility Option.**

(2) Paleontological Resources

As no grading or other earthwork activities would occur under Alternative 1, there would be no potential for Alternative 1 to impact subsurface paleontological resources. **As such, no impacts to paleontological resources would occur under Alternative 1 and the impacts would be less than the less-than-significant impacts of the Project and the Flexibility Option with mitigation.**

d) Greenhouse Gas Emissions

Alternative 1 would not result in new development or increased operations that could generate additional operational GHG emissions related to vehicular traffic, the consumption of electricity and natural gas, solid waste generation, or water demand beyond what is currently generated by the Project Site. **As such, no impacts associated with GHG emissions would occur under Alternative 1 and the impacts would be less than the less-than-significant impacts of the Project and the Flexibility Option.**

e) Hazards and Hazardous Materials

No new or expansion of development or uses would be introduced to the Project Site under Alternative 1. Therefore, Alternative 1 would not create a hazard to the public or environment related to hazards or hazardous materials beyond what currently exists at the Project Site. **As such, no impacts associated with hazards and hazardous materials would occur under Alternative 1 and the impacts would be less than the less-than-significant impacts of the Project and the Flexibility Option.**

f) Hydrology and Water Quality

(1) Construction

Under Alternative 1, no grading, excavation, construction activities, or development of new land uses would occur. Therefore, no changes to the hydrology of the Project Site or the potential for polluted runoff or siltation would occur. **As such, no construction-related impacts to hydrology and water quality would occur under Alternative 1, and the impacts would be less than the less-than-significant impacts of the Project and the Flexibility Option.**

(2) Operation

Under Alternative 1, conditions at the Project Site would continue as they presently exist. While Alternative 1's hydrology and water quality impacts would be less than significant, Alternative 1 would not implement BMPs, and low-impact design (LID) measures as under the Project, and therefore, would not provide the Project's beneficial water quality effect of decreasing the amount of stormwater leaving the Project Site and improving the quality of surface runoff from the Project Site over the existing conditions. **As such, impacts to hydrology and water quality under Alternative 1 would be less than significant but greater than the Project's and the and the Flexibility Option's less-than-significant impacts.**

g) Land Use and Planning

Under Alternative 1, no new development would occur. Re-occupancy of the existing buildings would be consistent with the existing land use designation and zoning classification of the Project Site. The existing uses on-site are compatible with the existing land uses in the vicinity of the Project Site and would be consistent with the local and regional plans and policies. **As such, no impacts related to land use and planning would occur under Alternative 1, and the impacts would be less than those associated with the Project and the Flexibility Option.**

h) Noise

Under Alternative 1, no grading, excavation, or construction would occur, and therefore, no construction-related noise or vibration would be generated on-site or off-site. Alternative 1 would not develop new uses on the Project Site and no changes to existing site operation would occur. Additionally, there would be no new vehicle trips generated under Alternative 1. Therefore, no new stationary or mobile noise sources would be introduced to the Project Site or Project vicinity. **As such, no impacts associated with construction noise or with on-site or off-site operational noise would occur under Alternative 1, and impacts would be less than the Project's and the Flexibility Option's significant and unavoidable construction vibration impacts related to human annoyance and less-than-significant-with-mitigation impacts with respect to all other sources of construction and operational noise and vibration.**

i) Population and Housing

Under Alternative 1, no structures would be constructed on the Project Site that would house residents or generate additional employees. As such, Alternative 1 would not induce population growth in the area. **Therefore, there would be no impact to population and housing under Alternative 1, and the impact would be less than the Project's and the Flexibility Option's less-than-significant impact.**

j) Public Services

(1) Fire Protection

Under Alternative 1, no new construction would occur on the Project Site and, therefore, no construction activities, or new mixed-use development, which could increase demand for services from the Los Angeles Fire Department (LAFD), would occur at the Project Site that would require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service. Additionally, under Alternative 1, there would be no change to fire flows requirements or emergency access

on the Project Site. **Therefore, Alternative 1 would have no impact to fire protection and emergency services, and the impact would be less than the Project's and the Flexibility Option's less-than-significant impacts.**

(2) Police Protection

Under Alternative 1, no new construction would occur on the Project Site and, therefore, no construction activities, or a new mixed-use development, which could result in increased demand for services from the Los Angeles Police Department (LAPD), would occur at the Project Site that would require the addition of a new police station or the expansion, consolidation, or relocation of an existing facility in order to maintain service. Additionally, under Alternative 1, there would be no change to emergency access, security or design features on the Project Site. **Therefore, Alternative 1 would have no impact to police protection services, and the impact would be less than the Project's and the Flexibility Option's less-than-significant impacts.**

(3) Schools

Under Alternative 1, no new construction would occur on the Project Site and, therefore, no new population would be introduced to the Project Site. As such, Alternative 1 would not create a need for new or physically altered school facilities. **Therefore, there would be no impact to school services, and the impact would be less than the Project's and the Flexibility Option's less-than-significant impact.**

(4) Parks and Recreation

Under Alternative 1, no new construction would occur on the Project Site and, therefore, no new population, which could demand park facilities, would be introduced to the Project Site. As such, Alternative 1 would not create a need for new or physically altered parks. Further, Alternative 1 would not increase the use or deterioration of parks and recreational facilities. **Therefore, there would be no impact to recreation and park services, and the impact would be less than the Project's and the Flexibility Option's less-than-significant impact.**

(5) Libraries

Under Alternative 1, no new construction would occur on the Project Site and, therefore, no new population, which could demand library services, would be introduced to the Project Site. As such, Alternative 1 would not create a need for new or physically altered libraries. **Therefore, there would be no impact to library services, and the impact would be less than the Project's and the Flexibility Option's less-than-significant impact.**

k) Transportation

(1) Plan Consistency

Under Alternative 1, the Project Site would remain as an industrial warehouse and surface parking lot and would not provide pedestrian enhancements along Mateo Street and Imperial Street or bicycle facilities and would, therefore, be less consistent with the Mobility Plan 2035 than the Project. Furthermore, Alternative 1 would not provide the beneficial effects of the Project with respect to transportation plans, including providing electric vehicle chargers, improving the walkability in the area, or increasing pedestrian connectivity from Mateo Street to Imperial Street, making Alternative 1 less compatible with the Mobility Hubs Reader's Guide than the Project. **Therefore, the impact of Alternative 1 with regard to compatibility with circulation system plans would be less than significant, but the impact would be greater when compared to the less-than-significant impacts of the Project and the Flexibility Option.**

(2) VMT Analysis

The Project would result in an estimated 5.0 daily household VMT per capita, which is less than the Central APC significance threshold of 6.0 VMT per capita, and an estimated 7.4 daily work VMT per employee, which is less than the Central APC significance threshold of 7.6 VMT per employee. The Flexibility Option would result in an estimated 5.0 daily household VMT per capita, which is less than the Central APC significance threshold of 6.0 VMT per capita, and an estimated 7.6 daily work VMT per employee, which is equal to the Central APC significance threshold of 7.6 VMT per employee. Because there are no residential dwelling units on the Project Site, Alternative 1 would have no impact under the household VMT per capita threshold; however, Alternative 1 would maintain the current estimated 1,070 daily work VMT. Based on an estimated 94 existing employees at the Project Site, this translates to a daily work VMT per employee of 11.4, which exceeds the Central APC significance threshold of 7.6 VMT per employee and is greater than the Project's and the Flexibility Option's daily work VMT per employee. As such, Alternative 1 would not implement the beneficial impacts of decreasing VMT as would occur under the Project and Flexibility Option. **The impact of Alternative 1 with regard to daily work VMT per employee would be greater than the Project's and the Flexibility Option's less-than-significant impact.**

(3) Geometric Design Feature or Incompatible Use Hazards

Under Alternative 1, no new development would occur and no change to Project Site access causing an increase in hazards due to a design feature or incompatible uses. **As such, no impacts to hazardous design features would occur under Alternative 1**

and the impact would be less than the Project's and the Flexibility Option's less-than-significant impacts.

(4) Emergency Access

Under Alternative 1, no new development would occur and no change to the emergency access of the Project Site or surroundings would occur. **As such, no impacts to emergency access would occur under Alternative 1 and the impact would be less than the Project's and the Flexibility Option's less-than-significant impacts.**

I) Tribal Cultural Resources

Grading and other earthwork activities would not occur under Alternative 1; therefore, there would be no potential for Alternative 1 to impact subsurface tribal cultural resources. **As such, Alternative 1 would have no impact on tribal cultural resources, and the impact would be less than the Project's and the Flexibility Option's less-than-significant impact.**

m) Utility and Service Systems

(1) Water

Under Alternative 1, no new construction would occur on the Project Site, and therefore, no new residential or commercial uses would be developed which would demand water. **As no increase in water use would occur as a result of either construction or operation, no impacts would occur under Alternative 1 and the impact would be less than the Project's and the Flexibility Option's less-than-significant impacts.**

(2) Wastewater

Under Alternative 1, no new construction would occur on the Project Site, and therefore, no new residential or commercial uses would be developed which would generate wastewater. **As no increase in wastewater generation would occur as a result of either construction or operation, no impacts would occur under Alternative 1, and the impact would be less than the Project's and the Flexibility Option's less-than-significant impacts.**

(3) Solid Waste

Under Alternative 1, no demolition or new construction would occur on the Project Site, and therefore, no demolition debris would be generated, and no new residential or commercial uses would generate solid waste. **As no increase in solid waste generation would occur as a result of either construction or operation, no impacts**

would occur under Alternative 1, and the impact would be less than the Project's and the Flexibility Option's less-than-significant impacts.

(4) Dry Utilities

Construction activities would not occur under Alternative 1. Additionally, Alternative 1 would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, and impacts related to dry utilities would not occur. **As such, no impacts to dry utilities would occur under Alternative 1 and the impact would be less than the less-than-significant impacts of the Project and the Flexibility Option.**

n) Energy Conservation

Construction activities would not occur under Alternative 1. Additionally, Alternative 1 would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not generate any new demand for energy, and no impacts related to energy would occur. **As such, no impacts to energy conservation would occur under Alternative 1, and the impact would be less than the less-than-significant impacts of the Project and the Flexibility Option.**

o) Wildfire

The Project Site is not located in or near the State Responsibility Area or a very high fire hazard severity zone. No new or expansion of development or uses would be introduced to the Project Site under Alternative 1. Therefore, Alternative 1 would have no potential to alter the Project Site's susceptibility to wildfire. **Accordingly, Alternative 1 would have no impact with regard to wildfire, similar to the Project and the Flexibility Option.**

3. Relationship to Project Objectives

Under Alternative 1, the existing warehouse and surface parking lot would remain, and no new development would occur. Although Alternative 1 would avoid most of the impacts of the Project, it would not implement the beneficial impacts of the Project related to water quality and transportation, and would maintain the existing daily work VMT, which currently exceeds the Central APC significance threshold of 7.6 work VMT per capita. Furthermore, Alternative 1 would not meet the Project's underlying purpose to revitalize the Project Site by developing a high-quality mixed-use development that includes publicly accessible open spaces that complement the uses in the Arts District with its

live/work units, commercial retail, and art production space, and that enhances the City's economic base, provides community serving amenities for the existing community, and is respectful of the existing surrounding neighborhoods. Specifically, Alternative 1 would achieve none of the basic Project objectives:

- Promote the Arts District neighborhood as a creative environment with a visually-distinctive building that complements the distinct urban community, providing public art/façade treatments and art-production and gallery space;
- Provide infill redevelopment with an integrated mixed-use project that is economically viable and serves the needs of the Arts District community with new live/work, commercial, and art/production opportunities;
- Encourage walkability and pedestrian safety in the Arts District with a project that would incorporate pedestrian-scaled improvements including lighting and landscaping, ground-floor commercial spaces and an inviting publicly accessible plaza and pedestrian paseo mid-block between Mateo and Imperial Streets that complements existing and future pedestrian activity in the Arts District;
- Contribute towards meeting the City's housing demands by increasing housing supply within the multi-modal, transit-accessible Arts District with live/work units, including affordable live/work units for Very Low Income households;
- Support regional mobility goals and local regional growth policies by encouraging a mixed-use development in and around activity centers so as to reduce vehicle trips and public infrastructure costs, and provide easy access and amenities for pedestrians and bicyclists; and
- Promote fiscal benefits, economic development, and job creation in the City through the construction and operation of a mixed-use development providing live/work units for a range of household types and an array of commercial spaces that attracts a diverse residents and visitors to the City's Arts District, and which generates local tax revenue and supports local businesses.

VI. Alternatives to the Project

C. Alternative 2a–Reduced Density

Alternative 2b–Reduced Density Option

1. Description

The purpose of the Reduced Density Alternative is to potentially avoid or substantially lessen the Project's significant impacts by reducing the overall commercial and residential floor area as compared to the Project and reducing underground excavation. Alternative 2a and 2b would both result in the construction of an approximately 148,016-square-foot mixed-use building, an overall 25 percent reduction in building envelope. Alternative 2a represents reduced density compared to the Project, while Alternative 2b represents reduced density compared to the Flexibility Option. Alternative 2a would have up to 139 live/work units, compared to Alternative 2b, which would have 119 live/work units. Under Alternative 2b, the live/work units on the second floor would be replaced with commercial space for a total of approximately 34,405 square feet of commercial space (compared to Alternative 2a's 17,535 square feet of commercial space). Alternatives 2a and 2b would reduce excavation by eliminating the need for one underground parking level compared to the Project. Alternatives 2a and 2b are described in detail below.

a) Alternative 2a

Under Alternative 2a, the building envelope and density would be reduced by approximately 25 percent. Accordingly, the height of the proposed development under Alternative 2a would be reduced from 8 stories and 116 feet (to top of parapet) tall to 6 stories and 83 feet tall. Alternative 2a would result in the construction of an approximately 148,016-square-foot mixed-use building (compared to the Project's and Flexibility Option's 197,355 square feet) including up to 139 live/work units (compared to the Project's 185 live/work units and the Flexibility Option's 135 live/work units), approximately 11,490 square feet of open space for residents (compared to the Project's 15,320 square feet and the Flexibility Option's 14,870 square feet), up to 17,535 square feet of art-production and commercial space (compared to the Project's 23,380 square feet and the Flexibility Option's 45,873 square feet), and associated parking facilities. Approximately 215 parking spaces (compared to the Project's and Flexibility Option's 287 parking space) would be provided in two subterranean levels (compared to the Project's and Flexibility Option's three subterranean levels).

The design and configuration of Alternative 2a would be similar to the Project. The main difference would be the total square footage and building height, resulting in a mixed-use development with approximately 75 percent of the mass of the Project, a reduction in excavation depth from 47 feet below ground surface with the Project and the Flexibility Option to approximately 37 feet below ground surface, and fewer residents approximately 336 residents (as compared to the Project's 448 residents and the Flexibility Option's 385 residents).

Alternative 2a would reduce the amount of excavation and hauling of soil as compared to the Project and the Flexibility Option due to one less subterranean level, which would lessen the impacts related to air quality emissions during construction and Project-level noise from construction. However, as discussed below under **Section VI.C.2(h)1**, Alternative 2a's construction vibration impacts related to human annoyance would remain significant and unavoidable. Alternative 2a's other impacts would be either less than or similar to the Project's and Flexibility Option's impacts.

The potential environmental impacts associated with Alternative 2a are described below and are compared to the environmental impacts that would result from the implementation of the Project, as described in **Section IV, Environmental Impact Analysis**, of this Draft EIR.

b) Alternative 2 – Reduced Density Option 2b

This alternative also includes an option to implement an increased commercial usage, the Reduced Density Option (Alternative 2b), that would provide the flexibility to increase the commercial square footage within the same building parameters as Alternative 2a (i.e., 148,016-square-feet, with six-above ground levels and two-level subterranean parking structure) and, in turn, reduce the number of live/work units from 139 live/work units to 119 live/work units. Similar to Alternative 2a, the height of the proposed development under Alternative 2b would be reduced from 8 stories and 116 feet (to top of parapet) tall to 6 stories and 83 feet tall. Under Alternative 2b, the live/work units on the second floor would be replaced with commercial space for a total of approximately 34,405 square feet of commercial space (compared to the Project's 23,380 square feet and the Flexibility Option's 45,873 square feet). The increased commercial space would consist of office and art production-related uses. Additionally, the amount of common open space provided under Alternative 2b would be the same as under Alternative 2a; however, the amount of private open space would be reduced to 11,153 square feet commensurate to the reduction in live/work units (compared to the Project's 15,320 square feet and the Flexibility Option's 14,870 square feet). **Table VI-3, Development Summary with Alternative 2a and Alternative 2b**, shows the resulting live/work unit count and commercial square footage of Alternative 2a and Alternative 2b.

Similar to Alternative 2a, Alternative 2b would reduce the amount of excavation and hauling of soil as compared to the Project and the Flexibility Option, which would lessen the impacts related to air quality emissions during construction and Project-level noise and vibration during construction. However, as discussed below under **Section VI.C.2(h)2**, Alternative 2b's construction vibration impacts related to human annoyance would remain significant and unavoidable. Alternative 2b's other impacts would generally be either less than or similar to the Project's and the Flexibility Option's impacts.

The potential environmental impacts associated with Alternative 2b are described below and are compared to the environmental impacts that would result from the implementation of the Project, as described in **Section IV, Environmental Impact Analysis**, of this Draft EIR.

Table VI-3
Development Summary with Alternative 2a and Alternative 2b

Use	Alternative 2a	Alternative 2b	Project	Flexibility Option
Commercial Floor Area and Art Production Related Uses	17,535 sf	34,405 sf	23,380 sf	45,873 sf
Residential Floor Area	127,481 sf	110,911 sf	170,075 sf	147,882 sf
Office (workspace within live/work units)	3,000 sf	2,700 sf	3,900 sf	3,600 sf
Total Floor Area	148,016 sf	148,016 sf	197,355 sf	197,355 sf
Live/work: Studio and 1-Bedroom	119	101	159	135
Live/work: 2 -Bedroom	20		26	
Live/work: 3-Bedroom		18		24
Total Live/Work Dwelling Units	139	119	185	159
Affordable (Very Low Income) Units	15	13	20	18
Maximum Stories	6	6	8	8
Maximum Height	83 feet	83 feet	116 feet	116 feet
Open Space	11,490 sf	11,153 sf	15,320 sf	14,870 sf
Parking Spaces	215	215	287	287
Levels of Subterranean Parking	2	2	3	3
<i>Source: EcoTierra, July 2020.</i>				

2. Comparative Analysis

Alternative 2a and Alternative 2b assume the development of the Related Projects listed in **Section III.2, Related Projects**. The potential environmental impacts associated with Alternative 2a and Alternative 2b are described below and are compared to the environmental impacts that would result from the implementation of the Project and the Flexibility Option, as described in **Chapter IV, Environmental Impact Analysis**, of this Draft EIR. Unless otherwise specified, references to the “Project” throughout this analysis, apply to both the Project and the Flexibility Option, as discussed in **Chapter II, Project Description**, of this Draft EIR. However, where numerical factors are cited and may differ, such as students generated, VMT, or solid waste output, the analysis presents and discusses the numerical factors for both the Project and the Flexibility Option separately.

a) Air Quality

(1) Alternative 2a

(a) *Construction*

(i) *Regional and Localized Air Quality Impacts*

Alternative 2a would involve the same amount of demolition and grading as the Project, however, 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 two aboveground levels. Therefore, the overall amount of construction activities and duration under Alternative 2a 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 and localized impacts on these days would be similar to those of the Project. Further, Alternative 2a would be located at similar distances from sensitive receptors as the Project. **Therefore, impacts associated with regional and localized construction emissions under Alternative 2a would be less than significant and similar to the less-than-significant impacts of the Project and the Flexibility Option.**

(ii) *Toxic Air Contaminants*

As with the Project, construction of Alternative 2a would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. Overall construction emissions generated by Alternative 2a would be less than those of the

Project due to the elimination of one subterranean level under Alternative 2a. **Therefore, TAC impacts would be less than significant under Alternative 2a and less than the less-than-significant TAC impacts of the Project and the Flexibility Option.**

(b) Operation

(i) Regional and Localized Air Quality Impacts

The number of net new daily vehicle trips generated by Alternative 2a, approximately 1,605 trips, would be fewer than the number of trips generated by the Project, approximately 2,404 trips, and the Flexibility Option, approximately 2,467 trips. Since the amount of vehicular emissions is based on the number of trips generated, the vehicular emissions generated by Alternative 2a would be less than the emissions generated by the Project and the Flexibility Option. In addition, since the size of residential and commercial uses would be reduced under Alternative 2a and the calculation of energy consumption is based on the size of proposed uses, the consumption of electricity and natural gas would also be reduced compared to the Project and the Flexibility Option. **Therefore, regional air quality impacts under Alternative 2a would be less than significant, and less than the less-than-significant impacts of the Project and the Flexibility Option.**

With regard to on-site localized emissions, as with the Project, Alternative 2a would not introduce any major new sources of air pollution within the Project Site. As discussed above, the number of vehicle trips generated by Alternative 2a would be less than the vehicle trips generated by the Project and the Flexibility Option. **As such, localized impacts under Alternative 2a would be less than significant, and less than the less-than-significant impacts of the Project and the Flexibility Option.**

(ii) Toxic Air Contaminants

Due to the reduction in daily trips that would occur under Alternative 2a, mobile source emissions generated by Alternative 2a would be correspondingly reduced compared to the mobile source emissions generated by the Project and by the Flexibility Option. **Therefore, TAC impacts would be less than significant under Alternative 2a and less than the less-than-significant TAC impacts of the Project and the Flexibility Option.**

(2) Alternative 2b

(a) Construction

(i) Regional and Localized Air Quality Impacts

Alternative 2b would involve the same amount of demolition and grading as the Project, however, 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 two aboveground levels. Therefore, the overall amount of construction activities and duration under Alternative 2b 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. Further, construction activities under Alternative 2b would be located at similar distances from sensitive receptors as the Project. Because maximum daily conditions are used for measuring impact significance, regional and localized impacts on these days would be similar to those of the Project. **Therefore, impacts associated with regional and localized construction emissions under Alternative 2b would be less than significant and similar to the less-than-significant impacts of the Project and the Flexibility Option.**

(ii) Toxic Air Contaminants

As with the Project, construction of Alternative 2b would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. Overall construction emissions generated by Alternative 2b would be less than those of the Project due to the elimination of one subterranean level under Alternative 2b. **Therefore, TAC impacts would be less than significant under Alternative 2b and less than the less-than-significant TAC impacts of the Project and the Flexibility Option.**

(b) Operation

(i) Regional and Localized Air Quality Impacts

As with the Project, operational regional air pollutant emissions associated with Alternative 2b 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. The number of net new daily vehicle trips generated by Alternative 2b, approximately 1,655 trips, would be fewer than the number of trips generated by the Project, approximately 2,404 trips, and the Flexibility Option, approximately 2,467 trips. Since the amount of vehicular emissions is based on the number of trips generated, the vehicular emissions generated by Alternative 2b would be less than the emissions

generated by the Project and by the Flexibility Option. In addition, since the size of residential and commercial uses would be reduced under Alternative 2b, the consumption of electricity and natural gas would also be reduced compared to the Project and the Flexibility Option. **Therefore, regional air quality impacts under Alternative 2b would be less than significant, and less than the less-than-significant impacts of the Project and the Flexibility Option.**

With regard to on-site localized emissions, as with the Project, Alternative 2b would not introduce any major new sources of air pollution within the Project Site. As discussed above, the number of vehicle trips generated by Alternative 2b would be less than the vehicle trips generated by the Project and the Flexibility Option. **As such, localized impacts under Alternative 2b would be less than significant, and less than the less-than-significant impacts of the Project and the Flexibility Option.**

