V. Alternatives

V. Alternatives

1. Introduction

The identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process under CEQA. Specifically, Public Resources Code Section 21001 states, in part, that the environmental review process is intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives which will avoid or substantially lessen such significant effects. In addition, Public Resources Code Section 21002.1(a) states, in part, that the purpose of an environmental impact report is to identify the significant effects on the environment of a project, identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.

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

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

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

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

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

2. Overview of Selected Alternatives

As set forth in Section II, Project Description, of this Draft EIR, the Project proposes two development scenarios—the Mixed Use Development Scenario and the No-Hotel Development Scenario. Under the Mixed Use Development Scenario, up to 737 residential units, up to 180 hotel rooms, up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area are proposed. Under the No-Hotel Development Scenario, a maximum of up to 827 residential units would be constructed along with up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area. The additional residential units (under the No-Hotel Development Scenario) would be located in the Sunset Building and would replace the 180 hotel rooms proposed by the Mixed Use Development Scenario. Regardless of the removal of the hotel, the Project design would remain as proposed. Specifically, the total floor area, building heights, massing, and footprint would be the same under both development scenarios. In addition, construction activities including depth of excavation, overall amount of grading, and the types of equipment to be used would be the same under both development scenarios. As such, the comparative analysis accounts for both development scenarios and the term "Project" is used unless stated otherwise.

As indicated above, the intent of the alternatives is to avoid or substantially lessen any of the significant effects of a project while still feasibly obtaining most of the basic project objectives. Based on the analyses provided in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project (under both Development Scenarios) would result in significant impacts that cannot be feasibly mitigated with respect to regional air quality during construction; on-site and off-site noise sources during construction; and vibration from on-site and off-site construction with respect to the significance threshold for human annoyance. Furthermore, as evaluated in Section IV, Environmental Impact Analysis, the following cumulative impacts would be significant and unavoidable: regional air quality impacts during construction; construction noise impacts

from on-site and off-site noise sources; and vibration impacts associated with off-site construction, pursuant to the significance threshold for human annoyance.

Based on the significant environmental impacts of the Project, the basic objectives established for the Project (refer to Section II, Project Description, of this Draft EIR), and the feasibility of the alternatives considered, the alternatives to the Project listed below were selected for evaluation.

- Alternative 1: No Project/No Build Alternative—Alternative 1 assumes that the Project would not be implemented, no new permanent development would occur within the Project Site, and the existing environment would be maintained. Thus, the physical conditions of the Project Site would remain as they are today.

- Alternative 2: Zoning Compliant Alternative—Alternative 2 considers development of the Project Site in accordance with its existing land use designation and zoning.

- Alternative 3: Office Campus Alternative—Alternative 3 would include the development of a 708,418-square-foot office campus, including 633,418 square feet of office uses and 75,000 square feet of ancillary retail and restaurant space.

- Alternative 4: Retail and Residential Campus Alternative—Alternative 4 would eliminate the office uses and hotel (under the Mixed Use Development Scenario) proposed by the Project while reducing the proposed residential uses and increasing the proposed retail uses to create a large retail campus.

- Alternative 5: Reduced Density Alternative—Alternative 5 would include the same uses proposed by the Project (under the Mixed Use Development Scenario) while reducing the amount of total new floor area proposed by the Project by approximately 35 percent.

- Alternative 6: Residential Townhome Alternative—Alternative 6 would develop 300,000 square feet of multi-family residential uses and would eliminate the retail, office, and hotel uses (under the Mixed Use Development Scenario) proposed by the Project.

Table V-1 on page V-4 provides a comparison of the Project with the six alternatives being considered. Each of these alternatives is described in the sections that follow. In addition, CEQA Guidelines Section 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible. Such potential alternatives are described below.

Table V-1
Summary of Development Proposed under Alternatives to the Project

	Mixed Use Development Scenario	No-Hotel Development Scenario	Alternative 1: No Project/No Build	Alternative 2: Zoning Compliant	Alternative 3: Office Campus	Alternative 4: Retail and Residential Campus	Alternative 5: Reduced Density	Alternative 6: Residential Townhomes
Residential	766,982 sf (737 du)	851,982 sf (827 du)	—	585,418 sf (587 du)	—	794,982 sf (827 du)	498,538 sf (479 du)	300,000 sf (250 du)
Commercial (Retail/ Restaurant)	95,000 sf	95,000 sf	—	75,000 sf	75,000 sf	200,000 sf	61,750 sf	—
Office	48,000 sf	48,000 sf	—	48,000 sf	633,418 sf	—	31,200 sf	—
Hotel	85,000 sf (180 rm)	—	—	—	—	—	55,250 sf (117 rm)	—
Total Square Footage	994,982 sf	994,982 sf	—	708,418 sf	708,418 sf	994,982 sf	646,738 sf	300,000 sf
Total FAR[a]	3.65:1	3.65:1	—	2.58:1	2.58:1	3.65 :1	2.37:1	1.10:1
Total Parking	933 spaces	907	—	1,272 spaces	1,417 spaces	1,020 spaces	1,087 spaces	500 spaces
Total Open Space	82,925 sf	93,050 sf	—	65,938 sf	—	92,938 sf	53,800 sf	37,500 sf
Heights	up to 572 ft (up to 49 levels)	up to 572 ft (up to 49 levels)	—	400 ft (35 levels)	250 ft (15 levels)	400 ft (35 levels)	370 ft (32 levels)	60 ft (4 levels)
Maximum Depth of Excavation	64 ft below grade (6 partially below grade/partially above grade levels)	64 ft below grade (6 partially below grade/ partially above grade levels)	—	36 ft below grade (3.1 subterranean levels)	39 ft below grade (3.4 subterranean levels)	44 ft below grade (3.9 subterranean levels)	31 ft below grade (2.6 subterranean levels)	17 ft below grade (1.2 subterranean levels)

du = dwelling units
FAR = floor area ratio
ft = feet
rm = rooms
sf = square footage
[a] *Total FAR is calculated after deducting the existing Elysian apartment building's floor area, equal to 110,336 square feet from the Project Site's development potential.*
Source: Eyestone Environmental, 2021.

3. Alternatives Considered and Rejected as Infeasible

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

Alternatives to Eliminate Significant Noise and Vibration Impacts During Construction: As discussed in Section IV.I, Noise, of this Draft EIR, the Project would result in short-term significant and unavoidable construction-related noise and vibration (human annoyance) impacts. Specifically, Project construction activities would result in significant unavoidable construction-related noise impacts related to on-site and off-site construction activities, and significant unavoidable vibration (human annoyance) impacts related to both on-site construction activities and off-site construction traffic. As such, the following approaches were considered to substantially reduce or avoid these impacts:

- Approach (a)—Extended Construction Duration: An approach that extends the construction period, thus reducing the amount of daily construction activity that would occur under the Project was evaluated. This approach was rejected for the following reasons:

  – Construction noise levels are dependent on the number of construction equipment (on-site equipment or off-site construction trucks). It is anticipated the number of on-site construction equipment and off-site construction trips would be reduced under this approach. Typically, a reduction of 50 percent in the number of construction equipment pieces or construction traffic (haul and delivery trucks trips) would reduce the construction-related noise levels by approximately 3 dBA (just perceptible).[1] For example, a 50 percent reduction in the construction trucks during site grading/excavation (Phases 0 and 1), from 103 to 52 truck trips per hour, would reduce the truck noise along Alpine Street to 69.7 dBA L_{eq}, (an approximately 3 dBA reduction as compared to

[1] *The reference to 3 dBA here and in other parts of the discussion of the noise options considered does not have to do with how much construction noise levels need to be reduced to avoid significant impacts. Rather, it has to do with: (1) the minimum reduction required to be audible to the human ear; and (2) the fact that a lowering of the number of construction pieces and volume of construction traffic by 50 percent is required to result in an audible reduction in on- and off-site construction noise, respectively. In other words, reducing peak day construction activities by 50 percent would result in a barely audible reduction in construction noise.*

the Project). However, when accounting for the ambient noise level (i.e., the Project plus ambient noise levels due to off-site construction trucks) the actual noise levels would only be reduced by 2.7 dBA along Alpine Street. In addition, a 50 percent reduction in the construction trucks during the mat foundation phase, from 117 to 59 truck trips per hour, would reduce the truck noise along Alpine Street, College Avenue and Figueroa Terrace to 70.1 dBA L_{eq} (an approximately 3 dBA reduction as compared to the Project). However, when accounting for the ambient noise level (i.e., the Project plus ambient noise levels due to off-site construction trucks) the actual noise levels would only be reduced by 2.8 dBA along Alpine Street, College Avenue and Figueroa Terrace. Thus, as analyzed, even with a 50 percent reduction in the truck trips, the off-site construction noise plus ambient noise would result in a minimal reduction in noise (i.e., less than the 3 dBA perceptible level) and the off-site noise impacts along Alpine Street, College Avenue and Figueroa Terrace would remain significant. With respect to on-site construction, a reduction in the number of pieces, off-site construction noise would be somewhat less than the Project (depending on the amount of reduction) but would still exceed the significance threshold. In addition, the reduction would be less than 3.0 dBA, which is the level where noise is perceptible. This approach would also be inefficient and would increase the number of days that sensitive receptors would be impacted by construction activities. Furthermore, due to the close proximity of the off-site noise sensitive receptors (e.g., receptor locations R1 and R2 are directly across from the Project Site), the site elevation changes (i.e., residential buildings along Sunvue Place are approximately 50 feet higher than the Project Site), and the building heights (i.e., 4-story residential buildings along Sunvue Place and the on-site 7-stories Elysian residential building), it would not be practical to reduce the construction noise levels to below the significance threshold as a single piece of equipment would result in noise levels above the significance threshold. As such, the on-site and off-site construction noise impacts under this approach would not be substantially less than the Project and would remain significant.

  - The on-site construction vibration impacts (human annoyance) would be significant, similar to the Project, as the vibration impact analysis is based on the peak vibration level generated by individual construction equipment, and the approach would utilize similar construction equipment (e.g., drill rig and large bulldozer). In addition, off-site construction vibration impacts (human annoyance), due to heavy trucks traveling by sensitive receptors, would also continue to be significant, similar to the Project.

- Approach (b)—Central Location of Development: An approach where proposed development is moved closer to the center of the Project Site, thus pulling back the proposed development and associated construction activities from the off-site sensitive receptors was reviewed and rejected for the following reasons:

  - Construction noise levels can be reduced by providing an additional buffer zone between the receptor and the construction equipment. Noise levels from construction equipment would attenuate approximately 6 dBA per doubling of distance. The construction noise levels associated with the building phases for the proposed towers placed closer to the center of the site would be lower than the Project. However, the noise level reduction, depending upon the setback from the property line, would be limited due the size of the Project site (approximately 450 feet from east to west property lines). In addition, noise levels during the site demolition, site preparation and grading would be similar to the Project, as construction activities for these phases would be up to the property line, similar to the Project. As such, the on-site construction noise impacts under this approach would remain significant as for the Project.

  - Similar to the Project, the on-site construction vibration impacts (human annoyance) of this option would be significant as heavy construction equipment (e.g., drill rig and large bulldozer) used for the site grading) would still operate near the property line and adjacent sensitive uses under this option. Also similar to the Project, the off-site construction vibration impacts (human annoyance) of this option due to heavy trucks traveling by sensitive receptors would be significant.

- Approach (c)—Reduced Development: An approach that reduces the amount of development that would occur under the Project to the extent that the significant construction-related noise and vibration impacts of the Project would be avoided or substantially reduced was also considered in Alternative 5. As concluded therein, due to the close proximity of the sensitive receptors (i.e., directly across from the Project Site) and a constrained Project Site that does not have the space to create a meaningful buffer zone, it would not be practical to mitigate the on-site construction noise impacts of the Project, especially at the upper levels of the on-site Elysian residential building. In addition, the on-site construction vibration impacts (human annoyance) of this option would be significant since the vibration impact analysis is based on the peak vibration level generated by individual construction equipment pieces that would still be required near the perimeter of the Project Site. Off-site construction vibration impacts (human annoyance), due to heavy trucks traveling by sensitive receptors, would be significant similar to the Project.

Based on the above, none of the above approaches would substantially reduce or avoid the significant unavoidable construction-related on-site noise and both on- and off-site vibration (human annoyance) impacts of the Project. This is because the significant unavoidable construction-related noise and vibration impacts of the Project are heavily influenced by the close proximity of the Project Site and the proposed haul route to existing noise- and vibration-sensitive uses rather than the amount or duration of Project construction activities. Furthermore, Approach (b) would not allow for the development of a primary open space amenity (The Hill) within the center of the Project Site. Therefore, an

alternative that includes one or more of these approaches would not substantially reduce or eliminate the significant noise and vibration impacts of the Project and thus no further consideration of these approaches in the EIR is required.

Alternative Project Site: The results of a search to find an alternative site on which the Project could be built determined that suitable similar locations are not available to meet the underlying purpose and objectives of the Project to redevelop the Project Site in proximity to other existing community-serving uses. Further, it is not expected that the Applicant can reasonably acquire, control, or have access to an alternative site of similar size. Therefore, an alternative site is not considered feasible as it is not expected that the Applicant can reasonably acquire, control or have access to a suitable alternative site that would provide for the uses and square footage proposed by the Project. In addition, if a suitable alternative site could be found, it is anticipated that the significant and unavoidable impacts with respect to regional air quality during construction; on-site and off-site noise sources during construction; and vibration from on-site and off-site construction with respect to the significance threshold for human annoyance would still occur. Specifically, given that maximum daily conditions are used for measuring impact significance, regional impacts with regard to construction emissions on these days would be similar to those of the Project. In addition, since the alternative site would also likely be an infill site with nearby sensitive receptors and since noise levels during maximum daily activity days are used for measuring impacts, noise levels associated with on- and off-site construction activities would be similar to those of the Project. Furthermore, since construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment, vibration levels associated with on- and off-site construction activities would be similar to the Project. Thus, in accordance with Section 15126.6(f) of the State CEQA Guidelines, this alternative was rejected from further consideration.

4. Alternatives Analysis Format

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the Project (and as appropriate, the two development scenarios—the Mixed Use Development Scenario and the No-Hotel Development Scenario), as measured against the baseline (existing conditions). Furthermore, each alternative is evaluated to determine whether the Project's basic objectives, identified in Section II, Project Description, of this Draft EIR, would be substantially attained by the alternative.[2] The evaluation of each of the alternatives follows the process described below:

[2] *State of California, CEQA Guidelines Section 15126.6(c).*

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

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

   - Less: Where the net impact of the alternative would be clearly less adverse or more beneficial than the impact of the Project, the comparative impact is said to be "less."

   - Greater: Where the net impact of the alternative would clearly be more adverse or less beneficial than the Project, the comparative impact is said to be "greater."

   - Similar: Where the impact of the alternative and Project would be roughly equivalent, the comparative impact is said to be "similar."

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

A summary matrix that compares the impacts associated with the Project with the impacts of each of the analyzed alternatives is provided in Table V-2 on page V-10.

As evaluated in the Initial Study prepared for the Project included in Appendix A of this Draft EIR, the Project would not result in significant impacts related to aesthetics, agriculture and forestry resources, biological resources, mineral resources, and solid waste. Therefore, no further analysis of these topics in this EIR is required or provided and these topics are not considered with respect to any of the alternatives considered as similar analytic conclusions are anticipated.

Table V-2
Comparison of Impacts Associated with the Alternatives

Impact Area	Project (Mixed Use Development and No-Hotel Development Scenarios)	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning Compliant Alternative	Alternative 3: Office Campus Alternative	Alternative 4: Retail and Residential Campus Alternative	Alternative 5: Reduced Density Alternative	Alternative 6: Residential Townhomes Alternative
A. AIR QUALITY							
Regional Emissions							
Construction	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Less (Less Than Significant Impact)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Less[a]/Similar[b] (Less Than Significant Impact)	Greater (Significant and Unavoidable)	Less (Less Than Significant)	Less (Less Than Significant)
Localized Emissions							
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Greater (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
Toxic Air Contaminants							
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
B. CULTURAL RESOURCES							
Historical Resources	Less Than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
Archaeological Resources	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)	Less (Less Than Significant with Mitigation)
C. ENERGY							
Wasteful, inefficient, or unnecessary consumption of Energy Resources							
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)
Operation	Less Than Significant	Greater (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
Conflict with Plans for Renewable Energy or Energy Efficiency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)

Table V-2 (Continued)
Comparison of Impacts Associated with the Alternatives

Impact Area	Project (Mixed Use Development and No-Hotel Development Scenarios)	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning Compliant Alternative	Alternative 3: Office Campus Alternative	Alternative 4: Retail and Residential Campus Alternative	Alternative 5: Reduced Density Alternative	Alternative 6: Residential Townhomes Alternative
D. GEOLOGY AND SOILS							
Geology and Soils	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
Paleontological Resources	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)	Less (Less Than Significant with Mitigation)
E. GREENHOUSE GAS EMISSIONS							
Greenhouse Gas Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Greater (Less Than Significant Impact)	Greater (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
F. HAZARDS AND HAZARDOUS MATERIALS							
Construction	Less Than Significant With Mitigation	Less (No Impact)	Less (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
G. HYDROLOGY AND WATER QUALITY							
Surface Water Quality							
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
Operation	Less Than Significant	Greater (Less Than Significant)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
Groundwater Quality							
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
Operation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
Surface Water Hydrology							
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
Operation	Less Than Significant	Greater (Less Than Significant)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)

Table V-2 (Continued)
Comparison of Impacts Associated with the Alternatives

Impact Area	Project (Mixed Use Development and No-Hotel Development Scenarios)	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning Compliant Alternative	Alternative 3: Office Campus Alternative	Alternative 4: Retail and Residential Campus Alternative	Alternative 5: Reduced Density Alternative	Alternative 6: Residential Townhomes Alternative
Groundwater Hydrology							
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
Operation	Less Than Significant	Greater (Less Than Significant)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
H. LAND USE AND PLANNING							
Conflict with Land Use Plans	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Greater (Less Than Significant Impact)	Greater (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Greater (Less Than Significant Impact)
I. NOISE							
Construction							
On-Site Noise	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Less (Significant and Unavoidable)
Off-Site Noise	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Less (Significant and Unavoidable)
On-Site Vibration (Building Damage)	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)
On-Site Vibration (Human Annoyance)	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Less (Significant and Unavoidable)
Off-Site Vibration (Building Damage)	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)
Off-Site Vibration (Human Annoyance)	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Less (Significant and Unavoidable)
Operation							
On-Site Noise	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
Off-Site Noise	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Greater (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
Vibration	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Greater (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)

Table V-2 (Continued)
Comparison of Impacts Associated with the Alternatives

Impact Area	Project (Mixed Use Development and No-Hotel Development Scenarios)	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning Compliant Alternative	Alternative 3: Office Campus Alternative	Alternative 4: Retail and Residential Campus Alternative	Alternative 5: Reduced Density Alternative	Alternative 6: Residential Townhomes Alternative
J. POPULATION, HOUSING, AND EMPLOYMENT							
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
K. PUBLIC SERVICES							
Fire Protection							
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
Police Protection							
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less[c]/Similar[d] (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
Schools							
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
Parks and Recreation							
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)

Table V-2 (Continued)
Comparison of Impacts Associated with the Alternatives

Impact Area	Project (Mixed Use Development and No-Hotel Development Scenarios)	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning Compliant Alternative	Alternative 3: Office Campus Alternative	Alternative 4: Retail and Residential Campus Alternative	Alternative 5: Reduced Density Alternative	Alternative 6: Residential Townhomes Alternative
Libraries							
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
L. TRANSPORTATION							
Conflict with Plans	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
Vehicle Miles Traveled	Less Than Significant	Less (No Impact)	Greater (Less Than Significant Impact)	Less (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Greater (Less Than Significant Impact)	Greater (Less Than Significant Impact)
Hazardous Design Features	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
Emergency Access	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
Freeway Safety Analysis	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
M. TRIBAL CULTURAL RESOURCES							
Tribal Cultural Resources	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)	Less (Less Than Significant with Mitigation)
N. UTILITIES AND SERVICE SYSTEMS							
Water Supply and Infrastructure							
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)

Table V-2 (Continued)
Comparison of Impacts Associated with the Alternatives

Impact Area	Project (Mixed Use Development and No-Hotel Development Scenarios)	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning Compliant Alternative	Alternative 3: Office Campus Alternative	Alternative 4: Retail and Residential Campus Alternative	Alternative 5: Reduced Density Alternative	Alternative 6: Residential Townhomes Alternative
Wastewater							
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
O. ENERGY INFRASTRUCTURE							
Infrastructure Capacity							
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Greater (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)

[a] *Impacts would be less than significant and less than the less-than-significant impacts of the Mixed Use Development Scenario.*
[b] *Impacts would be less than significant and similar to the less-than-significant impacts of the No-Hotel Development Scenario.*
[c] *Impacts would be less than significant and less than the less-than-significant impacts of the Mixed Use Development Scenario.*
[d] *Impacts would be less than significant and similar to the less-than-significant impacts of the No-Hotel Development Scenario.*
Source: Eyestone Environmental, 2021.

V. Alternatives

A. Alternative 1: No Project/No Build

1. Description of the Alternative

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states in part that, "in certain instances, the No Project/No Build Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, Alternative 1, the No Project/No Build Alternative, assumes that the Project would not be approved, no new permanent development would occur within the Project Site, and the existing environment would be maintained. Thus, the physical conditions of the Project Site would generally remain as they are today. Specifically, the existing vacant buildings as well as the surface parking areas would remain on the Project Site, and no new construction would occur.

2. Environmental Impacts

a. Air Quality

(1) Regional Emissions

(a) Construction

Alternative 1 would not remove the existing vacant buildings or require any construction activities on the Project Site. Therefore, Alternative 1 would not result in any construction emissions associated with construction worker and construction truck traffic, fugitive dust from demolition and excavation, or the use of heavy-duty construction equipment. Therefore, construction-related regional air quality impacts would not occur. As such, Alternative 1 would avoid the significant and unavoidable Project-specific and cumulative impacts of the Project associated with regional emissions. Thus, impacts related to regional air quality emissions during construction would be less under Alternative 1 when compared to the significant and unavoidable impacts of the Project.

(b) Operation

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. Therefore, no operational air quality impacts associated with regional emissions would occur under Alternative 1. Thus, impacts related to regional air quality emissions during operation would be less under Alternative 1 when compared to the less-than-significant impacts of the Project.

(2) Localized Emissions

(a) Construction

As previously discussed, Alternative 1 would not result in any construction emissions associated with construction worker and construction truck traffic, fugitive dust from demolition and excavation, or the use of heavy-duty construction equipment. Therefore, construction-related localized air quality impacts would not occur. Thus, impacts related to localized air quality emissions during construction would be less under Alternative 1 when compared to the less-than-significant impacts of the Project.

(b) Operation

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. Therefore, no operational air quality impacts associated with localized emissions would occur under Alternative 1, and such impacts would be less than the less-than-significant impacts of the Project.

(3) Toxic Air Contaminants

(a) Construction

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

(b) Operation

As discussed in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include diesel particulate matter (DPM) from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets) and, to a lesser extent, facility operations (e.g., natural gas fired boilers). Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes

(e.g., chrome plating, electrical manufacturing, petroleum refinery). Since Alternative 1 would not result in new development on the Project Site, no increase in any potential sources of TAC emissions would occur. Therefore, no operational impacts associated with TACs would occur under Alternative 1, and such impacts would be less than the less-than-significant impacts of the Project.

b. Cultural Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, there are no historical resources on the Project Site. In addition, no demolition, grading, or other earthwork activities that could potentially affect adjacent or nearby historical resources or would occur under the No Project/No Build Alternative. Therefore, impacts to historical resources would not occur under Alternative 1, and impacts would be less than the less-than-significant impact of the Project.

With regard to archaeological resources, Alternative 1 would not result in new development that would require grading or earthwork activities. As such, Alternative 1 would not result in the potential discovery of archaeological resources. No impacts associated with archaeological resources would occur under Alternative 1, and impacts would be less than the impacts of the Project, which would be less than significant with mitigation.

c. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

(a) Construction

Construction activities would not occur under the No Project/No Build Alternative. Therefore, Alternative 1 would not generate a short-term demand for energy during construction, which could result in the wasteful, inefficient, or unnecessary consumption of energy resources. Thus, construction-related impacts to energy would not occur. As such, impacts under the No Project/No Build Alternative would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

The No Project/No Build Alternative would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the long-term energy demand on the Project Site and would have no potential to result in the wasteful, inefficient, or unnecessary consumption of energy resources. It is noted however that the

Project would replace existing older buildings with modern buildings incorporating the latest City Green Building Code requirements, thereby improving the energy efficiency of buildings. As such, impacts would be greater when compared to the less-than-significant impacts of the Project.

(2) Conflict with Plans for Renewable Energy or Energy Efficiency

The No Project/No Build Alternative would not involve any new development. As such, Alternative 1 would not have the potential to conflict with plans for renewable energy or energy efficiency. No impacts related to renewable energy or energy efficiency plans would occur under the No Project/No Build Alternative, and impacts would be less when compared to the less-than-significant impacts of the Project.

d. Geology and Soils

The No Project/No Build Alternative would not result in development on the Project Site that would require grading or other earthwork activities. Therefore, Alternative 1 would not cause or accelerate geologic hazards related to fault rupture, strong seismic shaking, seismic-related ground failure, and site stability, which could result in substantial adverse effects. As such, no impacts related to geology and soils would occur under Alternative 1, and impacts would be less than the less-than-significant impact of the Project.

With regard to paleontological resources, Alternative 1 would not result in new development that would require grading or earthwork activities. As such, Alternative 1 would not result in the potential discovery of paleontological resources. No impacts associated with paleontological resources would occur under Alternative 1, and impacts would be less than the impacts of the Project, which would be less than significant with mitigation.

e. Greenhouse Gas Emissions

Alternative 1 would not develop new uses on the Project Site. Therefore, no new greenhouse gas (GHG) emissions would occur under Alternative 1 and new impacts associated with GHG emissions would not occur. As such, impacts associated with GHG emissions under Alternative 1 would be less than the less-than-significant impacts of the Project.

f. Hazards and Hazardous Materials

(1) Construction

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

(2) Operation

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

g. Hydrology and Water Quality

(1) Surface Water Quality

(a) Construction

As no new development would occur, Alternative 1 would not have the potential to contribute to pollutant loading in stormwater runoff associated with construction activities. Therefore, no construction-related impacts to surface water quality would occur under Alternative 1, and impacts would be less than the less-than-significant impacts of the Project.

(b) Operation

Under Alternative 1, no new permanent development would occur and existing development would remain on-site. Therefore, Alternative 1 would not increase the volume of runoff generated from the Project Site. However, Alternative 1 would not implement the BMPs proposed under the Project to reduce the quantity and improve the quality of stormwater runoff from the overall Project Site. Specifically, as discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, the Project Site currently does not have structural BMPs for the treatment of stormwater runoff from existing impervious surfaces such as building roof areas and pavements. Implementation of the Project and associated

BMPs would reduce the quantity and improve the quality of stormwater runoff that leaves the Project Site compared to existing conditions. Without implementation of BMPs as part of this alternative, there would be no reduction or improvement in stormwater runoff compared to the Project. Therefore, impacts to surface water quality during operation under Alternative 1 would be greater than the Project. However, impacts would remain less than significant.

(2) Groundwater Quality

(a) Construction

No grading or excavation would occur under Alternative 1. Therefore, there would be no potential to increase groundwater contamination or cause regulatory water quality standards at an existing production well to be violated. Thus, no construction-related impacts to groundwater quality would occur under this alternative, and impacts would be less than the less-than-significant impacts of the Project.

(b) Operation

Under Alternative 1, no new permanent development would occur that could result in new or increased use of potentially hazardous materials. Therefore, there would be no potential for Alternative 1 to release contaminants into the groundwater that could affect existing groundwater quality, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well. Thus, no operational impacts to groundwater quality would occur, and impacts would be less than the less-than-significant impacts of the Project.

(3) Surface Water Hydrology

(a) Construction

As no new development would occur, the No Project/No Build Alternative would not have the potential to temporarily alter existing surface drainage patterns and flows. Therefore, no impacts to surface water hydrology during construction would occur under Alternative 1, and impacts would be less than the less-than-significant impacts of the Project.

(b) Operation

Under Alternative 1, no new permanent development would occur and existing development would remain on-site. Therefore, Alternative 1 would not have the potential to alter the amount of pervious surfaces on the Project Site, and no modifications to the existing drainage patterns or increase in the volume of runoff generated from the Project

Site would occur. Consequently, as with the Project, Alternative 1 would not create runoff that would exceed the capacity of existing or planned drainage systems, and thus would not require construction of new stormwater drainage facilities or expansion of existing facilities. However, Alternative 1 would not implement the BMPs proposed under the Project to reduce the quantity of stormwater runoff from the overall Project Site. Specifically, as discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, under existing conditions, stormwater sheet flows from the Project Site without infiltration or capturing. In accordance with LID requirements, the Project BMPs would control stormwater runoff, with no increase in runoff resulting from the Project. Implementation of the Project and associated BMPs would reduce the quantity of stormwater runoff that leaves the Project Site compared to existing conditions. Without implementation of BMPs as part of this alternative, there would be no reduction in stormwater runoff compared to the Project. Therefore, impacts to surface water quality during operation under Alternative 1 would be greater than the Project. As such, while operational impacts to surface water hydrology would be less than significant under Alternative 1, such impacts would be greater than less than the less-than-significant impacts of the Project.

(4) Groundwater Hydrology

(a) Construction

No grading or excavation would occur under Alternative 1. Therefore, there would be no potential to encounter groundwater beneath the Project Site that could require dewatering. Thus, no construction-related impacts to groundwater hydrology would occur, and impacts would be less than the less-than-significant impacts of the Project.

(b) Operation

Under Alternative 1, no new permanent development would occur, and no increase in impervious surfaces on the Project Site would occur that could affect groundwater recharge rates on-site. However, Alternative 1 would not implement capture and use or biofiltration planter BMPs like the Project that would improve groundwater recharge capacity compared to existing conditions. Thus, while impacts to groundwater hydrology during operation of Alternative 1 would be less than significant, such impacts would be greater than the less-than-significant impacts of the Project.

h. Land Use and Planning

Under Alternative 1, there would be no changes to the physical or operational characteristics of the existing Project Site. No impacts associated with conflicts with land use plans or regulations would occur, and impacts would be less than the less-than-significant impacts of the Project.

i. Noise

(1) Noise

(a) Construction

No new construction activities would occur under the No Project/No Build Alternative. Therefore, no construction-related noise would be generated on-site or off-site. As such, no on-site or off-site noise impacts would occur under Alternative 1, and impacts would be less when compared to those of the Project. Specifically, the No Project/No Build Alternative would avoid the Project's significant and unavoidable impacts with respect to on-site and off-site noise sources during construction.

(b) Operation

The Project Site is currently developed with four vacant, three-story structures that comprise 114,600 square feet and were most recently used as church facilities; and the Elysian apartment building (which is on the Project Site, but not part of the Project). Alternative 1 would not develop new uses on the Project Site, and no changes to existing site operations would occur. Thus, no new stationary or mobile noise sources, which are created from an increase in traffic, would be introduced to the Project Site or the vicinity of the Project Site. As such, no impacts associated with operational on-site and off-site noise would occur under Alternative 1, and such impacts would be less than the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

No new construction activities would occur under the No Project/No Build Alternative. Therefore, no construction-related vibration would be generated on-site or off-site under Alternative 1. As such, no on-site or off-site vibration impacts would occur under Alternative 1, and impacts would be less when compared to those of the Project, which would be less than significant for on-site construction vibration (building damage), significant and unavoidable for on-site construction vibration (human annoyance), less than significant for off-site construction vibration (building damage), and significant and unavoidable for off-site construction vibration (human annoyance).

(b) Operation

The Project Site is currently developed with four vacant, three-story structures that comprise 114,600 square feet and were most recently used as church facilities; and the Elysian apartment building (which is on the Project Site, but not part of the Project).

Alternative 1 would not develop new uses on the Project Site, and no changes to existing site operations would occur. Thus, no new on-site or off-site vibration sources would be introduced to the Project Site or the vicinity of the Project Site. As such, no impacts associated with operational on-site and off-site vibration would occur under Alternative 1, and such impacts would be less than the less-than-significant impacts of the Project.

j. Population, Housing, and Employment

(1) Construction

As the No Project/No Build Alternative would not require construction, Alternative 1 would not result in any potential indirect population impacts associated with construction workers relocating their place of residence, which could create a demand for housing in the vicinity of the Project Site. Thus, no construction-related population, housing, and employment impacts would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Operation

No changes to existing land uses or site operations would occur under Alternative 1. Alternative 1 would not include development of residential uses, which could increase population. In addition, Alternative 1 would not develop the retail, office, and hotel (under the Mixed Use Development Scenario) uses proposed by the Project, which could generate employment opportunities. Therefore, this alternative would not result in direct or indirect population growth. No population impacts would occur under Alternative 1 and impacts would be less when compared to the less-than-significant impacts of the Project.

Unlike the Project, no new residential development would be introduced to the Project Site under Alternative 1. In addition, Alternative 1 would not develop the retail, office, and hotel (under the Mixed Use Development Scenario) uses proposed by the Project. Therefore, this alternative would have no potential to result in direct or indirect housing growth. No housing impacts would occur under Alternative 1 and impacts would be less than the less-than-significant impacts of the Project.

k. Public Services

(1) Fire Protection

(a) Construction

As Alternative 1 would not require construction, Alternative 1 would not have the potential to impact the provision of fire protection services in the vicinity of the Project Site.

Thus, no construction-related fire protection impacts would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

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

(2) Police Protection

(a) Construction

As Alternative 1 would not require construction, Alternative 1 would not potentially increase the need for police protection services to the Project Site. Therefore, Alternative 1 would not result in any police protection impacts due to construction, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

No changes to existing land uses or operations on-site would occur under Alternative 1. Therefore, there would be no potential to increase the service population on-site and associated level of activity that could increase calls for police protection services from the Los Angeles Police Department (LAPD). No impacts to police protection services would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(3) Schools

(a) Construction

As Alternative 1 would not require construction, this alternative would not have the potential for construction employment to result in an increase in the resident population or corresponding demand for schools in the vicinity of the Project Site. Therefore, Alternative 1 would not result in any school impacts due to construction, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

No changes to existing land uses or operations on-site would occur under Alternative 1. Therefore, there would be no potential to increase the population of school-aged children in the attendance boundaries of the schools that serve the Project Site. No impacts to schools would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(4) Parks and Recreation

(a) Construction

As Alternative 1 would not require construction, the No Project/No Build Alternative would not have the potential for construction employment to result in a notable increase in the resident population or corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site. Therefore, Alternative 1 would not result in impacts to parks and recreation due to construction, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

No changes to existing land uses or operations on-site would occur under Alternative 1. Therefore, there would be no potential to generate additional demand for parks and recreational facilities in the vicinity of the Project Site. No impacts to parks and recreational facilities would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(5) Libraries

(a) Construction

As Alternative 1 would not require construction, this alternative would not have the potential for construction employment to result in an increase in the resident population or corresponding demand for libraries in the vicinity of the Project Site. Therefore, Alternative 1 would not result in any library impacts due to construction, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

No changes to existing land uses or operations on-site would occur under Alternative 1. Therefore, there would be no potential to generate additional demand for libraries in the vicinity of the Project Site. No impacts to libraries would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

l. Transportation

Since the No Project Alternative would not develop new or additional land uses on the Project Site, Alternative 1 would not generate any additional vehicle trips or alter existing access or circulation within the Project Site during operation. Therefore, no impacts would occur with respect to operational traffic, including conflicts with programs, plans, ordinances, or policies addressing the circulation system; vehicle miles traveled (VMT); hazardous design features; emergency access; and freeway safety. However, this alternative would not provide the same community-serving assets as the Project, including wider sidewalks around the Project Site, and the Transportation Center which support many City policies. Overall, impacts under Alternative 1 would be less when compared to the Project, which would be less than significant.

m. Tribal Cultural Resources

No grading or earthwork activities would occur under Alternative 1. Therefore, there would be no potential for Alternative 1 to uncover subsurface tribal cultural resources. As such, no impacts to tribal cultural resources would occur, and impacts would be less than the impacts of the Project, which would be less than significant with mitigation.

n. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Construction activities would not occur under Alternative 1. Therefore, Alternative 1 would not generate a short-term demand for water during construction, and construction-related impacts to water supply and infrastructure would not occur. As such, impacts under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

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

(2) Wastewater

(a) Construction

Construction activities would not occur under Alternative 1. Therefore, Alternative 1 would not generate wastewater during construction and construction-related impacts to wastewater conveyance and treatment infrastructure would not occur. As such, impacts related to wastewater would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

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

(3) Energy Infrastructure

(a) Construction

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

(b) Operation

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

3. Comparison of Impacts

Alternative 1 would avoid the Project's significant and unavoidable environmental impacts, including those related to regional air quality emissions during construction, on- and off-site construction noise, and vibration from on- and off-site construction with respect to the significance threshold for human annoyance. Furthermore, Alternative 1 would avoid the Project's significant and unavoidable cumulative regional air quality impacts during

construction, cumulative construction noise impacts from on-site and off-site noise sources, and cumulative vibration impacts associated with off-site construction, pursuant to the significance threshold for human annoyance. Alternative 1 would also avoid most of the Project's remaining less-than-significant and less-than-significant with mitigation impacts as no changes to the existing conditions would occur. However, as Alternative 1 would not implement best management practices that would improve stormwater flows, this alternative would result in a greater impact with respect to surface water quality, surface water hydrology, and groundwater hydrology during operation. In addition, without updating the existing older and more energy consuming buildings, Alternative 1 would result in a greater impact associated with energy use compared to the Project.

4. Relationship of the Alternative to Project Objectives

Under the No Project/No Build Alternative, the existing buildings and surface parking areas would remain on the Project Site, and no new development would occur. As such, Alternative 1 would not meet the underlying purpose of the Project or any of the Project's basic objectives. Specifically, Alternative 1 would not:

- Advance the Central City North Community Plan's Policy 1-2.1 by providing multi-family residential development within a Project Site that is commercially zoned.

- Develop a project that preserves and enhances the varied and distinct residential character and integrity of existing residential neighborhoods by providing a mix of architectural structures that are compatible with the varied scale of surrounding uses, consistent with Central City North Community Plan Objective 1-3.

- Promote the provision of new and adequate housing for all persons, including affordable housing units and units for rent and for sale, consistent with the Central City North Community Plan Objective 1-4.

- Promote the Central City North Community Plan's Objective 2-1 to strengthen viable commercial development in the community and to provide additional opportunities for new commercial development and services by providing a variety of commercial uses, including office space, retail, and restaurant space.

- Encourage the reduction in vehicle trips by designing a project that includes infrastructure for walking and cycling and ride-sharing hubs and transit nodes for bus and shuttle pick-up, in support of Objective 1-2 and Goal 12 of the Central City North Community Plan.

- Create a pedestrian-friendly project by introducing active commercial uses along the Project Site frontages, incorporate pedestrian paseos transecting the Project

Site, provide publicly accessible open space, and improved streetscapes around the Project Site, in support of Goal 4 of the Central City North Community Plan.

Overall, the No Project/No Build Alternative would not meet the Project's underlying purpose to provide a high-density, mixed use and transit- and pedestrian-oriented development that includes a mix of new housing opportunities that are integrated with commercial and office uses (and hotel uses under the Mixed Use Development Scenario) that provide new employment and commercial opportunities for the surrounding community.

V. Alternatives

B. Alternative 2: Zoning-Compliant Alternative

1. Description of the Alternative

In accordance with CEQA Guidelines Section 15126.6(e)(3)(B), the No Project Alternative, analyzed above, may discuss "predictable actions by others, such as some other project if disapproval of the project under consideration were to occur." CEQA Guidelines Section 15126.6(e)(3)(B) states that "If disapproval of the project under consideration would result in actions by others, such as the proposal of some other project, this "no project" consequence should be discussed… and the analysis should identify the practical result of the project's non-approval…" CEQA Guidelines Section 15126.6(e)(3)(C) further states that the No Project Alternative should project "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." Based on this guidance, Alternative 2, the Zoning Compliant Alternative, considers development of the Project Site in accordance with the parameters set forth by the existing land use designation and zoning on the Project Site, which are General Commercial and C2-2D (Commercial Zone, Height District 2 with Development Limitation), respectively, as an additional No Project Alternative.

Land uses permitted within the C2 Zone include, but are not limited to, various retail and restaurant spaces, auditoriums, automotive fueling and service stations, churches, drive-in businesses, hospitals, offices, and schools. As discussed in Section II, Project Description, of this Draft EIR, the zoning of the Project Site does not specify a building height limit, but rather limits the floor area ratio (FAR) to 3:1 (Footnote 4 in General Plan Land Use Map) and a permitted density of one unit per 400 square feet of lot area or one guest room per 200 square feet of lot area. In addition, no front yard setbacks are required for commercial or residential uses.

Based on the existing land use and zoning of the Project Site described above, Alternative 2 would include the development of a mixed use project, including 587 residential units, 48,000 square feet of office space, and 75,000 square feet of general commercial floor area, including food and beverage uses. As compared to the Mixed Use Development Scenario, Alternative 2 would construct 150 fewer residential units, would eliminate the hotel, and would construct 20,000 less square feet of commercial uses. As compared to the No-Hotel Development Scenario, Alternative 2 would construct 240 fewer

residential units and would construct 20,000 less square feet of commercial uses. Overall, Alternative 2 would construct 708,418 square feet of new floor area within the Project Site, a reduction of 286,564 square feet compared to the Project, and would result in a net FAR of 2.58:1. As with the Project, implementation of the Zoning Compliant Alternative would require the removal of the existing vacant buildings within the Project Site that together comprise approximately 114,600 square feet.

As illustrated in the conceptual site plan of Alternative 2 provided in Figure V-1 on page V-33, similar to the Project, the proposed residential, office, and retail/restaurant uses would be built within four primary structures above a parking podium, including three residential buildings (referred to as Tower A, Tower B, and the Sunset Building), and a commercial building that could contain office, retail, and restaurant uses (referred to herein as the Courtyard Building). As shown in Figure V-1, other low-rise residential and non-residential structures would be dispersed throughout the Project Site.

As shown in the plan overview diagram provided in Figure V-2 on page V-34, the proposed residential uses would be primarily concentrated along the eastern and southern boundaries of the Project Site. Specifically, Tower A and the Sunset Building would be situated along the southern portion of the Project Site while Tower B would be located along the eastern portion of the Project Site. Tower A would include 35 levels with an approximate height of 400 feet (a reduction of 172 feet compared to the Project's height of 572 feet). Tower B would include 21 levels with an approximate height of 309 feet (a reduction of 99 feet compared to the Project's height of 408 feet). Like the Project, the Sunset Building would be located at the southwestern corner of the Project Site, primarily fronting Sunset Boulevard, and would include 17 levels with an approximate height of 211 feet. As illustrated in Figure V-2, a portion of the proposed residential uses (85 units) would be provided in low-rise residential buildings (not part of the residential towers) scattered throughout the eastern and southern portions of the Project Site around the base of the two residential towers. These low-rise residential buildings would include up to four levels with a height of up to 91 feet. Adjacent to the Sunset Building along Sunset Boulevard and Beaudry Avenue would be low-rise commercial and office structures. Similar to the Project, the low-rise commercial structures would include one to three levels with an approximate height of 64 feet. Behind the low-rise commercial structures fronting Sunset Boulevard would be the Courtyard Building. Like the Project, the Courtyard Building would include three levels with an approximate height of 91 feet.