(ii) *Toxic Air Contaminants*

Due to the reduction in daily trips that would occur under Alternative 2b (1,655 trips) compared to the Project (2,404 trips) and the Flexibility Option (2,467 trips), mobile source emissions generated by Alternative 2b would be correspondingly reduced compared to the mobile source emissions generated by the Project and by the Flexibility Option. **Therefore, TAC impacts would be less than significant under Alternative 2b and less than the less-than-significant TAC impacts of the Project and the Flexibility Option.**

b) Cultural Resources

(1) Alternative 2a

(a) *Historical Resources*

Similar to the Project, Alternative 2a would alter the immediate surroundings of historical resources in the vicinity by constructing a new building on the Project Site. Such resources include the Downtown Los Angeles Industrial Historic District and the National Biscuit Company Building. The design of the proposed building under Alternative 2a would be similar to that of the Project in terms of architectural style, building materials and colors, but would be reduced in height by two levels. Accordingly, the building would appear diminished in views of and from nearby historical resources as compared to the Project. **Thus, overall impacts to historical resources under Alternative 2a would be less than significant and less than the less-than-significant impacts of the Project and the Flexibility Option.**

(b) Archaeological Resources

Alternative 2a would construct one less subterranean parking level compared to the Project. Therefore, the potential for Alternative 2a to uncover subsurface archaeological resources would be less when compared to that of the Project. However, as under the Project, because Alternative 2a would also require excavation into high archaeological sensitivity sediments and would be located within the same proximity to the *Zanja* No. 1 branch. As such, mitigation measures MM CUL-1 through MM CUL-4 would also be required for Alternative 2a. **Thus, impacts to archaeological resources under Alternative 2a would be less than significant with mitigation but less than the less-than-significant-with-mitigation impacts of the Project and the Flexibility Option.**

*(2) Alternative 2b**(a) Historical Resources*

Similar to the Project, Alternative 2b would alter the immediate surroundings of historical resources in the vicinity by constructing a new building on the Project Site. Such resources include the Downtown Los Angeles Industrial Historic District and the National Biscuit Company Building. The design of the proposed building under Alternative 2b would be similar to that of the Project in terms architectural style, building materials and colors, but would be reduced in height by two levels. **Thus, overall impacts to historical resources under Alternative 2b would be less than significant and less than the less-than-significant impacts of the Project and the Flexibility Option.**

(b) Archaeological Resources

Alternative 2b would construct one less subterranean parking level compared to the Project. Therefore, the potential for Alternative 2b to uncover subsurface archaeological resources would be less when compared to that of the Project. However, as with the Project, because Alternative 2b would also require excavation into high archaeological sensitivity sediments and would be located within the same proximity to the *Zanja* No. 1 branch. As such, mitigation measures MM CUL-1 through MM CUL-4 would also be required for Alternative 2b. **Thus, impacts to archaeological resources under Alternative 2b would be less than significant with mitigation but less than the less-than-significant-with-mitigation impacts of the Project and the Flexibility Option.**

c) Geology and Soils

(1) Alternative 2a

(a) *Geology and Soils*

Under Alternative 2a impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, liquefaction, seismically induced settlement, soil stability, and subsidence would be similar to those under the Project because such impacts are a function of the Project Site's underlying geologic conditions rather than the type or amount of land use proposed. As such, although Alternative 2a would eliminate one level of subterranean parking and two aboveground levels as compared to the Project, the potential for encountering unstable soils would be substantially similar. Alternative 2a would comply with the same regulatory requirements as the Project to ensure that the soils underlying the Project Site can adequately support the proposed development. As with the Project, Alternative 2a would be designed and constructed to conform to the current seismic design provisions of the California Building Code and the Los Angeles Building Code. Alternative 2a would also be required to provide a final design-level geotechnical report, subject to LADBS review and approval, prior to the issuance of grading permits, to identify and minimize seismic risks. **Therefore, under Alternative 2a, impacts related to geology and soils would be less than significant and similar to those of the Project and the Flexibility Option.**

(b) *Paleontological Resources*

Alternative 2a would construct one less subterranean parking level compared to the Project. Therefore, the potential for Alternative 2a to uncover subsurface paleontological resources would be less when compared to that of the Project. However, because Alternative 2a would also require excavation into high paleontological sensitivity sediments, mitigation measure MM GEO-1 would also be required. **Thus, impacts to paleontological resources under Alternative 2a would be less than significant with mitigation but less than the less-than-significant-with-mitigation impacts of the Project and the Flexibility Option.**

(2) Alternative 2b

(a) *Geology and Soils*

Under Alternative 2b, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, liquefaction, seismically induced settlement, soil stability, and subsidence would be similar to those under the Project because such impacts are a function of the Project Site's underlying geologic conditions rather than the type or amount of land use proposed. As such, although Alternative 2b would eliminate one level of

subterranean parking and two aboveground levels as compared to the Project, the potential for encountering unstable soils would be substantially similar. Alternative 2b would comply with the same regulatory requirements as the Project to ensure that the soils underlying the Project Site can adequately support the proposed development. As with the Project, Alternative 2b would be designed and constructed to conform to the current seismic design provisions of the California Building Code and the Los Angeles Building Code. Alternative 2b would also be required to provide a final design-level geotechnical report, subject to LADBS review and approval, prior to the issuance of grading permits, to identify and minimize seismic risks. **Therefore, under Alternative 2b, impacts related to geology and soils would be less than significant and similar to the less-than-significant impacts of the Project and the Flexibility Option.**

(b) Paleontological Resources

Alternative 2b would construct one less subterranean parking level compared to the Project. Therefore, the potential for Alternative 2b to uncover subsurface paleontological resources would be less when compared to that of the Project. However, because Alternative 2b would also require excavation into high paleontological sensitivity sediments, mitigation measure MM GEO-1 would also be required. **Thus, impacts to paleontological resources under Alternative 2b would be less than significant with mitigation but less than the less-than-significant-with-mitigation impacts of the Project and the Flexibility Option.**

d) Greenhouse Gas Emissions

(1) Alternative 2a

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. Alternative 2a would result in 49,339 square feet less development compared to the Project and the Flexibility Option. Furthermore, as detailed below under **Section VI.C.k.1.b**, Alternative 2a would generate approximately 799 fewer daily trips than the Project and 862 fewer trips than the Flexibility Option. Therefore, under Alternative 2a, the trip generation and energy and water consumption from proposed land uses would be reduced compared to the Project and to the Flexibility Option due to the reduction of the proposed building and uses. Thus, the amount of GHG emissions generated by Alternative 2a would be less than the amount generated by the Project and the Flexibility Option. As with the Project, Alternative 2a would be designed to comply with CalGreen and the City's Green Building Ordinance, as applicable. Accordingly, similar to the Project, Alternative 2a 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 2a would be less than significant and less than the less-than-significant impacts of the Project and the Flexibility Option.

(2) Alternative 2b

As with Alternative 2a, Alternative 2b would result in 49,339 square feet less development compared to the Project and the Flexibility Option. Furthermore, as detailed below under **Section VI.C.k.2.b**, Alternative 2b would generate approximately 749 fewer daily trips than the Project and 812 fewer trips than the Flexibility Option. Therefore, under Alternative 2b, the trip generation and energy and water consumption from proposed land uses would be reduced compared to the Project and the Flexibility Option due to the reduction of the proposed building and uses. Thus, the amount of GHG emissions generated by Alternative 2b would be less than the amount generated by the Project. As with the Project, Alternative 2b would be designed to comply with CalGreen and the City's Green Building Ordinance, as applicable. Accordingly, similar to the Project, Alternative 2b 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 2b would be less than significant and less than the less-than-significant impacts of the Project and the Flexibility Option.**

e) Hazards and Hazardous Materials

(1) Alternative 2a

Impacts related to hazardous materials from a development project are determined in large part by the proposed land uses. Accordingly, because Alternative 2a would include the same uses as under the Project, albeit to a lesser amount, hazardous materials impacts would be similar to those of the Project. As with the Project, Alternative 2a would be required to comply with all applicable local, state, and federal regulations, as well as adhere to manufacturer's instructions with regard to hazardous materials. In addition, all development would occur within the boundaries of the Project Site; therefore, Alternative 2a would not cause permanent alterations to vehicular circulation routes or patterns or impede public access or travel upon public rights-of-way. Therefore, similar to the Project, Alternative 2a would not exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment. **As such, potential impacts related to hazards and hazardous materials during operation of Alternative 2a would be less than significant and similar to the Project's and Flexibility Option's less-than-significant impacts.**

(2) Alternative 2b

As described for Alternative 2a, because Alternative 2b would include the same uses as under the Project, albeit to a lesser amount, hazardous materials impacts would be similar to those of the Project. As with the Project, Alternative 2b would be required to comply with all applicable local, state, and federal regulations, as well as adhere to manufacturer's instructions with regard to hazardous materials. In addition, all development would occur within the boundaries of the Project Site; therefore, Alternative 2b would not cause permanent alterations to vehicular circulation routes or patterns or impede public access or travel upon public rights-of-way. Therefore, similar to the Project, Alternative 2b would not exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment. **As such, potential impacts related to hazards and hazardous materials during operation of Alternative 2b would be less than significant and similar to the Project's and the Flexibility Option's less-than-significant impacts.**

f) Hydrology and Water Quality

(1) Alternative 2a

(a) Construction

As with the Project, construction activities associated with Alternative 2a would have the potential to temporarily alter the existing surface drainage patterns and flows within the Project Site by diverting existing surface flows as a resulting of exposing underlying soils and making the Project Site temporarily more permeable. Similar to the Project, Alternative 2a would comply with the City's LID Ordinance and LAMC requirements that require necessary measures, plans, and inspections to reduce flooding, sedimentation and erosion. Thus, similar to the Project, through implementation of BMPs, LID and compliance with applicable City grading regulations, Alternative 2a would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, flooding on- or off-site. In addition, adherence to standard compliance measures during construction activities would ensure that Alternative 2a would not cause flooding that would have the potential to harm people or damage property, substantially reduce or increase the amount of surface water flow from the Project Site, or result in a permanent, adverse change to the movement of surface water to produce a substantial change in the current or direct of water flow during construction. As with the Project, construction of Alternative 2a would not be anticipated to encounter groundwater based on the depth of excavation and the depth of groundwater (historically 150 feet) below the Project Site. **Therefore, construction related impacts to water quality, drainage patterns, flooding and groundwater would be less than significant under**

Alternative 2a and similar to the Project's and the Flexibility Option's less-than-significant impacts.*(b) Operation*

Similar to the Project, Alternative 2a would not impact surface or groundwater movement or groundwater contamination. The Project Site is within the Hansen Dam and Sepulveda Dam's inundation areas but these dams are continuously monitored by various agencies such as the State of California Division of Safety of Dams to guard against the threat of dam failure. **Thus, potential failure of the dam that could result in inundation of the downstream area is low and impacts would be less than significant under Alternative 2a, similar to the Project and the Flexibility Option's less-than-significant impacts.**

As with the Project, upon buildout of Alternative 2a, there would be no increase or decrease in the imperviousness of the Project Site that could substantially increase runoff volumes into the existing storm drain system. Alternative 2a would slightly alter on-site drainage patterns although the total drainage area would not change. In accordance with LID requirements, the BMPs would be required to control stormwater runoff with no increase in runoff resulting from Alternative 2a. Implementation of Alternative 2a would not increase storm water flows from the site causing off-site flooding. Operation would entail the preparation and implementation of a development-specific SUSMP meeting the requirements of the County-wide SUSMP adopted by LARWQCB, and preparation and implementation of a development-specific LID Plan including BMPs design to address runoff and pollutants. Furthermore, like the Project, Alternative 2a would manage, capture, and treat runoff as required through regulatory compliance, representing an improvement in water quality from the existing conditions, which are not required to reduce runoff. Under Alternative 2a, there would be no incremental increase or decrease in the imperviousness of the Project Site that could affect groundwater recharge rates on-site, similar to the Project. Therefore, the potential for operational related impacts to groundwater would be less than significant and similar to the Project's less-than-significant impacts. **Overall, operational impacts to hydrology drainage patterns, flooding and water quality from Alternative 2a would be less than significant and similar to the Project's and the Flexibility Option's less-than-significant impacts.**

(2) Alternative 2b*(a) Construction*

As with the Project, construction activities associated with Alternative 2b would have the potential to temporarily alter the existing surface drainage patterns and flows within the Project Site by diverting existing surface flows as a resulting of exposing underlying soils and making the Project Site temporarily more permeable. Similar to the Project,

Alternative 2b would comply with the City's LID Ordinance and LAMC requirements that require necessary measures, plans, and inspections to reduce flooding, sedimentation and erosion. Thus, similar to the Project, through implementation of BMPs, LID and compliance with applicable City grading regulations, Alternative 2b would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, flooding on- or off-site. In addition, adherence to standard compliance measures during construction activities would ensure that Alternative 2b would not cause flooding that would have the potential to harm people or damage property, substantially reduce or increase the amount of surface water flow from the Project Site, or result in a permanent, adverse change to the movement of surface water to produce a substantial change in the current or direction of water flow during construction. As with the Project, construction of Alternative 2b would not be anticipated to encounter groundwater based on the depth of excavation and the depth of groundwater (historically 150 feet) below the Project Site. **Therefore, construction related impacts to water quality, drainage patterns, flooding and groundwater would be less than significant under Alternative 2b and similar to the Project's and the Flexibility Option's less-than-significant impacts.**

(b) Operation

Similar to the Project, Alternative 2b would not impact surface or groundwater movement or groundwater contamination. The Project Site is within the Hansen Dam and Sepulveda Dam inundation areas but these dams are continuously monitored by various agencies such as the State of California Division of Safety of Dams to guard against the threat of dam failure. **Thus, potential failure of the dam that could result in inundation of the downstream area is low and impacts would be less than significant under Alternative 2b, similar to the Project's and Flexibility Option's less-than-significant impacts.**

As with the Project, upon buildout of Alternative 2b, there would be no increase or decrease in the imperviousness of the Project Site that could substantially increase runoff volumes into the existing storm drain system. Alternative 2b would slightly alter on-site drainage patterns although the total drainage area would not change. In accordance with LID requirements, the BMPs would be required to control stormwater runoff with no increase in runoff resulting from Alternative 2b. Implementation of Alternative 2b would not increase storm water flows from the Project Site causing off-site flooding. Operation would entail the preparation and implementation of a development-specific SUSMP meeting the requirements of the County-wide SUSMP adopted by LARWQCB, and preparation and implementation of a development-specific LID Plan including BMPs design to address runoff and pollutants. Furthermore, like the Project, Alternative 2b would manage, capture, and treat runoff as required through regulatory compliance, representing an improvement in water quality from the existing conditions, which are not

required to reduce runoff. Under Alternative 2b, there would be no incremental increase or decrease in the imperviousness of the Project Site that could affect groundwater recharge rates on-site, similar to the Project. Therefore, the potential for operational related impacts to groundwater under Alternative 2b would be less than significant and similar to the Project's less-than-significant impacts. **Overall, operational impacts to hydrology drainage patterns, flooding and water quality from Alternative 2b would be less than significant and similar to the Project's and the Flexibility Option's less-than-significant impacts.**

g) Land Use and Planning

(1) Alternative 2a

Alternative 2a would seek the same general discretionary actions as the Project, a General Plan Amendment, Vesting Zone Change, Height District Change, Master Conditional Use, and Vesting Tentative Tract, with the exception of the requests associated with the Density Bonus for affordable housing. As with the Project, with approval of the requests, Alternative 2a would be in conformance with applicable provisions of the LAMC and General Plan, would revitalize an infill site by locating residential and commercial uses at a site targeted for high density in close proximity to transit, and would enhance the pedestrian environment and promote alternative forms of transportation to reduce VMT. As such, Alternative 2a would also not conflict with local and regional land use plans applicable to the Project Site. **Therefore, land use impacts under Alternative 2a would be less than significant and similar to the land use impacts of the Project and Flexibility Option.**

(2) Alternative 2b

Alternative 2b would seek the same general discretionary actions as the Project, a General Plan Amendment, Vesting Zone Change, Height District Change, Master Conditional Use, and Vesting Tentative Tract, with the exception of the requests associated with the Density Bonus for affordable housing. As with the Project, with approval of the requests, Alternative 2b would be in conformance with applicable provisions of the LAMC and General Plan, would revitalize an infill site by locating residential and commercial uses at a site targeted for high density in close proximity to transit, and would enhance the pedestrian environment and promote alternative forms of transportation to reduce VMT. As such, Alternative 2b would also not conflict with local and regional land use plans applicable to the Project Site. **Therefore, land use impacts under Alternative 2b would be less than significant and similar to the land use impacts of the Project and Flexibility Option.**

h) Noise

(1) Alternative 2a

(a) Construction

Alternative 2a would not require the extent of site excavation and soil export necessary under the Project due to the elimination of one subterranean level, resulting in a decrease in the number of haul truck trips and associated mobile noise sources. Furthermore, due to the reduction in the total floor area as compared to the Project, there would be a reduction in the amount and the overall duration of construction and associated onsite noise under Alternative 2a. However, on-site construction activities and the associated construction noise and vibration levels would be similar to the Project 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 2a when compared to the Project. Noise levels during maximum activity days, which are used for measuring impact significance, would therefore be similar to those of the Project and would require mitigation measure MM NOI-1. Alternative 2a would reduce the amount of excavation required because of the reduction of one underground parking level, which would reduce the duration of vibration from activities that would produce the highest vibration levels, including use of bulldozers, caisson drilling and haul truck movement. Impacts of Alternative 2a with respect to construction vibration resulting in building damage would be less than significant. Impacts of Alternative 2a with respect to construction vibration resulting in human annoyance would be significant and unavoidable, although less than the Project because of reduced construction duration. **As such, construction noise impacts under Alternative 2a would be less than significant with mitigation and similar to the less-than-significant-with-mitigation impacts under the Project and Flexibility Option. Construction vibration impacts under Alternative 2a would be significant and unavoidable and less than the Project's and the Flexibility Option's significant and unavoidable construction vibration impacts related to human annoyance; and would be less than significant and less than the less than significant impacts of the Project and Flexibility Option with respect to building damage.**

(b) Operation

As with the Project, the operational noise generated under Alternative 2a would be typical of residential and commercial land uses. Similar to the Project, new vehicle trips would be generated along study area roadways, however, as detailed below under **Section VI.C.k.1.b**, Alternative 2a would generate approximately 799 fewer daily trips than the Project and 862 fewer trips than the Flexibility Option. Thus, Alternative 2a would generate less traffic noise than the Project and the Flexibility Option. Under Alternative

2a, as with the Project, parking would also be shielded to avoid parking noise impacts to adjacent properties. Noise generated by mechanical equipment has the potential to be greater under Alternative 2a compared to the Project, as the building would be two stories shorter, placing mechanical equipment closer to receptors. However, as with the Project, the mechanical equipment would still be required to comply with regulatory limits, which would reduce and minimize mechanical noise impacts. In addition, the mechanical equipment such as refrigeration units (mounted at the roof level) would include vibration-attenuation mounts to reduce the vibration transmission into the building. **Therefore, operational noise and vibration impacts under Alternative 2a would be less than significant and similar to the Project's and the Flexibility Option's less-than-significant impacts.**

(2) Alternative 2b

(a) Construction

As with Alternative 2a, Alternative 2b would not require the extent of site excavation and soil export necessary under the Project due to the elimination of one subterranean level, resulting in a decrease in the number of haul truck trips and associated mobile noise sources. Furthermore, due to the reduction in the total floor area as compared to the Project, there would be a reduction in the amount and the overall duration of construction and associated onsite noise under Alternative 2b. However, on-site construction activities and the associated construction noise and vibration levels would be similar to the Project 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 2b when compared to the Project. Noise levels during maximum activity days, which are used for measuring impact significance, would therefore be similar to those of the Project and would require mitigation measure MM NOI-1. Alternative 2b would reduce the amount of excavation required because of the reduction of one underground parking level, which would reduce the duration of vibration from activities that would produce the highest vibration levels, including use of bulldozers, caisson drilling and haul truck movement. Impacts of Alternative 2b with respect to construction vibration resulting in building damage would be less than significant. Impacts of Alternative 2b with respect to construction vibration resulting in human annoyance would be significant and unavoidable, although less than the Project because of reduced construction duration. **As such, construction noise impacts under Alternative 2b would be less than significant with mitigation and similar to the less-than-significant-with-mitigation impacts under the Project and Flexibility Option. Construction vibration impacts under Alternative 2b would be significant and unavoidable and less than the Project's and the Flexibility Option's significant and unavoidable construction vibration impacts related to human annoyance; and would be less than significant**

and less than the less than significant impacts of the Project and Flexibility Option with respect to building damage.

(b) *Operation*

As with the Project, the operational noise generated under Alternative 2b would be typical of residential and commercial land uses. Similar to the Project, new vehicle trips would be generated along study area roadways, however, as detailed below under **Section VI.C.k.2.b**, Alternative 2b would generate approximately 749 fewer daily trips than the Project and 812 fewer trips than the Flexibility Option. Thus, Alternative 2b would generate less traffic noise than the Project and the Flexibility Option. Under Alternative 2b, as with the Project, parking would also be shielded to avoid parking noise impacts to adjacent properties. Noise generated by mechanical equipment has the potential to be greater under Alternative 2b compared to the Project, as the building would be two stories shorter, placing mechanical equipment closer to receptors. However, as with the Project, the mechanical equipment would still be required to comply with regulatory limits, which would reduce and minimize mechanical noise impacts. In addition, the mechanical equipment such as refrigeration units (mounted at the roof level) would include vibration-attenuation mounts to reduce the vibration transmission into the building. **Therefore, operational noise and vibration impacts under Alternative 2b would be less than significant and similar to the Project's and the Flexibility Option's less-than-significant impacts.**

i) Population and Housing

(1) Alternative 2a

As under the Project, Alternative 2a would not require the extension of roadways or infrastructure to an undeveloped area and would be supported by the existing infrastructure. **As such, indirect population growth impacts would be less than significant, similar to the Project and the Flexibility Option.**

As shown in **Table VI-4, Alternative 2a Net Employee Generation**, Alternative 2a is estimated to generate approximately 72 employees, which would result in a net *decrease* of approximately 22 employees (as compared to the Project's approximately 92 employees, which would result in a net *decrease* of approximately 2 employees, and the Flexibility Option's approximately 151 employees, which would result in a net increase of approximately 57 employees), approximately 336 residents (as compared to the Project's 448 residents and the Flexibility Option's 385 residents),² and 139 dwelling units (as compared to the Project's 185 units and the Flexibility Option's 159 units). **As Alternative**

² Based on the City's Person Per Household Rate of 2.42. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019.

2a would generate fewer employees, residents, and housing units, its impacts would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.