The proposed uses under this alternative would require 1,272 auto parking spaces in accordance with the requirements of the Los Angeles Municipal Code (LAMC).[3] Parking

[3] *As with the Project, parking for Alternative 2 was designed to account for required parking prior to the application of AB 744.*

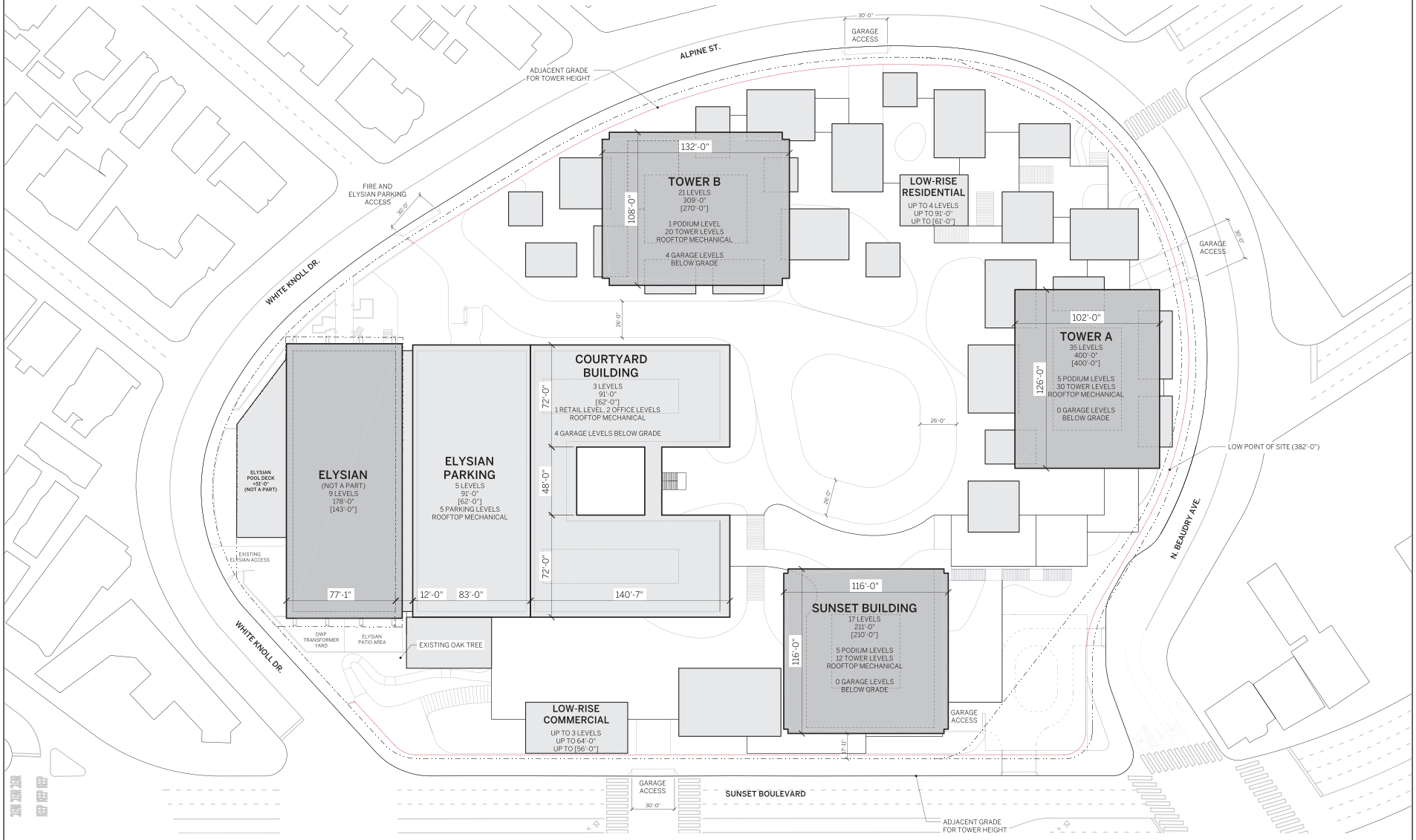

Figure V-1
Alternative 2 Conceptual Site Plan

Source: Skidmore, Owings & Merrill LLP, 2020.

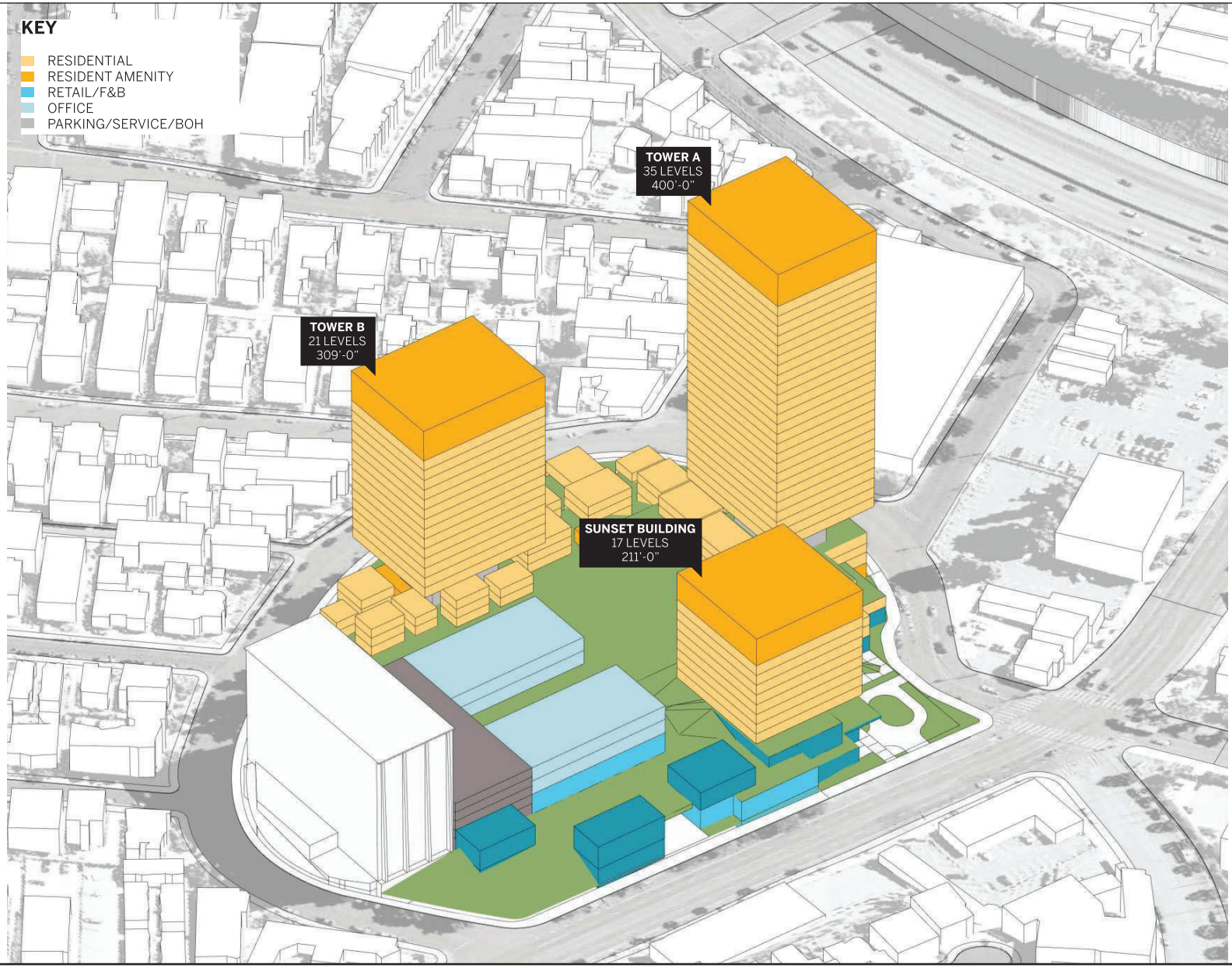

Figure V-2
Alternative 2 Plan Overview

Source: Skidmore, Owings & Merrill LLP, 2020.

would be provided in a proposed four-level parking podium, which would be partially below grade and partially above grade. The portions of the parking that would be above grade would be wrapped in active uses or landscaping. Below grade parking would extend to a maximum depth of 36 feet (a reduction of 28 feet compared to the Project's six-level parking podium). An additional 168 parking spaces for the existing Elysian apartment building would be provided within a five-level, partially subterranean parking structure (Elysian Parking Facility) located within the northern portion of the footprint of the proposed Courtyard Building.

The Zoning Compliant Alternative would include 65,938 square feet of open space, including approximately 34,779 square feet of exterior common area and 16,485 square feet of interior common area, pursuant to the requirements of the LAMC.

With the reduction in the number of subterranean levels as compared to the conservative assumption of six levels with the Project (absent the application of AB 744), it is estimated that approximately 370,375 cubic yards of export material would be hauled from the Project Site during the demolition and excavation phase, a reduction of 101,625 cubic yards compared to the Project's estimated 472,000 cubic yards of export.

As with the Project, the Zoning Compliant Alternative would require approval of a Major Development Conditional Use permit, Site Plan Review, removal of a variable width Building Line, a Master Conditional Use Permit to permit the sale of alcoholic beverages, a Zoning Administrator's Adjustment related to the Building Separation, a Director's Determination to reduce the number of trees planted on-site, a Vesting Tentative Tract Map that would create ownership lots, and various approval and permits from the City Department of Building and Safety. The Zoning Compliant Alternative would not require a Density Bonus request as with the Project.

2. Environmental Impacts

As discussed in the Initial Study prepared for the Project included in Appendix A of this Draft EIR, the Project Site is identified by the City as being located within a transit priority area. In addition, the Project is a mixed use residential project and is located on an infill site which meets PRC Section 21099's definition of an infill site as a lot located within an urban area that has been previously developed. The Project Site is also located within 0.5 mile of several bus lines, the majority of which provide a frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. Therefore, pursuant to SB 743 and ZI No. 2452, the Project's aesthetic impacts shall not be considered significant impacts on the environment.

Similar to the Project, Alternative 2 would meet the provisions of SB 743 as it would be developed within the same Project Site, which is identified as an infill site located within a transit priority area. In addition, Alternative 2 would be considered a mixed use residential project.[4] Therefore, as with the Project, the aesthetics impacts of Alternative 2 would not be considered a significant impact on the environment.

a. Air Quality

(1) Regional Emissions

(a) Construction

As with the Project, construction of Alternative 2 has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. As with the Project, Alternative 2 would be required to implement Mitigation Measures AQ-MM-1 through -5.

Under Alternative 2, construction activities would be reduced in comparison to the Project due to the reduction in development of approximately 286,564 square feet. The overall phasing of construction would result in similar overlapping construction activities as the Project. Thus, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities, although the duration of construction may be reduced. Because maximum daily conditions are used for measuring impact significance, regional impacts on these days would be similar to those of the Project. Therefore, as with the Project, Alternative 2 would result in significant and unavoidable impacts associated with regional construction emissions, and impacts would be similar to those of the Project.

(b) Operation

As previously discussed, the development proposed under Alternative 2 would be reduced compared to the Project. As such, the number of daily trips generated by Alternative 2 would be less than the number of new daily trips generated by the Project.

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[4] *Senate Bill 743 [Public Resources Code Section 21099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment."*

Specifically, as provided in Appendix T of this Draft EIR, Alternative 2 would result in a total of 6,112 daily vehicle trips compared to the Mixed Use Development Scenario's 8,257 total daily vehicle trips and the No-Hotel Development Scenario's 7,711 total daily vehicle trips.[5] Alternative 2 would result in 39,047 daily VMT compared to the Mixed Use Development Scenario's 52,517 daily VMT and the No-Hotel Development Scenario's 49,137 daily VMT. Operational regional air pollutant emissions associated with Alternative 2 would be generated by vehicle trips and daily VMT to the Project Site, which are the largest contributors to operational air pollutant emissions, and by the consumption of natural gas. It should be noted that criteria pollutant emissions are not calculated for electricity usage, consistent with SCAQMD and CalEEMod methodology. Criteria pollutant emissions from power plants are subject to local, state, and federal control measures, which can be considered to be the maximum feasible level of mitigation for power plant emissions.

As vehicular emissions depend on the number of trips and associated VMT, the overall pollutant emissions generated by Alternative 2 would be less than the emissions generated by both development scenarios because the number of vehicular trips would be less. With the reduction in uses and overall floor area, both area sources and stationary sources would also generate less on-site operational air emissions associated with energy consumption compared to the Project. Therefore, impacts associated with regional air pollutant emissions during operation of Alternative 2 would be less than significant and less than the less than significant impacts of the Project.

(2) Localized Emissions

(a) Construction

On-site construction activities under Alternative 2 would be located at similar distances from sensitive receptors as the Project. Given the reduction in the proposed development, overall construction activities and associated localized emissions from construction of Alternative 2 would be reduced compared to those of the Project. Therefore, as with the Project, localized impacts under Alternative 2 would be less than significant, and less than the less-than-significant impacts of the Project.

(b) Operation

Localized operational impacts are determined primarily by traffic volumes. As provided in Appendix T of this Draft EIR, Alternative 2 would generate 6,112 daily vehicle trips. As such, this alternative would generate less daily trips compared to the Mixed Use

[5] *Gibson Transportation Consulting, Inc., "Transportation Assessment for the Alternatives to the 1111 Sunset Boulevard Mixed Use Project," October 19, 2020. See Appendix T of this Draft EIR.*

Development Scenario's 8,257 daily trips and the No-Hotel Development Scenario's 7,711 daily trips. As such, total vehicular emissions would be less compared to the Project under both development scenarios. In addition, the development proposed under Alternative 2 would be reduced compared to the Project; therefore, area and stationary sources would also generate less on-site operational air emissions compared to the Project. As such, under Alternative 2, total contributions to localized air pollutant emissions during operation would be less than the Project's contribution. Accordingly, localized air quality impacts under Alternative 2 would be less than significant, and less than the less-than-significant impacts of the Project.

(3) Toxic Air Contaminants

(a) Construction

As with the Project, construction of Alternative 2 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. Overall construction TAC emissions generated by Alternative 2 would be less than to those of the Project since grading and excavation activities required during construction of Alternative 2 would be reduced under this alternative. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 2 would be less than significant, and less than the impacts of the Project.

(b) Operation

As set forth in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential TACs associated with Project operations would include DPM from delivery trucks. Alternative 2 would reduce the majority of the uses proposed by the Project and would eliminate the hotel use under the Mixed Use Development Scenario. Consequently, Alternative 2 would result in a decrease in the number of deliveries and DPM emissions. Similar to the Project, the land uses proposed under Alternative 2 are not considered land uses that generate substantial TAC emissions. Therefore, Alternative 2 would not release substantial amounts of TACs. Impacts under Alternative 2 would be less than significant, and less than the less-than-significant impacts of the Project.

b. Cultural Resources

As with the Project, Alternative 2 would require the removal of the existing vacant on-site buildings. As determined in the Historic Report included in Appendix E.1 of this Draft EIR, the existing on-site buildings do not qualify as historical resources. Therefore,

as with the Project, the potential for direct impacts to historical resources as a result of the removal of the existing vacant on-site buildings would also be less than significant.

With regard to indirect impacts on adjacent historical resources, similar to the Project, Alternative 2 would not impact or diminish the architectural design and integrity or impact the setting of any adjacent historical resources. Therefore, as with the Project, Alternative 2 would not indirectly affect adjacent contributing properties in the vicinity of the Project Site, and indirect impacts to historical resources would be less than significant.

Overall, impacts to historical resources under Alternative 2 would be less than significant, and similar to the less-than-significant impacts of the Project.

With regard to archaeological resources, Alternative 2 would require less grading when compared to the Project. Therefore, the potential for Alternative 2 to uncover archaeological resources would be reduced when compared to that of the Project. Like the Project, Alternative 2 would implement the same mitigation measure (CUL-MM-1) as the Project in order to mitigate potential impacts to archaeological resources. As such, as with the Project, impacts to archaeological resources under Alternative 2 would be less than significant with mitigation. However, such impacts would be less than the impacts of the Project.

c. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

(a) Construction

Similar to the Project, construction activities associated with Alternative 2 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. Like the Project, construction activities associated with Alternative 2 would not involve the consumption of natural gas. As with the Project, Alternative 2 would also generate a demand for transportation energy associated with on- and off-road vehicles. However, the energy consumed during construction of Alternative 2 would be reduced compared to the Project due to the reduction in construction activities and duration. As with the Project, the electricity demand during construction of Alternative 2 would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Construction equipment used during construction of Alternative 2 would also comply with Title 24 requirements where applicable, similar to the Project. With regard to transportation

fuels, trucks and equipment used during construction of Alternative 2 would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. Therefore, as with the Project, construction activities would use energy that is not wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 2 and similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 2 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions. As previously discussed, when compared to the Project, Alternative 2 would reduce the residential and commercial uses and would eliminate the hotel (under the Mixed Use Development Scenario). Therefore, as discussed above, the number of daily trips under Alternative 2 would be reduced compared to the Project. Specifically, as provided in Appendix T of this Draft EIR, Alternative 2 would result in 6,112 daily vehicle trips, which would be comparatively less than the Mixed Use Development Scenario's 8,257 total daily vehicle trips and the No-Hotel Development Scenario's 7,711 total daily vehicle trips. In addition, the change in land uses associated with this Alternative would also result in a decrease in daily VMT as compared to the Project (Alternative 2—39,047; Mixed Use Development Scenario—52,517; No-Hotel Development Scenario—49,137). As such, the consumption of electricity, natural gas, and petroleum-based fuels would be reduced under Alternative 2. In addition, similar to the Project, Alternative 2 would implement design features to reduce energy usage. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 2 would not be wasteful, inefficient, or unnecessary. Overall, impacts related to energy use during operation of Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Conflict with Plans for Renewable Energy or Energy Efficiency

As discussed in Section IV.C, Energy, of this Draft EIR, the current City of LA Green Building Code requires compliance with CalGreen and California's Building Energy Efficiency Standards (Title 24). Like the Project, Alternative 2 would comply with the City's Green Building Code, as well as be capable of achieving LEED® Certified equivalency. Therefore, similar to the Project, Alternative 2 would incorporate measures that are beyond current State and City energy conservation requirements. Also similar to the Project, Alternative 2 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2019 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code.

With regard to transportation related energy usage, Alternative 2 would also comply with goals of the SCAG's RTP/SCS which incorporates VMT targets established by SB 375. As with the Project, the uses proposed under Alternative 2 and their proximity to major job centers and public transportation would serve to reduce VMT and associated transportation fuel usage within the region. In addition, vehicle trips generated during Project operations would comply with CAFE fuel economy standards. As with the Project, Alternative 2 would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction.

Based on the above, Alternative 2 would not conflict with plans for renewable energy or energy efficiency. No impacts related to renewable energy or energy efficiency plans would occur under Alternative 2, and impacts would be similar to the less-than-significant impacts of the Project.

d. Geology and Soils

Under Alternative 2, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, and site stability 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 of land use proposed. Alternative 2 would be developed within the same site as the Project and 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 2 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 2 would also comply with the same regulatory requirements as the Project, which require the preparation of a final design-level geotechnical engineering report to identify and minimize seismic risks. Therefore, as with the Project, Alternative 2 would not cause or accelerate geologic conditions which could result in substantial damage to proposed structures or infrastructure or expose people to substantial risk of injury. Impacts related to geology and soils under Alternative 2 would be less than significant, and similar to the impacts of the Project, which are less than significant.

With regard to paleontological resources, Alternative 2 would construct fewer subterranean parking levels compared to the Project. Therefore, the potential for Alternative 2 to uncover subsurface paleontological resources would be reduced when compared to that of the Project. Like the Project, Alternative 2 would implement the same mitigation measure (GEO-MM-1) as the Project in order to mitigate potential impacts to paleontological resources. As such, as with the Project, impacts to paleontological resources under Alternative 2 would be less than significant with mitigation. However, such impacts would be less than the impacts of the Project.

e. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily trips generated and associated VMT, as well as energy consumption from proposed land uses. As previously discussed, the number of daily trips and daily VMT under Alternative 2 would be reduced compared to both Project development scenarios. In addition, energy and water consumption from proposed land uses would be reduced compared to the Project due to the reduction in development. Thus, the amount of GHG emissions generated by Alternative 2 would be less than the amount generated by the Project due to the reduction in the number of trips and daily VMT generated when compared to the Project and the reduction in total development. As with the Project, Alternative 2 would be designed to comply with the requirements of the CALGreen Code and the Los Angeles Green Building Code. Alternative 2 would also incorporate design features to reduce GHG emissions and would be designed to comply with the City's Green Building Ordinance, as applicable. With compliance with the CALGreen Code and the Los Angeles Green Building Code, and with the implementation of comparable sustainability features as the Project, Alternative 2 would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 2 would be less than significant, and less than the less-than-significant impacts of the Project due to the reduction in GHG emissions.

f. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, during demolition, on-site grading, and building construction associated with Alternative 2, fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners would be used, handled, and stored on the Project Site, and would therefore require proper management and disposal. Such use would be expected to be less due to the reduced construction activities. Notwithstanding, like the Project, Alternative 2 would fully comply with all applicable federal, state, and local requirements, as well as the manufacturer's instructions concerning the use, handling, storage, and disposal of hazardous materials.

As discussed in detail in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, according to the Phase I ESA, during the Project Site reconnaissance, no evidence of existing underground storage tanks or aboveground storage tanks were observed on the Project Site. However, SCAQMD and LAFD records indicate the permitting of a 500-gallon diesel-fuel underground storage tank located on the northern perimeter of the Project Site. As with the Project, Alternative 2 would not involve any construction in or near the area of the existing underground storage tank. Notwithstanding,

in the unlikely event that underground storage tanks are uncovered, suspect materials would be removed in accordance with all applicable federal, state, and local regulations similar to the Project.

While asbestos-containing materials and lead-based paints may be present on-site due to the age of the existing buildings, similar to the Project, Alternative 2 would comply with relevant regulations and requirements related to asbestos-containing material and lead-based paint to ensure that impacts would be less than significant. Furthermore, like the Project, in the event that PCBs are found within areas proposed for demolition during construction of Alternative 2, suspect materials would be removed in accordance with all applicable federal, state, and local regulations.

Additionally, similar to the Project, Alternative 2 would follow applicable California Geologic Energy Management Division (CalGEM) requirements for site plan review for construction activities proposed in the area of existing wells. This alternative would also include implementation of the same mitigation measures as the Project (under both development scenarios) to ensure potential impacts associated with the discovery of buried wells is less than significant. As with the Project, Mitigation Measures HAZ-MM-1 and HAZ-MM-2, may require an additional surface geophysical survey be conducted to attempt to locate the oil wells on the Project Site following demolition of existing structures (as the prior survey did not locate any existing oil wells and existing structures precluded geophysical survey in some areas of the site). If located, the wells would be unearthed and inspected by a licensed Petroleum Engineer and would be reported to CalGEM to assess and prescribe abandonment procedures based on their observed condition, as well as the Petroleum Administrator, the Los Angeles City Certified Unified Program Agency (LACUPA), and Los Angeles Department of City Planning. Similar to the Project, a soil and site management plan would be developed and implemented pursuant to Mitigation Measure HAZ-MM-3 to address the potential identification and abandonment of the oil wells if encountered during earthwork activities. Furthermore, in the event contaminated soils are encountered during construction, or construction occurs in areas of known or potential contamination, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166.[6] Additionally, as with the Project, Alternative 2 would implement Project Design Feature HAZ-PDF-1, which would require buildings be placed in a manner so as to not significantly impede future access to the locations of the existing wells as depicted in CalGEM's maps.

[6] *South Coast Air Quality Management District. Rules and Compliance, Rule 1166, www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf?sfvrsn=4, accessed January 16, 2021.*

Moreover, the Zoning Compliant Alternative's adherence to the construction safety measures, as well as compliance with California Occupational Safety and Health Act safety requirements, would serve to reduce the risk in the event that elevated levels of methane gas are encountered during grading and construction. In addition, as with the Project, Alternative 2 would implement controls during construction at the Project Site in order to mitigate the effects of subsurface gases on workers and the public. In addition, as with the Project, Alternative 2 would implement Mitigation Measures HAZ-MM-4 and HAZ-MM-5, to ensure potential impacts related to subsurface gases and associated potential impacts to soil and groundwater are less than significant. Specifically, Mitigation Measure HAZ-MM-4 would install controls during construction at the Project Site to mitigate the effects of subsurface gases on workers and the public and Mitigation Measure HAZ-MM-5 would require the Applicant install a Passive System that would include a standard de-watering system or a reinforced concrete mat slab to accommodate hydrostatic pressure, as well as a sub-slap vapor collection and ventilation system.

With regard to emergency response plans, although construction activities for Alternative 2 are expected to be primarily confined to the Project Site, like the Project, it is expected that construction fences would encroach into the public right-of-way (e.g., sidewalks and roadways) adjacent to the Project Site on White Knoll Drive, Alpine Street, and Beaudry Avenue. As such, sidewalks surrounding the Project Site are expected to be temporarily closed during construction. However, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period and emergency access would not be impeded. In addition, similar to the Project, a Construction Management Plan would be implemented and would include street/lane closure information, a detour plan, haul route(s), and a staging plan.

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

(2) Operation

Similar to the Project, Alternative 2 would not include the use of materials that would contain asbestos, lead based paint, or PCBs. In addition, Alternative 2 would not propose the installation of underground or aboveground storage tanks. The operation of Alternative 2 would involve the limited use of potentially hazardous materials typical of those used in offices, including cleaning agents, paints, pesticides, and other materials used for landscaping. Such use would be reduced compared to the Project due to the reduction in development. In addition, as with the Project, all hazardous materials on the Project Site would be acquired, handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, state, and local requirements. As

with the Project, Alternative 2 would also comply with the City of Los Angeles' Methane Mitigation Ordinance No. 175,790.

With regard to emergency response plans, Alternative 2 would not involve any activities that would impede public access or travel along the public right-of-way or interfere with an adopted emergency response or evacuation plan. In addition, similar to the Project, the increase in traffic generated by Alternative 2 would not significantly impact emergency vehicle response to the Project Site and surrounding uses, including along City-designated disaster routes since the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or driving in the lanes of opposing traffic. Furthermore, as Alternative 2 would reduce traffic as compared to the Project, Alternative 2 would have a lesser impact on emergency response within, and in, the vicinity of the Project Site compared to the Project.

Based on the above, potential impacts related to hazards and hazardous materials during operation of Alternative 2 would be less than significant, and less than the less-than-significant impacts of the Project due to the reduction in development.

g. Hydrology and Water Quality

(1) Surface Water Quality

(a) Construction

Under Alternative 2, the degree to which new pollutants could be introduced to the Project Site during construction would be reduced compared to the Project as Alternative 2 would result in the reduction of construction activities and duration. As with the Project, a SWPPP would be prepared for Alternative 2 and would specify BMPs to be used during construction. In addition, as discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, the geotechnical investigation conducted for the Project Site encountered water seepage at depths of 16 feet to 62 feet. Given the below grade parking proposed by this alternative would extend to a depth of 36 feet, construction activities on the Project Site associated with this alternative could also encounter groundwater and dewatering may be required. Thus, similar to the Project, Alternative 2 would utilize temporary dewatering systems in compliance with all relevant NPDES requirements related to construction and discharges from dewatering operations.

With the implementation of site-specific BMPs included as part of the SWPPP, Alternative 2 would reduce or eliminate the discharge of potential pollutants from stormwater runoff. In addition, construction of Alternative 2 would be required to comply with City grading permit regulations, which require necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and

inspection to reduce sedimentation and erosion. Therefore, with compliance with NPDES requirements and City of Los Angeles grading permit regulations, construction of Alternative 2 would not result in discharge that would violate any water quality standard or waste discharge requirements, or otherwise substantially degrade water quality. Furthermore, construction of Alternative 2 would not result in discharges that would cause regulatory standards to be violated. Therefore, as with the Project, construction-related impacts to surface water quality under Alternative 2 would be less than significant, and less than the less-than-significant impacts of the Project due to the reduction in excavation and overall construction activities.

(b) Operation

Similar to the Project, Alternative 2 would implement BMPs for managing stormwater runoff in accordance with current City LID Ordinance requirements. The BMPs would control stormwater runoff with no increase in runoff resulting from the alternative. Due to the incorporation of the LID BMPs, operation of Alternative 2 would not result in discharges that would violate any water quality standard or waste discharge requirements, or otherwise substantially degrade water quality. Thus, as with the Project, impacts to surface water quality during operation of Alternative 2 would be less than significant, and less than the less-than-significant impacts of the Project due to the reduction in development.

(2) Groundwater Quality

(a) Construction

As discussed above, Project construction activities could encounter groundwater as the geotechnical investigation conducted for the Project Site encountered water seepage at depths of 16 feet to 62 feet. Therefore, as with the Project, temporary dewatering may also be required for Alternative 2. In the event dewatering is required as part of the Zoning Compliant Alternative, like the Project, a temporary dewatering system would be installed and operated in accordance with NPDES requirements. Any discharge of groundwater during construction of Alternative 2 would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements. Pursuant to such requirements, the groundwater extracted would be chemically analyzed to determine the appropriate treatment and/or disposal methods. As such, groundwater quality would not be impacted from potential dewatering activities.

As previously discussed, there is an existing underground storage tank in the northern perimeter of the Project Site. However, as with the Project, construction activities under Alternative 2 would not occur near or in the area of the existing underground storage tank. Therefore, the potential for the underground storage tank to affect groundwater quality is negligible.

As with the Project, construction activities associated with the Zoning Compliant Alternative could also encounter contaminated soil and groundwater that would require proper handling and disposal. Where construction is proposed in the area of existing wells, applicable CalGEM requirements for site plan review would be followed. In addition, as with the Project, Alternative 2 would implement the same mitigation measures to ensure potential impacts associated with the discovery of buried oil wells is less than significant. If located, the wells would be unearthed and inspected by a licensed Petroleum Engineer and would be reported to CalGEM to assess and prescribe abandonment procedures based on their observed condition, as well as the Petroleum Administrator, LACUPA, and Los Angeles Department of City Planning. Similar to the Project, a soil and site management plan would be developed and implemented to address the potential identification and abandonment of the oil wells if encountered during earthwork activities. Furthermore, in the event contaminated soils are encountered during construction, or construction occurs in areas of known or potential contamination, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166.[7] Additionally, as with the Project, Alternative 2 would implement the same Project Design Feature (HAZ-PDF-1), which would require buildings be placed in a manner so as to not significantly impede future access to the locations of the existing wells as depicted in CalGEM's maps. Therefore, compliance with existing regulations would ensure the Zoning Compliant Alternative would not create a significant hazard to groundwater quality associated with the existing on-site oil wells.

During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would therefore require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials to be released into groundwater. However, as this alternative would require less construction activities than the Project, the use of hazardous materials would be reduced. Moreover, compliance with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste, would reduce the potential for the construction of Alternative 2 to release contaminants into groundwater, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well downstream.

Based on the above, as with the Project, impacts with respect to groundwater quality during construction under Alternative 2 would be less than significant. Such impacts would

[7] *South Coast Air Quality Management District. Rules and Compliance, Rule 1166, www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf?sfvrsn=4, accessed January 16, 2021.*

be less than the less-than-significant impacts of the Project due to a reduction in excavation and overall construction activities.

(b) Operation

Similar to the Project, Alternative 2 would not include the surface or subsurface application or introduction of potential contaminants or waste materials. Like the Project, Alternative 2 is not anticipated to result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater through percolation. Therefore, as with the Project, impacts with respect to groundwater quality during operation of Alternative 2 would be less than significant and such impacts would be similar to those of the Project.

(3) Surface Water Hydrology

(a) Construction

Similar to the Project, construction activities for Alternative 2 would include demolition of the existing vacant on-site buildings. While construction of Alternative 2 would reduce the extent of excavation activities and construction activities, Alternative 2 would disturb the same surface area as the Project. Like the Project, construction activities, particularly grading of the Project Site, would have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. However, Alternative 2 would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, Alternative 2 would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. In addition, Alternative 2 would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion, similar to the Project. Thus, through compliance with all NPDES Construction General Permit requirements, including preparation of a SWPPP, implementation of BMPs, and compliance with applicable City grading regulations, Alternative 2 would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, or flooding on- or off-site. Similarly, with adherence to standard compliance measures (e.g., NPDES requirements), construction activities would not cause flooding, substantially increase or decrease the amount of surface water flow from the Project Site into a water body, or result in a permanent, adverse change to the movement of surface water. Therefore, construction-related impacts to surface water hydrology under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 2 would include development of new buildings, paved areas, and landscaped areas. As discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, the Project Site is currently comprised of 72 percent impervious surfaces. Like the Project, implementation of Alternative 2 would increase the number of impervious surfaces compared to the Project Site's existing impervious surfaces. However, similar to the Project, Alternative 2 would implement BMPs to control stormwater runoff with no increase in runoff resulting from the Project Site. Therefore, like the Project, Alternative 2 would not impact existing storm drain infrastructure serving the Project Site and runoff would continue to follow the same discharge paths and drain to the same storm systems. Consequently, as with the Project, Alternative 2 would not cause flooding during the 50-year developed storm event, would not create runoff which would exceed the capacity of existing or planned drainage systems, would not require construction of new stormwater drainage facilities or expansion of existing facilities, would not substantially reduce or increase the amount of surface water in a water body, or result in a permanent adverse change to the movement of surface water. Operational impacts to surface water hydrology under Alternative 2 would be less than significant, and similar to the less-than-significant impacts of the Project.

(4) Groundwater Hydrology

(a) Construction

As previously discussed, as with the Project, Alternative 2 could require a temporary dewatering system during construction. Similar to the Project, in the event dewatering is required during construction of Alternative 2, a temporary dewatering system would be installed and operated in accordance with NPDES General Construction Permit requirements. Any discharge of groundwater during construction of Alternative 2 would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements.

As discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, no water supply wells are located at the Project Site or within one mile of the Project Site that could be impacted by construction, nor would Alternative 2 include the construction of water supply wells.

Based on the above, construction impacts on groundwater hydrology during construction of Alternative 2 would be less than significant, and less than the less-than-significant impacts of the Project due to the reduction in excavation and construction activities.

(b) Operation

Similar to the Project, the subterranean levels of Alternative 2 would be designed such that they are able to withstand hydrostatic forces and incorporate comprehensive waterproofing systems in accordance with current industry standards and construction methods such that permanent dewatering operations would not be required. Thus, the potential impact during operation on groundwater level under Alternative 2 would be less than significant.

As discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, the Project Site is currently comprised of approximately 72 percent impervious surfaces. Therefore, there is currently a minimal groundwater recharge potential on the Project Site. As with the Project, with implementation of Alternative 2, the amount of impervious areas would increase compared to the Project Site's existing impervious area. However, like the Project, Alternative 2 would include the installation of capture and use or biofiltration planter BMPs in order to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site. Therefore, potential impacts on groundwater recharge would be less than significant under Alternative 2.

Based on the above, impacts to groundwater hydrology during operation of Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

h. Land Use and Planning

As described above, Alternative 2, the Zoning Compliant Alternative, considers development of the Project Site in accordance with the parameters set forth by the existing land use designation and zoning on the Project Site, which are General Commercial and C2-2D (Commercial Zone, Height District 2 with Development Limitation), respectively. Land uses permitted within the C2 Zone include, but are not limited to, various retail and restaurant spaces, auditoriums, automotive fueling and service stations, churches, drive-in businesses, hospitals, offices, and schools. The zoning of the Project Site does not specify a building height limit, but rather limits the FAR to 3 to 1 (Footnote 4 in General Plan Land Use Map) and a permitted density of one unit per 400 square feet of lot area or one guest room per 200 square feet of lot area. In addition, no front yard setbacks are required for commercial or residential uses. Based on the existing land use and zoning of the Project Site, Alternative 2 would include the development of a mixed use project, including 587 residential units, 48,000 square feet of office space, and 75,000 square feet of general commercial floor area, including food and beverage uses. As compared to the Mixed Use Development Scenario, Alternative 2 would construct 150 fewer residential units, 20,000 less square feet of commercial uses and would eliminate the hotel. When compared with the No-Hotel Development Scenario, Alternative 2 would construct

240 fewer units and 20,000 less square feet of commercial uses. Overall, Alternative 2 would construct 708,418 square feet of new floor area within the Project Site, a reduction of 286,564 square feet compared to both development scenarios, and would result in a net FAR of 2.58:1.

Based on the zoning and land use designation of the Project Site, the proposed residential, office, and commercial uses are permitted on the Project Site and such uses, as proposed by Alternative 2, would not conflict with other surrounding multi-family residential uses. In addition, as the Zoning Compliant Alternative would construction a project consistent with the existing zoning of the Project Site, this alternative also would not conflict with the applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect, including those set forth in the Los Angeles General Plan Framework Element, the Housing Element, the Central City North Community Plan, and SCAG's RTP/SCS. Thus, impacts related to land use consistency would be less than significant and less than the less-than-significant impacts of the Project.

i. Noise

(1) Noise

(a) Construction

The types of construction activities under Alternative 2 would be substantially similar to the Project, although the amount of construction activities and duration would be reduced due to the reduction in total floor area. As with the Project, construction of Alternative 2 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Under Alternative 2, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to that of the Project during maximum activity days since the overall amount and duration, but not the daily intensity of construction activities, would decrease under Alternative 2 when compared to the Project. As such, noise levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Accordingly, noise impacts due to on- and off-site construction activities under Alternative 2 would be similar to those of the Project. As with the Project, Alternative 2 would implement Project Design Features NOI-PDF-1 (requiring muffling of equipment) and NOI-PDF-4 (prohibiting use of impact piles), and Mitigation Measure NOI-MM-1 (requiring sound barriers) to reduce noise levels during construction. Similar to the Project, on-site and off-site construction noise would be significant and unavoidable under Alternative 2 even with the application of project design features and the mitigation measure. Overall, impacts under Alternative 2 would be similar to those of the Project.

(b) Operation

As discussed in Section IV.I, Noise, of this Draft EIR, sources of operational noise under the Project include: (a) on-site stationary noise sources, including mechanical equipment, activities within the proposed outdoor spaces, parking facilities, loading dock and trash collection areas; and (b) off-site mobile (roadway traffic) noise sources. Alternative 2 would introduce noise from similar on-site and off-site noise sources as the Project. However, it is anticipated that with the overall reduction in total floor area and uses, the noise levels from building mechanical equipment, outdoor spaces, and parking facilities would be reduced. In addition, similar to the Project, Alternative 2 would include Project Design Features NOI-PDF-2, -3, -5, and -6 that require screening of mechanical equipment and loading docks, specify sound levels for outdoor sound systems, and specify the maximum occupancy of the Elysian Parking outdoor roof deck. The Zoning Compliant Alternative would also comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. Thus, operational on-site noise impacts would be less than significant and less than the less-than-significant impacts of the Project due to reduction in total floor area and uses proposed.

With regard to off-site noise sources, when compared with the Mixed Use Development Scenario, Alternative 2 would result in 2,330 fewer daily vehicle trips. When compared to the No-Hotel Development Scenario, Alternative 2 would result in 1,747 fewer daily vehicle trips. The reduction in vehicle trips would result in a decrease in off-site traffic-related noise levels under Alternative 2. Therefore, as with the Project, off-site noise impacts under Alternative 2 would be less than significant. Such impacts would be less than those of the Project due to the reduction in vehicle trips.

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 2 would be similar to the Project, although the amount and duration of construction activities would be reduced. As with the Project, construction of the Zoning Compliant Alternative would generate vibration from the use of heavy-duty construction equipment as well as from truck trips. While the overall amount of construction would be reduced, on- and off-site construction activities and the associated construction vibration levels would be expected to be similar to those of the Project, as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment. As such, peak vibration levels generated by the construction equipment would be similar to those of the Project. Accordingly, vibration impacts due to on- and off-site construction activities under Alternative 2 would similarly be less than significant for on-site and off-site

construction vibration (building damage) and significant and unavoidable for on-site and off-site construction vibration (human annoyance). Overall, vibration impacts under Alternative 2 would be similar to the impacts of the Project.

(b) Operation

As described in Section IV.I, Noise, of this Draft EIR, sources of vibration related to operation of the Project would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under Alternative 2. As with the Project, vehicular-induced vibration from Alternative 2, including vehicle circulation within the subterranean parking area, would not generate perceptible vibration levels at off-site sensitive uses. In addition, like the Project, building mechanical equipment installed as part of Alternative 2 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration transmission such that the vibration would not be perceptible at the off-site sensitive receptors. Therefore, as with the Project, operation of Alternative 2 would not increase the existing vibration levels in the immediate vicinity of the Project Site. As such, vibration impacts associated with operation of the Zoning Compliant Alternative would also be less than significant. However, such impacts would be less than those of the Project due to the reduction in vehicle trips and floor area.

j. Population, Housing, and Employment

(1) Construction

Alternative 2 would be constructed within the same Project Site as the Project. As with the Project, Alternative 2 would not involve removal of the existing Elysian apartment building located within the Project Site. Therefore, similar to the Project, this alternative would not displace substantial number of existing housing or people, necessitating the construction of replacement housing elsewhere. As discussed in Section IV.J, Population, Housing, and Employment, of this Draft EIR, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by a particular development. Many construction workers are highly specialized (e.g., crane operators, steel workers, masons), and move from job site to job site as dictated by the demand for their skills. Therefore, population impacts related to household growth in the City of Los Angeles or the SCAG Region as a result of construction worker relocation under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Operation

As compared to the Mixed Use Development Scenario, Alternative 2 would construct 150 fewer residential units, 20,000 less square feet of commercial uses and would eliminate the hotel. When compared with the No-Hotel Development Scenario, Alternative 2 would construct 240 fewer units and 20,000 less square feet of commercial uses. Based on a household size factor of 2.41 persons per household and 587 units, Alternative 2 would generate a new residential population of 1,415 persons[8] compared to the 1,777 persons generated by the Mixed Use Development Scenario and the 1,994 persons generated by the No-Hotel Development Scenario. As discussed in Section IV.J, Population, Housing, and Employment, of this Draft EIR, the new residents generated by the Mixed Use Development Scenario and the No-Hotel Development Scenario would be within and, thus, consistent with SCAG growth forecasts, constituting a small percentage of projected City and regional growth. Additionally, the new residential units proposed by the Mixed Use Development Scenario and the No-Hotel Development Scenario would represent a small percentage of the housing growth in the SCAG region and in the City. Thus, as with the Project, the residents and new residential units generated by Alternative 2 would similarly be consistent with SCAG growth forecasts.

With regard to indirect population impacts, the proposed commercial and office uses would generate employment opportunities. Based on the generation rates provided by the City of Los Angeles VMT Calculator Documentation, Alternative 2 would generate approximately 432 employees[9] compared to the 582 employees generated by the Mixed Use Development Scenario and the 492 employees generated by the No-Hotel Development Scenario. Similar to the Project, these new employment opportunities may be filled, in part, by persons already residing in the vicinity of the workplace and who would not relocate their households due to such employment opportunities. Nevertheless, as discussed in Section IV.J, Population, Housing, and Employment, of this Draft EIR, the new employees generated by the Mixed Use Development Scenario and the No-Hotel Development Scenario would be within and, thus, consistent with SCAG growth forecasts, constituting a small percentage of projected City and regional growth. As such, like the

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[8] *Based on a household rate of 2.41 persons for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.*

[9] *Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the rate 0.002 employee per square foot for "General Retail" land use is applied to the 8,200 square feet of commercial uses, the rate 0.004 employee per square foot for "Supermarket" land use is applied to the 27,300-square-foot grocery store, the rate 0.001 employee per square foot for "Health Club" land use is applied to the 14,500-square-foot health club/spa, the rate 0.004 employee per square foot for "High-Turnover Sit-Down Restaurant" land use is applied to the 25,000-square-foot restaurant, and the rate 0.004 employee per square foot for "General Office" land use is applied to the 48,000 square feet of office uses.*

Project, this alternative would not induce substantial population growth or exceed SCAG's population forecast for the City or the SCAG Region due to new businesses. Similarly, any indirect demand for housing associated with the proposed new businesses would be fulfilled by vacancies in the surrounding housing market and from other new units in the vicinity of the Project Site. As such, this alternative's indirect housing demand would not induce substantial population growth.

Additionally, with regard to infrastructure, all circulation improvements planned for Alternative 2 would be intended to improve circulation flows and safety throughout the Project Site and vicinity, similar to the Project. Utility and other infrastructure improvements planned for Alternative 2 would also be intended to connect the proposed uses to the existing main infrastructure system.

Overall, impacts related to population, housing, and employment under this alternative would be less than significant and less than the less-than-significant impacts of the Project.

k. Public Services

(1) Fire Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 2 would be similar to that of the Project. However, the overall amount of construction activities and duration of construction would be reduced compared to the Project due to the reduction in development. Construction would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous waste. Thus, compliance with regulatory requirements would effectively reduce the potential for construction activities to expose people to the risk of fire or explosion related to hazardous materials.

Additionally, while construction activities would generally be contained within the boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by temporary lane closures (with travel still available in each direction), the hauling of soil and construction materials, construction worker traffic, roadway/access improvements, and the construction of utility line connections. Similar to the Project, it is likely that Alternative 2 would require construction fences that would encroach into the public right-of-way (e.g., sidewalks and roadways) adjacent to the Project Site on White Knoll Drive, Alpine Street, Beaudry Avenue, and Sunset Boulevard. However, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period and emergency access would not be impeded. In addition, Alternative

2 would implement a similar design feature in order to allow construction-related traffic, including hauling activities and construction worker trips, to occur outside the typical weekday commuter A.M. and P.M. peak periods to the extent feasible, thereby reducing the potential for traffic-related conflicts. Similar to the Project, under both development scenarios, Alternative 2 would be required to implement Project Design Feature TR-PDF-1 which would require a Construction Management Plan to be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Therefore, construction-related impacts related to fire protection services under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in construction activities and duration.