**Table VI-4
Alternative 2a Net Employee Generation**

Land Use	Size	Generation Rate ^a	Employees
Live Work Units	139 units	N/A	<10 ^b
Commercial Space and Art Production Related Uses	17,535 sf	2.71/ employees/1,000 sf	48
Office (workspace within live/work units)	3,000 sf	4.79/ employees/1,000 sf	14
<i>Alternative 2a Total</i>			72
<i>Less Existing Uses Total</i>			94
<i>Alternative 2a Net Total</i>			(22)
<i>Notes: sf = square feet</i> ^a <i>Los Angeles Unified School District, Level 1 – Developer Fee Justification Study for Los Angeles Unified School District, March 2018.</i> ^b <i>The School Fee Justification Studies for Los Angeles Unified School District do not include employee generation factors for multi-family residential uses. The small number of employees (estimated at less than 10) was assumed to be required to provide management and maintenance for the residential uses (e.g., day porters, parking garage personnel, leasing office, janitorial, etc.).</i> <i>Source (table): EcoTierra Consulting, 2020.</i>			

(2) Alternative 2b

As under the Project, Alternative 2b would not require the extension of roadways or infrastructure to an undeveloped area and would be supported by the existing infrastructure. **As such, indirect population growth impacts would be less than significant and similar to the Project and the Flexibility Option.**

As shown in **Table VI-5, Alternative 2b Net Employee Generation**, Alternative 2b is estimated to generate approximately 116 employees, which would result in a net increase of approximately 22 employees on the Project Site (as compared to the Project's approximately 92 employees, which would result in a net *decrease* of approximately 2 employees on the Project Site and the Flexibility Option's approximately 151 employees, which would result in a net increase of approximately 57 employees on the Project Site), approximately 288 residents (as compared to the Project's 448 residents and the Flexibility Option's 385 residents),³ and 119 dwelling units (as compared to the Project's 185 units and the Flexibility Option's 159 units). **As Alternative 2b would generate fewer residents and housing units than the Project and Flexibility Option, fewer employees than the Project, and a lower increase in employees than the Flexibility**

³ *Based on the City's Person Per Household Rate of 2.42. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019.*

Option, its impacts would be less than significant and would be less than the Project's and the Flexibility Option's less-than-significant impacts.

**Table VI-5
Alternative 2b Net Employee Generation**

Land Use	Size	Generation Rate^a	Employees
Live Work Units	119 units	N/A	<10 ^b
Commercial Space and Art Production Related Uses	34,405 sf	2.71/ employees/1,000 sf	93
Office (workspace within live/work units)	2,700 sf	4.79/ employees/1,000 sf	13
<i>Alternative 2b Total</i>			116
Less Existing Uses Total			94
Alternative 2b Net Total			22

Notes: sf = square feet

^b Los Angeles Unified School District, Level 1 – Developer Fee Justification Study for Los Angeles Unified School District, March 2018.

^b The School Fee Justification Studies for Los Angeles Unified School District do not include employee generation factors for multi-family residential uses. The small number of employees (estimated at less than 10) was assumed to be required to provide management and maintenance for the residential uses (e.g., day porters, parking garage personnel, leasing office, janitorial, etc.).

Source (table): EcoTierra Consulting, 2020.

j) Public Services

(1) Fire Protection

(a) Alternative 2a

(i) Construction

The types of construction activities that would be required for Alternative 2a would be similar to those of the Project, however, the overall duration of construction would be reduced compared to the Project. Similar to the Project, implementation of “good housekeeping” procedures by the construction contractors and the work crews would minimize these hazards. During construction of Alternative 2a, emergency access to the Project Site and surrounding vicinity could be impacted by construction activities, however, construction impacts are temporary in nature and would not cause lasting access effects to emergency services. In addition, construction work and haul truck trips would occur outside of typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related impacts. Furthermore, construction-related traffic would not significantly impact LAFD emergency response within the vicinity as emergency vehicles normally have a variety of options for avoiding traffic. As with the Project, a Construction Staging and Traffic Management Plan (PDF TR-1) 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 2a would be less than significant and,**

due to the reduced construction period, would be less than the less-than-significant impacts of the Project and the Flexibility Option.

(ii) Operation

Similar to the Project, Alternative 2a would implement all applicable City Building Code and Fire Code requirements. Alternative 2a proposes 46 fewer residential units than the Project and 20 fewer units than the Flexibility Option; as well as 49,339 less building square footage as compared to the Project. Therefore, the demand for services from the LAFD would be correspondingly reduced under Alternative 2a due to fewer people on the Project Site, smaller size of building requiring fire suppression, and reduced square footage of uses requiring the need for fire and emergency service. **Therefore, Alternative 2a's demand for fire protection services would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impact.**

(b) Alternative 2b

(i) Construction

The types of construction activities that would be required for Alternative 2b would be similar to those of the Project, however, the overall duration of construction would be reduced compared to the Project. Similar to the Project, implementation of "good housekeeping" procedures by the construction contractors and the work crews would minimize these hazards. During construction of Alternative 2b, emergency access to the Project Site and surrounding vicinity could be impacted by construction activities, however, construction impacts are temporary in nature and would not cause lasting access effects to emergency services. In addition, construction work and haul truck trips would occur outside of typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related impacts. Furthermore, construction-related traffic would not significantly impact LAFD emergency response within the vicinity as emergency vehicles normally have a variety of options for avoiding traffic. As with the Project, a Construction Staging and Traffic Management Plan, project design feature PDF TR-1 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 2b would be less than significant and, due to the reduced construction period, would be less than the less-than-significant impacts of the Project and the Flexibility Option.**

(ii) Operation

. Alternative 2b proposes 66 fewer residential units than the Project and 40 fewer units than the Flexibility Option; as well as 49,339 less building square footage as compared to the Project. Therefore, the demand for services from the LAFD would be

correspondingly reduced under Alternative 2b due to fewer people on the Project Site, smaller size of building requiring fire suppression, and reduced square footage of uses requiring the need for fire and emergency service. **Therefore, Alternative 2b's demand for fire protection services would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impact.**

(2) Police Protection

(a) *Alternative 2a*

(i) *Construction*

The types of construction activities that would be required for Alternative 2a would be similar to those of the Project, however, the overall duration of construction would be reduced compared to the Project. Alternative 2a would also implement PDF POL-1 to reduce the demand for police protection services during construction.

During construction of Alternative 2a, emergency access to the Project Site and surrounding vicinity could be impacted by construction activities. However, construction impacts are temporary in nature and would not cause lasting access effects to emergency services. In addition, construction work and haul truck trips would occur outside of typical weekday commuter morning and afternoon peak periods and emergency vehicles normally have a variety of options for avoiding traffic. As with the Project, Construction Staging and Traffic Management Plan, project design feature PDF TR-1 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 to police protection services under Alternative 2a would be less than significant and, due to the reduced construction period, would be less than the less-than-significant impacts of the Project and the Flexibility Option.**

(ii) *Operation*

Alternative 2a would result in 46 fewer residential units than the Project and 20 fewer units than the Flexibility Option; as well as 49,339 less building square footage as compared to the Project. | Therefore, the demand for services from the LAPD would be incrementally reduced due to fewer people on the Project Site and the reduced square footage of uses requiring the need for police services. Furthermore, Alternative 2a would implement PDF POL-2 to improve safety through Project Site design. **Therefore, impacts to police protection under Alternative 2a would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.**

(b) *Alternative 2b*(i) *Construction*

The types of construction activities that would be required for Alternative 2b would be similar to those of the Project, however, the overall duration of construction would be reduced compared to the Project. Alternative 2b would also implement PDF POL-1 to reduce the demand for police protection services during construction.

During construction of Alternative 2b, emergency access to the Project Site and surrounding vicinity could be impacted by construction activities. However, construction impacts are temporary in nature and would not cause lasting access effects to emergency services. In addition, construction work and haul truck trips would occur outside of typical weekday commuter morning and afternoon peak periods and emergency vehicles normally have a variety of options for avoiding traffic. As with the Project, a Construction Staging and Traffic Management Plan, project design feature PDF TR-1 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 to police protection services under Alternative 2b would be less than significant and, due to the reduced construction period, would be less than the less-than-significant impacts of the Project and the Flexibility Option.**

(ii) *Operation*

Alternative 2b would result in 66 fewer residential units than the Project and 40 fewer units than the Flexibility Option; as well as 49,339 less building square footage as compared to the Project. Therefore, the demand for services from the LAPD would be incrementally reduced due to fewer people on the Project Site and the reduced square footage of uses requiring the need for police services. Furthermore, Alternative 2b would implement PDF POL-2 to improve safety through Site design. **Therefore, impacts to police protection under Alternative 2b would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.**

(3) *Schools*(a) *Alternative 2a*(i) *Construction*

Similar to the Project, Alternative 2a would generate part-time and full-time jobs associated with its construction. 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 2a. **As such, impacts on school facilities during construction under Alternative 2a would be less than significant and similar to the Project's and the Flexibility Option's less-than-significant impacts.**

(ii) *Operation*

Alternative 2a would develop new residential and commercial uses that would generate students; however, as shown in **Table IV-6, Alternative 2a Student Generation**, Alternative 2a would generate approximately 51 net new students, 23 fewer than the Project and 26 fewer than the Flexibility Option. As with the Project, Alternative 2a would also be required to pay development fees for schools to the LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, payment of the school fees established by the LAUSD would, by law, address Alternative 2a's direct and indirect impacts on schools. **Therefore, impacts to schools would be less than significant and, due to the reduction in the number of students as compared to the Project, would be less than the Project's and the Flexibility Option's less-than-significant impacts.**

**Table VI-6
Alternative 2a Student Generation**

Land Use	Size	Students Generated ^a			
		Elementary (K-6)	Middle School (7-8)	High School (9-12)	Total
Existing Uses					
Warehouse	26,740 sf	11	3	7	21
Total Existing Students		11	3	7	21
Proposed Uses					
Live Work Units	139 du	32	8	18	58
Commercial and Art Production Related Uses	17,535 sf	6	2	3	11
Office (workspace within live/work units)	3,000 sf	1	1	1	3
Total Projected Students		39	11	22	72
Less Existing		11	3	7	21
Total Net New Students		28	8	15	51

Note: du = dwelling unit; sf = square feet

a Based on student generation factors provided in the 2018 Developer Fee Justification Study for Los Angeles Unified School District, March 2018. The student generation rate of 0.00352 (employees per square foot) for "Industrial Business Parks" (Table 14) uses are applied for the warehouse uses, resulting in 94 (rounded) employees. The following student generation rates are applied for residential uses: 0.2269 students per household (grades K-6), 0.0611 students per household (grades 7-8), and 0.1296 students per household (grades 9-12) (Table 3). The student generation rate of 0.0027 (employees per square foot) for "Neighborhood Shopping Center" (Table 14) uses is applied for commercial uses, resulting in 47 (rounded) employees. The student generation rate of 0.00479 (employees per square foot) for "Standard Commercial Office" (Table 14) uses is applied for office and

**Table VI-6
Alternative 2a Student Generation**

Land Use	Size	Students Generated ^a			
		Elementary (K-6)	Middle School (7-8)	High School (9-12)	Total
<i>art production related uses, resulting in 14 (rounded) employees. The ratio of students per employee in the District is 0.2249, with the Project's office and art production generating a total of 3 students and the commercial generating a total of 11 students. Since the LAUSD School Fee Justification Study does not specify which grade levels students fall within for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 54 percent elementary school, 15 percent middle school, and 31 percent high school).</i>					
<i>Source: EcoTierra Consulting, 2020.</i>					

(b) *Alternative 2b*

(i) *Construction*

Similar to the Project, Alternative 2b would generate part-time and full-time jobs associated with its construction. 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 2b. **As such, impacts on school facilities during construction under Alternative 2b would be less than significant and similar to the Project's and the Flexibility Option's less-than-significant impacts.**

(ii) *Operation*

Alternative 2b would develop new residential and commercial uses that would generate students; however, as shown in **Table IV-7, Alternative 2b Student Generation**, Alternative 2b would generate approximately 52 net new students, 22 fewer than the Project and 25 fewer than the Flexibility Option. As with the Project, Alternative 2b would also be required to pay development fees for schools to the LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, payment of the school fees established by the LAUSD would, by law, address Alternative 2b's direct and indirect impacts on schools. **Therefore, impacts to schools would be less than significant and, due to the reduction in the number of students as compared to the Project, would be less than the Project's and the Flexibility Option's less-than-significant impacts.**

**Table VI-7
Alternative 2b Student Generation**

Land Use	Size	Students Generated ^a			
		Elementary (K-6)	Middle School (7-8)	High School (9-12)	Total
Existing Uses					
Warehouse	26,740 sf	11	3	7	21
Total Existing Students		11	3	7	21
Proposed Uses					
Live Work Units	119 du	27	7	15	49
Commercial and Art Production Related Uses	34,405 sf	11	3	7	21
Office (workspace within live/work units)	2,700 sf	1	1	1	3
Total Projected Students		39	11	23	73
Less Existing		11	3	7	21
Total Net New Students		28	8	16	52

Note: du = dwelling unit; sf = square feet

a Based on student generation factors provided in the 2018 Developer Fee Justification Study for Los Angeles Unified School District, March 2018. The student generation rate of 0.00352 (employees per square foot) for "Industrial Business Parks" (Table 14) uses are applied for the warehouse uses, resulting in 94 (rounded) employees. The following student generation rates are applied for residential uses: 0.2269 students per household (grades K-6), 0.0611 students per household (grades 7-8), and 0.1296 students per household (grades 9-12) (Table 3). The student generation rate of 0.0027 (employees per square foot) for "Neighborhood Shopping Center" (Table 14) uses is applied for commercial uses, resulting in 93 (rounded) employees. The student generation rate of 0.00479 (employees per square foot) for "Standard Commercial Office" (Table 14) uses is applied for office and art production related uses, resulting in 13 (rounded) employees. The ratio of students per employee in the District is 0.2249, with the Project's office and art production generating a total of 3 students and the commercial generating a total of 21 students. Since the LAUSD School Fee Justification Study does not specify which grade levels students fall within for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 54 percent elementary school, 15 percent middle school, and 31 percent high school).

Source: EcoTierra Consulting, Inc., 2020.

(4) Parks and Recreation

(a) Alternative 2a

(i) Construction

Similar to the Project, 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 the construction job opportunities presented by Alternative 2a would be negligible. Therefore, the construction employment generated by Alternative 2a would not result in a notable increase in the resident population or a corresponding demand for parks and recreational facilities in the vicinity of the Project Site. Also, the use of public parks and recreational facilities during lunch breaks at the parks would be limited as the breaks 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). Based on this analysis, construction of Alternative 2a would not generate a demand for park or recreational facilities and services or interfere with existing park usage. **Therefore, impacts on parks and recreational facilities during construction of Alternative 2a would be less than significant and similar to the Project's and the Flexibility Option's less-than-significant impacts.**

(ii) *Operation*

Alternative 2a would develop 46 fewer residential units than the Project and 20 fewer units than the Flexibility Option; as well as 49,339 less building square footage as compared to the Project. Therefore, Alternative 2a would result in a reduced demand for public parks and recreation services compared to the Project. Furthermore, as under the Project, Alternative 2a would be required to provide open space and landscaping and would provide sufficient open space to meet the City's requirements. The payment of Quimby/Finn fees⁴ and/or the Dwelling Unit Construction Tax⁵ set forth in the Los Angeles Municipal Code to alleviate the demand on City parks and recreational facilities would also be required for Alternative 2a. **Accordingly, the impact to park facilities under Alternative 2a would be less than significant and, due to the decrease in number of residents, would be less than the Project's and the Flexibility Option's less-than-significant impacts.**

(b) *Alternative 2b*

(i) *Construction*

Similar to the Project, 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 the construction job opportunities presented by Alternative 2b would be negligible. Therefore, the construction employment generated by Alternative 2b would not result in a notable increase in the resident population or a corresponding demand for parks and recreational facilities in the vicinity of the Project Site. Also, the use of public parks and recreational facilities during lunch breaks at the parks would be limited as the breaks 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). Based on this analysis, construction of Alternative 2b would not generate a demand for park or recreational facilities and services or interfere with existing park usage. **Therefore, impacts on parks and recreational facilities during construction of Alternative 2b would be less than significant and similar to the Project's and the Flexibility Option's less-than-significant impacts.**

⁴ LAMC Sections 12.33 and 17.12.

⁵ LAMC Section 21.10.3(a)(1).

(ii) *Operation*

Alternative 2b would develop 66 fewer residential units than the Project and 40 fewer units than the Flexibility Option; as well as 49,339 less building square footage as compared to the Project. Therefore, Alternative 2b would result in a reduced demand for public parks and recreation services compared to the Project. Furthermore, as under the Project, Alternative 2b would be required to provide open space and landscaping and would provide sufficient open space to meet the City's requirements. The payment of Quimby/Finn fees⁶ and/or the Dwelling Unit Construction Tax⁷ set forth in the Los Angeles Municipal Code to alleviate the demand on City parks and recreational facilities would also be required for Alternative 2b. **Accordingly, the impact to park facilities under Alternative 2b would be less than significant and, due to the decrease in number of residents, would be less than the Project's and the Flexibility Option's less-than-significant impacts.**

(5) Libraries

(a) *Alternative 2a*

(i) *Construction*

Similar to the Project, 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 construction of Alternative 2a. 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 in 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 libraries by construction workers under Alternative 2a would be negligible like the Project. **As such, impacts to library facilities and services during construction of Alternative 2a would be less than significant and similar to the Project's and the Flexibility Option's less-than-significant impacts.**

(ii) *Operation*

Alternative 2a would develop new residential uses that would increase the demand for library facilities; however, Alternative 2a would result in 46 fewer residential units than the

⁶ LAMC Sections 12.33 and 17.12.

⁷ LAMC Section 21.10.3(a)(1).

Project and 20 fewer units than the Flexibility Option. Therefore, the potential demand for library services would be reduced in comparison to the Project. Furthermore, as under the Project, as a condition of approval, Alternative 2a would be required to pay a fee of \$200 per capita to the Los Angeles Public Library to alleviate the demand on library services created by the increase in residents. Alternative 2a would also generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, etc.) that could potentially be applied toward the provision of new library facilities and related staffing in the Downtown Community, as deemed appropriate. **Accordingly, impacts to library facilities under Alternative 2a would be less than significant and, due to the decrease in number of residents, would be less than the Project's and the Flexibility Option's less-than-significant impacts.**

(b) *Alternative 2b*

(i) *Construction*

Similar to the Project 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 construction of Alternative 2b. 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 (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work in 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 libraries by construction workers under Alternative 2b would be negligible like the Project. **As such, impacts to library facilities and services during construction of Alternative 2b would be less than significant and similar to the Project's and the Flexibility Option's less-than-significant impacts.**

(ii) *Operation*

Alternative 2b would develop new residential uses that would increase the demand for library facilities; however, Alternative 2b would result in 66 fewer residential units than the Project and 40 fewer units than the Flexibility Option. Therefore, the potential demand for library services would be reduced in comparison to the Project. Furthermore, as under the Project, as a condition of approval, Alternative 2b would be required to pay a fee of \$200 per capita to the Los Angeles Public Library to alleviate the demand on library services created by the increase in residents. Alternative 2b would also generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, etc.) that could potentially be applied toward the provision of new library facilities and

related staffing in the Downtown Community, as deemed appropriate. **Accordingly, impacts to library facilities under Alternative 2b would be less than significant and, due to the decrease in number of permanent residents, would be less than the Project's and the Flexibility Option's less-than-significant impacts.**

k) Transportation

(1) Alternative 2a

(a) Plan Consistency

Similar to the Project, Alternative 2a would provide pedestrian enhancements along Mateo Street and Imperial Street, bicycle facilities, electric vehicle chargers, improve the walkability in the area, and increase pedestrian connectivity from Mateo Street to Imperial Street. Therefore, as with the Project, Alternative 2a would be compatible with circulation system plans. **As such, the impact of Alternative 2a with regard to compatibility with circulation system plans would be less than significant and similar to the less-than-significant impacts of the Project and the Flexibility Option.**

(b) VMT Analysis

The Project would generate approximately 2,404 daily trips, resulting in an estimated 5.0 daily household VMT per capita, which is less than the Central APC significance threshold of 6.0 VMT per capita, and an estimated 7.4 daily work VMT per employee, which is less than the Central APC significance threshold of 7.6 VMT per employee. The Flexibility Option would generate approximately 2,467 daily trips, resulting in an estimated 5.0 daily household VMT per capita, which is less than the Central APC significance threshold of 6.0 VMT per capita, and an estimated 7.6 daily work VMT per employee, which is equal to the Central APC significance threshold of 7.6 VMT per employee. Alternative 2a would generate 1,809 daily trips, compared to the Project's 2,404 daily trips and the Flexibility Option's 2,467 daily trips. Alternative 2a would result in an estimated 5.1 daily household VMT per capita, which is below the Central APC significance threshold of 6.0 VMT per capita, but more than the daily household VMT per capita of the Project (5.0) and the Flexibility Option (5.0). In addition, Alternative 2a would result in an estimated 7.5 daily work VMT per employee, which is less than the Central APC significance threshold of 7.6 VMT per employee, more than the daily work VMT per employee for the Project (7.4), and less than the daily work VMT per employee for the Flexibility Option (7.6). **As such, the impact of Alternative 2a with regard to daily household VMT would be less than significant and greater than the Project's and the Flexibility Option's less-than-significant impact. The impact of Alternative 2a with regard to daily work VMT would be less than significant and greater than the Project's less-than-significant impact, but less than the Flexibility Option's less-than-significant impact.**

(c) Geometric Design Feature or Incompatible Use Hazards

As with the Project, Alternative 2a would not substantially increase hazards due to a design feature or incompatible uses. Alternative 2a proposes a land use that complements the surrounding urban development and utilizes the existing roadway network. Alternative 2a's driveway would conform to the City's design standards and would provide adequate sight distance, sidewalks, and pedestrian movement controls meeting the City's requirements to protect pedestrian safety. **As such, no impacts to hazardous design features would occur under Alternative 2a, similar to the impacts of the Project and the Flexibility Option.**

(d) Emergency Access

As with the Project, Alternative 2a would maintain emergency access during construction and implement PDF TR-1 to address traffic and access control during construction. Furthermore, construction impacts are temporary in nature and would not cause lasting access effects to emergency services. During operation, all circulation improvements that are proposed for the Project Site would comply with the Fire Code, including any additional access requirements of the LAFD. In addition, emergency vehicles normally have a variety of options for avoiding traffic. **As such, impacts to emergency access during construction and operation of Alternative 2a would be less than significant and similar to the less-than-significant impacts of the Project and the Flexibility Option.**

(2) Alternative 2b*(a) Plan Consistency*

Similar to the Project, Alternative 2b would provide pedestrian enhancements along Mateo Street and Imperial Street, bicycle facilities, electric vehicle chargers, improve the walkability in the area, and increase pedestrian connectivity from Mateo Street to Imperial Street. Therefore, as with the Project, Alternative 2b would be compatible with circulation system plans. **As such, the impact of Alternative 2b with regard to compatibility with circulation system plans would be less than significant and similar to the less-than-significant impacts of the Project and the Flexibility Option.**

(b) VMT Analysis

The Project would generate approximately 2,404 daily trips, resulting in an estimated 5.0 daily household VMT per capita, which is less than the Central APC significance threshold of 6.0 VMT per capita, and an estimated 7.4 daily work VMT per employee, which is less than the Central APC significance threshold of 7.6 VMT per employee. The Flexibility Option would generate approximately 2,467 daily trips, resulting in an estimated 5.0 daily

household VMT per capita, which is less than the Central APC significance threshold of 6.0 VMT per capita, and an estimated 7.6 daily work VMT per employee, which is equal to the Central APC significance threshold of 7.6 VMT per employee. Alternative 2b would generate approximately 1,849 daily trips, compared to the Project's 2,404 daily trips and the Flexibility Option's 2,467 daily trips. Alternative 2b would result in an estimated 5.0 daily household VMT per capita, which is below the Central APC significance threshold of 6.0 VMT per capita and the same as the daily household VMT per capita of the Project (5.0) and the Flexibility Option (5.0). In addition, Alternative 2b would result in an estimated 7.6 daily work VMT per employee, which is similar to the Central APC significance threshold of 7.6 VMT per employee, more than the daily work VMT per employee for the Project (7.4), and similar to the daily work VMT per employee for the Flexibility Option (7.6). **As such, the impact of Alternative 2b with regard to daily household VMT would be less than significant and similar to the Project's and the Flexibility Option's less-than-significant impact. The impact of Alternative 2b with regard to daily work VMT would be less than significant and greater than the Project's less-than-significant impact, but similar to the Flexibility Option's less-than-significant impact.**

(c) *Geometric Design Feature or Incompatible Use Hazards*

As with the Project, Alternative 2b would not substantially increase hazards due to a design feature or incompatible uses. Alternative 2b proposes a land use that complements the surrounding urban development and utilizes the existing roadway network. Alternative 2b's driveway would conform to the City's design standards and would provide adequate sight distance, sidewalks, and pedestrian movement controls meeting the City's requirements to protect pedestrian safety. **As such, no impacts to hazardous design features would occur under Alternative 2b, similar to the no impacts of the Project and the Flexibility Option.**

(d) *Emergency Access*

As with the Project, Alternative 2b would maintain emergency access during construction and implement PDF TR-1 to address traffic and access control during construction. Furthermore, construction impacts are temporary in nature and would not cause lasting access effects to emergency services. During operation, all circulation improvements that are proposed for the Project Site would comply with the Fire Code, including any additional access requirements of the LAFD. In addition, emergency vehicles normally have a variety of options for avoiding traffic. **As such, impacts to emergency access during construction and operation of Alternative 2b would be less than significant and similar to the less-than-significant impacts of the Project and the Flexibility Option.**

I) Tribal Cultural Resources

(1) Alternative 2a

Alternative 2a would construct one less subterranean level than proposed by the Project. Therefore, the potential for Alternative 2a to uncover subsurface tribal cultural resources would be reduced when compared to that of the Project. Moreover, 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. This standard condition of approval would also be applied to Alternative 2a. **Accordingly, impacts to tribal cultural resources under Alternative 2a would be less than significant and less than the less-than-significant impacts of the Project and the Flexibility Option.**

(2) Alternative 2b

Alternative 2b would construct one less subterranean level than proposed by the Project. Therefore, the potential for Alternative 2b to uncover subsurface tribal cultural resources would be reduced when compared to that of the Project. Moreover, 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. This standard condition of approval would also be applied to Alternative 2b. **Accordingly, impacts to tribal cultural resources under Alternative 2b would be less than significant and less than the less-than-significant impacts of the Project and the Flexibility Option.**

m) Utilities and Service Systems

(1) Water

(a) Alternative 2a

(i) Construction

Similar to the Project, construction activities associated with Alternative 2a would generate a short-term demand for water. However, this demand would be less than the Project as Alternative 2a would not require the same amount of grading as there would be one fewer parking level compared to the Project. Accordingly, since the water demand for construction activities under Alternative 2a would be less than the Project, the temporary and intermittent demand for water during construction under Alternative 2a would also be met by the City's available water supplies. Similarly, the existing LADWP water infrastructure would be adequate to provide the water flow necessary to serve Alternative 2a. Furthermore, as with the Project, the design and installation of new service connections under Alternative 2a would be required to meet applicable City regulations and standards. **Therefore, impacts on water supply and infrastructure associated**

with short-term construction activities would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.

(ii) Operation

As shown in **Table VI-8, Alternative 2a Estimated Daily Water Consumption**, as a result of the reduction in unit count and commercial floor area, Alternative 2a would consume a net total of approximately 27,293 gallons per day of water, a decrease of 9,331 gallons per day as compared to the Project's consumption and a decrease of 6,750 gallons per day as compared to the Flexibility Option's consumption. The estimated water demand for the Project would not exceed the available supplies projected by LADWP. Thus, the estimated water demand under Alternative 2a 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 2a since the water demand would be lower than the Project. Furthermore, similar to the Project, the Applicant would construct the necessary on-site water infrastructure and off-site connections to the LADWP system pursuant to applicable City requirements under Alternative 2a to accommodate the new building. **Therefore, Alternative 2a's impacts to water would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.**

**Table VI-8
Alternative 2a Estimated Daily Water Consumption**

Land Use	Size	Consumption Rate	Total Consumption (gpd)	Total Consumption (AF/y)
Apartment: 1 Bedroom	119 du	185/du ^a	22,015	24.8
Apartment: 2 Bedroom	20 du	225/du ^a	4,500	5.1
Commercial and Art Production Space	17,535 sf	60/1,000 sf ^b	1,052	1.1
Open Space	11,490 sf	60/1,000 sf ^b	689	0.7
<i>Total Alternative 2a Water Consumption</i>			28,256	31.7
Existing Water Consumption			963	1.1
Net Total Water Consumption			27,293	30.6
<i>Notes: gpd = gallons per day; AF/y = acre-feet per year; sf = square feet; du = dwelling unit</i> ^a The consumption rates are comprised of an artist space in addition to living space. ^b The average daily flow based on 120 percent of City of Los Angeles Bureau of Sanitation sewerage generation factors. Source (table): EcoTierra Consulting, 2020.				

(b) Alternative 2b

(i) Construction

Similar to the Project, construction activities associated with Alternative 2b would generate a short-term demand for water. However, this demand would be less than the Project as Alternative 2b would not require the same amount of grading as there would

be one fewer parking level compared to the Project. Since the water demand for construction activities under Alternative 2b would be less than the Project, the temporary and intermittent demand for water during construction under Alternative 2b would also be met by the City's available water supplies. Similarly, the existing LADWP water infrastructure would be adequate to provide the water flow necessary to serve Alternative 2b. Furthermore, as with the Project, the design and installation of new service connections under Alternative 2b would be required to meet applicable City regulations and standards. **Therefore, impacts on water supply and infrastructure associated with short-term construction activities would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.**

(ii) *Operation*

As shown in **Table VI-9, Alternative 2b Estimated Daily Water Consumption**, as a result of the reduction in unit count and commercial floor area, Alternative 2b would consume a net total of approximately 25,225 gallons per day of water, a decrease of 12,439 gallons per day as compared to the Project's consumption and 8,978 gallons per day as compared to the Flexibility Option's consumption. The estimated water demand for the Project would not exceed the available supplies projected by LADWP. Thus, the estimated water demand under Alternative 2b 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 2b since the water demand would be lower than the Flexibility Option. Furthermore, similar to the Flexibility Option, the Applicant would construct the necessary on-site water infrastructure and off-site connections to the LADWP system pursuant to applicable City requirements under Alternative 2b to accommodate the new building. **Therefore, Alternative 2b's impacts to water would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.**

**Table VI-9
Alternative 2b Estimated Daily Water Consumption**

Land Use	Size	Consumption Rate ^a	Total Consumption (gpd)	Total Consumption (AF/y)
Apartment: 1 Bedroom	101 du	185/du ^b	18,685	20.8
Apartment: 3 Bedroom	18 du	265/du ^b	4,770	5.5
Commercial and Art Production Space	34,405 sf	60/1,000 sf	2,064	2.2
Open Space	11,153 sf	60/1,000 sf	669	0.7
<i>Total Alternative 2b Water Consumption</i>			26,188	29.2
Existing Water Consumption			963	1.1
Net Total Water Consumption			25,225	28.1
<i>Notes: gpd = gallons per day; AF/y = acre-feet per year; sf = square feet; du = dwelling unit</i> ^a <i>The average daily flow based on 120 percent of City of Los Angeles Bureau of Sanitation sewerage generation factors.</i>				

Table VI-9
Alternative 2b Estimated Daily Water Consumption

Land Use	Size	Consumption Rate ^a	Total Consumption (gpd)	Total Consumption (AF/y)
^b The consumption rates are comprised of an artist space in addition to living space. Source (table): EcoTierra Consulting, 2020.				

(2) Wastewater

(a) Alternative 2a

(i) Construction

Under Alternative 2a, similar to the Project, temporary facilities such as portable restrooms 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 2a would not cause an increase in wastewater flows to the municipal sewer system. Therefore, construction of Alternative 2a would not 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 2a 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 onsite wastewater conveyance infrastructure and minor off-site work associated with connections to the City sewer lines in the streets adjacent to the Project Site. Similar to the Project, a Construction Staging and Traffic Management Plan, project design feature PDF TR-1, would be implemented during the construction of Alternative 2a 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 2a would be less than significant and similar to the Project's and the Flexibility Option's less than significant impacts.**

(ii) Operation

1. Treatment Capacity

As with the Project, operation of Alternative 2a, would generate greater wastewater flows relative to existing conditions. As shown in **Table VI-10, Alternative 2a Average Daily Wastewater Generation**, as a result of the reduction in unit count and commercial floor area, Alternative 2a would generate a net total of approximately 27,165 gallons per day of wastewater, a difference of 9,233 fewer gallons per day as compared to the Project and 6,428 fewer gallons per day as compared to the Flexibility Option. Thus, estimated

wastewater generated would be less than the Project's estimated flow, which can be adequately accommodated by the Hyperion Treatment Plant. Therefore, the Hyperion Treatment Plant would also adequately accommodate Alternative 2a's wastewater. **As such, impacts with respect to treatment capacity under Alternative 2a would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.**

**Table VI-10
Alternative 2a Average Daily Wastewater Generation**

Type of Use	Size	Sewage Generation Rate (gpd) ^a	Total Sewage Generated (gpd)
Apartment: 1 Bedroom	119 du	185/du ^b	22,015
Apartment: 2 Bedroom	20 du	225/du ^b	4,500
Commercial and Art Production Space	17,535 sf	50/1,000 sf	877
Open Space	11,490 sf	50/1,000 sf	575
<i>Total Alternative 2a Wastewater Generation</i>			<i>27,967</i>
Existing Wastewater Generation			802
Total Wastewater Generation			27,165

Notes: gpd = gallons per day; sf = square feet; du = dwelling unit

^a The average daily flow based on 100 percent of City of Los Angeles Bureau of Sanitation sewerage generation factors.

^b The generation rates are comprised of an artist space in addition to living space.

Source (table): EcoTierra Consulting, 2020.

2. Conveyance Capacity

Given that wastewater flows generated by Alternative 2a would be less than the estimated wastewater flow of the Project, which can be adequately accommodated by the existing sewer lines in Mateo Street, there would also be sufficient capacity to serve Alternative 2a. All related sanitary sewer connections and on-site infrastructure under Alternative 2a would be designed and constructed in accordance with applicable Bureau of Sanitation regulations, standards, and policies. **Therefore, Alternative 2a's impacts to wastewater conveyance infrastructure would be less than significant and, due to the reduction in wastewater generated under Alternative 2a, less than the Project's and the Flexibility Option's less-than-significant impacts.**

(b) Alternative 2b

(i) Construction

Under Alternative 2b, similar to the Project, temporary facilities such as portable restrooms 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 2b would not cause a measurable increase in wastewater flows to the municipal sewer system. Therefore, construction of

Alternative 2b would not substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the City's IRP. Additionally, as with the Project, Alternative 2b 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 onsite wastewater conveyance infrastructure and minor off-site work associated with connections to the City sewer lines in the streets adjacent to the Project Site. Similar to the Flexibility Option, a Construction Staging and Traffic Management Plan, project design feature PDF TR-1, would be implemented during the construction of Alternative 2 Flexibility Option 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 2b would be less than significant and similar to the Project's and the Flexibility Option's less than significant impacts.**

(ii) *Operation*

1. *Treatment Capacity*

As with the Project, operation of Alternative 2b, would generate greater wastewater flows relative to existing conditions. As shown in **Table VI-11, Alternative 2b Average Daily Wastewater Generation**, as a result of the reduction in unit count and commercial floor area, Alternative 2b would generate a net total of approximately 24,931 gallons per day of wastewater, a difference of 12,507 fewer gallons per day as compared to the Project and 8,822 fewer gallons per day as compared to the Flexibility Option. Thus, estimated wastewater generated would be less than the Project and the Flexibility Option's estimated flow, which can be adequately accommodated by the Hyperion Treatment Plant. Therefore, the Hyperion Treatment Plant would also adequately accommodate Alternative 2b's wastewater. **As such, impacts with respect to treatment capacity under Alternative 2b would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.**

**Table VI-11
Alternative 2b Average Daily Wastewater Generation**

Type of Use	Size	Sewage Generation Rate (gpd) ^a	Total Sewage Generated (gpd)
Apartment: 1 Bedroom	101 du	185/du ^b	18,685
Apartment: 3 Bedroom	18 du	265/du ^b	4,770
Commercial and Art Production Space	34,405 sf	50/1,000 sf	1,720
Open Space	11,153 sf	50/1,000 sf	558
<i>Total Alternative 2b Wastewater Generation</i>			25,733
Existing Wastewater Generation			802
Total Wastewater Generation			24,931
<i>Notes: gpd = gallons per day; sf = square feet; du = dwelling unit</i>			

Table VI-11
Alternative 2b Average Daily Wastewater Generation

Type of Use	Size	Sewage Generation Rate (gpd) ^a	Total Sewage Generated (gpd)
^a The average daily flow based on 100 percent of City of Los Angeles Bureau of Sanitation sewerage generation factors. ^b The generation rates are comprised of an artist space in addition to living space. Source (table): EcoTierra Consulting, 2020.			

2. Conveyance Capacity

Given that wastewater flows generated by Alternative 2b would be less than the estimated wastewater flow of the Project, which can be adequately accommodated by the existing sewer lines in Mateo Street, there would also be sufficient capacity to serve Alternative 2b. All related sanitary sewer connections and on-site infrastructure under Alternative 2b would be designed and constructed in accordance with applicable Bureau of Sanitation regulations, standards, and policies. **Therefore, Alternative 2b's impacts to wastewater conveyance infrastructure would be less than significant and, due to the reduction in wastewater generated under Alternative 2b, less than the Project's and the Flexibility Option's less-than-significant impacts.**

(3) Solid Waste

(a) Alternative 2a

(i) Construction

Because Alternative 2a would demolish the same improvements on the Project Site, the amount of demolition debris generated by Alternative 2a would be the same as the Project, approximately 1,248 tons. However, due to the reduced development amount proposed under Alternative 2a compared to the Project, Alternative 2a would generate less total solid waste than the Project, approximately 297.5 tons of solid waste,⁸ a reduction of 99.5 tons as compared to the Project. Furthermore, as with the Project, Alternative 2a would be required to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Like the Project, Alternative 2a would represent a very small percentage of the inert waste disposal capacity in the region. Therefore, Alternative 2a would not create a need for additional solid waste disposal facilities to adequately handle the construction-generated inert waste. **Thus,**

⁸ A construction waste generation rate of 4.02 pounds per square foot was used. 148,016 square feet of construction multiplied by 4.02 pounds is 595,024.3 pounds (297.5 tons). Source: U.S. EPA, *Characterization of Building-Related Construction and Demolition Debris in the United States*, Table A-2, June 1998.

construction impacts under Alternative 2a would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.

(ii) *Operation*

As shown in **Table VI-12, Alternative 2a Estimated Daily Solid Waste Generation**, as a result of the reduction in unit count and commercial floor area, Alternative 2a is estimated to generate a net total of approximately 1,299 pounds per day, a reduction of 753 pounds per day compared to the Project and a reduction of 1,067 pounds per day compared to the Flexibility Option. Since the net solid waste generated by Alternative 2a would be less than the Project and the Flexibility Option, the existing landfill serving the Project Site would also have the capacity to accommodate the disposal needs of Alternative 2a and, therefore, Alternative 2a would not result in the need for an additional recycling or disposal facility. Similar to the Project, as Alternative 2a would implement PDF SW-2 and PDF SW-3 to promote recycling and would be required to divert a minimum of 50 percent of solid waste from landfills in accordance with SB 939, it would therefore, comply with federal, state, and local management statutes and regulations. **Therefore, Alternative 2a's operational impacts to solid waste would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.**

**Table VI-12
Alternative 2a Estimated Daily Solid Waste Generation**

Land Use	Size (square feet)	Generation Rate ^a (pounds/ employee/day)	Employees^b	Total Generation (pounds/day)
Apartment: 1 Bedroom	119 du	12.23/du	0	1,455
Apartment: 2 Bedroom	20 du	12.23/du	0	245
Commercial and Art Production Related Uses	17,535 sf	10.53	48	505
Office (workspace within live/work uses)	3,000 sf	10.53	8	84
Total Alternative 2a Solid Waste Generation				2,289
Existing Solid Waste Generation				990
Total Solid Waste Generation				1,299
^a Generation rates are from the L.A. CEQA Thresholds Guide, 2006 (commercial rate used).				
^b 0.00271 employees per average square foot (commercial category) x _____ square feet = _____ employees. Source: Los Angeles Unified School District, 2018 Developer Fee Justification Study for Los Angeles Unified School District, March 2018. Source (table): EcoTierra Consulting, 2020.				

(b) *Alternative 2b*(i) *Construction*

Because Alternative 2b would demolish the same improvements on the Project Site, the amount of demolition debris generated by Alternative 2b would be the same as the Project, approximately 1,248 tons. However, due to the reduced development amount proposed under Alternative 2b compared to the Project, Alternative 2b would generate less total solid waste than the Project, approximately 297.5 tons of solid waste,⁹ a reduction of 99.5 tons as compared to the Project. Furthermore, as with the Project, Alternative 2b would be required to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Like the Project, Alternative 2b would represent a very small percentage of the inert waste disposal capacity in the region. Therefore, Alternative 2b would not create a need for additional solid waste disposal facilities to adequately handle the construction-generated inert waste. **Thus, construction impacts under Alternative 2b would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.**

(ii) *Operation*

As shown in **Table VI-13, Alternative 2b Estimated Daily Solid Waste Generation**, as a result of the reduction in unit count and commercial floor area Alternative 2b is estimated to generate a net total of approximately 1,518 pounds per day, a reduction of 534 pounds per day compared to the Project and a reduction of 848 pounds per day compared to the Flexibility Option. Since the net solid waste generated by Alternative 2b would be less than the Project and the Flexibility Option, the existing landfill serving the Project Site would also have the capacity to accommodate the disposal needs of Alternative 2b and, therefore, Alternative 2b would not result in the need for an additional recycling or disposal facility. Similar to the Project as Alternative 2b would implement PDF SW-2 and PDF SW-3 to promote recycling and would be required to divert a minimum of 50 percent of solid waste from landfills in accordance with SB 939, it would therefore, comply with federal, state, and local management statutes and regulations. **Therefore, Alternative 2b's operational impacts to solid waste would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.**

⁹ A construction waste generation rate of 4.02 pounds per square foot was used. 148,016 square feet of construction multiplied by 4.02 pounds is 595,024.3 pounds (297.5 tons). Source: U.S. EPA, *Characterization of Building-Related Construction and Demolition Debris in the United States*, Table A-2, June 1998.

Table VI-13
Alternative 2b Estimated Daily Solid Waste Generation

Land Use	Size (square feet)	Generation Rate^a (pounds/ employee/day)	Employees^b	Total Generation (pounds/day)
Apartment: 1 Bedroom	101 du	12.23/du	0	1,235
Apartment: 3 Bedroom	18 du	12.23/du	0	220
Commercial and Art Production Related Uses	34,405 sf	10.53	93	979
Office (workspace within live/work units)	2,700 sf	10.53	7	74
Total Alternative 2b Solid Waste Generation				2,508
Existing Solid Waste Generation				990
Total Solid Waste Generation				1,518
^a Generation rates are from the L.A. CEQA Thresholds Guide, 2006 (commercial rate used). ^b 0.00271 employees per average square foot (commercial category) x _____ square feet = _____ employees. Source: Los Angeles Unified School District, 2018 Developer Fee Justification Study for Los Angeles Unified School District, March 2018. Source (table): EcoTierra Consulting, 2020.				

(4) Dry Utilities

(a) Alternative 2a

(i) Construction

As with the Project, construction-related activities with Alternative 2a, including grading and excavation, could encroach on telecommunication facilities and typically do not involve consumption of natural gas or telecommunication service. However, before construction begins, the Project Applicant would coordinate with applicable regulatory agencies and telecommunication providers to implement orderly relocation of telecommunication facilities that need to be removed or relocated. Similar to the Project, under Alternative 2a, energy consumption during the construction of the Project would be finite and limited (i.e., all equipment would be turned off when not in use), and would not result in the need for relocation or construction of new or expanded electric power facilities. Because Alternative 2a would require a shorter construction period due to the reduced size of development proposed as compared to the Project, the overall amount of electricity that would be required would be reduced. **Therefore, impacts on energy resources associated with short-term construction activities would be less than significant under Alternative 2a and less than the less-than-significant impacts of the Project and the Flexibility Option.**

(ii) Operation

As Alternative 2a proposes a building that would be 49,339 square-feet smaller than under the Project, electricity and natural gas consumption for Alternative 2a would be less

than under the Project (refer to **Section VI.C.2.n.1.b**, below, for details). Thus, the associated consumption of electricity and natural gas under Alternative 2a would be reduced. Furthermore, similar to the Project, Alternative 2a would adhere to the Title 24 energy conservation standards, which would improve energy efficiency and reduce impacts on consumption of energy resources. Telecommunications services would be provided from existing suppliers through established service procedures. Therefore, Alternative 2a would not require the need for relocation or construction of new or expanded electric or natural gas power facilities or telecommunication facilities. **Therefore, impacts to dry utilities under Alternative 2a would be less than significant and less than the less-than-significant impacts of the Project and the Flexibility Option.**

(b) *Alternative 2b*

(i) *Construction*

As with the Project, construction-related activities with Alternative 2b, including grading and excavation, could encroach on telecommunication facilities and typically do not involve consumption of natural gas or telecommunications service. However, before construction begins, the Project Applicant would coordinate with applicable regulatory agencies and telecommunication providers to implement orderly relocation of telecommunication facilities that need to be removed or relocated. Similar to the Project, under Alternative 2b, energy consumption during the construction of the Project would be finite and limited (i.e., all equipment would be turned off when not in use), and would not result in the need for relocation or construction of new or expanded electric power facilities. Because Alternative 2b would require a shorter construction period due to the reduced size of development proposed as compare to the Project, the overall amount of electricity that would be required would be reduced. **Therefore, impacts on energy resources associated with short-term construction activities would be less than significant under Alternative 2b and less than the less-than-significant impacts of the Project and the Flexibility Option.**

(ii) *Operation*

As Alternative 2b proposes a building that would be 49,339 square-feet smaller than under the Project, electricity and natural gas consumption for Alternative 2b would be less than under the Project (refer to **Section VI.C.2.n.2.b**, below, for details). Thus, the associated consumption of electricity and natural gas under Alternative 2b would be reduced. Furthermore, similar to the Project, Alternative 2b would implement the Title 24 energy conservation standards, which would improve energy efficiency and reduce impacts on consumption of energy resources. Telecommunications services would be provided from existing suppliers through established service procedures. Therefore,

Alternative 2b would not require the need for relocation or construction of new or expanded electric or natural gas power facilities or telecommunication facilities. **Therefore, impacts to dry utilities under Alternative 2b would be less than significant and less than the less-than-significant impacts of the Project and the Flexibility Option.**

n) Energy Conservation

(1) Alternative 2a

(a) Construction

As with the Project, Alternative 2a would also be subject to state and federal regulations that reduce the inefficient, wasteful, and unnecessary consumption of energy. Furthermore, under Alternative 2a, due to the elimination of one level of subterranean level, reduction of total floor area, and elimination of two aboveground levels, the construction period length and overall intensity of activities would be reduced compared to the Project. Therefore, the amount of electricity and petroleum-based fuel required for construction of Alternative 2a would be correspondingly reduced compared to the Project. **Therefore, impacts on energy resources associated with short-term construction activities would be less than significant under Alternative 2a and less than the less-than-significant impacts of the Project and the Flexibility Option.**