(b) Operation

As with the Project, Alternative 2 would generate a new residential population, as well as a new visitor and employee population on the Project Site that would contribute to an increase in demand for LAFD fire protection and emergency medical services. Specifically, Alternative 2 would generate approximately 1,415 new residents.[10] As such, Alternative 2 would result in a smaller residential service population when compared to the 1,777 new residents generated by the Mixed Use Development Scenario and the 1,994 new residents generated by the No-Hotel Development Scenario. In addition, Alternative 2 would provide 75,000 square feet of retail uses (20,000 square feet less than either development scenario) and 48,000 square feet of office uses, which would generate approximately 432 employees.[11] As such, Alternative 2 would result in a smaller employee service population when compared to 582 employees generated by Mixed Use Development Scenario and the 492 employees generated by the No-Hotel Development Scenario. Therefore, with the reduction in residential and commercial uses and the elimination of the proposed hotel (with respect to the Mixed Use Development Scenario), the overall increased demand for LAFD fire protection and emergency medical services would be reduced compared to that of the Project. In addition, similar to the Project, Alternative 2 would implement all applicable City Building Code and Fire Code

[10] *Based on a household rate of 2.41 persons for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.*

[11] *Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the rate 0.002 employee per square foot for "General Retail" land use is applied to the 8,200 square feet of commercial uses, the rate 0.004 employee per square foot for "Supermarket" land use is applied to the 27,300-square-foot grocery store, the rate 0.001 employee per square foot for "Health Club" land use is applied to the 14,500-square-foot health club/spa, the rate 0.004 employee per square foot for "High-Turnover Sit-Down Restaurant" land use is applied to the 25,000-square-foot restaurant, and the rate 0.004 employee per square foot for "General Office" land use is applied to the 48,000 square feet of office uses.*

requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Alternative 2 would also include the installation of automatic fire sprinklers within all proposed buildings and would not include the installation of barriers that could impede emergency vehicle access. As with the Project, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for Alternative 2. Therefore, similar to the Project, this alternative would not necessitate the construction of new fire protection facilities or expansion of existing facilities in order to maintain service. Operation of Alternative 2 would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities (fire protection), the construction of which would cause significant environmental impacts, in order to maintain acceptable fire protection services. Overall impacts with regard to LAFD fire protection during operation of Alternative 2 would be less than significant. Such impacts would be less than the less-than-significant impacts of the Project due to the reduction in total floor area and uses and associated service population.

(2) Police Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 2 would be similar to that of the Project. However, the overall amount of construction activities and duration of construction would be reduced compared to the Project due to the reduction in development. Additionally, similar to the Project (under both development scenarios) Alternative 2 would be required to implement Project Design Feature POL-PDF-1, which includes temporary security measures such as security fencing, lighting, locked entry to secure the Project Site during construction, and regular security patrols during non-construction hours, thereby reducing the demand for police protection services.

In addition, similar to the Project, a Construction Management Plan (TR-PDF-1) would be implemented to ensure that adequate and safe access is available within and near the Project Site during construction activities. Therefore, construction-related impacts to police protection services under Alternative 2 would be less than significant, and less than the less-than-significant impacts of the Project due to the reduction in construction activities and duration.

(b) Operation

Like the Project, Alternative 2 would generate a new residential population, as well as a new visitor and employee population on the Project Site that would contribute to an increase in demand for LAPD police protection services. Specifically, Alternative 2 would

generate approximately 1,415 new residents.[12] As such, Alternative 2 would result in a smaller residential service population when compared to the 1,777 new residents generated by the Mixed Use Development Scenario and the 1,994 new residents generated by the No-Hotel Development Scenario. In addition, Alternative 2 would provide 75,000 square feet of retail uses and 48,000 square feet of office uses, which would generate approximately 432 employees.[13] As such, Alternative 2 would result in a smaller employee service population when compared to 582 employees generated by Mixed Use Development Scenario and the 492 employees generated by the No-Hotel Development Scenario. Given the reduction in uses proposed under this alternative, the police service population generated by Alternative 2 would be less than the estimated police service population generated by both development scenarios. While Alternative 2 would increase the existing police service population of the Central Area compared to existing conditions, the increase would be less than the Project due to the reduction in residential and commercial uses and the elimination of the proposed hotel (under the Mixed Use Development Scenario). Like the Project (under both development scenarios), Alternative 2 would be required to implement Project Design Feature POL-PDF-2 through Project Design Feature POL-PDF-5, which include a 24-hour camera network, on-site security, appropriate lighting to ensure security, and the prevention of concealed spaces. The design features would help offset the increase in demand for police protection services generated by Alternative 2. Thus, as with the Project, Alternative 2 would not result in the need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service. As such, the impact on police protection services under Alternative 2 would be less than significant, and less than the less-than-significant impacts of the Project.

(3) Schools

(a) Construction

Similar to the Project, Alternative 2 would generate part-time and full-time jobs associated with construction of the alternative between the start of construction and

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[12] *Based on a household rate of 2.41 persons for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.*

[13] *Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the rate 0.002 employee per square foot for "General Retail" land use is applied to the 8,200 square feet of commercial uses, the rate 0.004 employee per square foot for "Supermarket" land use is applied to the 27,300-square-foot grocery store, the rate 0.001 employee per square foot for "Health Club" land use is applied to the 14,500-square-foot health club/spa, the rate 0.004 employee per square foot for "High-Turnover Sit-Down Restaurant" land use is applied to the 25,000-square-foot restaurant, and the rate 0.004 employee per square foot for "General Office" land use is applied to the 48,000 square feet of office uses.*

buildout of the development proposed under Alternative 2. 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 the alternative. Therefore, the construction employment generated by Alternative 2 would not result in a notable increase in the resident population or a corresponding increase in demand for schools in the vicinity of the Project Site. Therefore, there would be no need for a new school facility and impacts under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 2 would generate a new residential population on the Project Site that would contribute to an increased demand for schools. Specifically, Alternative 2 would generate approximately 1,415 new residents[14] which would be comparatively less than the 1,777 new residents generated by the Mixed Use Development Scenario and the 1,994 new residents generated by the No-Hotel Development Scenario. Therefore, the overall increased demand in school services would be reduced compared to the Project under both development scenarios due to the reduction in residential units. Additionally, the construction of commercial and office uses could indirectly generate students by potentially causing employees to relocate to the vicinity of the Project Site. However, when compared to the Project (either development scenario), the number of students that could be indirectly generated by Alternative 2 as a result of employment opportunities would be less due to the reduction in commercial uses and the elimination of the proposed hotel (under the Mixed Use Development Scenario). Specifically, Alternative 2 would generate approximately 432 employees,[15] which would be comparatively less than the 582 employees generated by the Mixed Use Development and the 492 employees generated by the No-Hotel Development Scenario. Additionally, as with the Project, pursuant to Senate Bill 50, the Applicant for the Zoning Compliant Alternative would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these

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[14] *Based on a household rate of 2.41 persons for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.*

[15] *Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the rate 0.002 employee per square foot for "General Retail" land use is applied to the 8,200 square feet of commercial uses, the rate 0.004 employee per square foot for "Supermarket" land use is applied to the 27,300-square-foot grocery store, the rate 0.001 employee per square foot for "Health Club" land use is applied to the 14,500-square-foot health club/spa, the rate 0.004 employee per square foot for "High-Turnover Sit-Down Restaurant" land use is applied to the 25,000-square-foot restaurant, and the rate 0.004 employee per square foot for "General Office" land use is applied to the 48,000 square feet of office uses.*

fees fully removes all of Alternative 2's related school impacts. Therefore, impacts related to schools under Alternative 2 would be less than significant, and less than the less-than-significant impacts of the Project.

(4) Parks and Recreation

(a) Construction

Similar to the Project, construction of Alternative 2 would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, the likelihood that construction workers would relocate their households as a consequence of working on Alternative 2 is negligible. Therefore, the construction workers associated with Alternative 2 would not result in a notable increase in the residential population, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site.

As with the Project, during construction of Alternative 2, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. However, any resulting increase in the use of such parks and recreational facilities would be temporary and negligible.

Based on the above, construction of Alternative 2 would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities, nor would construction workers interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the vicinity of the Project Site. Therefore, impacts on parks and recreational facilities under Alternative 2 would be less than significant, and similar to the less-than-significant impacts of the Project.

(b) Operation

Residents are considered the primary users of parks and recreation facilities. Similar to the Project, Alternative 2 would generate a new residential population on the Project Site, which could create a demand for parks and recreation services. As previously discussed, Alternative 2 would generate approximately 1,415 new residents[16] which would

[16] *Based on a household rate of 2.41 persons for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.*

be comparatively less than the 1,777 new residents generated by the Mixed Use Development Scenario and the 1,994 new residents generated by the No-Hotel Development Scenario. Therefore, the overall increased demand in parks and recreation facilities would be reduced compared to both development scenarios due to the reduction in residential units. As with the Project, Alternative 2 would provide a variety of open space and recreational amenities to comply with the open space requirements of the LAMC. In addition, while it is possible that employees of Alternative 2 may utilize local parks and recreational facilities, the increased demand would be negligible as it is anticipated that employees and visitors would also primarily utilize on-site open space during their time spent at the Project Site, resulting in a negligible demand for surrounding parks and recreational facilities. Thus, Alternative 2 would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities. Pursuant to LAMC Section 12.33, subdivision projects consisting of more than 50 residential units are subject to a Quimby in-lieu fee, while all other residential projects are subject to a park mitigation fee. Thus, similar to the Project, under Alternative 2 the Applicant would be required to pay Quimby fees to the City that could be used to add or improve park facilities in the vicinity of the Project Site. Therefore, impacts to park and recreation facilities would be less than significant under Alternative 2 and less than the less-than-significant impacts of the Project.

(5) Libraries

(a) Construction

Similar to the Project, construction of Alternative 2 would result in a temporary increase of construction workers on the Project Site. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by Alternative 2. Therefore, construction workers would not result in a material increase in the resident population within the service area of the libraries serving the Project Site and vicinity.

In addition, it is unlikely that construction workers would visit library facilities in the vicinity of the Project Site on their way to/from work or during their lunch hours. Specifically, it is unlikely that construction workers would utilize library facilities on their way to work as the start of their workday generally occurs before the libraries open for service. Additionally, lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. Furthermore, it is unlikely that construction workers would utilize library facilities at the end of the work day, and would instead likely use library facilities near their place of residence. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. As such, impacts to library facilities

during construction would be less than significant under Alternative 2, and similar to the less-than-significant impacts of the Project.

(b) Operation

Residents are considered the primary users of library facilities. As with the Project, Alternative 2 would generate a new residential population on the Project Site, which could create a demand for library facilities. Specifically, Alternative 2 would generate approximately 1,415 new residents[17] which would be comparatively less than the 1,777 new residents generated by the Mixed Use Development Scenario and the 1,994 new residents generated by the No-Hotel Development Scenario. Therefore, the overall increased demand in library facilities would be reduced compared to the Project under both development scenarios. In addition, the number of employees generated by Alternative 2 would also be reduced compared to the Project under both development scenarios. Specifically, Alternative 2 would generate approximately 432 employees,[18] which would be comparatively less than the 582 employees generated by the Mixed Use Development Scenario and the 492 employees generated by the No-Hotel Development Scenario. Employees would generate minimal demand for library services since they would be more likely to use library facilities near their homes during non-work hours. Furthermore, employees at the Project Site would have internet access, which provides information and research capabilities and reduces the demand at physical library locations. Therefore, any indirect or direct demand for library services generated by the employees of Alternative 2 would be unlikely to necessitate the construction of a new or expanded library. As such, impacts under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

I. Transportation

As previously described, Alternative 2 would be developed within the same Project Site as the Project and with similar uses. As such, the plans, policies, and programs applicable to the Project would also apply to Alternative 2. As discussed above, while

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[17] *Based on a household rate of 2.41 persons for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.*

[18] *Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the rate 0.002 employee per square foot for "General Retail" land use is applied to the 8,200 square feet of commercial uses, the rate 0.004 employee per square foot for "Supermarket" land use is applied to the 27,300-square-foot grocery store, the rate 0.001 employee per square foot for "Health Club" land use is applied to the 14,500-square-foot health club/spa, the rate 0.004 employee per square foot for "High-Turnover Sit-Down Restaurant" land use is applied to the 25,000-square-foot restaurant, and the rate 0.004 employee per square foot for "General Office" land use is applied to the 48,000 square feet of office uses.*

Alternative 2 would include a reduction in the square footage proposed by both development scenarios. Alternative 2 would feature similar vehicular, pedestrian, and bicycle access as the Project. Specifically, Alternative 2 would widen the sidewalks on all sides of the Project Site, would provide a new signalized pedestrian crossing point on Sunset Boulevard with continental crosswalks, and install all-way stop-control at the intersection of Beaudry Avenue & Alpine Street, where there is currently an uncontrolled crosswalk across Beaudry Avenue. In addition, as with the Project, Alternative 2 would also promote pedestrian activity and reduce vehicle trips and VMT by encouraging multi-modal mobility options such as bicycle and scooter sharing services; providing a Transportation Center; providing convenient and adequate bicycling facilities; and enhancing pedestrian amenities through the provision of gardens, courtyards, and terraces, which would include family play features, a lawn with lounge furniture, and other landscape elements. As such, Alternative 2 would comply with the programs and policies set forth in the Mobility Plan; Plan for a Healthy Los Angeles; LAMC Section 12.21.A.16, LAMC Section 12.26J, and LAMC Section 12.37; Vision Zero; Citywide Design Guidelines and SCAG RTP/SCS to the same extent as the Project. Therefore, Alternative 2 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Thus, impacts would be similar to the less-than-significant impacts of the Project.

When accounting for the same project design features as the Project, the proposed uses under Alternative 2 would result in a lower daily VMT when compared to both development scenarios. Specifically, as shown in Appendix T of this Draft EIR, Alternative 2 would result in a 41,996 total daily VMT, which would be comparatively less than the 56,710 daily VMT generated by the Mixed Use Development Scenario and the 53,035 daily VMT generated by the No-Hotel Development Scenario. Based on the population assumptions, this Alternative would generate an average household VMT of 5.1 per capita and an average work VMT of 8.4 per employee.[19] As such, the average household VMT per capita for Alternative 2 would still fall below the significance threshold of 7.2 and the average work VMT per employee for Alternative 2 would still fall below the significance threshold of 12.7.[20] Therefore, impacts with respect to conflicts with CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant and greater than the less-than-significant impacts of the Project.

Alternative 2 would have the same access plan as the Project. Specifically, as with the Project, Alternative 2 would include six different access points around the Project Site.

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[19] *Gibson Transportation Consulting, Inc., "Transportation Assessment for the Alternatives to the 1111 Sunset Boulevard Mixed Use Project," October 19, 2020. See Appendix T of this Draft EIR.*

[20] *Gibson Transportation Consulting, Inc., "Transportation Assessment for the Alternatives to the 1111 Sunset Boulevard Mixed Use Project," October 19, 2020. See Appendix T of this Draft EIR.*

Similar to the Project (under both development scenarios), the final design of the access points would be reviewed by the City Department of Building and Safety, Bureau of Engineering, and LADOT during site plan review to ensure code compliance and safe pedestrian and vehicular design. Therefore, similar to the Project, impacts would be less than significant. Lastly, similar to the Project, Alternative 2 would not interfere with emergency access. Similar to the Project under both development scenarios, Alternative 2 would be required to implement Project Design Feature TR-PDF-1 which would require a Construction Management Plan to be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. With regard to operation, all driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding emergency access and would not include the installation of barriers that could impede emergency vehicle access. Lastly, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, Alternative 2 would result in less than significant emergency access impacts that would be similar to the less than significant impacts of the Project.

Alternative 2 would generate 16 morning peak hour trips and 24 afternoon peak hour trips on the SR 110 southbound off-ramp to Figueroa Terrace. Therefore, Alternative 2 does not meet the 25-trip threshold requiring analysis of freeway off-ramps. Nonetheless, under Future with Alternative 2 Conditions, Alternative 2 would result in a ramp queue of 1.1 vehicles (approximately 28 feet based on 25 feet per vehicle) during the morning peak hour and 3.6 vehicles (90 feet) during the afternoon peak hour. The off-ramp provides approximately 500 feet of queuing space before reaching the freeway mainline lanes. Therefore, similar to the Project, no significant impact would occur.

m. Tribal Cultural Resources

Alternative 2 would construct fewer subterranean parking levels compared to the Project. Therefore, the potential for Alternative 2 to uncover subsurface tribal cultural resources would be reduced when compared to that of the Project. However, as discussed in Section IV.M, Tribal Cultural Resources, of this Draft EIR and in the Tribal Cultural Resources Report included as Appendix R.1, the likelihood that buried, intact cultural deposits of Native American origin are preserved within the Project Site is low, considering the significant landscape modification and construction that has occurred within the Project Site from the 1870s forward. Nonetheless, based on the substantial (and confidential) evidence provided by the Kizh Nation, the possibility exists that intact cultural deposits related to a potential tribal cultural resource may be preserved within the Project Site. Alternative 2 would implement the same mitigation measure (TCR-MM-1) as the Project in order to mitigate potential impacts to tribal cultural resources. As such, as with the Project,

impacts to tribal cultural resources under Alternative 2 would be less than significant with mitigation. However, such impacts would be less than the impacts of the Project.

n. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 2 would generate a short-term demand for water. This demand would be less than the Project due to the reduction in construction activities and duration. As evaluated in Section IV.N.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of construction. Since the water demand for construction activities would be reduced under the Zoning Compliant Alternative, the temporary and intermittent demand for water during construction under Alternative 2 would also be expected to be met by the City's available water supplies.

Furthermore, as with the Project, the design and installation of new service connections under Alternative 2 would be required to meet applicable City standards. The connections and installation of on-site water distribution lines would primarily involve on-site trenching to place the lines below the surface and minor off-site trenching to connect to the existing public water mains or existing meter lateral locations. As with the Project, prior to ground disturbance associated with the Zoning Compliant Alternative, Project contractors would coordinate with LADWP to identify the locations and depths of all lines. Furthermore, LADWP would be notified in advance of proposed ground disturbance activities to avoid disruption of water service. LADWP would review and approve all appropriate connection requirements, pipe depths, and connection location(s). In addition, given that construction activities could temporarily affect access in adjacent rights-of-way, a Construction Management Plan, similar to the Project, would be implemented to ensure adequate and safe access remains available within and near the Project Site during construction. Therefore, impacts on water supply and infrastructure associated with short-term construction activities under Alternative 2 would be less than significant, and less than the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 2 would generate an increased demand for water relative to existing conditions. As with the Project, a Water Supply Assessment would be required for Alternative 2 to determine whether adequate water supplies would be available to serve Alternative 2. However, based on the reduction in total development as compared to the Project, water demand for Alternative 2 would be less than the Project's

estimated increase in water demand. Thus, as with the Project, the estimated water demand under Alternative 2 would similarly be met by the available supplies projected by LADWP. Therefore, the estimated water demand under Alternative 2 would also be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040. In addition, the existing water distribution infrastructure would be adequate to serve Alternative 2 since the water demand would be less than the water demand generated by the Project. Furthermore, similar to the Project, the Zoning Compliant Alternative would construct the necessary on-site water infrastructure and off-site connections to the LADWP water system pursuant to applicable City requirements to accommodate the new building. Thus, impacts to water supply under Alternative 2 would be less than significant, and less than the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, the existing sewer laterals would be capped during construction of the Zoning Compliant Alternative. As such, no new sewage would enter the public sewer system, except for sewer services needed for the Elysian apartment building. As with the Project, temporary facilities, such as portable toilet and hand wash areas, would be provided by the construction contractor; however, any sewage generated from these facilities would be collected and hauled off-site and would not be discharged into the public sewer system. Thus, wastewater generation from construction activities under Alternative 2 is not anticipated to cause a measurable increase in wastewater flows. Therefore, similar to the Project, construction-related impacts to the wastewater system under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 2 would generate greater wastewater flows relative to existing conditions. However, based on the reduction in total development, wastewater generation under Alternative 2 would be less than the Project's estimated wastewater flow. As provided in Section IV.N.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the Project-generated wastewater could be accommodated by the existing capacity of the Hyperion Water Reclamation Plant. Therefore, it is anticipated that the wastewater generated by Alternative 2 could also be accommodated by the existing capacity of the Hyperion Water Reclamation Plant, and impacts with respect to treatment capacity would be less than significant.

Similar to the Project, sewer service for Alternative 2 would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project

Site. Given that the wastewater flows generated by Alternative 2 would be less than the estimated wastewater flows of the Project, it is possible that there would be sufficient capacity within the sewer lines serving the Project Site to serve the wastewater flows of Alternative 2. However, as with the Project, Alternative 2 could potentially require the upsizing of the existing 8-inch line on Beaudry Avenue, or equivalent improvement, as determined by LA Sanitation, to ensure adequate sewer capacity is available in the vicinity of the Project Site to meet the requirements of the Zoning Compliant Alternative. However, additional detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for Alternative 2 during the permitting process. All related sanitary sewer connections and on-site infrastructure under Alternative 2 would be designed and constructed in accordance with applicable standards.

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

(3) Energy Infrastructure

(a) Construction

As previously noted, the energy consumed by Alternative 2 would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. As LADWP has confirmed that the supply and existing infrastructure in the Project area would have the capacity to serve the Project Site, the existing infrastructure would similarly have capacity to supply energy for Alternative 2. Therefore, impacts on infrastructure capacity associated with short-term construction activities under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project due to the reduction in development.

(b) Operation

As with the Project, operation of Alternative 2 would generate an increased consumption of electricity and natural gas relative to existing conditions. However, based on the reduction in residential and commercial uses and the elimination of the proposed hotel (under the Mixed Use Development Scenario), the total energy consumption of Alternative 2 would be less than the total energy consumption of the Project, for both development scenarios. Therefore, impacts to infrastructure capacity under Alternative 2 would be less than significant, and less than the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above, Alternative 2 would not eliminate any of the Project's significant and unavoidable impacts. Specifically, the Project's significant and unavoidable impacts related to regional air quality emissions during construction; on- and off-site construction noise; and vibration from on- and off-site construction with respect to the significance threshold for human annoyance would remain with the Zoning Compliant Alternative. Additionally, Alternative 2 would not avoid the Project's significant and unavoidable cumulative regional air quality impacts during construction; cumulative construction noise impacts from on-site and off-site noise sources; and cumulative vibration impacts associated with off-site construction, pursuant to the significance threshold for human annoyance. In addition, since this Alternative would result in a greater average household VMT per capita and a greater average work VMT per employee than the No-Hotel Development Scenario, Alternative 2 would result in a greater impact associated with VMT. The remaining impacts would be similar to or less than those of the Project.