(b) Operation

Based on the 49,339-square-foot reduction in total development that would occur under Alternative 2a as compared to the Project, electricity, and natural gas consumption for Alternative 2a would be correspondingly reduced compared to the Project. In addition, as discussed above in **Section VI.C.2.k.1.b**, Alternative 2a would generate approximately 799 fewer daily trips than the Project and 862 fewer daily trips than the Flexibility Option. Thus, the associated consumption of petroleum-based fuels under Alternative 2a would also be correspondingly reduced. Furthermore, similar to the Project, Alternative 2a would implement the Title 24 energy conservation standards, 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 2a would not be wasteful, inefficient, or unnecessary. **Therefore, impacts to energy resources under Alternative 2a would be less than significant and less than the less-than-significant impacts of the Project and the Flexibility Option.**

(2) Alternative 2b

(a) Construction

As with the Project, Alternative 2b would also be subject to state and federal regulations that reduce the inefficient, wasteful, and unnecessary consumption of energy. Furthermore, under Alternative 2b, due to the elimination of one level of subterranean level, reduction of total floor area, and elimination of two aboveground levels, the construction period length and overall intensity of activities would be reduced compared to the Project. Therefore, the amount of electricity and petroleum-based fuel required for construction of Alternative 2b would be correspondingly reduced compared to the Project. **Therefore, impacts on energy resources associated with short-term construction activities would be less than significant under Alternative 2b and less than the less-than-significant impacts of the Project and the Flexibility Option.**

(b) Operation

Based on the 49,339-square-foot reduction in total development that would occur under Alternative 2b as compared to the Project, electricity, and natural gas consumption for Alternative 2b would be correspondingly reduced compared to the Project. In addition, as discussed above in **Section VI.C.2.k.2.b**, Alternative 2b would generate approximately 749 fewer daily trips than the Project and 812 fewer daily trips than the Flexibility Option. Thus, the associated consumption of petroleum-based fuels under Alternative 2b would also be correspondingly reduced. Furthermore, similar to the Project, Alternative 2b would implement the Title 24 energy conservation standards, 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 2b would not be wasteful, inefficient, or unnecessary. **Therefore, impacts to energy resources under Alternative 2b would be less than significant and less than the less-than-significant impacts of the Project and the Flexibility Option.**

o) Wildfire

(1) Alternative 2a

The Project Site is not located in or near the State Responsibility Area or a very high fire hazard severity zone and no impact with regard to wildfire would occur. Although Alternative 2a would require less construction and would construct a 49,339-square-foot smaller building than the Project, it would be located on the same Project Site with the same proximity to the State Responsibility Area and very high fire hazard severity zones. No changes to the uses of the Project Site are proposed under Alternative 2a that would

have the potential to alter the Project Site's susceptibility to wildfire compared to the Project. **Accordingly, Alternative 2a would have no impact with regard to wildfire, similar to the Project and the Flexibility Option.**

(2) Alternative 2b

The Project Site is not located in or near the State Responsibility Area or a very high fire hazard severity zone and no impact with regard to wildfire would occur. Although Alternative 2b would require less construction and would construct a 49,339-square-foot smaller building than the Project, it would be located on the same Project Site with the same proximity to the State Responsibility Area and very high fire hazard severity zones. No changes to the uses of the Project Site are proposed under Alternative 2b that would have the potential to alter the Project Site's susceptibility to wildfire compared to the Project. **Accordingly, Alternative 2b would have no impact with regard to wildfire, similar to the Project and the Flexibility Option.**

3. Relationship to Project Objectives

Alternative 2a and Alternative 2b would meet the Project's underlying purpose to revitalize the Project Site by developing mixed-use development that includes publicly accessible open spaces that complement the uses in the Arts District with its live/work units, commercial retail, and art production space, and that enhances the City's economic base, provides community serving amenities for the existing community, and is respectful of the existing surrounding neighborhoods.

Alternative 2a and Alternative 2b would achieve all of the Project objectives:

- Promote the Arts District neighborhood as a creative environment with a visually-distinctive building that complements the distinct urban community, providing public art/façade treatments and art-production and gallery space;
- Provide infill redevelopment with an integrated mixed-use project that is economically viable and serves the needs of the Arts District community with new live/work, commercial, and art/production opportunities;
- Encourage walkability and pedestrian safety in the Arts District with a project that would incorporate pedestrian-scaled improvements including lighting and landscaping, ground-floor commercial spaces and an inviting publicly accessible plaza and pedestrian paseo mid-block between Mateo and Imperial Streets that complements existing and future pedestrian activity in the Arts District.

- Contribute towards meeting the City's housing demands by increasing housing supply within the multi-modal, transit-accessible Arts District with live/work units, including affordable live/work units for Very Low Income households;
- Support regional mobility goals and local regional growth policies by encouraging a mixed-use development in and around activity centers so as to reduce vehicle trips and public infrastructure costs, and provide easy access and amenities for pedestrians and bicyclists; and
- Promote fiscal benefits, economic development, and job creation in the City through the construction and operation of a mixed-use development providing live/work units for a range of household types and an array of commercial spaces that attracts a diverse residents and visitors to the City's Arts District, and which generates local tax revenue and supports local businesses.

However, Alternative 2a and Alternative 2b would not maximize the number of new market-rate and affordable housing units at the Project Site as the Project would and would therefore not meet the existing housing demand in the City and the Arts District community to the same extent as the Project. The reduced size of Alternative 2a and Alternative 2b would also not as fully promote local and regional mobility objectives due to the reduction in neighborhood-serving commercial uses at the ground level, office uses, and reduced residential density at an infill location that is well served by abundant transit infrastructure. The shorter construction duration for Alternative 2a, as well as the reduced retail and office commercial floor area, would also not as fully meet the Project objective of creating economic vitality through construction and permanent job opportunities. Due to its inclusion of the same pedestrian-oriented design features and streetscape enhancements at the Project, Alternative 2a and Alternative 2b would meet the walkability and pedestrian safety Project objective to the same extent as the Project.

Alternative 2a's and Alternative 2b's remaining impacts would generally be either less than the Project's impacts or similar to the Project's impacts. Nonetheless, Alternative 2a and Alternative 2b would not reduce the Project's significant and unavoidable impact associated with construction vibration human annoyance to a less-than-significant level.

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VI. Alternatives to the Project

D. Alternative 3 – Commercial Use with Aboveground Parking

1. Description

The purpose of the Commercial Use with Aboveground Parking Alternative (Alternative 3) is to avoid significant and unavoidable impacts when compared to the Project by reducing the size of the project and eliminating the need for underground excavation. Alternative 3 would eliminate the significant and unavoidable construction vibration impacts related to human annoyance that would result from the Project and the Flexibility Option.

Under Alternative 3 the Project's building envelope and density would be reduced by approximately 88 percent. Alternative 3 would result in the construction of an approximately 23,380-square-foot commercial building (compared to the Project's and Flexibility Option's 197,355 square feet) including up to 15,005 square feet of restaurant floor area and 8,375 square feet of retail floor area (compared to the Project's 23,380 square feet and the Flexibility Option's 45,873 square feet of commercial space), and associated parking facilities. The total building height would be approximately 31 feet compared to the Project's and the Flexibility Option's proposed eight-story building with a height of 116 feet. Alternative 3 would have on-site aboveground parking for 47 parking spaces (compared to the Project's and Flexibility Option's 287 parking space).¹⁰

The general architectural design of Alternative 3 would be similar to the Project. The configuration of Alternative 3 would be different, in order to accommodate ground level parking. Specifically, Alternative 3 would likely cover the majority of the Project Site with ground level parking and therefore would not be able to include the raised live/work complex building at the northwest corner of the Project Site and the associated open space under this building, plus other open space and courtyards that would be provided under the Project and Flex Option. An additional difference would be the total square footage and building height, resulting in a commercial development with approximately 12 percent of the mass of the Project. The ground level would be comprised of parking, approximately 11 feet high, and the second level would be comprised of commercial uses,

¹⁰ Commercial parking ratio per East Los Angeles State Enterprise Zone is 2 spaces/1,000 square feet.

approximately 20 feet, for a two-story building with a height of approximately 31 feet compared to the Project's proposed eight-story building with a height of 116 feet. There would be no live/work uses and therefore, no affordable housing units, nor would there be open space under Alternative 3.

Table VI-14, Development Summary with Alternative 3, shows the resulting commercial square footage of Alternative 3.

**Table VI-14
Development Summary with Alternative 3**

Use	Alt 3 Commercial Use with Aboveground Parking Alternative
Restaurant Floor Area	15,005 sf
Retail Floor Area	8,375 sf
Total Floor Area	23,380 sf
Maximum Height	31 feet
Open Space	0 sf
Parking Spaces	47
No. of Subterranean Levels	0
<i>Source: EcoTierra, February 2020.</i>	

2. Comparative Analysis

Alternative 3 assumes the development of the Related Projects listed in **Section III.2, Related Projects**. The potential environmental impacts associated with Alternative 3 are described below and are compared to the environmental impacts that would result from the implementation of the Project and the Flexibility Option, as described in **Chapter IV, Environmental Impact Analysis**, of this Draft EIR. Unless otherwise specified, references to the "Project" throughout this analysis, apply to both the Project and the Flexibility Option, as discussed in **Chapter II, Project Description**, of this Draft EIR. However, where numerical factors are cited and may differ, such as students generated, VMT, or solid waste output, the analysis presents and discusses the numerical factors for both the Project and the Flexibility Option separately.

a) Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

Alternative 3 would involve the same amount of demolition and grading as the Project, but the amount of excavation, soil export, and new construction would be substantially reduced due to the elimination of all three underground levels, elimination of 6 aboveground levels, and reduction of 173,975 square feet of total floor area. 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 to those of the Project on days when maximum construction activities occur, such as grading and building construction. Because maximum daily conditions are used for measuring impact significance, regional impacts on these days would be similar to those of the Project. Further, Alternative 3 would be located at similar distances from sensitive receptors as the Project. **Therefore, impacts associated with regional and localized construction emissions under Alternative 3 would be less than significant and similar to the Project's and the Flexibility Option's less-than-significant impacts.**

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 3 would generate diesel particulate emissions associated with heavy equipment operations during grading activities. These activities represent the greatest potential for 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 Alternative 3 would be reduced compared to the Project due to the elimination of all subterranean levels, elimination of 6 aboveground levels, and reduction of 173,975 square feet of total floor area. **Therefore, TAC impacts would be less than significant under Alternative 3 and less than the less-than-significant impacts of the Project and the Flexibility Option.**

(2) Operation

(a) Regional and Localized Air Quality Impacts

As with the Project, 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. The number of net new daily vehicle trips generated by Alternative 3 would be fewer than the number of trips generated by the Project and the Flexibility Option. 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 and the Flexibility Option. In addition, since there would be no residential use and the size of commercial uses would be reduced under Alternative 3, and because the calculation of energy consumption is based on a CalEEMod-determined consumption rate that reflects the size of proposed uses, the consumption of electricity and natural gas would also be reduced compared to the Project and the Flexibility Option. **Therefore, regional air quality impacts under Alternative 3 would be less than**

significant, and less than the less-than-significant impacts of the Project and the Flexibility Option.

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. As discussed below, the number of net new peak-hour vehicle trips generated by Alternative 3 would be less than the vehicle trips generated by the Project and the Flexibility Option. **As such, localized impacts under Alternative 3 would be less than significant, and less than the less-than-significant impacts of the Project and the Flexibility Option.**

(b) Toxic Air Contaminants

Due to the reduction in daily trips that would occur under Alternative 3 compared to the Project and the Flexibility Option, mobile source emissions generated by Alternative 3 would be correspondingly reduced compared to the mobile source emissions generated by the Project and the Flexibility Option. **Therefore, TAC impacts would be less than significant under Alternative 3 and less than the less-than-significant TAC impacts of the Project and the Flexibility Option.**

b) Cultural Resources

(1) Historical Resources

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 Downtown Los Angeles Industrial Historic District and the National Biscuit Company Building. The design of the proposed building under Alternative 3 would be similar to that of the Project in terms architectural style, and building materials and colors; however, the height would be greatly reduced: approximately 31 feet under Alternative 3 compared to approximately 116 feet to the top of the parapet under the Project. Accordingly, the building would appear diminished in views of and from nearby historical resources as compared to the Project. **Thus, overall impacts to historical resources under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project and the Flexibility Option.**

(2) Archaeological Resources

Alternative 3 would not construct subterranean levels. Therefore, the potential for Alternative 3 to uncover subsurface archaeological resources would be less when compared to that of the Project, which would construct three subterranean levels. However, grading and shallow excavations for building foundations and off-site improvements would still extend into sediment with high sensitivity for buried archaeological sites, albeit to a lesser extent than with the Project. Because Alternative

3 would also require excavation into high archaeological sensitivity sediments and would be located within the same proximity to the *Zanja* No. 1 branch, mitigation measures MM CUL-1 through MM CUL-4 would also be required for Alternative 3. **Thus, impacts to archaeological resources under Alternative 3 would be less than significant with mitigation but less than the less-than-significant-with-mitigation impacts of the Project and the Flexibility Option.**

c) Geology and Soils

(1) Geology and Soils

Under Alternative 3, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, liquefaction, seismically induced settlement, soil stability, and subsidence would be similar to those under the Project because such impacts are a function of the Project Site's underlying geologic conditions rather than the type or amount of land use proposed. As such, although Alternative 3 would eliminate all three subterranean levels and would eliminate 6 aboveground levels as compared to the Project, the potential for encountering unstable soils would be substantially similar. Alternative 3 would comply with the same regulatory requirements as the Project to ensure that the soils underlying the Project Site can adequately support the proposed development. As with the Project, Alternative 3 would be designed and constructed to conform to the current seismic design provisions of the California Building Code and the Los Angeles Building Code. Alternative 3 would also be required to provide a final design-level geotechnical report, subject to LADBS review and approval, prior to the issuance of grading permits, to identify and minimize seismic risks. **Therefore, under Alternative 3, impacts related to geology and soils would be less than significant and similar to the less-than-significant impacts of the Project and the Flexibility Option.**

(2) Paleontological Resources

Alternative 3 would not construct any subterranean levels. Therefore, the potential for Alternative 3 to uncover subsurface paleontological resources would be less when compared to that of the Project, which would construct three subterranean levels. Because Alternative 3 would not involve excavation into high paleontological sensitivity sediments, Alternative 3 would not require mitigation measure MM GEO-1 that the Project would require. **Thus, impacts to paleontological resources under Alternative 3 would be less than significant and less than the less-than-significant-with-mitigation impacts of the Project and the Flexibility Option.**

d) 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. Alternative 3 would result in 173,975-square-feet less development compared to the Project and the Flexibility Option. Furthermore, as detailed below under **Section VI.D.k.2**, Alternative 3 would generate approximately 725 fewer daily trips than the Project and 788 fewer trips than the Flexibility Option. Therefore, under Alternative 3, the trip generation and energy and water consumption from proposed land uses would be reduced compared to the Project and to the Flexibility Option due to the reduction of the proposed building and uses. Thus, the amount of GHG emissions generated by Alternative 3 would be less than the amount generated by the Project and by the Flexibility Option. As with the Project, Alternative 3 would be designed to comply with CalGreen and the City's Green Building Ordinance, as applicable. Accordingly, similar to the Project, 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 Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project and the Flexibility Option.**

e) Hazards and Hazardous Materials

Impacts related to hazardous materials from a development project are determined in large part by the proposed land uses. Alternative 3 would eliminate the residential and art production space proposed under the Project and would only include restaurant and retail uses. Furthermore, the overall square footage of uses would be reduced from 197,355 square-feet under the Project to 23,380 square-feet under Alternative 3. Therefore, the amounts of hazardous materials used, stored, and disposed of by Alternative 3 would be correspondingly reduced compared to the Project. As with the Project, Alternative 3 would be required to comply with all applicable local, state, and federal regulations, as well as adhere to manufacturer's instructions with regard to hazardous materials. In addition, all development would occur within the boundaries of the Project Site; therefore, Alternative 3 would not cause permanent alterations to vehicular circulation routes or patterns or impede public access or travel upon public rights-of-way. Therefore, similar to the Project, Alternative 3 would not exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment. **As such, potential impacts related to hazards and hazardous materials during operation of Alternative 3 would be less than significant and, due to the elimination of residential and art production uses and reduced building size, less than the Project's and the Flexibility Option's less-than-significant impacts.**

f) Hydrology and Water Quality

(1) Construction

As with the Project, construction activities associated with Alternative 3 would have the potential to temporarily alter the existing surface drainage patterns and flows within the Project Site by diverting existing surface flows as a resulting of exposing underlying soils and making the Project Site temporarily more permeable. Similar to the Project, Alternative 3 would comply with the City's LID Ordinance and LAMC requirements that require necessary measures, plans, and inspections to reduce flooding, sedimentation, and erosion. Thus, similar to the Project, through implementation of BMPs, LID and compliance with applicable City grading regulations, Alternative 3 would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, flooding on- or off-site. In addition, adherence to standard compliance measures during construction activities would ensure that Alternative 3 would not cause flooding that would have the potential to harm people or damage property, substantially reduce or increase the amount of surface water flow from the Project Site, or result in a permanent, adverse change to the movement of surface water to produce a substantial change in the current or direction of water flow during construction. Furthermore, because Alternative 3 would also not involve excavation for subterranean levels, the chances of encountering groundwater would be further reduced compared to the Project, which would involve excavation for three subterranean levels. **Therefore, construction related impacts to water quality, drainage patterns, flooding and groundwater would be less than significant under Alternative 3 and similar to the Project's and the Flexibility Option's less-than-significant impacts.**

(2) Operation

Similar to the Project, Alternative 3 would not impact surface or groundwater movement or groundwater contamination. The Project Site is within the Hansen Dam and Sepulveda Dam inundation areas but these dams are continuously monitored by various agencies such as the State of California Division of Safety of Dams to guard against the threat of dam failure. **Thus, potential failure of the dam that could result in inundation of the downstream area is low and impacts would be less than significant under Alternative 3, as under the Project.**

As with the Project, upon buildout of Alternative 3, there would be no increase or decrease in the imperviousness of the Project Site that could substantially increase runoff volumes into the existing storm drain system. Alternative 3 would slightly alter on-site drainage patterns, although the total drainage area would not change. In accordance with LID requirements, the BMPs would be required to control stormwater runoff with no increase in runoff resulting from Alternative 3. Implementation of Alternative 3 would not increase

storm water flows from the Project Site causing off-site flooding. Operation would entail the preparation and implementation of a development-specific SUSMP meeting the requirements of the County-wide SUSMP adopted by LARWQCB, and preparation and implementation of a development-specific LID Plan including BMPs design to address runoff and pollutants. Furthermore, like the Project, Alternative 3 would manage, capture, and treat runoff as required through regulatory compliance, representing an improvement in water quality from the existing conditions, which are not required to reduce runoff. Under Alternative 3, there would be no incremental increase or decrease in the imperviousness of the Project Site that could affect groundwater recharge rates on-site, similar to the Project. Therefore, the potential for operational related impacts to groundwater would be less than significant and similar to the Project's less-than-significant impacts. **Overall, operational impacts to hydrology drainage patterns, flooding and water quality from Alternative 3 would be less than significant and similar to the Project's and the Flexibility Option's less-than-significant impacts.**

g) Land Use and Planning

The Project Site's current M3 Zone permits commercial uses permitted under the C2 Zone, which would include the commercial and retail and restaurant uses proposed under Alternative 3. Accordingly, Alternative 3 would comply with the Project Site's current zoning designations, including the existing FAR limit of 1.5:1, and would therefore be more consistent with existing land use and zoning designations than the Project. In addition, because Alternative 3 would avoid all the significant traffic impacts when compared to the Project, Alternative 3 would also be consistent with transportation policies of SCAG's 2016-2040 RTP/SCS¹¹ for the Project Site to a greater degree than the Project. However, Alternative 3 would not provide residential units and would, therefore, not be consistent with the goals of providing needed housing in proximity to existing transit contained in the General Plan Framework and Housing Elements and the Central City North Community Plan. In addition, Alternative 3 would not provide bicycle facilities, or electric vehicle chargers, and would not improve the walkability in the area or increase pedestrian connectivity from Mateo Street to Imperial Street and would; therefore, not be consistent with the goals and objectives of Mobility Plan 2035 and 2010 Bicycle Plan. **Therefore, impacts related to land use under Alternative 3 would be less than significant but greater than the Project's and the Flexibility Option's less-than-significant impacts.**

¹¹ As discussed throughout this Draft EIR, on September 3, 2020, SCAG approved and adopted the Connect SoCal 2020–2045 RTP/SCS. It should be noted that the circulation of the NOP for the Project was on February 23, 2018, which was prior to the adoption of the 2020-2045 RTP/SCS, and therefore the analysis focuses on the Project's consistency with the 2016-2040 RTP/SCS.

h) Noise

(1) Construction

Alternative 3 would not require the extent of site excavation and soil export necessary under the Project due to the elimination of all subterranean levels, resulting in a decrease in the number of haul truck trips and associated mobile noise. Furthermore, due to the reduction in the total floor area as compared to the Project, there would be a reduction in the amount and the overall duration of construction and associated on-site noise under Alternative 3. Additionally, construction of a two-story building would not require the same amount and intensity of equipment that an eight-story building would. Accordingly, on-site construction activities and the associated construction noise levels would be reduced under Alternative 3 as compared to the Project. However, because Alternative 3 would be located on the same Project Site as the Project and, accordingly, within the same distance from adjacent sensitive receptors, Alternative 3 would still require mitigation measure MM NOI-1. Alternative 3 would eliminate underground excavation since all parking would be above ground, which would avoid activities that would produce the highest vibration levels, including use of bulldozers, caisson drilling and haul truck movement. Impacts of Alternative 3 with respect to construction vibration resulting in building damage and human annoyance would be less than significant. **As such, construction noise impacts under Alternative 3 would be less than significant with mitigation and similar to the less-than-significant-with-mitigation impacts under the Project and Flexibility Option. Construction vibration impacts under Alternative 3 would avoid the Project's and the Flexibility Option's significant and unavoidable construction vibration impacts related to human annoyance and less than significant impacts of the Project and Flexibility Option with respect to building damage.**

(2) Operation

As with the Project, the operational noise generated under Alternative 3 would be typical of commercial land uses. However, due to the elimination of the residential uses proposed under the Project, as detailed below in **Section VI.D.k.2**, Alternative 3 would result in 725 fewer daily trips than the Project and 788 fewer trips than the Flexibility Option. Thus, Alternative 3 would generate less traffic noise than the Project or the Flexibility Option. Under Alternative 3, parking would be in an above-grade level and therefore the associated noise would be located closer to adjacent uses, however, in accordance with the City's Above-Grade Parking Advisory Update,¹² parking would be required to be fully "wrapped" (i.e. centrally located within a building with other uses

¹² City of Los Angeles, Department of City Planning, Recommendation Report, Update of Advisory Notice Relative to Above-Ground Parking, October 24, 2019.

surrounding) or completely enclosed. Therefore, impacts from parking lot noise from Alternative 3 would not exceed existing, ambient noise levels. Noise generated by mechanical equipment has the potential to be greater under Alternative 3 compared to the Project, as the building would be shorter, placing mechanical equipment closer to receptors. However, as under the Project, mechanical equipment would be required to comply with regulatory limits which would reduce and minimize mechanical noise impacts. In addition, the mechanical equipment such as refrigeration units (mounted at the roof level) would include vibration-attenuation mounts to reduce the vibration transmission into the building. **Therefore, operational noise and vibration impacts under Alternative 3 would be less than significant and, due to the elimination of uses and reduction in intensity of uses, less than the Project's and the Flexibility Option's less-than-significant impacts.**

i) Population and Housing

As under the Project, Alternative 3 would not require the extension of roadways or infrastructure to an undeveloped area and would be supported by the existing infrastructure. **As such, indirect population growth impacts would be less than significant and similar to the less-than-significant impacts of the Project and the Flexibility Option.**

As shown in **Table VI-15, Alternative 3 Net Employee Generation**, Alternative 3 is estimated to generate approximately 63 employees, which would result in a net *decrease* of approximately 31 employees on the Project Site (as compared to the Project's approximately 92 employees, which would result in a net *decrease* of approximately 2 employees on the Project Site and the Flexibility Option's approximately 151 employees, which would result in a net increase of approximately 57 employees on the Project Site), no residents (as compared to the Project's 448 residents and the Flexibility Option's 385 residents),¹³ and no dwelling units (as compared to the Project's 185 units and the Flexibility Option's 159 units). Accordingly, as with the Project, the employees generated by Alternative 3 would also be within regional and local forecasts. **As such, direct population and housing impacts under Alternative 3 would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.**

¹³ Based on the City's Person Per Household Rate of 2.42. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019.