4. Relationship of the Alternative to Project Objectives

With the reduction in residential and commercial uses and the elimination of the proposed hotel (under the Mixed Use Development Scenario), Alternative 2 would not fully meet the underlying purpose of the Project to provide a high-density, mixed use and transit- and pedestrian-oriented development that includes new housing opportunities that are integrated with commercial and office uses that provide new employment and commercial opportunities for the surrounding community including a hotel use (under the Mixed Use Development Scenario), which Alternative 2 does not include. In addition, Alternative 2 would only partially meet the following objectives of the Project as Alternative 2 would include only office and commercial space and less residential units:

- Advance the Central City North Community Plan's Policy 1-2.1 by providing multi-family residential development within a Project Site that is commercially zoned.

- Consistent with Central City North Community Plan Objective 1-3, to develop a project that preserves and enhances the varied and distinct residential character and integrity of existing residential neighborhoods by providing a mix of architectural structures that are compatible with the varied scale of surrounding uses.

- Consistent with the Central City North Community Plan's Objective 1-4, promote the provision of new and adequate housing for all persons, including affordable housing units and units for rent and for sale.

- Promote the Central City North Community Plan's Objective 2-1 to strengthen viable commercial development in the community and to provide additional opportunities for new commercial development and services by providing a variety of commercial uses, including office space, retail, and restaurant space.

- In support of Objective 1-2 and Goal 12 of the Central City North Community Plan, encourage the reduction in vehicle trips by designing a project that includes infrastructure for walking and cycling and ride-sharing hubs and transit nodes for bus and shuttle pick-up.

- In support of the Central City North Community Plan's Goal 4 to provide adequate recreation and park facilities which meet the needs of the residents in the Community Plan area, create a pedestrian-friendly project by introducing active commercial uses along the Project Site frontages, incorporate pedestrian paseos transecting the Project Site, provide publicly accessible open space, and improved streetscapes around the Project Site.

V. Alternatives

C. Alternative 3: Office Campus Alternative

1. Description of the Alternative

The Office Campus Alternative, Alternative 3, would include the development of a 708,418-square-foot office campus, including 633,418 square feet of office uses and 75,000 square feet of ancillary retail and restaurant space. The Office Campus Alternative would not include any residential or hotel uses as proposed by the Project. As with the Project, the existing vacant buildings and surface parking areas within the Project Site would be removed. Overall, Alternative 3 would construct 708,418 square feet of new floor area within the Project Site, a reduction of 286,564 square feet compared to the Project's 994,982 square feet of new floor area within the Project Site, and would result in a net FAR of 2.58:1.

As illustrated in the conceptual site plan of the Office Campus Alternative provided in Figure V-3 on page V-71, the proposed office uses would be distributed throughout the Project Site within four buildings above a parking podium. The four buildings are referred to herein as Tower A, Tower B, Building C, and the Sunset Building. As shown in the plan overview diagram provided in Figure V-4 on page V-72, the proposed retail and restaurant uses would be concentrated within the ground floor and lower levels of Tower A and the Sunset Building. As shown in Figure V-3, Tower A would be situated along the southern portion of the Project Site, similar to the Project, and would include 15 levels with an approximate height of 250 feet (a reduction of 322 feet compared to the Project's height of 572 feet). Tower B would be situated along the eastern portion of the Project Site, also similar to the Project, and would include 10 levels with an approximate height of 200 feet (a reduction of 208 feet compared to the Project's height of 408 feet). Like the Project, the Sunset Building would be located at the southwestern corner of the Project Site, primarily fronting Sunset Boulevard, and would include nine levels with an approximate height of 170 feet (a reduction of 41 feet compared to the Project's height of 211 feet). Building C, which would be located generally where the Courtyard Building is proposed by the Project, would include two levels with an approximate height of 91 feet, similar to the Project.

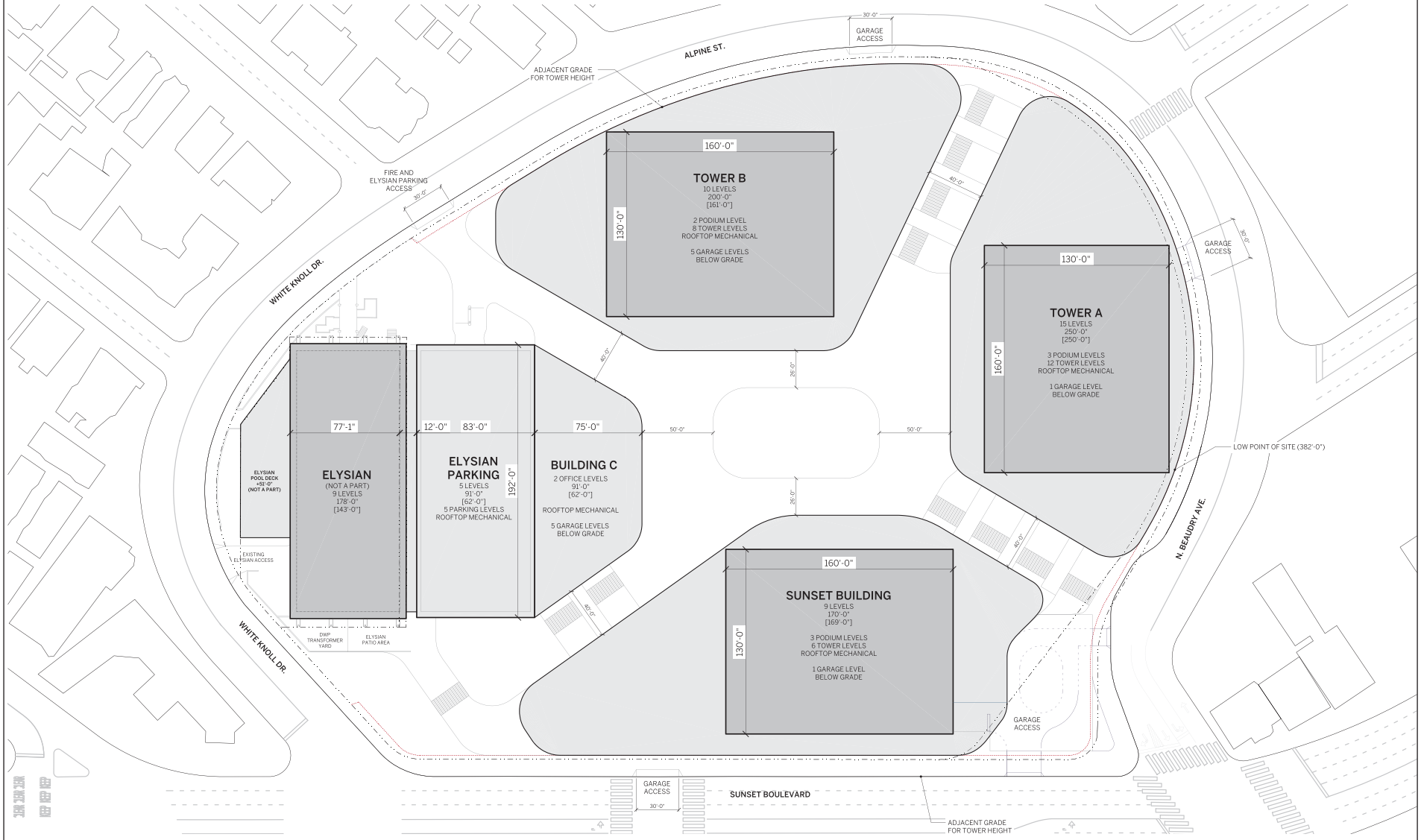

Figure V-3
Alternative 3 Conceptual Site Plan

Source: Skidmore, Owings & Merrill LLP, 2020.

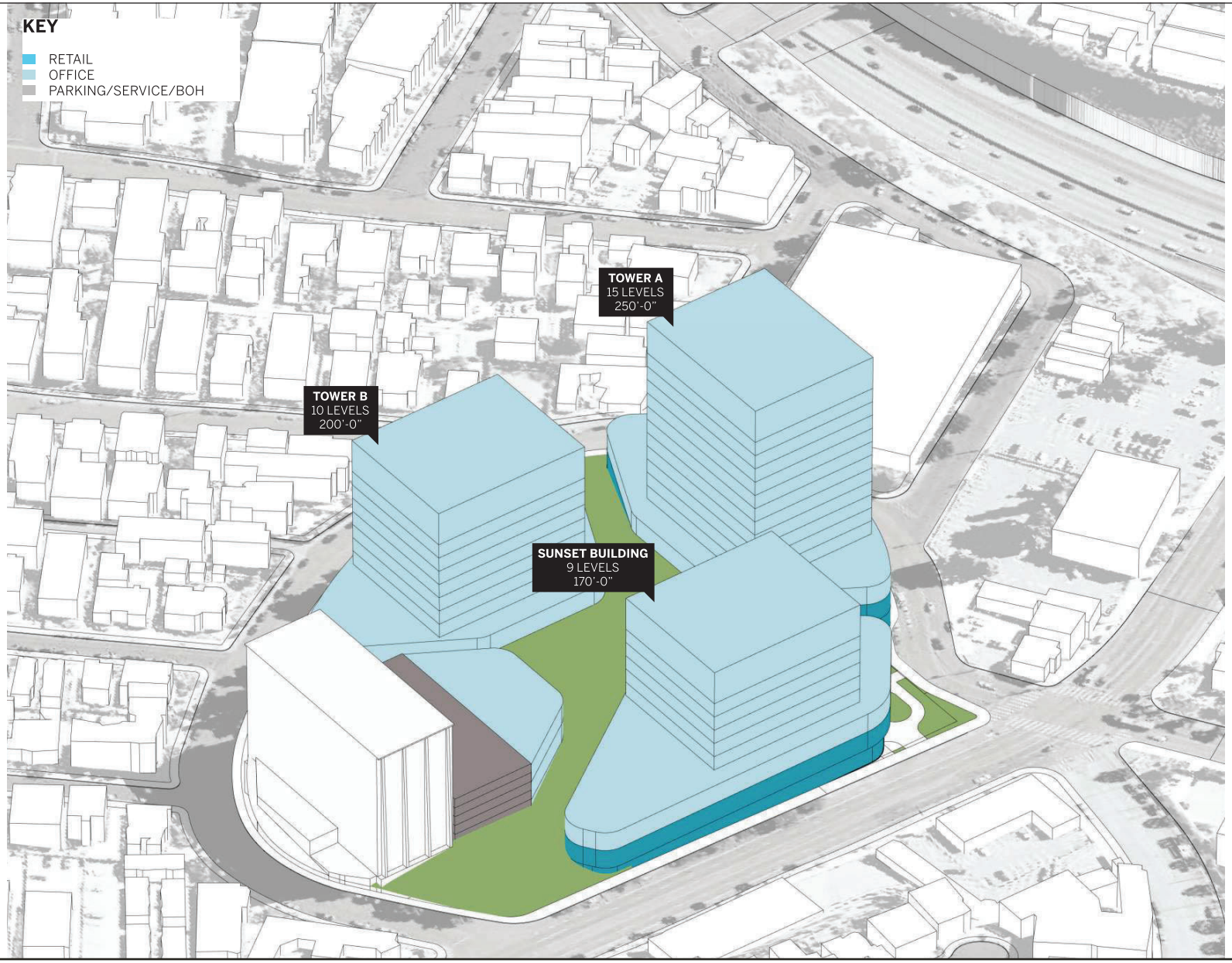

Figure V-4
Alternative 3 Plan Overview

Source: Skidmore, Owings & Merrill LLP, 2020.

The Office Campus Alternative would require and would provide 1,417 parking spaces in accordance with the requirements of the LAMC.[21] Parking would be provided in a proposed five-level parking podium, which would be partially below grade and partially above grade. The portions of the parking that would be above grade would be wrapped in active uses or landscaping. Below grade parking would extend to a maximum depth of 39 feet (a reduction of 25 feet compared to the Project's six-level parking podium). An additional 168 parking spaces for the existing Elysian apartment building would be provided within a five-level, partially subterranean parking structure (Elysian Parking Facility) located within the northern portion of the footprint of the proposed Building C, similar to the Project.

As the Office Campus Alternative would not include any residential uses, no open space would be required. However, Alternative 3 would provide several landscaped courtyards throughout the Project Site for use by employees and visitors.

Given the reduction in excavation associated with the reduced subterranean parking garage, it is estimated that approximately 406,683 cubic yards of export material would be hauled from the Project Site during the demolition and excavation phase of the Office Campus Alternative, a reduction of 65,317 cubic yards compared to the Project's estimated 472,000 cubic yards of export. With the reduction in floor area, overall construction activities and the construction duration of Alternative 3 would also be reduced compared to the Project.

As with the Project, the Office Campus Alternative would require the approval of a Major Development Conditional Use Permit, Site Plan Review, removal of a variable width Building Line, a Master Conditional Use Permit to permit the sale of alcoholic beverages, and a Vesting Tentative Tract Map. Alternative 3 would not require a Density Bonus request, a Zoning Administrator's Adjustment related to the Building Separation or a Director's Determination to reduce the number of trees planted on site, or a Vesting Conditional Use Permit to permit a hotel use and short term/extended stay rentals within 500 feet of an A or R zone.

2. Environmental Impacts

As discussed in the Initial Study prepared for the Project included in Appendix A of this Draft EIR, the Project Site is identified by the City as being located within a transit priority area. In addition, the Project is a mixed use residential project and is located on an infill site which meets PRC Section 21099's definition of an infill site as a lot located within

[21] *As with the Project, parking for Alternative 3 was designed to account for required parking prior to the application of AB 744.*

an urban area that has been previously developed. The Project Site is also located within 0.5 mile of several bus lines, the majority of which provide a frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. Therefore, pursuant to SB 743 and ZI No. 2452, the Project's aesthetic impacts shall not be considered significant impacts on the environment.

Similar to the Project, Alternative 3 would meet the provisions of SB 743 as it would be developed within the same Project Site, which is identified as an infill site located within a transit priority area. In addition, Alternative 3 would be considered an employment center project.[22] Therefore, as with the Project, the aesthetics impacts of Alternative 3 would not be considered a significant impact on the environment.

a. Air Quality

(1) Regional Emissions

(a) Construction

As with the Project, construction of the Office Campus Alternative has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. As with the Project, Alternative 3 would be required to implement Mitigation Measures AQ-MM-1 through AQ-MM-5.

Under Alternative 3, construction activities would be reduced in comparison to the Project due to the reduction in development. However, the overall phasing of construction would result in similar overlapping construction activities as the Project. Thus, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities, although the duration of construction may be reduced. Because maximum daily conditions are used for measuring impact significance, regional impacts on these days would be similar to those of the Project. Therefore, as with the Project, under both development scenarios, the Office Campus

[22] *Senate Bill 743 [Public Resources Code Section 21099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment."*

Alternative would result in significant and unavoidable impacts associated with regional construction emissions, and impacts would be similar to those of the Project.

(b) Operation

As previously discussed, the total amount of development proposed under the Office Campus Alternative would be reduced when compared to the Project and the residential uses and proposed hotel (under the Mixed Use Development Scenario) would be removed. However, the Office Campus Alternative would greatly increase the amount of office space compared to the Project. As summarized in Appendix T of this Draft EIR, the number of daily trips generated by Alternative 3 would be less than the number of new daily trips generated by the Mixed Use Development Scenario and the No-Hotel Development Scenario. Specifically, as provided in Appendix T of this Draft EIR, the Office Campus Alternative would result in a total of 7,327 daily vehicle trips, compared to the Mixed Use Development Scenario's 8,257 total daily vehicle trips and the No-Hotel Development Scenario's 7,711 total daily vehicle trips. Alternative 3 would result in 50,241 daily VMT compared to the Mixed Use Development Scenario's 52,517 daily VMT and the No-Hotel Development Scenario's 49,137 daily VMT. The change in land uses associated with this Alternative would result in a slight decrease in daily VMT as compared to the Mixed Use Development Scenario and a slight increase in daily VMT compared to the No-Hotel Development Scenario. Operational regional air pollutant emissions associated with Alternative 3 would be generated by vehicle trips and daily VMT to the Project Site, which are the largest contributors to operational air pollutant emissions, and by the consumption of natural gas. The overall pollutant emissions from vehicles generated by this alternative would be less than the emissions generated by the Mixed Use Development Scenario and slightly higher compared to the No-Hotel Development Scenario.[23] With the reduction in uses and overall floor area, both area sources and stationary sources would generate less on-site operational air emissions associated with energy consumption compared to the Project.

Although the vehicle emissions under Alternative 3 are slightly higher than the No-Hotel Development Scenario, the reduction in on-site operational emissions would result in similar total operational emissions to the No-Hotel Development Scenario. Total operational emissions under this Alternative would remain below regional significance thresholds. Therefore, impacts would be less than significant and less than the impacts of the Project Mixed Use Development Scenario and similar to the impacts of the No-Hotel Scenario.

[23] *Refer to Appendix C.5 for the CalEEMod modeling data.*

(2) Localized Emissions

(a) Construction

On-site construction activities associated with Alternative 3 would be located at similar distances from sensitive receptors as the Project. Given the reduction in overall development, construction activities and associated localized emissions from construction of the Office Campus Alternative would be reduced compared to the Project. Therefore, as with the Project, localized impacts under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

(b) Operation

Localized operational impacts are determined primarily by traffic volumes. As provided in Appendix T of this Draft EIR, the Office Campus Alternative would generate 7,327 daily vehicle trips. This alternative would generate fewer daily trips compared to the Mixed Use Development Scenario's 8,257 daily trips and the No-Hotel Development Scenario's 7,711 daily trips. As such, localized vehicular emissions would be less than the Project under either development scenario. In addition, with the reduction in uses and overall floor area, area and stationary sources would generate less on-site operational air emissions compared to the Project. Overall, total contributions to localized air pollutant emissions during operation of the Office Campus Alternative would be less than the Project's contribution. Accordingly, localized air quality impacts under Alternative 3 would be less than significant and would be less than the less-than-significant impacts of the Project.

(3) Toxic Air Contaminants

(a) Construction

As with the Project, construction of Alternative 3 would generate diesel particulate emissions associated with heavy equipment operations during grading. However, Alternative 3 would reduce the Project's proposed excavation activities and associated diesel particulate emissions associated with the construction of subterranean parking. Overall construction TAC emissions generated by Alternative 3 would be reduced compared to those of the Project since excavation activities required during construction of Alternative 3 would be reduced. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

(b) Operation

As set forth in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential TACs associated with Project operations would include DPM from delivery trucks. Under Alternative 3, the overall increase in the number of deliveries and associated DPM emissions would be less than the Project due to reduction in development. Similar to the Project, the land uses proposed under Alternative 3 are not considered land uses that generate substantial TAC emissions. Therefore, Alternative 3 would not release substantial amounts of TACs and impacts would be less than significant. Such impacts would be less than the less-than-significant impacts of the Project.

b. Cultural Resources

As with the Project, Alternative 3 would require demolition of the existing vacant on-site buildings. As determined in the Historic Report included in Appendix E.1 of this Draft EIR, the existing on-site buildings do not qualify as historical resources. Therefore, the potential for direct impacts to historical resources as a result of removal of the existing vacant buildings on-site would also be less than significant under this alternative.

With regard to indirect impacts on adjacent historical resources, similar to the Project, Alternative 3 also would not impact or diminish the architectural design, and integrity or impact the setting of any adjacent historical resources. Therefore, as with the Project, Alternative 3 would not indirectly affect adjacent contributing properties in the vicinity of the Project Site, and indirect impacts to historical resources would be less than significant.

Overall, impacts to historical resources under Alternative 3 would be less than significant, and similar to the less-than-significant impacts of the Project.

With regard to archaeological resources, Alternative 3 would require less grading when compared to the Project. Therefore, the potential for Alternative 3 to uncover archaeological resources would be reduced when compared to that of the Project. Like the Project, Alternative 3 would implement the same mitigation measure (CUL-MM-1) as the Project in order to mitigate potential impacts to archaeological resources. As such, as with the Project, impacts to archaeological resources under Alternative 3 would be less than significant with mitigation. However, such impacts would be less than the impacts of the Project.

c. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

(a) Construction

Similar to the Project, construction activities associated with the Office Campus Alternative would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. Similar to the Project, construction activities associated with Alternative 3 would not involve the consumption of natural gas. As with the Project, Alternative 3 would also generate a demand for transportation energy associated with on- and off-road vehicles. However, the energy consumed during construction of Alternative 3 would be reduced compared to the Project due to the reduction in construction activities and duration. As with the Project, the electricity demand during construction of Alternative 3 would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Construction equipment used during construction of Alternative 3 would also comply with Title 24 requirements where applicable, similar to the Project. With regard to transportation fuels, trucks and equipment used during construction of Alternative 3 would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. Therefore, as with the Project, construction activities would use energy that is not wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 3 and similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 3 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions. As previously discussed, Alternative 3 would result in a reduction in overall development when compared to the Project, under both development scenarios; however, this Alternative would greatly increase the amount of office space compared to the Project. As summarized in Appendix T of this Draft EIR, the number of daily trips generated by Alternative 3 would be less than the number of new daily trips generated by the Mixed Use Development Scenario and the No-Hotel Development Scenario. Specifically, as provided in Appendix T of this Draft EIR, the Office Campus Alternative would result in a total of 7,327 daily vehicle trips compared to the Mixed Use Development Scenario's 8,257 total

daily vehicle trips and the No-Hotel Development Scenario's 7,711 total daily vehicle trips. However, the change in land uses associated with this Alternative would result in a slight decrease in daily VMT as compared to the Mixed Use Development Scenario and a slight increase in daily VMT compared to the No-Hotel Development Scenario. As such, the consumption of petroleum-based fuels would decrease when compared to the Mixed Use Development Scenario and increase when compared to the No-Hotel Development Scenario. In addition, the consumption of electricity would increase while consumption of natural gas would be reduced under Alternative 3. Similar to the Project, Alternative 3 would implement design features to reduce energy usage. 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. Overall, impacts related to energy use during operation of Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Conflict with Plans for Renewable Energy or Energy Efficiency

As discussed in Section IV.C, Energy, of this Draft EIR, the current City of LA Green Building Code requires compliance with CalGreen and California's Building Energy Efficiency Standards (Title 24). Similar to the Project, the Office Campus Alternative would comply with the City's Green Building Code, as well as be capable of achieving LEED® Certified equivalency. Therefore, similar to the Project, Alternative 3 would incorporate measures that are beyond current State and City energy conservation requirements. Also similar to the Project, Alternative 3 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2019 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code.

With regard to transportation related energy usage, Alternative 3 would also comply with goals of the SCAG's RTP/SCS which incorporates VMT targets established by SB 375. As with the Project, the uses proposed under Alternative 3 and their proximity to major job centers and public transportation would serve to reduce VMT and associated transportation fuel usage within the region. In addition, vehicle trips generated during operation would comply with CAFE fuel economy standards. As with the Project, Alternative 3 would also be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction.

Based on the above, Alternative 3 would not conflict with plans for renewable energy or energy efficiency. No impacts related to renewable energy or energy efficiency plans would occur under the Office Campus Alternative, and impacts would be similar to the less-than-significant impacts of the Project.

d. Geology and Soils

Under Alternative 3, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, and site stability 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 of land use proposed. The Office Campus Alternative would be developed within the same site as the Project and 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 comply with the same regulatory requirements as the Project, which require the preparation of a final design-level geotechnical engineering report to identify and minimize seismic risks. Therefore, as with the Project, Alternative 3 would not cause or accelerate geologic conditions which could result in substantial damage to proposed structures or infrastructure or expose people to substantial risk of injury. Impacts related to geology and soils under Alternative 3 would be less than significant, and similar to the less-than-significant impacts of the Project.

With regard to paleontological resources, Alternative 3 would construct fewer subterranean parking levels compared to the Project. Therefore, the potential for Alternative 3 to uncover subsurface paleontological resources would be reduced when compared to that of the Project. Like the Project, Alternative 2 would implement the same mitigation measure (GEO-MM-1) as the Project in order to mitigate potential impacts to paleontological resources. As such, as with the Project, impacts to paleontological resources under Alternative 2 would be less than significant with mitigation. However, such impacts would be less than the impacts of the Project.

e. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily trips generated and associated VMT, as well as energy consumption from proposed land uses. As previously discussed, the number of daily trips and daily VMT under Alternative 3 would be reduced as compared to the Mixed Use Development Scenario and a slight increase as compared to the No-Hotel Development Scenario. In addition, as discussed above, energy and water consumption from proposed land uses would be reduced due to the reduction in development and elimination of the residential uses and the proposed hotel (under the Mixed Use Development Scenario). However, the overall amount of GHG emissions generated by Alternative 3 would be greater than the amount generated by the Project. The office uses under Alternative 3 would consume more electricity in comparison to the Mixed Use and No-Hotel Development scenario resulting in increased GHG emissions. As with the Project, Alternative 3 would be

designed to comply with the requirements of the CALGreen Code and the Los Angeles Green Building Code. Alternative 3 would also incorporate design features to reduce GHG emissions and would be designed to comply with the City's Green Building Ordinance, as applicable. Compliance with the CALGreen Code and the Los Angeles Green Building Code, and with the implementation of comparable sustainability features as 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 greater than the less-than-significant impacts of the Project.

f. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, during demolition, on-site grading, and building construction associated with Alternative 3, fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners would be used, handled, and stored on the Project Site, and would therefore require proper management and disposal. Such use would be expected to be less than that of the Project due to the reduction in construction activities. Notwithstanding, like the Project, Alternative 3 would fully comply with all applicable federal, state, and local requirements, as well as the manufacturer's instructions concerning the use, handling, storage, and disposal of hazardous materials.

As discussed in detail in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, according to the Phase I ESA, during the Project Site reconnaissance, no evidence of existing underground storage tanks or aboveground storage tanks were observed on the Project Site. However, SCAQMD and LAFD records indicate the permitting of a 500-gallon diesel-fuel underground storage tank located on the northern perimeter of the Project Site. As with the Project, Alternative 3 would not involve any construction in or near the area of the existing underground storage tank. Notwithstanding, in the unlikely event that underground storage tanks are uncovered, suspect materials would be removed in accordance with all applicable federal, state, and local regulations similar to the Project.

While asbestos-containing materials and lead-based paints may be present on-site due to the age of the existing buildings, similar to the Project, Alternative 3 would comply with relevant regulations and requirements related to asbestos-containing materials and lead-based paint to ensure that impacts would be less than significant. Furthermore, like the Project, in the event that PCBs are found within areas proposed for demolition during construction of Alternative 3, suspect materials would be removed in accordance with all applicable federal, state, and local regulations.

Additionally, similar to the Project, Alternative 3 would follow applicable CalGEM requirements for site plan review for construction activities proposed in the area of existing wells. The Office Campus Alternative would also include implementation of the same mitigation measures as the Project (under both development scenarios) to ensure potential impacts associated with the discovery of buried wells is less than significant. As with the Project, Mitigation Measure HAZ-MM-1 and HAZ-MM-2, may require an additional surface geophysical survey be conducted to attempt to locate the oil wells on the Project Site following demolition of existing structures (as the prior survey did not locate any existing oil wells and existing structures precluded geophysical survey in some areas of the site). If located, the wells would be unearthed and inspected by a licensed Petroleum Engineer and would be reported to CalGEM to assess and prescribe abandonment procedures based on their observed condition, as well as the Petroleum Administrator, LACUPA, and Los Angeles Department of City Planning. Similar to the Project, a soil and site management plan would be developed and implemented pursuant to Mitigation Measure HAZ-MM-3 to address the potential identification and abandonment of the oil wells if encountered during earthwork activities. Furthermore, in the event contaminated soils are encountered during construction, or construction occurs in areas of known or potential contamination, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166. Additionally, as with the Project, Alternative 3 would implement Project Design Feature HAZ-PDF-1, which would require buildings be placed in a manner so as to not significantly impede future access to the locations of the existing wells as depicted in CalGEM's maps.

Moreover, the Office Campus Alternative would adhere to applicable construction safety measures, as well as comply with California Occupational Safety and Health Act safety requirements, which would serve to reduce the risk in the event that elevated levels of methane gas are encountered during grading and construction. In addition, as with the Project, under both development scenarios, Alternative 3 would implement controls during construction at the Project Site in order to mitigate the effects of subsurface gases on workers and the public. In addition, as with the Project, Alternative 3 would implement Mitigation Measures HAZ-MM-4 and HAZ-MM-5, to ensure potential impacts related to subsurface gases and associated potential impacts to soil and groundwater are less than significant. Specifically, Mitigation Measure HAZ-MM-4 would install controls during construction at the Project Site to mitigate the effects of subsurface gases on workers and the public and Mitigation Measure HAZ-MM-5 would require the Applicant install a Passive System that would include a standard de-watering system or a reinforced concrete mat slab to accommodate hydrostatic pressure, as well as a sub-slap vapor collection and ventilation system. With regard to emergency response plans, although construction activities for Alternative 3 are expected to be primarily confined to the Project Site, like the Project, it is expected that construction fences would encroach into the public right-of-way (e.g., sidewalks and roadways) adjacent to the Project Site on White Knoll Drive, Alpine

Street, and Beaudry Avenue. As such, sidewalks surrounding the Project Site are expected to be temporarily closed during construction. In addition, temporary travel lane closures may occur. However, a travel lane would be maintained in each direction on all streets around the Project Site throughout the construction period and emergency access would not be impeded. In addition, similar to the Project, a Construction Management Plan would be implemented as part of the Office Campus Alternative and would include street/lane closure information, a detour plan, haul route(s), and a staging plan.

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

(2) Operation

Similar to the Project, Alternative 3 would not include the use of materials that would contain asbestos, lead based paint, or PCBs. In addition, Alternative 3 would not propose the installation of underground or aboveground storage tanks. The operation of Alternative 3 would involve the limited use of potentially hazardous materials typical of those used in mixed use developments such as Alternative 3, including cleaning agents, paints, pesticides, and other materials used for landscaping. Such use would be reduced compared to the Project due to the reduction in development. In addition, as with the Project, all hazardous materials on the Project Site would be acquired, handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, state, and local requirements. As with the Project, Alternative 3 would also comply with the City of Los Angeles' Methane Mitigation Ordinance No. 175,790.

With regard to emergency response plans, Alternative 3 would not involve any activities that would impede public access or travel along the public right-of-way or interfere with an adopted emergency response or evacuation plan. In addition, similar to the Project, the increase in traffic generated by Alternative 3 would not significantly impact emergency vehicle response to the Project Site and surrounding uses, including along City-designated disaster routes since the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or driving in the lanes of opposing traffic.

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

g. Hydrology and Water Quality

(1) Surface Water Quality

(a) Construction

Under Alternative 3, the degree to which new pollutants could be introduced to the Project Site during construction would be reduced compared to the Project as Alternative 3 would result in a reduction in construction activities compared to the Project. Notwithstanding, as with the Project, a SWPPP would be prepared for Alternative 3 that would specify BMPs to be used during construction. In addition, as discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, a geotechnical investigation conducted for the Project Site encountered water seepage at depths of 16 feet to 62 feet. Given the below grade parking proposed by this alternative would extend to a depth of 39 feet, construction activities on the Project Site associated with this alternative could also encounter groundwater and temporary dewatering may be required. Thus, although Alternative 3 would reduce the depth of excavation, dewatering may also be required as part of this alternative. Therefore, similar to the Project, Alternative 3 would utilize temporary dewatering systems in compliance with all relevant NPDES requirements related to construction and discharges from dewatering operations.

With the implementation of site-specific BMPs included as part of the SWPPP, Alternative 3 would reduce or eliminate the discharge of potential pollutants from stormwater runoff. In addition, construction of Alternative 3 would be required to comply with City grading permit regulations, which require necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspection to reduce sedimentation and erosion. Therefore, with compliance with NPDES requirements and City of Los Angeles grading permit regulations, construction of Alternative 3 would not result in discharge that would violate any water quality standard or waste discharge requirements, or otherwise substantially degrade water quality. Furthermore, construction of Alternative 3 would not result in discharges that would cause regulatory standards to be violated. Therefore, as with the Project, construction-related impacts to surface water quality under Alternative 3 would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 3 would implement BMPs for managing stormwater runoff in accordance with current City LID Ordinance requirements. The BMPs would control stormwater runoff with no increase in runoff resulting from Alternative 3. Due to the incorporation of LID BMPs, operation of Alternative 3 would not result in discharges that would violate any water quality standard or waste discharge requirements, or otherwise substantially degrade water quality. Thus, as with the Project, impacts to surface water

quality during operation of Alternative 3 would be less than significant. Such impacts would be less than the less-than-significant impacts of the Project due to the reduction in development.

(2) Groundwater Quality

(a) Construction

As previously noted, Alternative 3 would reduce the depth of excavation compared to the Project. However, due to the depths at which water seepage was encountered at the Project Site, it is likely that excavation activities associated with the Office Campus Alternative could encounter groundwater during construction and temporary dewatering may be required. In the event dewatering is required as part of Alternative 3, like the Project, a temporary dewatering system would be installed and operated in compliance with all relevant NPDES requirements related to construction and discharges from dewatering operations. Any discharge of groundwater during construction of Alternative 3 would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements. Pursuant to such requirements, the groundwater extracted would be chemically analyzed to determine the appropriate treatment and/or disposal methods. As such, groundwater quality would not be impacted from potential dewatering activities.

As previously discussed, there is an existing underground storage tank in the northern perimeter of the Project Site. However, as with the Project, construction activities under Alternative 3 would not occur near or in the area of the existing underground storage tank. Therefore, the potential for the underground storage tank to effect groundwater quality is negligible.

As with the Project, construction activities associated with the Office Campus Alternative could also encounter contaminated soil and groundwater that would require proper handling and disposal. Where construction is proposed in the area of existing wells, applicable CalGEM requirements for site plan review would be followed. In addition, as with the Project, Alternative 3 would implement the same mitigation measures to ensure potential impacts associated with the discovery of buried oil wells is less than significant. If located, the wells would be unearthed and inspected by a licensed Petroleum Engineer and would be reported to CalGEM to assess and prescribe abandonment procedures based on their observed condition, as well as the Petroleum Administrator, LACUPA, and Los Angeles Department of City Planning. Similar to the Project, a soil and site management plan would be developed and implemented to address the potential identification and abandonment of the oil wells if encountered during earthwork activities. Furthermore, in the event contaminated soils are encountered during construction, or construction occurs in areas of known or potential contamination, the nature and extent of the contamination

would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166.[24] Additionally, as with the Project, Alternative 3 would implement the same Project Design Feature (HAZ-PDF-1), which would require buildings be placed in a manner so as to not significantly impede future access to the locations of the existing wells as depicted in CalGEM's maps. Therefore, compliance with existing regulations would ensure construction activities associated with the Office Campus Alternative would not create a significant hazard to groundwater quality associated with the existing on-site oil wells.

During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would, therefore, require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the potential for hazardous materials releases into groundwater. However, as this alternative would require less construction activities than the Project, the use of hazardous materials would be reduced. Moreover, compliance with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste would reduce the potential for construction of Alternative 3 to release contaminants into groundwater. In addition, as there are no groundwater production wells or public water supply wells on-site or within one mile of the Project Site, construction activities would not be anticipated to affect existing wells.

Based on the above, impacts with respect to groundwater quality during construction of Alternative 3 would be less than significant. Such impacts would be less compared to the less-than-significant impacts of the Project due to a reduction in excavation and overall construction activities.

(b) Operation

Similar to the Project, Alternative 3 would not include the surface or subsurface application or introduction of potential contaminants or waste materials. Like the Project, Alternative 3 is not anticipated to result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater through percolation. Therefore, as with the Project, impacts with respect to groundwater quality during operation of Alternative 3 would be less than significant and such impacts would be similar to those of the Project.

[24] *South Coast Air Quality Management District. Rules and Compliance, Rule 1166, www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf?sfvrsn=4, accessed January 16, 2021.*

(3) Surface Water Hydrology

(a) Construction

Similar to the Project, construction activities for Alternative 3 would include demolition of the existing vacant on-site buildings and surface parking areas. While construction of Alternative 3 would reduce the extent of excavation activities, Alternative 3 would disturb the same surface area as the Project. As with the Project, construction activities, particularly grading of the Project Site, would have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. However, as with the Project, Alternative 3 would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, Alternative 3 would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. In addition, Alternative 3 would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion, similar to the Project. Thus, through compliance with all NPDES Construction General Permit requirements, including preparation of a SWPPP, implementation of BMPs, 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, or flooding on- or off-site. Similarly, with adherence to standard compliance measures (e.g., NPDES requirements), construction activities would not cause flooding, substantially increase or decrease the amount of surface water flow from the Project Site into a water body, or result in a permanent, adverse change to the movement of surface water. Therefore, construction-related impacts to surface water hydrology under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, under both development scenarios the Office Campus Alternative would include development of new buildings, paved areas, and landscaped areas. Like the Project, implementation of Alternative 3 would increase the amount of impervious surfaces compared to the Project Site's existing impervious surfaces. However, similar to the Project, Alternative 3 would implement BMPs to control stormwater runoff with no increase in runoff resulting from the Project Site. Therefore, like the Project, Alternative 3 would not impact existing storm drain infrastructure serving the Project Site and runoff would continue to follow the same discharge paths and drain to the same storm systems. Consequently, as with the Project, Alternative 3 would not cause flooding during the 50-year developed storm event, would not create runoff which would exceed the capacity of existing or planned drainage systems, would not require construction of new stormwater drainage facilities or expansion of existing facilities, would not substantially reduce or

increase the amount of surface water in a water body, or result in a permanent adverse change to the movement of surface water. Operational impacts to surface water hydrology under Alternative 3 would be less than significant, and similar to the less-than-significant impacts of the Project.

(4) Groundwater Hydrology

(a) Construction

As previously described, the excavation proposed by Alternative 3 would be reduced compared to the Project due to the reduction in subterranean parking levels. As discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, a geotechnical investigation of the Project Site performed exploratory test borings and encountered water seepage at depths of 16 feet to 62 feet. Therefore, excavation activities associated with the Office Campus Alternative could encounter groundwater. Thus, as with the Project, Alternative 3 would utilize a temporary dewatering system in compliance with all relevant NPDES requirements related to construction and discharges from dewatering operations. In addition, no water supply wells are located at the Project Site or within one mile of the Project Site that could be impacted by construction, nor would this alternative include the construction of water supply wells.

Based on the above, construction impacts on groundwater hydrology during construction of the Office Campus Alternative would be less than significant. Such impacts would be less than the less-than-significant impacts of the Project.

(b) Operation

Similar to the Project, the subterranean levels of Alternative 3 would be designed such that they are able to withstand hydrostatic forces and incorporate comprehensive waterproofing systems in accordance with current industry standards and construction methods such that permanent dewatering operations would not be required. Thus, the potential impact during operation on groundwater level under Alternative 3 would be less than significant.

As discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, the Project Site is currently comprised of approximately 72 percent impervious surfaces. Therefore, there is currently minimal groundwater recharge potential on the Project Site. As with the Project, with implementation of Alternative 3, the amount of impervious areas would increase compared to the Project Site's existing impervious area. However, like the Project, Alternative 3 would include the installation of capture and use or biofiltration planter BMPs in order to reduce the quantity and improve the quality of rainfall runoff that leaves

the Project Site. Therefore, potential impacts on groundwater recharge would be less than significant under Alternative 3.

Based on the above, impacts to groundwater hydrology during operation of Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

h. Land Use and Planning

As described above, Alternative 3 would develop an office campus with retail and restaurant uses and would eliminate the residential uses and proposed hotel (under the Mixed Use Development Scenario). Alternative 3 would construct 708,418 square feet of new floor area within the Project Site, a reduction of 286,564 square feet compared to both development scenarios, and would result in a net FAR of 2.58:1. As previously discussed, the existing land use designation and zoning on the Project Site are General Commercial and C2-2D (Commercial Zone, Height District 2 with Development Limitation), respectively. Land uses permitted within the C2 Zone include, but are not limited to, various retail and restaurant spaces, auditoriums, automotive fueling and service stations, churches, drive-in businesses, hospitals, offices, and schools. The zoning of the Project Site does not specify a building height limit, but rather limits the FAR to 3 to 1 (Footnote 4 in General Plan Land Use Map). Based on the zoning and land use designation of the Project Site, the proposed office and retail/restaurant uses with a net FAR of 2.58:1 would be permitted on the Project Site and such uses would not conflict with the surrounding uses. Therefore, as with the Project, the Office Campus Alternative would not conflict with the applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect, including those set forth in the Los Angeles General Plan Framework Element, the Housing Element, the Central City North Community Plan, and SCAG's RTP/SCS. However, as previously discussed, the Office Campus Alternative would generate additional VMT compared to the Project. In addition, Alternative 3 would not provide for the synergy of uses as the Project, which could serve to reduce vehicle trips and vehicle miles traveled and associated air emissions. Thus, impacts related to land use consistency would be less than significant and greater than the less-than-significant impacts of the Project.

i. Noise

(1) Noise

(a) Construction

The types of construction activities under Alternative 3 would be substantially similar to the Project, although the amount of new construction and duration of construction would be reduced due to the reduction in total floor area. As with the Project, construction of

Alternative 3 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Under Alternative 3, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to that of the Project during maximum activity days since the overall amount and duration, but not the daily intensity of construction activities, would decrease under Alternative 3 when compared to the Project (for both development scenarios). As such, noise levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Accordingly, noise impacts due to on- and off-site construction activities under Alternative 3 would be similar to those of the Project. As with the Project, Alternative 3 would implement Project Design Features NOI-PDF-1 (requiring muffling of equipment) and NOI-PDF-4 (prohibiting use of impact piles), and Mitigation Measure NOI-MM-1 (requiring sound barriers) to reduce noise levels during construction. Similar to the Project, on-site and off-site construction noise would be significant and unavoidable under Alternative 3 even with the application of project design features and mitigation measures. Overall, impacts under Alternative 3 would be similar to those of the Project.

(b) Operation

As discussed in Section IV.I, Noise, of this Draft EIR, sources of operational noise under the Project include: (a) on-site stationary noise sources, including mechanical equipment, activities with the proposed outdoor spaces, parking facilities, loading dock and trash collection areas; and (b) off-site mobile (roadway traffic) noise sources. Alternative 3 would introduce noise from similar on-site and off-site noise sources as the Project. However, it is anticipated that with the reduction in overall development, the noise levels from building mechanical equipment, outdoor spaces, and parking facilities would be reduced. In addition, similar to the Project, Alternative 3 would include Project Design Features NOI-PDF-2, -3, -5, and -6 that require screening of mechanical equipment and loading docks, specify sound levels for outdoor sound systems, and specify the maximum occupancy of the Elysian Parking outdoor roof deck. The Office Campus Alternative would also comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. Thus, operational on-site noise impacts would be less than significant and less than the less-than-significant impacts of the Project.

With regard to off-site noise sources, when compared with the Mixed Use Development Scenario, Alternative 3 would result in 980 fewer daily vehicle trips. When compared to the No-Hotel Development Scenario, Alternative 3 would result in 397 fewer daily vehicle trips. The reduction in vehicle trips would result in a decrease in off-site traffic-related noise levels under Alternative 3. Therefore, as with the Project, off-site noise

impacts under Alternative 3 would be less than significant. Such impacts would be less than those of the Project due to the reduction in vehicle trips.

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 3 would be similar to the Project, although the amount and duration of construction activities would be reduced. As with the Project, construction of the Office Campus Alternative would generate vibration from the use of heavy-duty construction equipment as well as from truck trips. While the overall amount of construction would be reduced, on- and off-site construction activities and the associated construction vibration levels would be expected to be similar to those of the Project, as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment. As such, peak vibration levels generated by the construction equipment would be similar to those of the Project. Accordingly, vibration impacts due to on- and off-site construction activities under Alternative 3 would similarly be less than significant for on-site and off-site construction vibration (building damage) and significant and unavoidable for on-site and off-site construction vibration (human annoyance). Overall, vibration impacts under Alternative 3 would be similar to the impacts of the Project.

(b) Operation

As described in Section IV.I, Noise, of this Draft EIR, sources of vibration related to operation of the Project would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under Alternative 3. As with the Project, vehicular-induced vibration from Alternative 3, including vehicle circulation within the subterranean parking area, would not generate perceptible vibration levels at off-site sensitive uses. In addition, like the Project, building mechanical equipment installed as part of Alternative 3 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration transmission such that the vibration would not be perceptible at the off-site sensitive receptors. Therefore, as with the Project, operation of Alternative 3 would not increase the existing vibration levels in the immediate vicinity of the Project Site. As such, vibration impacts associated with operation of the Office Campus Alternative would also be less than significant. Such impacts would be anticipated to be similar to those of the Project.

j. Population, Housing, and Employment

(1) Construction

The Office Campus Alternative would be constructed within the same Project Site as the Project. As discussed in Section II, Project Description, of this Draft EIR, the Elysian apartment building is located on the Project Site and contains 96 joint living and work quarter units. As with the Project, Alternative 3 would not involve removal of the existing Elysian apartment building. Therefore, similar to the Project, this alternative would not displace substantial number of existing housing or people, necessitating the construction of replacement housing elsewhere. As discussed in Section IV.J, Population, Housing, and Employment, of this Draft EIR, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by a particular development. Many construction workers are highly specialized (e.g., crane operators, steel workers, masons), and move from job site to job site as dictated by the demand for their skills. Therefore, population impacts related to household growth in the City of Los Angeles or the SCAG Region as a result of construction worker relocation under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Operation

As previously discussed, Alternative 3 would construct office and retail/restaurant uses. Alternative 3 would not include any residential uses. Therefore, Alternative 3 would not generate a new residential population on the Project Site.