Table VI-15
Alternative 3 Net Employee Generation

Land Use	Size	Generation Rate^a	Employees
Commercial Space	23,380 sf	2.71/ employees/1,000 sf	63
<i>Alternative 3 Total</i>			63
<i>Less Existing Uses Total</i>			94
<i>Alternative 3 Net Total</i>			(31)
<i>Notes: sf = square feet</i> ^c <i>Los Angeles Unified School District, Level 1 – Developer Fee Justification Study for Los Angeles Unified School District, March 2018.</i> ^b <i>The School Fee Justification Studies for Los Angeles Unified School District do not include employee generation factors for multi-family residential uses. The small number of employees (estimated at less than 10) was assumed to be required to provide management and maintenance for the residential uses (e.g., day porters, parking garage personnel, leasing office, janitorial, etc.).</i> <i>Source (table): EcoTierra Consulting, February 2020.</i>			

j) Public Services

(1) Fire Protection

(a) Construction

The types of construction activities that would be required for Alternative 3 would be similar to those of the Project, however, the overall duration of construction would be reduced compared to the Project. Similar to the Project, implementation of “good housekeeping” procedures by the construction contractors and the work crews would minimize these hazards. During construction of Alternative 3, emergency access to the Project Site and surrounding vicinity could be impacted by construction activities, however, construction impacts are temporary in nature and would not cause lasting access effects to emergency services. In addition, construction work and haul truck trips would occur outside of typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related impacts. Furthermore, construction-related traffic would not significantly impact LAFD emergency response within the vicinity as emergency vehicles normally have a variety of options for avoiding traffic. As with the Project, a Construction Staging and Traffic Management Plan, project design feature PDF TR-1 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, due to the reduced construction period, would be less than the less-than-significant impacts of the Project and the Flexibility Option.**

(b) Operation

Similar to the Project, Alternative 3 would implement all applicable City Building Code and Fire Code requirements. Alternative 3 proposes no residential uses and 173,975 less

building square footage as compared to the Project. Therefore, the demand for services from the LAFD would be correspondingly reduced under Alternative 3 due to fewer people on the Project Site, smaller size of building requiring fire suppression, and reduced square footage of uses requiring the need for fire and emergency service. **Therefore, Alternative 3's demand for fire protection services would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impact.**

(2) Police Protection

(a) Construction

The types of construction activities that would be required for Alternative 3 would be similar to those of the Project, however, the overall duration of construction would be reduced compared to the Project. Alternative 3 would also implement PDF POL-1 to reduce the demand for police protection services during construction.

During construction of Alternative 3, emergency access to the Project Site and surrounding vicinity could be impacted by construction activities. However, construction impacts are temporary in nature and would not cause lasting access effects to emergency services. In addition, construction work and haul truck trips would occur outside of typical weekday commuter morning and afternoon peak periods and emergency vehicles normally have a variety of options for avoiding traffic. As with the Project, a Construction Staging and Traffic Management Plan, project design feature PDF TR-1 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 to police protection services under Alternative 3 would be less than significant and, due to the reduced construction period, would be less than the less-than-significant impacts of the Project and the Flexibility Option.**

(b) Operation

Alternative 3 would eliminate the residential uses proposed under the Project and would result in a building 173,975 square-feet smaller than the Project. Therefore, the demand for services from the LAPD would be correspondingly reduced due to fewer people on the Project Site and the reduced square footage of uses requiring the need for police services. Furthermore, because Alternative 3 would not include residential uses, it would not require as extensive security features and design coordination with the LAPD that the Project would. Due to the reduced size and uses on the Project Site, which negate the need for PDF POL-2, Alternative 3 would have less than significant impacts to police services. **Therefore, impacts to police protection under Alternative 3 would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.**

(3) Schools

(a) Construction

Similar to the Project, Alternative 3 would generate part-time and full-time jobs associated with its construction. 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. **As such, impacts on school facilities during construction under Alternative 3 would be less than significant and similar to the Project's and the Flexibility Option's less-than-significant impacts.**

(b) Operation

Under Alternative 3, new commercial uses would be developed that would generate students; however, as shown in **Table VI-16, Alternative 3 Student Generation**, due to the elimination of residential uses, Alternative 3 would result in a net *reduction* of 7 students, 81 fewer than the Project and 84 fewer than the Flexibility Option. As with the Project, Alternative 3 would also be required to pay development fees for schools to the LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, payment of the school fees established by the LAUSD would, by law, address Alternative 3's direct and indirect impacts on schools. **Therefore, impacts to schools would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.**

**Table VI-16
Alternative 3 Student Generation**

Land Use	Size	Students Generated ^a			
		Elementary (K-6)	Middle School (7-8)	High School (9-12)	Total
Existing Uses					
Warehouse	26,740 sf	11	3	7	21
Total Existing Students		11	3	7	21
Proposed Uses					
Commercial	23,380 sf	8	2	4	14
Total Projected Students		8	2	4	14
Less Existing		11	3	7	21
Total Net New Students		(3)	(1)	(3)	(7)
Note: du = dwelling unit; sf = square feet					
a Based on student generation factors provided in the 2018 Developer Fee Justification Study for Los Angeles Unified School District, March 2018. The student generation rate of 0.00352 (employees per square foot) for “Industrial Business Parks” (Table 14) uses are applied for the warehouse uses, resulting in 94 (rounded) employees. The student generation rate of 0.0027 (employees per square foot) for “Neighborhood Shopping Center” (Table 14) uses is applied for commercial uses, resulting in 63 (rounded) employees. The ratio of students per employee in					

Table VI-16
Alternative 3 Student Generation

Land Use	Size	Students Generated ^a			
		Elementary (K-6)	Middle School (7-8)	High School (9-12)	Total
<i>the District is 0.2249, with the Project's commercial generating a total of 14 students. Since the LAUSD School Fee Justification Study does not specify which grade levels students fall within for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 54 percent elementary school, 15 percent middle school, and 31 percent high school).</i>					
<i>Source: EcoTierra Consulting, 2020.</i>					

(4) Parks and Recreation

(a) Construction

Similar to the Project, 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 the construction job opportunities presented by Alternative 3 would be negligible. Therefore, the construction employment generated by Alternative 3 would not result in a notable increase in the resident population or a corresponding demand for parks and recreational facilities in the vicinity of the Project Site. Also, the use of public parks and recreational facilities during lunch breaks at the parks would be limited as the breaks 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). Based on this analysis, construction of Alternative 3 would not generate a demand for park or recreational 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 and the Flexibility Option's less-than-significant impacts.**

(b) Operation

Alternative 3 would develop new commercial uses at the Project Site, the employees and visitors of which could make use of park facilities in the area. However, Alternative 3 would not develop any residential uses and would result in a building 173,975 square-feet smaller than under the Project. Accordingly, Alternative 3 would result in a correspondingly reduced demand for public parks and recreation services as compared to the Project. Therefore, as with the Project, operation of Alternative 3 would not result in an increase in the use of parks that would require the construction of new or expanded park facilities. **As such, impacts to parks and recreation facilities from Alternative 3 would be less than significant and, due to the decreased demand compared to the**

Project, less than the Project's and the Flexibility Option's less-than-significant impacts.

(5) Libraries

(a) Construction

Similar to the Project, 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 construction of Alternative 3. 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 (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work in 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 libraries by construction workers under Alternative 3 would be negligible like the Project. **As such, impacts to library facilities and services during construction of Alternative 3 would be less than significant and similar to the Project's and the Flexibility Option's less-than-significant impacts.**

(b) Operation

Alternative 3 would develop new commercial uses at the Project Site, the employees and visitors of which could increase the use of library services in the area. However, Alternative 3 would not develop any residential uses and would result in a building 173,975 square-feet smaller than under the Project. Accordingly, Alternative 3 would result in a correspondingly reduced demand for library services compared to the Project. Therefore, as with the Project, Alternative 3 would not result in the need for new or altered library facilities. Furthermore, Alternative 3 would also generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, etc.) that could potentially be applied toward the provision of new library facilities and related staffing in the Downtown Community, as deemed appropriate. **As such, impacts to library facilities during operation of Alternative 3 would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.**

k) Transportation

(1) Plan Consistency

Similar to the Project, Alternative 3 would provide pedestrian enhancements along Mateo Street and Imperial Street; however, Alternative 3 would not provide bicycle facilities,

electric vehicle chargers, improve the walkability in the area, or increase pedestrian connectivity from Mateo Street to Imperial Street. Therefore, although Alternative 3 would not specifically conflict with circulation system plans, it would be compatible with circulation system plans to a lesser degree when compared to the Project. **As such, the impact of Alternative 3 with regard to compatibility with circulation system plans would be less than significant but greater than the less-than-significant impacts of the Project and the Flexibility Option.**

(2) VMT Analysis

The Project would generate approximately 2,404 daily trips, resulting in an estimated 5.0 daily household VMT per capita, which is less than the Central APC significance threshold of 6.0 VMT per capita, and an estimated 7.4 daily work VMT per employee, which is less than the Central APC significance threshold of 7.6 VMT per employee. The Flexibility Option would generate approximately 2,467 daily trips, resulting in an estimated 5.0 daily household VMT per capita, which is less than the Central APC significance threshold of 6.0 VMT per capita, and an estimated 7.6 daily work VMT per employee, which is equal to the Central APC significance threshold of 7.6 VMT per employee. The 1,885 daily trips that would be created under Alternative 3 would result exclusively from commercial uses and would, accordingly, not result in a daily household VMT. In addition, Alternative 3's 23,380 square-feet of commercial uses does not meet the screening threshold of 50,000 square-feet and therefore, the calculation of daily work VMT is not required. **As such, the impact of Alternative 3 with regard to VMT would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impact.**

(3) Geometric Design Feature or Incompatible Use Hazards

As with the Project, Alternative 3 would not substantially increase hazards due to a design feature or incompatible uses. Alternative 3 proposes a land use that complements the surrounding urban development and utilizes the existing roadway network. Alternative 3's driveway would conform to the City's design standards and would provide adequate sight distance, sidewalks, and pedestrian movement controls meeting the City's requirements to protect pedestrian safety. **As such, no impacts to hazardous design features would occur under Alternative 3, similar to the no impacts of the Project and the Flexibility Option.**

(4) Emergency Access

As with the Project, Alternative 3 would maintain emergency access during construction and would implement PDF TR-1 to address traffic and access control during construction. Furthermore, construction impacts are temporary in nature and would not cause lasting access effects to emergency services. During operation, all circulation improvements that

are proposed for the Project Site would comply with the Fire Code, including any additional access requirements of the LAFD. In addition, emergency vehicles normally have a variety of options for avoiding traffic. **As such, impacts to emergency access during construction and operation of Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project and the Flexibility Option.**

I) Tribal Cultural Resources

Alternative 3 would not construct any subterranean levels. Therefore, the potential for Alternative 3 to uncover subsurface tribal cultural resources would be reduced when compared to that of the Project, which would construct three subterranean levels. Moreover, 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. This standard condition of approval would also be applied to Alternative 3. **Accordingly, impacts to tribal cultural resources under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project and the Flexibility Option.**

m) Utilities and Service Systems

(1) Water

(a) Construction

Similar to the Project, construction activities associated with Alternative 3 would generate a short-term demand for water. However, this demand would be less than the Project as Alternative 3 would not require the same amount of grading and associated dust control measures (i.e. watering) as there would be no subterranean parking levels compared to three levels with the Project. Furthermore, a reduction in the overall building size proposed under Alternative 3 as compared to the Project would reduce the overall construction period and the number of days of construction-related water demand. Accordingly, since the water demand for construction activities under Alternative 3 would be less than the Project, the temporary and intermittent demand for water during construction under Alternative 3 would also be met by the City's available water supplies. Similarly, the existing LADWP water infrastructure would be adequate to provide the water flow necessary to serve Alternative 3. Furthermore, as with the Project, the design and installation of new service connections under Alternative 3 would be required to meet applicable City regulations and standards. **Therefore, impacts on water supply and infrastructure associated with short-term construction activities would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.**

(b) Operation

As shown in **Table VI-17, Alternative 3 Estimated Daily Water Consumption**, Alternative 3 would consume a net total of approximately 14,288 gallons per day of water, a decrease of 23,376 gallons per day as compared to the Project and a decrease of 19,915 gallons per day as compared to the Flexibility Option's consumption. The estimated water demand for the Project would not exceed the available supplies projected by LADWP. Thus, the estimated 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 Alternative 3 since the water demand would be lower than the Project. Furthermore, similar to the Project, the Applicant would construct the necessary on-site water infrastructure and off-site connections to the LADWP system pursuant to applicable City requirements under Alternative 3 to accommodate the new building. **Therefore, Alternative 3's impacts to water would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.**

Table VI-17
Alternative 3 Estimated Daily Water Consumption

Land Use	Size	Consumption Rate ^a	Total Consumption (gpd)	Total Consumption (AF/y)
Restaurant Use	500 seats ^b	30/seat	15,000	16.8
Retail Use	8,375 sf	30/1,000 sf	251	0.3
<i>Total Alternative 3 Water Consumption</i>			15,251	17.1
Existing Water Consumption			963	1.1
Net Total Water Consumption			14,288	16
<i>Notes: gpd = gallons per day; AF/y = acre-feet per year; sf = square feet; du = dwelling unit</i> ^a The average daily flow based on 120 percent of City of Los Angeles Bureau of Sanitation sewerage generation factors. ^b Assumes 30 square feet per seat. Source (table): EcoTierra Consulting, February 2020.				

(2) Wastewater

(a) Construction

Under Alternative 3, similar to the Project, temporary facilities such as portable restrooms would be provided by the contractor at the Project Site, and sewage from these facilities would be collected and hauled offsite under Alternative 3. As such, wastewater generation from construction activities associated with Alternative 3 would not cause a measurable increase in wastewater flows to the municipal sewer system. Therefore, construction of Alternative 3 would not substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the City's 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 onsite wastewater conveyance infrastructure and minor off-site work associated with connections to the City sewer lines in the streets adjacent to the Project Site. Similar to the Project, a Construction Staging and Traffic Management Plan, project design feature PDF TR-1, 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 Project's and the Flexibility Option's less than significant impacts.**

(b) *Operation*

(i) *Treatment Capacity*

As shown in **Table VI-18, Alternative 3 Average Daily Wastewater Generation**, as a result of the elimination of residential and art production uses and the construction of a 173,975 square-foot smaller building as compared to the Project, Alternative 3 would generate a net total of approximately 11,907 gallons per day of wastewater, a decrease of 25,531 gallons per day as compared to the Project and a decrease of 21,846 gallons per day as compared to the Flexibility Option. Thus, estimated wastewater generated would be less than the Project's and the Flexibility Option's estimated flow, which can be adequately accommodated by the Hyperion Treatment Plant. Therefore, the Hyperion Treatment Plant would also adequately accommodate Alternative 3's wastewater. **As such, impacts with respect to treatment capacity under Alternative 3 would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.**

Table VI-18
Alternative 3 Average Daily Wastewater Generation

Type of Use	Size	Sewage Generation Rate (gpd) ^a	Total Sewage Generated (gpd)
Restaurant Use	500 seats ^b	25/seat	12,500
Retail Use	8,375 sf	25/1,000 sf	209
<i>Total Alternative 3 Wastewater Generation</i>			<i>12,709</i>
Existing Wastewater Generation			802
Total Wastewater Generation			11,907
<i>Notes: gpd = gallons per day; sf = square feet; du = dwelling unit</i> ^a The average daily flow based on 100 percent of City of Los Angeles Bureau of Sanitation sewerage generation factors. ^b Assumes 30 square feet per seat. <i>Source (table): EcoTierra Consulting, February 2020.</i>			

(ii) *Conveyance Capacity*

Given that wastewater flows generated by Alternative 3 would be less than the estimated wastewater flow of the Project, which can be adequately accommodated by the existing sewer lines in Mateo Street, there would also be sufficient capacity to serve Alternative 3. All related sanitary sewer connections and on-site infrastructure under Alternative 3 would be designed and constructed in accordance with applicable Bureau of Sanitation regulations, standards, and policies. **Therefore, Alternative 3's impacts to wastewater conveyance infrastructure would be less than significant and, due to the reduction in wastewater generated under Alternative 3, less than the Project's and the Flexibility Option's less-than-significant impacts.**

(3) *Solid Waste*

(a) *Construction*

Because Alternative 3 would demolish the same improvements on the Project Site, the amount of demolition debris generated by Alternative 3 would be the same as the Project, approximately 1,248 tons. However, due to the reduced development amount proposed under Alternative 3 compared to the Project, Alternative 3 would generate less total solid waste than the Project, approximately 46.99 tons of solid waste,¹⁴ a reduction of approximately 350 tons as compared to the Project. Furthermore, as with the Project, Alternative 3 would be required to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Like the Project, Alternative 3 would represent a very small percentage of the inert waste disposal capacity in the region. Therefore, Alternative 3 would not create a need for additional solid waste disposal facilities to adequately handle construction-generated inert waste. **Thus, construction impacts under Alternative 3 would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.**

(b) *Operation*

As shown in **Table VI-19, Alternative 3 Estimated Dailey Solid Waste Generation**, as a result of the 173,975 square-foot smaller building that would be constructed under Alternative 3, Alternative 3 is estimated to generate a net total *reduction* in solid waste generated at the Project Site of approximately 316 pounds per day compared to existing conditions; a reduction of 2,368 pounds per day compared to the Project and a reduction of 2,682 pounds per day compared to the Flexibility Option. Since the net solid waste

¹⁴ A construction waste generation rate of 4.02 pounds per square foot was used. 23,380 square feet of construction multiplied by 4.02 pounds is 93,987.6 pounds (46.99 tons). Source: U.S. EPA, *Characterization of Building-Related Construction and Demolition Debris in the United States*, Table A-2, June 1998.

generated by Alternative 3 would be less than the Project and the Flexibility Option, the existing landfill serving the Project Site would also have the capacity to accommodate the disposal needs of Alternative 3 and, therefore, Alternative 3 would not result in the need for an additional recycling or disposal facility. Similar to the Project, as Alternative 3 would implement PDF SW-2 and PDF SW-3 to promote recycling and would be required to divert a minimum of 50 percent of solid waste from landfills in accordance with SB 939, it would therefore, comply with federal, state, and local management statutes and regulations. **Therefore, Alternative 3's operational impacts to solid waste would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.**

Table VI-19
Alternative 3 Estimated Daily Solid Waste Generation

Land Use	Size (square feet)	Generation Rate ^a (pounds/ employee/day)	Employees ^b	Total Generation (pounds/day)
Restaurant Use	15,005 sf	10.53	41	432
Retail Use	8,375 sf	10.53	23	242
<i>Total Alternative 3 Solid Waste Generation</i>				674
Existing Solid Waste Generation				990
Total Solid Waste Generation				(316)
^a Generation rates are from the L.A. CEQA Thresholds Guide, 2006 (commercial rate used).				
^b 0.00271 employees per average square foot (commercial category) x _____ square feet = _____ employees. Source: Los Angeles Unified School District, 2018 Developer Fee Justification Study for Los Angeles Unified School District, March 2018.				
Source (table): EcoTierra Consulting, February 2020.				

(4) Dry Utilities

(a) Construction

As with the Project, construction-related activities with Alternative 3, including grading, could encroach on telecommunication facilities and typically do not involve consumption of natural gas or telecommunication service. However, before construction begins, the Project Applicant would coordinate with applicable regulatory agencies and telecommunication providers to implement orderly relocation of telecommunication facilities that need to be removed or relocated. Similar to the Project, under Alternative 3, energy consumption during the construction of the Project would be finite and limited (i.e., all equipment would be turned off when not in use), and would not result in the need for relocation or construction of new or expanded electric power facilities. Because Alternative 3 would require a shorter construction period due to the reduced size of development proposed as compare to the Project, the overall amount of electricity that would be required would be reduced. **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 and the Flexibility Option.

(b) Operation

As Alternative 3 proposes a building that would be 173,975 square-feet smaller than under the Project, electricity, and natural gas consumption for Alternative 3 would be less than under the Project (refer to **Section VI.D.2.n.2**, below, for details). Thus, the associated consumption of electricity and natural gas under Alternative 3 would be reduced. Furthermore, similar to the Project, Alternative 3 would adhere to the Title 24 energy conservation standards, which would improve energy efficiency and reduce impacts on consumption of energy resources. Therefore, Alternative 3 would not require the relocation or construction of new or expanded electric or natural gas power facilities. **Therefore, impacts to dry utilities under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project and the Flexibility Option.**

n) Energy Conservation

(1) Construction

As with the Project, Alternative 3 would also be subject to state and federal regulations that reduce the inefficient, wasteful, and unnecessary consumption of energy. Furthermore, under Alternative 3, due to the elimination of all subterranean levels and reduction of total floor area by 173,975 square-feet as compared to the Project, the construction period length and overall intensity of activities would be substantially reduced compared to the Project. Therefore, the amount of electricity and petroleum-based fuel required for construction of Alternative 3 would be correspondingly substantially reduced compared to the Project. **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 and the Flexibility Option.**

(2) Operation

Based on the 173,975-square-foot reduction in total development that would occur under Alternative 3 as compared to the Project, electricity, natural gas, and petroleum-based fuel consumption for Alternative 3 would be correspondingly reduced compared to the Project. In addition, as discussed above in **Section VI.D.2.k.2**, Alternative 3 would generate approximately 725 fewer daily trips than the Project and 788 fewer trips than the Flexibility Option. Thus, the associated consumption of petroleum-based fuels under Alternative 3 would also be correspondingly reduced. Furthermore, similar to the Project,

Alternative 3 would implement the Title 24 energy conservation standards, 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. **Therefore, impacts to energy resources under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project and the Flexibility Option.**

o) Wildfire

The Project Site is not located in or near the State Responsibility Area or a very high fire hazard severity zone and no impact with regard to wildfire would occur. Although Alternative 3 would require less construction and would construct a 173,975-square-foot smaller building than compared to the Project, it would be located on the same Project Site with the same proximity to the State Responsibility Area and very high fire hazard severity zones. No changes to the uses of the Project Site are proposed under Alternative 3 that would have the potential to alter the Project Site's susceptibility to wildfire compared to the Project. **Accordingly, Alternative 3 would have no impact with regard to wildfire, similar to the Project and the Flexibility Option.**

3. Relationship to Project Objectives

Alternative 3, would only partially meet the Project's underlying purpose to revitalize the Project Site by developing a mixed-use development that includes publicly accessible open spaces that complement the uses in the Arts District with commercial retail space, and that enhances the City's economic base, provides community serving amenities for the existing community, and is respectful of the existing surrounding neighborhoods. As such, Alternative 3 would meet the following Project objective:

- Support regional mobility goals and local regional growth policies by encouraging a mixed-use development in and around activity centers so as to reduce vehicle trips and public infrastructure costs, and provide easy access and amenities for pedestrians and bicyclists.

Alternative 3 would not achieve the following Project objectives:

- Promote the Arts District neighborhood as a creative environment with a visually-distinctive building that complements the distinct urban community, providing public art/façade treatments and art-production and gallery space.
- Provide infill redevelopment with an integrated mixed-use project that is economically viable and serves the needs of the Arts District community with new live/work, commercial, and art/production opportunities;

- Encourage walkability and pedestrian safety in the Arts District with a project that would incorporate pedestrian-scaled improvements including lighting and landscaping, ground-floor commercial spaces and an inviting publicly accessible plaza and pedestrian paseo mid-block between Mateo and Imperial Streets that complements existing and future pedestrian activity in the Arts District;
- Contribute towards meeting the City's housing demands by increasing housing supply within the multi-modal, transit-accessible Arts District with live/work units, including affordable live/work units for Very Low Income households; and
- Promote fiscal benefits, economic development, and job creation in the City through the construction and operation of a mixed-use development providing live/work units for a range of household types and an array of commercial spaces that attracts a diverse residents and visitors to the City's Arts District, and which generates local tax revenue and supports local businesses.

Alternative 3 would consist of only approximately 23,380 square feet of total floor area, a reduction of approximately 88 percent from the total floor area proposed by the Project, which would only consist of retail and restaurant commercial space and no live/work units or office space. Thus, Alternative 3 would not provide infill redevelopment with an integrated mixed-use project that is economically viable and serves the needs of the Arts District community with new live/work, commercial, and art/production opportunities. Therefore, Alternative 3 would not meet existing market demand for housing or contribute to the burgeoning creative office synergy in the area to the same extent as the Project. Moreover, Alternative 3 would not support regional mobility goals and local regional growth policies by encouraging a mixed-use development in and around activity centers.

VI. Alternatives to the Project

E. Alternative 4 – Existing Zoning – Industrial Use

1. Description

The purpose of the Existing Zoning – Industrial Use Alternative (Alternative 4), is to demonstrate the degree to which a project that complies with existing underlying zoning would reduce the impacts of the Project. Alternative 4 would reduce the amount of excavation and hauling of soil, which would lessen the impacts related to air quality cumulative emission of NO_x during grading phase of construction, Project-level cumulative noise from off-site construction, and cumulative off-site operational traffic noise, and intersection impacts.

Under Alternative 4, the Project Site would be developed with an industrial building at the density permitted by the existing M3-1-RIO (Heavy Industrial Zone – Height District No. 1 – River Improvement Overlay District) zoning. The M3 Zone permits a range of industrial and manufacturing uses that are in operation in the area. The M3 Zone also permits commercial uses allowed under the C2 Zone, such as restaurants, bars, studios, offices, and adaptive reuse into live/work units, which can all be found within the immediate surrounding area of the Project Site. In regards to the River Improvement Overlay District (RIO), projects located within the RIO District, such as the Project, require an Administrative Clearance from the Department of City Planning prior to issuance of a building permit, to ensure that projects meet certain standards for screening, lighting, river access, and landscaping. Height District No.1 permits a FAR of 1.5:1.

The Project Site has a General Plan land use designation of Heavy Industrial under the Central City North Community Plan. The Heavy Industrial land use designation permits a range of corresponding industrial zones that allow for a variety of industrial, commercial, and adaptive live/work uses and intensities. Under Alternative 4, the approximately 44,800 square foot lot area (1.03 acres) would be developed with 67,200 square feet of floor area (compared to the Project's and Flexibility Option's 197,355 square feet) based on an FAR of 1.5 (44,800 square feet X 1.5 FAR). The development under Alternative 4 would be all industrial uses provided in a single one to two-story building totaling approximately 30 feet in height (compared to the Project's and the Flexibility Option's proposed eight-story building with a height of 116 feet) located on the Project Site.

The architectural design and configuration of Alternative 4 would be different, in order to propose the industrial uses. Specifically, Alternative 4 would likely represent a more utilitarian design, and would not be able to include the raised live/work complex building at the northwest corner of the Project Site and the associated open space under this building, plus other open space and courtyards that would be provided under the Project. Parking for all uses contained within Alternative 4 would be provided on site. For Industrial uses a total of one automobile parking space for each 500 square feet of combined floor area is required. Alternative 4 would provide approximately 134 vehicle parking spaces (compared to the Project's and Flexibility Option's 287 parking space). Parking would be provided in one level of subterranean parking.

The main difference with the Project would be construction of an all industrial development, and the reduction in total square footage and building height which is based on a FAR of 1.5:1.

Table VI-20, Development Summary with Alternative 4, shows the resulting Industrial square footage of Alternative 4.

**Table VI-20
Development Summary with Alternative 4**

Use	Alt 4 Existing Zoning (Industrial Use) Alternative
Industrial Floor Area	67,200 sf
Total Floor Area	67,200 sf
Maximum Stories	1-2
Maximum Height	30 feet
Open Space	0 sf
Parking Spaces	134
No. of Subterranean Levels	1
<i>Source: EcoTierra, 2020.</i>	

2. Comparative Analysis

Alternative 4 assumes the development of the Related Projects listed in **Section III.2, Related Projects**. The potential environmental impacts associated with Alternative 4 are described below and are compared to the environmental impacts that would result from the implementation of the Project and the Flexibility Option, as described in **Chapter IV, Environmental Impact Analysis**, of this Draft EIR. Unless otherwise specified, references to the "Project" throughout this analysis, apply to both the Project and the Flexibility Option, as discussed in **Chapter II, Project Description**, of this Draft EIR. However, where numerical factors are cited and may differ, such as students generated, VMT, or solid waste output, the analysis presents and discusses the numerical factors for both the Project and the Flexibility Option separately.

a) Air Quality

(1) Construction

(a) *Regional and Localized Air Quality Impacts*

Alternative 4 would involve the same amount of demolition and grading as the Project, but the amount of excavation, soil export, and new construction would be substantially reduced due to the elimination of two subterranean levels and 6 to 7 aboveground levels, resulting in a 130,155-square-foot smaller building than under 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 to those of the Project on days when maximum construction activities occur, such as grading and building construction. Because maximum daily conditions are used for measuring impact significance, regional impacts on these days would be similar to those of the Project. Further, Alternative 3 would be located at similar distances from sensitive receptors as the Project. **Therefore, impacts associated with regional and localized construction emissions under Alternative 4 would be less than significant and similar to the Project's and the Flexibility Option's less-than-significant impacts.**

(b) *Toxic Air Contaminants*

As with the Project, construction of Alternative 4 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. Overall construction emissions generated by Alternative 4 would be less than those of the Project since the total construction period would be reduced compared to the Project and the amount of excavation required under Alternative 4 would be reduced compared to the Project due to the elimination of two subterranean levels and 6-7 aboveground levels, resulting in a 130,155-square-foot smaller building than under the Project. **Therefore, TAC impacts would be less than significant under Alternative 4 and less when compared to the less-than-significant impacts of the Project and the Flexibility Option.**

(2) Operation

(a) *Regional and Localized Air Quality Impacts*

As with the Project, operational regional air pollutant emissions associated with Alternative 4 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. The number of net new daily vehicle trips generated by Alternative 4 would

be fewer than the number of trips generated by the Project and the Flexibility Option. Since the amount of vehicular emissions is based on the number of trips generated, the vehicular emissions generated by Alternative 4 would be less than the emissions generated by the Project or the Flexibility Option. In addition, since there would be no residential use and the size of the building proposed would be reduced under Alternative 4, and because the calculation of energy consumption is based on a CalEEMod-determined consumption rate that reflects the size of proposed uses, the consumption of electricity and natural gas would also be reduced compared to the Project and the Flexibility Option. **Accordingly, regional air quality impacts under Alternative 4 would be less than significant, and less than the less-than-significant impacts of the Project and the Flexibility Option.**

With regard to on-site localized emissions, as with the Project, Alternative 4 would not introduce any major new sources of air pollution within the Project Site. As discussed below, the number of net new peak-hour vehicle trips generated by Alternative 4 would be less than the vehicle trips generated by the Project. **As such, localized impacts under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project and the Flexibility Option.**

(b) Toxic Air Contaminants

Due to the reduction in daily trips that would occur under Alternative 4 compared to the Project and the Flexibility Option, mobile source emissions generated by Alternative 4 would be correspondingly reduced compared to the mobile source emissions generated by the Project or the Flexibility Option. Industrial uses typically result in a higher amount of truck traffic due to deliveries and shipments, which can increase the emissions of TAC from idling trucks, however, CARB mandates that airborne toxic control measures limit diesel fueled commercial vehicles (delivery trucks) to idle for no more than 5 minutes at any given time. **Therefore, TAC impacts would be less than significant under Alternative 4 and less than the less-than-significant TAC impacts of the Project and the Flexibility Option.**

b) Cultural Resources

(1) Historical Resources

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 Downtown Los Angeles Industrial Historic District and the National Biscuit Company Building. Like the Project, the proposed building under Alternative 4 would be contemporary in style. However, the proposed building under Alternative 4 would be substantially smaller in height (maximum of approximately 30 feet under

Alternative 4 compared to 116 feet to the top of the parapet under the Project). Accordingly, the building would appear diminished in views of and from nearby historical resources as compared to the Project. **Thus, overall impacts to historical resources under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project and the Flexibility Option.**

(2) Archaeological Resources

Alternative 4 would construct two fewer subterranean parking levels compared to the Project. Therefore, the potential for Alternative 4 to uncover subsurface archaeological resources would be less when compared to that of the Project. However, because Alternative 4 would also require excavation into high archaeological sensitivity sediments and would be located within the same proximity to the *Zanja* No. 1 branch, mitigation measures MM CUL-1 through MM CUL-4 would also be required for Alternative 3. **Thus, impacts to archaeological resources under Alternative 4 would be less than significant with mitigation but less than the less-than-significant-with-mitigation impacts of the Project and the Flexibility Option.**

c) Geology and Soils

(1) Geology and Soils

Under Alternative 4, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, liquefaction, seismically induced settlement, soil stability, and subsidence would be similar to those under the Project because such impacts are a function of the Project Site's underlying geologic conditions rather than the type or amount of land use proposed. As such, although Alternative 4 would eliminate two subterranean and one to two aboveground levels as compared to the Project, the potential for encountering unstable soils would be substantially similar. Alternative 4 would comply with the same regulatory requirements as the Project to ensure that the soils underlying the Project Site can adequately support the proposed development. As with the Project, Alternative 4 would be designed and constructed to conform to the current seismic design provisions of the California Building Code and the Los Angeles Building Code. Alternative 4 would also be required to provide a final design-level geotechnical report, subject to LADBS review and approval, prior to the issuance of grading permits, to identify and minimize seismic risks. **Therefore, under Alternative 4, impacts related to geology and soils would be less than significant, and similar to the less-than-significant impacts of the Project and the Flexibility Option.**

(2) Paleontological Resources

Alternative 4 would construct two fewer subterranean parking levels compared to the Project. Therefore, the potential for Alternative 4 to uncover subsurface paleontological resources would be less when compared to that of the Project. However, because Alternative 4 would also require excavation into high paleontological sensitivity sediments, mitigation measure MM GEO-1 would also be required. **Thus, impacts to paleontological resources under Alternative 4 would be less than significant with mitigation but less than the less-than-significant-with-mitigation impacts of the Project and the Flexibility Option.**

d) 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. Alternative 4 would result in 130,155-square-feet less development compared to the Project and the Flexibility Option. Furthermore, as detailed below under **Section VI.E.k.2**, Alternative 4 would generate approximately 2,056 fewer daily trips than the Project and 2,119 fewer trips than the Flexibility Option, which would result in a reduced consumption of petroleum-based fuels. Thus, the amount of GHG emissions generated by Alternative 4 would be less than the amount generated by the Project or the Flexibility Option. As with the Project, Alternative 4 would be designed to comply with CalGreen and the City's Green Building Ordinance, as applicable. Accordingly, similar to the Project, 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 emissions under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project and the Flexibility Option.**

e) Hazards and Hazardous Materials

Impacts related to hazardous materials from a development project are determined in large part by the proposed land uses. Accordingly, because Alternative 4 proposes industrial uses, which use would generate hazardous materials in greater quantities and intensities than commercial and residential uses, hazardous materials impacts under Alternative 4 would be greater than those of the Project. However, as with the Project, Alternative 4 would be required to comply with all applicable local, state, and federal regulations, as well as adhere to manufacturer's instructions with regard to hazardous materials. Should the operational activities of the uses proposed under Alternative 4 require the disposal of hazardous wastes, such disposal would be done under appropriate permits in accordance with applicable regulations for the storage, transport, and disposal of hazardous wastes at facilities approved to receive such waste. In addition, all development would occur within the boundaries of the Project Site; therefore, Alternative

4 would not cause permanent alterations to vehicular circulation routes or patterns or impede public access or travel upon public rights-of-way. Similar to the Project, Alternative 4 would not exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment. **As such, potential impacts related to hazards and hazardous materials during operation of Alternative 4 would be less than significant but greater than the Project's and the Flexibility Option's less-than-significant impacts.**

f) Hydrology and Water Quality

(1) Construction

As with the Project, construction activities associated with Alternative 4 would have the potential to temporarily alter the existing surface drainage patterns and flows within the Project Site by diverting existing surface flows as a result of exposing underlying soils and making the Project Site temporarily more permeable. Similar to the Project, Alternative 4 would comply with the City's LID Ordinance and LAMC requirements that require necessary measures, plans, and inspections to reduce flooding, sedimentation, and erosion. Thus, similar to the Project, through implementation of BMPs, LID and compliance with applicable City grading regulations, Alternative 4 would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, flooding on- or off-site. In addition, adherence to standard compliance measures during construction activities would ensure that Alternative 4 would not cause flooding that would have the potential to harm people or damage property, substantially reduce or increase the amount of surface water flow from the Project Site, or result in a permanent, adverse change to the movement of surface water to produce a substantial change in the current or direct of water flow during construction. As with the Project, construction of Alternative 4 would not be anticipated to encounter groundwater based on the depth of excavation and the depth of groundwater (historically 150 feet) below the Project Site. **Therefore, construction related impacts to water quality, drainage patterns, flooding and groundwater would be less than significant under Alternative 4 and similar to the Project's and the Flexibility Option's less-than-significant impacts.**

(2) Operation

Similar to the Project, Alternative 4 would not impact surface or groundwater movement or groundwater contamination. The Project Site is within the Hansen Dam and Sepulveda Dam inundation areas but these dams are continuously monitored by various agencies such as the State of California Division of Safety of Dams to guard against the threat of dam failure. **Thus, potential failure of the dam that could result in inundation of the**

downstream area is low and impacts would be less than significant under Alternative 4, as under the Project.

As with the Project, upon buildout of Alternative 4, there would be no increase or decrease in the imperviousness of the Project Site that could substantially increase runoff volumes into the existing storm drain system. Alternative 4 would slightly alter on-site drainage patterns although the total drainage area would not change. In accordance with LID requirements, the BMPs would be required to control stormwater runoff with no increase in runoff resulting from Alternative 4. Therefore, implementation of Alternative 4 would not increase storm water flows from the Project Site causing off-site flooding. Operation would entail the preparation and implementation of a development-specific SUSMP meeting the requirements of the County-wide SUSMP adopted by LARWQCB, and preparation and implementation of a development-specific LID Plan including BMPs design to address runoff and pollutants. Furthermore, like the Project, Alternative 4 would manage, capture, and treat runoff as required through regulatory compliance, representing an improvement in water quality from the existing conditions which are not required to reduce runoff. Under Alternative 4, there would be no incremental increase or decrease in the imperviousness of the Project Site that could affect groundwater recharge rates on-site, similar to the Project. Therefore, the potential for operational related impacts to groundwater would be less than significant and similar to the Project's less-than-significant impacts. **Overall, operational impacts to hydrology drainage patterns, flooding and water quality from Alternative 4 would be less than significant and similar to the Project's and the Flexibility Option's less-than-significant impacts.**

g) Land Use and Planning

The Project Site's current M3 Zone permits a range of industrial and manufacturing uses, which would include the industrial use proposed under Alternative 4. Alternative 4 would not require the density bonus for affordable housing. Accordingly, Alternative 4 would comply with the Project Site's current zoning designations, including the existing FAR limit of 1.5:1, and would therefore be more consistent with existing land use and zoning designations than the Project. Furthermore, Alternative 4 would be consistent with the Industrial Land Use Policies Memo to preserve industrially zoned land. In addition, Alternative 4 would avoid all the significant traffic impacts when compared to the Project and would, therefore, be more consistent with the transportation policies of SCAG's 2016-2040 RTP/SCS¹⁵ to a greater degree than the Project. However, Alternative 4 would not

¹⁵ As discussed throughout this Draft EIR, on September 3, 2020, SCAG approved and adopted the Connect SoCal 2020–2045 RTP/SCS. It should be noted that the circulation of the NOP for the Project was on February 23, 2018, which was prior to the adoption of the 2020-2045 RTP/SCS, and therefore the analysis focuses on the Project's consistency with the 2016-2040 RTP/SCS.

provide residential units or commercial uses and would, therefore, not be consistent with the goals of providing needed housing and services in proximity to existing transit contained in the General Plan Framework and Housing Elements and the Central City North Community Plan. In addition, Alternative 4 would not provide pedestrian enhancements along Mateo Street and Imperial Street, bicycle facilities, or electric vehicle chargers, and would not improve the walkability in the area or increase pedestrian connectivity from Mateo Street to Imperial Street and would; therefore, not be consistent with the goals and objectives of Mobility Plan 2035 and 2010 Bicycle Plan. **Therefore, impacts related to land use under Alternative 4 would be less than significant but greater than the Project's and the Flexibility Option's less-than-significant impacts.**

h) Noise

(1) Construction

Alternative 4 would not require the extent of site excavation and soil export necessary under the Project due to the elimination of two subterranean levels, resulting in a decrease in the number of haul truck trips and associated mobile noise sources. Furthermore, due to the reduction in the total floor area as compared to the Project, there would be a reduction in the amount and the overall duration of construction and associated on-site noise under Alternative 4. Furthermore, construction of a two-story building would not require the same amount and intensity of equipment that an eight-story building would. Accordingly, on-site construction activities and the associated construction noise and vibration levels would be reduced under Alternative 4 as compared to the Project. However, because Alternative 4 would be located on the same Project Site as the Project and, accordingly, within the same distance from adjacent sensitive receptors, Alternative 4 would still require mitigation measure MM NOI-1. Alternative 4 would reduce the amount of excavation required because of the reduction of two underground parking levels, which would reduce the duration of vibration from activities that would produce the highest vibration levels, including use of bulldozers, caisson drilling and haul truck movement. Impacts of Alternative 4 with respect to construction vibration resulting in building damage would be less than significant. Impacts of Alternative 4 with respect to construction vibration resulting in human annoyance would be significant and unavoidable, although less than the Project because of reduced construction duration. **As such, construction noise impacts under Alternative 4 would be less than significant with mitigation and less than the less-than-significant-with-mitigation impacts of the Project and the Flexibility Option. Construction vibration impacts under Alternative 4 would be significant and unavoidable but less than the Project's and the Flexibility Option's significant and unavoidable construction vibration impacts related to human annoyance and less than the less than**

significant impacts of the Project and Flexibility Option with respect to building damage.

(2) Operation

Operational noise generated under Alternative 4 would be typical of industrial land uses. Due to the elimination of the residential uses proposed under the Project, as detailed below in **Section VI.D.E.2**, Alternative 4 would result in 2,056 fewer daily vehicle trips than the Project and 2,119 fewer daily trips than the Flexibility Option. Thus, Alternative 4 would generate less traffic noise than the Project. Under Alternative 4, as with the Project, parking would also be shielded and impacts would be less than significant. Further, noise generated by mechanical equipment has the potential to be greater under Alternative 4 compared to the Project, as the building would be shorter, placing mechanical equipment closer to receptors. However, as under the Project, mechanical equipment would be required to comply with regulatory limits which would reduce and minimize mechanical noise impacts. In addition, the mechanical equipment such as refrigeration units (mounted at the roof level) would include vibration-attenuation mounts to reduce the vibration transmission into the building. **Therefore, operational noise and vibration impacts under Alternative 4 would be less than significant and, due to the reduction in traffic noise, less than the Project's and the Flexibility Option's less than significant impacts.**

i) Population and Housing

As under the Project, Alternative 4 would not require the extension of roadways or infrastructure to an undeveloped area and would be supported by the existing infrastructure. **As such, indirect population growth impacts would be less than significant, similar to the less-than-significant impacts of the Project and the Flexibility Option.**

Because Alternative 4 would not include residential units (as compared to the Project's 185 units and the Flexibility Option's 159 units), it would not generate any residents (as compared to the Project's 448 residents and the Flexibility Option's 385 residents).¹⁶ **As such, direct population and housing impacts under Alternative 4 would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.**

However, as shown in **Table VI-21, Alternative 4 Net Employee Generation**, Alternative 4 is estimated to generate approximately 237 employees, which would result in a net increase of approximately 146 employees on the Project Site (as compared to the

¹⁶ Based on the City's Person Per Household Rate of 2.42. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019.

Project's approximately 92 employees, which would result in a net *decrease* of approximately 2 employees on the Project Site and the Flexibility Option's approximately 151 employees, which would result in a net increase of approximately 57 employees on the Project Site). Because the existing warehouse use has been vacated subsequent to the publication of the Project's NOP, in order to provide the most conservative estimate of employment impacts, the following analysis assumes that there is no existing employment at the Project Site and Alternative 4 would result in an increase of 237 employees. Accordingly, Alternative 4 would account for 0.5 percent of SCAG's estimated increase of 50,557 jobs between 2018 and 2021 and 0.08 percent of SCAG's estimated increase of 310,128 jobs between 2018 and 2040. **As such, direct employment impacts under Alternative 4 would be less than significant but greater than the Project's and the Flexibility Option's less-than-significant impacts.**

Table VI-21
Alternative 4 Net Employee Generation

Land Use	Size	Generation Rate^a	Employees
Industrial Space	67,200 sf	3.52/ employees/1,000 sf	237
<i>Alternative 4 Total</i>			237
<i>Less Existing Uses Total</i>			94
<i>Alternative 4 Net Total</i>			146
<i>Notes: sf = square feet</i> <i>Los Angeles Unified School District, Level 1 – Developer Fee Justification Study for Los Angeles Unified School District, March 2018.</i> <i>Source (table): EcoTierra Consulting, 2020.</i>			

j) Public Services

(1) Fire Protection

(a) Construction

The types of construction activities that would be required for Alternative 4 would be similar to those of the Project, however, the overall duration of construction would be reduced compared to the Project. Similar to the Project, implementation of “good housekeeping” procedures by the construction contractors and the work crews would minimize these hazards. During construction of Alternative 4, emergency access to the Project Site and surrounding vicinity could be impacted by construction activities, however, construction impacts are temporary in nature and would not cause lasting access effects to emergency services. In addition, construction work and haul truck trips would occur outside of typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related impacts. Furthermore, construction-related traffic would not significantly impact LAFD emergency response within the vicinity as emergency vehicles normally have a variety of options for avoiding traffic. As with the Project, a Construction Staging and Traffic Management Plan, project design feature PDF TR-1

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, due to the reduced construction period, would be less than the less-than-significant impacts of the Project and the Flexibility Option.**

(b) *Operation*

Similar to the Project, Alternative 4 would implement all applicable City Building Code and Fire Code requirements. Alternative 4 proposes no residential units and 130,155 less building square footage as compared to the Project. Therefore, the demand for services from the LAFD would be correspondingly reduced under Alternative 4 due to fewer people on the Project Site, smaller size of building requiring fire suppression, and reduced square footage of uses requiring the need for fire and emergency service. **Therefore, Alternative 4's demand for fire protection services would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impact.**

(2) Police Protection

(a) *Construction*

The types of construction activities that would be required for Alternative 4, would be similar to those of the Project, however, the overall duration of construction would be reduced compared to the Project. Alternative 4 would also implement PDF POL-1 to reduce the demand for police protection services during construction.

During construction of Alternative 4, emergency access to the Project Site and surrounding vicinity could be impacted by construction activities. However, construction impacts are temporary in nature and would not cause lasting access effects to emergency services. In addition, construction work and haul truck trips would occur outside of typical weekday commuter morning and afternoon peak periods and emergency vehicles normally have a variety of options for avoiding traffic. As with the Project, a Construction Staging and Traffic Management Plan, project design feature PDF TR-1 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 to police protection services under Alternative 4 would be less than significant and, due to the reduced construction period, would be less than the less-than-significant impacts of the Project and the Flexibility Option.**

(b) *Operation*

Alternative 4 includes industrial uses in a 130,155 square foot smaller building than the Project, and would eliminate the residential uses proposed under the Project. Therefore,

the demand for services from the LAPD would be correspondingly reduced due to fewer people on the Project Site and the reduced square footage of uses requiring the need for police services. Furthermore, because Alternative 4 would not include residential uses, it would not require as extensive security features and design coordination with the LAPD as would be required for the Project. As such, Alternative 4 would not need and would not include PDF POL-2, which is primarily designed to increase the safety of residential projects. **Therefore, Alternative 4 impacts to police protection would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.**

(3) Schools

(a) Construction

Similar to the Project, Alternative 4 would generate part-time and full-time jobs associated with its construction. 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. **As such, impacts on school facilities during construction under Alternative 4 would be less than significant and similar to the Project's and the Flexibility Option's less-than-significant impacts.**

(b) Operation

Under Alternative 4, industrial uses would be developed that would generate students; however, as shown in **Table VI-22, Alternative 4 Student Generation**, due to the elimination of residential uses, Alternative 4 would result in a net increase of 7 students, 61 fewer than the Project and 70 fewer than the Flexibility Option. As with the Project, Alternative 4 would also be required to pay development fees for schools to the LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, payment of the school fees established by the LAUSD would, by law, address Alternative 4's direct and indirect impacts on schools. **Therefore, impacts to schools would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.**

Table VI-22
Alternative 4 Student Generation

Land Use	Size	Students Generated ^a			
		Elementary (K-6)	Middle School (7-8)	High School (9-12)	Total
Existing Uses					
Warehouse	26,740 sf	11	3	7	21
<i>Total Existing Students</i>		11	3	7	21
Proposed Uses					
Industrial Space	67,200 sf	29	8	16	53
Total Projected Students		29	8	16	53
<i>Less Existing</i>		11	3	7	21
Total Net New Students		18	5	9	32
<i>Note: du = dwelling unit; sf = square feet</i>					
<i>a Based on student generation factors provided in the 2018 Developer Fee Justification Study for Los Angeles Unified School District, March 2018. The student generation rate of 0.00352 (employees per square foot) for “Industrial Business Parks” (Table 14) uses are applied for the warehouse uses, resulting in 94 (rounded) employees. The student generation rate of 0.00352 (employees per square foot) for “Industrial Business Parks” (Table 14) uses are applied for the industrial space, resulting in 237 (rounded) employees. The ratio of students per employee in the District is 0.2249, with the Project’s industrial space generating a total of 53 students. Since the LAUSD School Fee Justification Study does not specify which grade levels students fall within for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 54 percent elementary school, 15 percent middle school, and 31 percent high school).</i>					
<i>Source: EcoTierra Consulting, 2020.</i>					

(4) Parks and Recreation

(a) Construction

Similar to the Project, 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 the construction job opportunities presented by Alternative 4 would be negligible. Therefore, the construction employment generated by Alternative 4 would not result in a notable increase in the resident population or a corresponding demand for parks and recreational facilities in the vicinity of the Project Site. Also, the use of public parks and recreational facilities during lunch breaks at the parks would be limited as the breaks 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). Based on this analysis, construction of Alternative 4 would not generate a demand for park or recreational 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 and the Flexibility Option's less-than-significant impacts.

(b) Operation

Alternative 4 would not develop any residential uses and would result in a building 130,155 square-feet smaller than under the Project. Accordingly, Alternative 4 would result in a correspondingly reduced demand for public parks and recreation services as compared to the Project. Therefore, as with the Project, operation of Alternative 4 would not result in an increase in the use of parks that would require the construction of new or expanded park facilities. **As such, impacts to parks and recreation facilities from Alternative 4 would be less than significant and, due to the decreased demand compared to the Project, less than the Project's and the Flexibility Option's less-than-significant impacts.**

(5) Libraries

(a) Construction

Similar to the Project, 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 construction of Alternative 4. 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 in 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 libraries by construction workers under Alternative 4 would be negligible like the Project. **As such, impacts to library facilities and services during construction of Alternative 4 would be less than significant and similar to the Project's and the Flexibility Option's less-than-significant impacts.**

(b) Operation

Alternative 4 would develop new industrial uses at the Site, the employees of which could make use of library services in the area. However, Alternative 4 would not develop any residential uses and would result in a building 130,155 square-feet smaller than under the Project. Accordingly, Alternative 4 would result in a correspondingly reduced demand for library services compared to the Project. Therefore, as with the Project, Alternative 4 would not result in the need for new or altered library facilities. Furthermore, Alternative 4 would also generate revenues to the City's General Fund (in the form of property taxes,

sales tax, business tax, etc.) that could potentially be applied toward the provision of new library facilities and related staffing in the Downtown Community, as deemed appropriate. **As such, impacts to library facilities during operation of Alternative 4 would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.**

k) Transportation

(1) Plan Consistency

The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant. Unlike the Project, Alternative 4 would not provide pedestrian enhancements along Mateo Street and Imperial Street, bicycle facilities, or electric vehicle chargers, and would not improve the walkability in the area or increase pedestrian connectivity from Mateo Street to Imperial Street. Therefore, although Alternative 4 would not specifically conflict with circulation system plans, it would also not be as compatible with circulation plans to as high of a degree as the Project would. **As such, the impact of Alternative 4 with regard to compatibility with circulation system plans would be less than significant but greater than the less-than-significant impacts of the Project and the Flexibility Option.**

(2) VMT Analysis

The Project would generate approximately 2,404 daily trips, resulting in an estimated 5.0 daily household VMT per capita, which is less than the Central APC significance threshold of 6.0 VMT per capita, and an estimated 7.4 daily work VMT per employee, which is less than the Central APC significance threshold of 7.6 VMT per employee. The Flexibility Option would generate approximately 2,467 daily trips, resulting in an estimated 5.0 daily household VMT per capita, which is less than the Central APC significance threshold of 6.0 VMT per capita, and an estimated 7.6 daily work VMT per employee, which is equal to the Central APC significance threshold of 7.6 VMT per employee. The 387 daily trips that would be generated under Alternative 4 would result exclusively from industrial uses and would, accordingly, not result in a daily household VMT. In addition, Alternative 4 would result in a net increase of only 233 daily trips per day over existing conditions because of the reduced size and the trip generating characteristics of industrial employees associated with Alternative 4. This increase does not meet the LADOT screening threshold of 250 daily trips and therefore, the calculation of daily work VMT is not required and impacts would therefore be less than significant. **As such, the impact of Alternative 4 with regard to VMT would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.**

(3) Geometric Design Feature or Incompatible Use Hazards

As with the Project, Alternative 4 would not substantially increase hazards due to a design feature or incompatible uses. Alternative 4 proposes a land use that complements the surrounding urban development and utilizes the existing roadway network. Alternative 4's driveway would conform to the City's design standards and would provide adequate sight distance, sidewalks, and pedestrian movement controls meeting the City's requirements to protect pedestrian safety. **As such, no impacts to hazardous design features would occur under Alternative 4, similar to the no impacts of the Project and the Flexibility Option.**

(4) Emergency Access

As with the Project, Alternative 4 would maintain emergency access during construction. Alternative 4 would also implement PDF TR-1 to address traffic and access control during construction. Furthermore, construction impacts are temporary in nature and would not cause lasting access effects to emergency services. During operation, all circulation improvements that are proposed for the Project Site would comply with the Fire Code, including any additional access requirements of the LAFD. In addition, emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. **As such, impacts to emergency access during construction and operation of Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project and the Flexibility Option.**

I) Tribal Cultural Resources

Alternative 4 would construct two fewer subterranean levels than proposed by the Project. Therefore, the potential for Alternative 4 to uncover subsurface tribal cultural resources would be reduced when compared to that of the Project. Moreover, 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. This standard condition of approval would also be applied to Alternative 4. **Accordingly, impacts to tribal cultural resources under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project and the Flexibility Option.**

m) Utilities and Service Systems

(1) Water

(a) Construction

Similar to the Project, construction activities associated with Alternative 4 would generate a short-term demand for water. However, this demand would be less than the Project as Alternative 4 would not require the same amount of grading and associated dust control measures (i.e. watering) as there would be one subterranean parking level compared to three levels with the Project. Furthermore, a reduction in the overall building size proposed under Alternative 4 as compared to the Project would reduce the overall construction period and the number of days of construction-related water demand. Accordingly, since the water demand for construction activities under Alternative 4 would be less than the Project, the temporary and intermittent demand for water during construction under Alternative 4 would also be met by the City's available water supplies. Similarly, the existing LADWP water infrastructure would be adequate to provide the water flow necessary to serve Alternative 4. Furthermore, as with the Project, the design and installation of new service connections under Alternative 4 would be required to meet applicable City regulations and standards. **Therefore, impacts on water supply and infrastructure associated with short-term construction activities would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.**

(b) Operation

As shown in **Table VI-23, Alternative 4 Estimated Daily Water Consumption**, Alternative 4 would consume a net total of approximately 1,456 gallons per day of water, a decrease of 36,208 gallons per day from Project consumption and a decrease of 32,747 gallons per day as compared to the Flexibility Option's consumption as a result of the overall reduction in size and usage change from mixed-use with residential to industrial space. The estimated water demand for the Project would not exceed the available supplies projected by LADWP. Thus, the estimated water demand under Alternative 4 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 4 since the water demand would be lower than the Project. Furthermore, similar to the Project, the Applicant would construct the necessary on-site water infrastructure and off-site connections to the LADWP system pursuant to applicable City requirements under Alternative 4 to accommodate the new building. **Therefore, Alternative 4's impacts to water would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.**

Table VI-23
Alternative 4 Estimated Daily Water Consumption

Land Use	Size	Consumption Rate^a	Total Consumption (gpd)	Total Consumption (AF/y)
Industrial Space	67,200 sf	36/1,000 sf	2,419	2.6
<i>Total Alternative 4 Water Consumption</i>			2,419	2.6
Existing Water Consumption			963	1.1
Net Total Water Consumption			1,456	1.5
<i>Notes: gpd = gallons per day; AF/y = acre-feet per year; sf = square feet</i> ^a <i>The average daily flow based on 120 percent of City of Los Angeles Bureau of Sanitation sewerage generation factors.</i> <i>Source (table): EcoTierra Consulting, 2020.</i>				

(2) Wastewater

(a) Construction

Under Alternative 4, similar to the Project, temporary facilities such as portable restrooms would be provided by the contractor at the Project Site, and sewage from these facilities would be collected and hauled offsite under Alternative 4. As such, wastewater generation from construction activities associated with Alternative 4 would not cause a measurable increase in wastewater flows to the municipal sewer system. Therefore, construction of Alternative 4 would not substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the City's 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 onsite wastewater conveyance infrastructure and minor off-site work associated with connections to the City sewer lines in the streets adjacent to the Project Site. Similar to the Project, a Construction Staging and Traffic Management Plan, project design feature PDF TR-1, 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 Project's and the Flexibility Option's less than significant impacts.**

(b) Operation

(i) Treatment Capacity

As with the Project, operation of Alternative 4 would generate greater wastewater flows relative to existing conditions. As shown in **Table VI-24, Alternative 4 Average Daily Wastewater Generation**, as a result of the elimination of residential and art production

uses and the construction of a 130,155 square-foot smaller building as compared to the Project, Alternative 4 would generate a net total of approximately 1,214 gallons per day of wastewater, a decrease of 36,224 gallons per day as compared to the Project and a decrease of 32,539 gallons per day as compared to the Flexibility Option. Thus, estimated wastewater generated would be less than the Project's estimated flow, which can be adequately accommodated by the Hyperion Treatment Plant. Therefore, the Hyperion Treatment Plant would also adequately accommodate Alternative 4's wastewater. **As such, Alternative 4 impacts with respect to treatment capacity would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.**

Table VI-24
Alternative 4 Average Daily Wastewater Generation

Type of Use	Size	Sewage Generation Rate (gpd) ^a	Total Sewage Generated (gpd)
Industrial Space	67,200 sf	36/1,000 sf	2,016
<i>Total Alternative 4 Wastewater Generation</i>			<i>2,016</i>
Existing Wastewater Generation			802
Total Wastewater Generation			1,214
Notes: gpd = gallons per day; sf = square feet			
^a The average daily flow based on 100 percent of City of Los Angeles Bureau of Sanitation sewerage generation factors.			
Source (table): EcoTierra Consulting, 2020.			

(ii) *Conveyance Capacity*

Given that wastewater flows generated by Alternative 4 would be less than the estimated wastewater flow of the Project, which can be adequately accommodated by the existing sewer lines in Mateo Street, there would also be sufficient capacity to serve Alternative 4. All related sanitary sewer connections and on-site infrastructure under Alternative 4 would be designed and constructed in accordance with applicable Bureau of Sanitation regulations, standards, and policies. **Therefore, Alternative 4's impacts to wastewater conveyance infrastructure would be less than significant and, due to the reduction in wastewater generated under Alternative 4, less than the Project's and the Flexibility Option's less-than-significant impacts.**

(3) **Solid Waste**

(a) *Construction*

Because Alternative 4 would demolish the same Project Site, the amount of demolition debris generated by Alternative 4 would be the same as the Project, approximately 1,248 tons. However, due to the reduced development amount proposed under Alternative 4 compared to the Project, Alternative 4 would generate less total solid waste than the

Project, approximately 135.1 tons of solid waste,¹⁷ a reduction of approximately 262 tons as compared to the Project. Furthermore, as with the Project, Alternative 4 would be required to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Like the Project, Alternative 4 would represent a very small percentage of the inert waste disposal capacity in the region. Therefore, Alternative 4 would not create a need for additional solid waste disposal facilities to adequately handle construction-generated inert waste. **Thus, construction impacts under Alternative 4 would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.**

(b) *Operation*

As shown in **Table VI-25, Alternative 4 Estimated Daily Solid Waste Generation**, as a result of the 130,155 square-foot smaller building that would be constructed under Alternative 4, Alternative 4 is estimated to generate a net total of approximately 1,506 pounds per day, a reduction of 546 pounds per day compared to the Project and a reduction of 860 pounds per day compared to the Flexibility Option. Since the net solid waste generated by Alternative 4 would be less than the Project and the Flexibility Option, the existing landfill serving the Project Site would also have the capacity to accommodate the disposal needs of Alternative 4 and, therefore, Alternative 4 would not result in the need for an additional recycling or disposal facility. Similar to the Project, as Alternative 4 would implement PDF SW-2 and PDF SW-3 to promote recycling and would be required to divert a minimum of 50 percent of solid waste from landfills in accordance with SB 939, Alternative 4 would, therefore, comply with federal, state, and local management statutes and regulations. **Therefore, Alternative 4's operational impacts to solid waste would be less than significant and less than the Project's and the Flexibility Option's less-than-significant impacts.**

**Table VI-25
Alternative 4 Estimated Daily Solid Waste Generation**

Land Use	Size (square feet)	Generation Rate ^a (pounds/employee/day)	Employees ^b	Total Generation (pounds/day)
Industrial Space	67,200 sf	10.53/du	237	2,496
<i>Total Alternative 4 Solid Waste Generation</i>				2,496
Existing Solid Waste Generation				990
Total Solid Waste Generation				1,506

^a Generation rates are from the L.A. CEQA Thresholds Guide, 2006 (commercial rate used).

¹⁷ A construction waste generation rate of 4.02 pounds per square foot was used. 67,200 square feet of construction multiplied by 4.02 pounds is 270,144 pounds (135.1 tons). Source: U.S. EPA, Characterization of Building-Related Construction and Demolition Debris in the United States, Table A-2, June 1998.

Table VI-25
Alternative 4 Estimated Daily Solid Waste Generation

Land Use	Size (square feet)	Generation Rate ^a (pounds/ employee/day)	Employees ^b	Total Generation (pounds/day)
^b 0.00271 employees per average square foot (commercial category) x _____ square feet = _____ employees. Source: Los Angeles Unified School District, 2018 Developer Fee Justification Study for Los Angeles Unified School District, March 2018. Source (table): EcoTierra Consulting, 2020.				

(4) Dry Utilities

(a) Construction

As with the Project, construction-related activities with Alternative 4, including grading and excavation, could encroach on telecommunication facilities and typically do not involve consumption of natural gas or telecommunication service. However, before construction begins, the Project Applicant would coordinate with applicable regulatory agencies and telecommunication providers to implement orderly relocation of telecommunication facilities that need to be removed or relocated. Similar to the Project, under Alternative 4, energy consumption during the construction of the Project would be finite and limited (i.e., all equipment would be turned off when not in use), and would not result in the need for relocation or construction of new or expanded electric power facilities. Because Alternative 4 would require a shorter construction period due to the reduced size of development proposed as compared to the Project, the overall amount of electricity that would be required would be reduced. **Therefore, impacts on energy resources associated with short-term construction activities would be less than significant under Alternative 4 and less than the less-than-significant impacts of the Project and the Flexibility Option.**

(b) Operation

As Alternative 4 proposes a building that would be 130,155 square-feet smaller than under the Project, electricity and natural gas consumption for Alternative 4 would be less than under the Project (refer to **Section VI.E.2.n.2** below, for details). Thus, the associated consumption of electricity and natural gas under Alternative 4 would be reduced. Furthermore, similar to the Project, Alternative 4 would adhere to the Title 24 energy conservation standards, which would improve energy efficiency and reduce impacts on consumption of energy resources. Therefore, Alternative 4 would not require the relocation or construction of new or expanded electric or natural gas power facilities. **Therefore, impacts to dry utilities under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project and the Flexibility Option.**

n) Energy Conservation

(1) Construction

As with the Project, Alternative 4 would also be subject to state and federal regulations that reduce the inefficient, wasteful, and unnecessary consumption of energy. Furthermore, under Alternative 4, due to the elimination of two subterranean levels and reduction of total floor area by 130,155 square-feet as compared to the Project, the construction period length and overall intensity of activities would be substantially reduced compared to the Project. Therefore, the amount of electricity and petroleum-based fuel required for construction of Alternative 4 would be correspondingly substantially reduced compared to the Project. **Therefore, impacts on energy resources associated with short-term construction activities would be less than significant under Alternative 4 and less than the less-than-significant impacts of the Project and the Flexibility Option.**

(2) Operation

Based on the 130,155-square-foot reduction in total development that would occur under Alternative 4 as compared to the Project, electricity, natural gas, and petroleum-based fuel consumption for Alternative 4 would be correspondingly reduced compared to the Project. In addition, as discussed above in **Section VI.E.2.k.2**, Alternative 4 would generate approximately 2,056 fewer daily trips than the Project and 2,119 fewer daily trips than the Flexibility Option. Thus, the associated consumption of petroleum-based fuels under Alternative 4 would also be correspondingly reduced. Furthermore, similar to the Project, Alternative 4 would implement the Title 24 energy conservation standards, 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. **Therefore, impacts to energy resources under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project and the Flexibility Option.**

o) Wildfire

The Project Site is not located in or near the State Responsibility Area or a very high fire hazard severity zone and no impact with regard to wildfire would occur. Although Alternative 4 would require less construction and would construct a 130,155-square-foot smaller building than compared to the Project, it would be located on the same Project Site with the same proximity to the State Responsibility Area and very high fire hazard severity zones. No changes to the uses of the Project Site are proposed under Alternative 4 that would have the potential to alter the Project Site's susceptibility to wildfire compared

to the Project. **Accordingly, Alternative 4 would have no impact with regard to wildfire, similar to the Project and the Flexibility Option.**

3. Relationship to Project Objectives

Alternative 4 would not meet the Project's underlying purpose to redevelop the Project Site with a mixed-use development that includes publicly accessible open spaces that complement the uses in the Arts District with its live/work units, commercial retail, and art production space, and that enhances the City's economic base, provides community serving amenities for the existing community, and is respectful of the existing surrounding neighborhoods. As an industrial-only development, Alternative 4 would not provide new residential units and would similarly not provide a mix of residential and commercial uses in conformance with local and regional mobility objectives. In addition, Alternative 4 would not improve the pedestrian experience along Mateo and Imperial Streets with a publicly accessible plaza and pedestrian paseo. Therefore, Alternative 4 would not encourage walkability and pedestrian safety in the Arts District. Alternative 4 would not achieve any of the basic Project objectives:

- Promote the Arts District neighborhood as a creative environment with a visually-distinctive building that complements the distinct urban community, providing public art/façade treatments and art-production and gallery space;
- Provide infill redevelopment with an integrated mixed-use project that is economically viable and serves the needs of the Arts District community with new live/work, commercial, and art/production opportunities;
- Encourage walkability and pedestrian safety in the Arts District with a project that would incorporate pedestrian-scaled improvements including lighting and landscaping, ground-floor commercial spaces and an inviting publicly accessible plaza and pedestrian paseo mid-block between Mateo and Imperial Streets that complements existing and future pedestrian activity in the Arts District.
- Contribute towards meeting the City's housing demands by increasing housing supply within the multi-modal, transit-accessible Arts District with live/work units, including affordable live/work units for Very Low Income households;
- Support regional mobility goals and local regional growth policies by encouraging a mixed-use development in and around activity centers so as to reduce vehicle trips and public infrastructure costs, and provide easy access and amenities for pedestrians and bicyclists; and
- Promote fiscal benefits, economic development, and job creation in the City through the construction and operation of a mixed-use development providing

live/work units for a range of household types and an array of commercial spaces that attracts a diverse residents and visitors to the City's Arts District, and which generates local tax revenue and supports local businesses.

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VI. Alternatives to the Project

F. Environmentally Superior Alternative

In addition to the discussion and comparison of impacts of a proposed project and its alternatives, Section 15126.6 of the *State CEQA Guidelines* requires that an environmentally superior alternative be identified and the reasons for such a selection be disclosed. In general, the environmentally superior alternative is the alternative that would generate the least amount of adverse impacts. In this case, the No Project Alternative (Alternative 1) would result in fewer impacts on the existing environment.

However, Section 15126.6(e)(2) of the *State CEQA Guidelines* states that if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. Based on the above analysis and **Table VI-2**, Alternative 3, the Commercial Use and Aboveground Parking Alternative, would be environmentally superior to the Project. In most environmental areas, Alternative 3 would result in lesser degrees of Project impacts due to overall reduction in development, and would avoid the Project's significant and unavoidable construction vibration impact related to human annoyance as Alternative 3 would not include excavations. However, it should be noted that Alternative 3 does not meet five of the Project's six objectives, including not providing any live/work or affordable housing units, open space, and plazas. Alternative 3 meets the remaining Project objective to a lesser extent than the Project.

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