With regard to indirect population impacts, the proposed office and retail/restaurant uses would generate employment opportunities. Based on the generation rates provided by the City of Los Angeles VMT Calculator Documentation, Alternative 2 would generate a approximately 2,774 employees[25] compared to the 582 employees generated by the Mixed Use Development Scenario and the 492 employees generated by the No-Hotel Development Scenario under the Project. Nevertheless, similar to the Project, these new employment opportunities may be filled, in part, by persons already residing in the vicinity

[25] *Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the rate 0.002 employee per square foot for "General Retail" land use is applied to the 8,200 square feet of commercial uses, the rate 0.004 employee per square foot for "Supermarket" land use is applied to the 27,300-square-foot grocery store, the rate 0.001 employee per square foot for "Health Club" land use is applied to the 14,500-square-foot health club/spa, the rate 0.004 employee per square foot for "High-Turnover Sit-Down Restaurant" land use is applied to the 25,000-square-foot restaurant, and the rate 0.004 employee per square foot for "General Office" land use is applied to the 633,418 square feet of office uses.*

of the workplace and who generally do not relocate their households due to such employment opportunities. As such, similar to the Project, Alternative 3 would not induce substantial population growth or exceed SCAG's population forecast for the City or the SCAG region. Similarly, any indirect demand for housing associated with the proposed uses would be fulfilled by vacancies in the surrounding housing market and from other new units in the vicinity of the Project Site. As such, this alternative's indirect housing demand also would not induce substantial population growth.

With regard to infrastructure, all circulation improvements planned for Alternative 3 are intended to improve circulation flows and safety throughout the Project Site and vicinity, similar to the Project. Utility and other infrastructure improvements planned for Alternative 3 would also be intended to connect the proposed uses to the existing main infrastructure system.

Overall, impacts related to population, housing, and employment under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

k. Public Services

(1) Fire Protection

(a) Construction

As previously discussed, the types of construction activities required for Alternative 3 would be similar to that of the Project. However, the overall amount and duration of construction activities would be reduced compared to the Project due to the reduction in overall development. Construction would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous waste. Thus, compliance with regulatory requirements would effectively reduce the potential for construction activities to expose people to the risk of fire or explosion related to hazardous materials.

Additionally, while construction activities would primarily be contained within the boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by temporary lane closures (with travel still available in each direction), the hauling of soil and construction materials, construction worker traffic, roadway/access improvements, and the construction of utility line connections. Similar to the Project, it is likely that Alternative 3 would require construction fences that would encroach into the public right-of-way (e.g., sidewalks and roadways) adjacent to the Project Site on White Knoll Drive, Alpine Street, Beaudry Avenue, and Sunset Boulevard. However, a travel lane would be maintained in each direction on all streets around the Project Site throughout the construction period and emergency access would not be impeded. Similar to the Project,

under both development scenarios, Alternative 3 would be required to implement Project Design Feature TR-PDF-1 which would require a Construction Management Plan to be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. In addition, Alternative 3 would implement a similar design feature in order to allow construction-related traffic, including hauling activities and construction worker trips to occur outside the typical weekday commuter A.M. and P.M. peak periods to the extent feasible, thereby reducing the potential for traffic-related conflicts. Therefore, construction-related impacts related to fire protection services under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in construction activities and duration.

(b) Operation

As previously discussed, Alternative 3 would eliminate the residential uses proposed by both development scenarios; therefore, Alternative 3 would not generate a new residential population. However, similar to the Project, Alternative 3 would generate a new visitor and employee population on the Project Site that would contribute to an increase in demand for LAFD fire protection and emergency medical services. However, with the reduction in the total floor area and elimination of residential uses and the proposed hotel use (under the Mixed Use Development Scenario), the overall increased demand for LAFD fire protection and emergency medical services would be reduced compared to that of the Project. In addition, similar to the Project, Alternative 3 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Alternative 3 would also include the installation of automatic fire sprinklers within all proposed buildings and would not include the installation of barriers that could impede emergency vehicle access. As with the Project, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for Alternative 3. Therefore, similar to the Project, this alternative would not necessitate the construction of new fire protection facilities or expansion of existing facilities in order to maintain service. Operation of the Alternative 3 would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities (fire protection), the construction of which would cause significant environmental impacts, in order to maintain acceptable fire protection services. Overall impacts with regard to LAFD fire protection during operation of Alternative 3 would be less than significant. Such impacts would be less than the less-than-significant impacts of the Project due to the reduction in total floor area and uses.

(2) Police Protection

(a) Construction

As previously discussed above, construction activities required for Alternative 3 would be similar to that of the Project. However, the overall amount of construction activities and duration of construction would be reduced compared to the Project due to the reduction in development. Similar to the Project (under both development scenarios), Alternative 3 would be required to implement Project Design Feature POL-PDF-1, which includes temporary security measures such as security fencing, lighting, locked entry to secure the Project Site during construction, and regular security patrols during non-construction hours, thereby reducing the demand for police protection services.

In addition, similar to the Project, a Construction Management Plan would be implemented as part of the Office Campus Alternative to ensure that adequate and safe access is available within and near the Project Site during construction activities. Overall, construction-related impacts to police protection services under Alternative 3 would be less than significant, and less than the less-than-significant impacts of the Project due to the reduction in construction activities and duration.

(b) Operation

As previously discussed, Alternative 3 would eliminate the residential uses proposed by both development scenarios; therefore, the Project would not generate a new residential population on the Project Site, which would generate a demand for police protection services. Alternative 3 would, however, generate a higher employee population on the Project Site than the Project. However, the overall increased demand in police protection services would not cause a significant change to the current officer-to-resident ratio as no residential units are proposed. In addition, like the Project (under both development scenarios), Alternative 3 would be required to implement Project Design Feature POL-PDF-2 through Project Design Featured POL-PDF-5, which include a 24-hour camera network, on-site security, appropriate lighting to ensure security, and the prevention of concealed spaces. The design features would help offset the increase in demand for police protection services generated by Alternative 3. Therefore, the impact on police protection services would be less than significant, and less than the less-than-significant impacts of the Project.

(3) Schools

(a) Construction

Similar to the Project, Alternative 3 would generate part-time and full-time jobs associated with construction between the start of construction and buildout of the

development proposed under Alternative 3. 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 the alternative. Therefore, the construction employment generated by Alternative 3 would not result in a notable increase in the resident population or a corresponding increase in demand for schools in the vicinity of the Project Site. Therefore, impacts to schools associated with construction of Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As previously discussed, Alternative 3 would eliminate the residential uses proposed by both development scenarios. Therefore, Alternative 3 would not generate a new residential population on the Project Site that would contribute to an increased demand for schools. Office and commercial uses could indirectly generate students by potentially causing employees to relocate to the vicinity of the Project Site. Nevertheless, as with the Project, pursuant to Senate Bill 50, the Applicant for the Office Campus Alternative would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees fully removes all of Alternative 3's related school impacts. Therefore, impacts related to schools under Alternative 3 would be less than significant, and less than the less-than-significant impacts of the Project.

(4) Parks and Recreation

(a) Construction

As with the Project, construction of Alternative 3 would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, the likelihood that construction workers would relocate their households as a consequence of working on Alternative 3 is negligible. Therefore, the construction workers associated with Alternative 3 would not result in a notable increase in the residential population, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site.

Like the Project, during construction of Alternative 3, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. However, any resulting increase in the use of such parks and recreational facilities would be temporary and negligible.

Based on the above, construction of Alternative 3 would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities, nor would construction workers interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the vicinity of the Project Site. Therefore, impacts on parks and recreational facilities under Alternative 3 would be less than significant, and similar to the less-than-significant impacts of the Project.

(b) Operation

Residents are considered the primary users of parks and recreational facilities. As previously discussed, Alternative 3 would eliminate the residential uses proposed by both development scenarios. As such, this alternative would not generate a new residential population at the Project Site that could create a demand for parks and recreation services. While it is possible that employees of Alternative 3 may utilize local parks and recreational facilities, the increased demand would be negligible as it is anticipated that employees and visitors would also primarily utilize on-site open space during their time spent at the Project Site, resulting in a negligible demand for surrounding parks and recreational facilities. Thus, Alternative 3 would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities. Therefore, impacts to park and recreation facilities would be less than significant under Alternative 3, and less than the less-than-significant impacts of the Project given the elimination of the proposed residential units.

(5) Libraries

(a) Construction

Similar to the Project, construction of Alternative 3 would result in a temporary increase of construction workers on the Project Site. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by Alternative 3. Therefore, construction workers would not result in a material increase in the resident population within the service area of the libraries serving the Project Site and vicinity.

In addition, it is unlikely that construction workers would visit library facilities in the vicinity of the Project Site on their way to/from work or during their lunch hours. Specifically, it is unlikely that construction workers would utilize library facilities on their way to work as the start of their workday generally occurs before the libraries open for service. Additionally, lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. Furthermore, it is unlikely that construction workers would utilize

library facilities at the end of the work day, and would instead likely use library facilities near their place of residence. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. As such, impacts to library facilities during construction would be less than significant under Alternative 3, and similar to the less-than-significant impacts of the Project.

(b) Operation

Residents are considered the primary users of library facilities. As previously discussed, Alternative 3 would eliminate the residential uses proposed by both development scenarios. As such, Alternative 3 would not generate a new residential population on the Project Site that could demand library services. In addition, although the number of employees generated by Alternative 3 would greater than those generated by the Project, employees would generate minimal demand for library services since they would be more likely to use library facilities near their homes during non-work hours. Employees at the Project Site would also have internet access, which provides information and research capabilities and reduces the demand at physical library locations. Therefore, any indirect or direct demand for library services generated by the employees of Alternative 3 would be unlikely to necessitate the construction of a new or expanded library. As such, impacts on libraries facilities and services under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project due to the elimination of the proposed residential use.

I. Transportation

As previously described, Alternative 3 would be developed within the same Project Site as the Project and would include office and commercial uses like the Project. As such, many of the same plans, policies, and programs applicable to the Project would also apply to Alternative 3. As discussed above, while Alternative 3 would include a reduction in the uses [e.g., elimination of the residential uses and the hotel use (under the Mixed Use Development Scenario)] and square footage proposed by both development scenarios, Alternative 3 would feature similar vehicular, pedestrian, and bicycle access as the Project. In addition, parking would generally be provided in a similar manner to the Project. Therefore, overall, as with the Project, Alternative 3 would be consistent with the goals, policies, and requirements of the applicable plans. Specifically, Alternative 3 would widen the sidewalks on all sides of the Project Site, would provide a new signalized pedestrian crossing point on Sunset Boulevard with continental crosswalks, and install all-way stop-control at the intersection of Beaudry Avenue & Alpine Street, where there is currently an uncontrolled crosswalk across Beaudry Avenue. In addition, as with the Project, Alternative 3 would also promote pedestrian activity and reduce vehicle trips and VMT by encouraging multi-modal mobility options such as bicycle and scooter sharing services; providing a Transportation Center; providing convenient and adequate bicycling facilities;

and enhancing pedestrian amenities through the provision of gardens, courtyards, and terraces, which would include family play features, a lawn with lounge furniture, and other landscape elements. As such, Alternative 3 would comply with the programs and policies set forth in the Mobility Plan; Plan for a Healthy Los Angeles; LAMC Section 12.21.A.16, LAMC Section 12.26J, and LAMC Section 12.37; Vision Zero; Citywide Design Guidelines, and SCAG RTP/SCS to the same extent as the Project. Therefore, Alternative 3 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Thus, impacts would be less than significant and similar to the impacts of the Project.

With respect to VMT, Alternative 3 does not include residential uses and would not result in any household VMT per capita. When accounting for the same project design features as the Project, the proposed uses would result in 54,641 total daily VMT, which would be comparatively less than the 56,710 total daily VMT generated by the Mixed Use Development Scenario and greater than the 53,035 total daily VMT generated by the No-Hotel Development Scenario. Based on the population assumptions, this Alternative would generate an average work VMT per employee of 7.2.[26] As such, the average work VMT per employee for Alternative 3 would still fall below the significance threshold of 12.7.[27] Therefore, impacts with respect to conflicts with CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant and less than the less-than-significant impacts of the Project.

Alternative 3 would have the same access plan as the Project. Specifically, as with the Project, Alternative 3 would include six different access points around the Project Site. Similar to the Project (under both development scenarios), the final design of the access points would be reviewed by the City Department of Building and Safety, Bureau of Engineering, and LADOT during site plan review to ensure code compliance and safe pedestrian and vehicular design. Therefore, similar to the Project, impacts would be less than significant. Such impacts would be similar to the impacts of the Project. Lastly, similar to the Project, Alternative 3 would not interfere with emergency access. Similar to the Project, under both development scenarios, Alternative 3 would be required to implement Project Design Feature TR-PDF-1 which would require a Construction Management Plan to be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. With regard to operation, all driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding emergency access, and would not include the

[26] *Gibson Transportation Consulting, Inc., "Transportation Assessment for the Alternatives to the 1111 Sunset Boulevard Mixed Use Project," October 19, 2020. See Appendix T of this Draft EIR.*

[27] *Gibson Transportation Consulting, Inc., "Transportation Assessment for the Alternatives to the 1111 Sunset Boulevard Mixed Use Project," October 19, 2020. See Appendix T of this Draft EIR.*

installation of barriers that could impede emergency vehicle access. Lastly, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, Alternative 3 would result in less than significant emergency access impacts that would be similar to the less than significant impacts of the Project.

Alternative 3 would generate 60 morning peak hour trips and 25 afternoon peak hour trips on the SR 110 southbound off-ramp to Figueroa Terrace. Under Future with Alternative 3 Conditions, Alternative 3 would result in a ramp queue of 1.7 vehicles (43 feet) during the morning peak hour and 3.6 vehicles (90 feet) during the afternoon peak hour. The off-ramp provides approximately 500 feet of queuing space before reaching the freeway mainline lanes. Therefore, similar to the Project, Alternative 3 would not result in a freeway safety impact.

m. Tribal Cultural Resources

Alternative 3 would construct fewer subterranean parking levels compared to the Project and would result in reduced excavation activities. Therefore, the potential for Alternative 3 to uncover subsurface tribal cultural resources would be reduced compared to that of the Project. However, as discussed in Section IV.M. Tribal Cultural Resources, of this Draft EIR and in the Tribal Cultural Resources Report included in Appendix R.1, the likelihood that buried, intact cultural deposits of Native American origin are preserved within the Project Site is low considering the significant landscape modification and construction that has occurred within the Project Site from the 1870s forward. Nonetheless, based on the substantial (and confidential) evidence provided by the Kizh Nation, the possibility exists that intact cultural deposits related to a potential tribal cultural resource may be preserved within the Project Site. As such, Alternative 3 would implement the same mitigation measure (TCR-MM-1) as the Project to mitigate potential impacts to tribal cultural resources. Accordingly, impacts to tribal cultural resources under Alternative 3 would be less than significant with mitigation, and less than the impacts of the Project.

n. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 3 would generate a short-term demand for water. This demand could be reduced compared to that of the Project since Alternative 3 would result in a reduction in construction activities and duration. As evaluated in Section IV.N.1, Utilities and Service Systems—Water Supply and

Infrastructure, of this Draft EIR, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of construction. Since the water demand for construction activities associated with Alternative 3 would be reduced, the temporary and intermittent demand for water during construction of Alternative 3 would be expected to be met by the City's available water supplies.

As with the Project, the design and installation of new service connections under Alternative 3 would be required to meet applicable City standards. The connections and installation of on-site water distribution lines would primarily involve on-site trenching to place the lines below the surface and minor off-site trenching to connect to the existing public water mains or existing meter lateral locations. As with the Project, prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depths of all lines. Furthermore, LADWP would be notified in advance of proposed ground disturbance activities to avoid disruption of water service. LADWP would review and approve all appropriate connection requirements, pipe depths, and connection location(s). In addition, given that construction activities could temporarily affect access in adjacent rights-of-way, a Construction Management Plan, similar to the Project, would be implemented to ensure adequate and safe access remains available within and near the Project Site during construction. Therefore, impacts on water supply and infrastructure associated with construction activities would be less than significant under Alternative 3, and less than the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 3 would generate an increased demand for water relative to existing conditions. However, based on the reduction in total development and the elimination of residential uses and the proposed hotel (under the Mixed Use Development Scenario), water demand for Alternative 3 would be less than the Project's estimated increase in water demand. Therefore, as with the Project, the estimated water demand for Alternative 3 would not exceed the available supplies projected by LADWP. Therefore, the estimated water demand for 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 less than the water demand generated by the Project. Furthermore, similar to the Project, the Applicant for this alternative would construct the necessary on-site water infrastructure and off-site connections to the LADWP water system pursuant to applicable City requirements to accommodate the new buildings proposed by Alternative 3. Thus, impacts to water supply and infrastructure under Alternative 3 would be less than significant, and less than the less--than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, Alternative 3 would cap existing sewer laterals during construction. As such, no new sewage would enter the public sewer system, except for sewer services needed for the Elysian apartment building. As with the Project, temporary facilities, such as portable toilet and hand wash areas, would be provided by the construction contractor; however, any sewage generated from these facilities would be collected and hauled off-site and would not be discharged into the public sewer system. Thus, wastewater generation from construction activities under Alternative 3 is not anticipated to cause a measurable increase in wastewater flows. Therefore, similar to the Project, construction-related impacts to the wastewater system under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 3 would generate greater wastewater flows relative to existing conditions. However, based on the reduction in total development, wastewater generation under Alternative 3 would be less than the Project's estimated wastewater flow. As provided in Section IV.N.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the Project-generated wastewater could be accommodated by the existing capacity of the Hyperion Water Reclamation Plant. Therefore, it is anticipated that the wastewater generated by Alternative 3 could also be accommodated by the existing capacity of the Hyperion Water Reclamation Plant, and impacts with respect to treatment capacity would be less than significant.

As with the Project, sewer service for Alternative 3 would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site. Given that the wastewater flows generated by Alternative 3 would be less than the estimated wastewater flows of the Project, it is possible that there would be sufficient capacity within the sewer lines serving the Project Site to serve the wastewater flows of Alternative 3. However, as with the Project, Alternative 3 could require the upsizing of the existing 8-inch line on Beaudry Avenue, or equivalent improvement, as determined by LA Sanitation, to ensure adequate sewer capacity is available in the vicinity of the Project Site to meet the requirements of the Alternative 3. However, additional detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for Alternative 3 during the permitting process. All related sanitary sewer connections and on-site infrastructure under Alternative 3 would be designed and constructed in accordance with applicable standards.

Based on the above, impacts with regard to wastewater generation and infrastructure capacity under Alternative 3 would be less than significant, and less than the less than the impacts of the Project.

(3) Energy Infrastructure

(a) Construction

As previously noted, the energy consumed by Alternative 3 during construction would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. As LADWP has confirmed that the supply and existing infrastructure in the Project area would have the capacity to serve the Project Site, the existing infrastructure would similarly have capacity to supply energy for Alternative 3. Therefore, impacts on infrastructure capacity associated with short-term construction activities under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project due to the reduction in development.

(b) Operation

As with the Project, operation of Alternative 3 would generate an increased consumption of electricity and natural gas relative to existing conditions. However, based on the reduction in development, the total energy consumption of Alternative 3 would be less than the total energy consumption of the Project. Therefore, impacts to infrastructure capacity under Alternative 3 would be less than significant, and less than the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above, the Office Campus Alternative would not avoid any of the Project's significant and unavoidable impacts. Specifically, the Project's significant and unavoidable impacts related to regional air quality during construction; on- and off-site construction noise; and vibration from on-site and off-site construction with respect to the significance threshold for human annoyance would remain with development of Alternative 3. The Office Campus Alternative also would not avoid the Project's significant and unavoidable cumulative impacts related to regional air quality during construction; construction noise from on-site and off-site noise sources; and vibration associated with off-site construction, pursuant to the significance threshold for human annoyance. In addition, since this Alternative would not provide for the synergy of uses as the Project, which could serve to reduce vehicle trips and vehicle miles traveled and associated air and GHG emissions, Alternative 3 would result in a greater impact associated with consistency with land use plan and policies and GHG emissions compared to the Project. All other impacts would be less than or similar to those of the Project.

4. Relationship of the Alternative to Project Objectives

With the elimination of the residential uses and proposed hotel use (under the Mixed Use Development Scenario), the Office Campus Alternative would not fully meet the underlying purpose of the Project to provide a high-density, mixed use and transit- and pedestrian-oriented development that includes new housing opportunities that are integrated with commercial and office uses that provide new employment and commercial opportunities for the surrounding community. In addition, Alternative 3 would not achieve the following Project objectives:

- Advance the Central City North Community Plan's Policy 1-2.1 by providing multi-family residential development within a Project Site that is commercially zoned.
- Consistent with the Central City North Community Plan's Objective 1-4 to promote the provision of new and adequate housing for all persons, including affordable housing units and units for rent and for sale.
- Support the Central City North Community Plan's Goal 4 to provide adequate recreation and park facilities which meet the needs of the residents in the Community Plan area, create a pedestrian-friendly project by introducing active commercial uses along the Project Site frontages, incorporate pedestrian paseos transecting the Project Site, provide publicly accessible open space, and improved streetscapes around the Project Site.

Additionally, Alternative 3 would only partially meet the following objective of the Project:

- Promote the Central City North Community Plan's Objective 2-1 to strengthen viable commercial development in the community and to provide additional opportunities for new commercial development and services by providing a variety of commercial uses, including office space, retail, and restaurant space.

The Office Campus Alternative would generally meet the following Project objectives:

- Be consistent with Central City North Community Plan Objective 1-3, to develop a project that preserves and enhances the varied and distinct residential character and integrity of existing residential neighborhoods by providing a mix of architectural structures that are compatible with the varied scale of surrounding uses.

- Support Objective 1-2 and Goal 12 of the Central City North Community Plan, and encourage the reduction in vehicle trips by designing a project that includes infrastructure for walking and cycling and ride-sharing hubs and transit nodes for bus and shuttle pick-up.

V. Alternatives

D. Alternative 4: Retail and Residential Mixed Use Alternative

1. Description of the Alternative

Alternative 4, the Retail and Residential Mixed Use Alternative, would eliminate the 48,000 square feet of office uses and the 180-room hotel proposed by the Project (under the Mixed Use Development Scenario) and would include the maximum number of residential units that could potentially be included as part of the Project (which, under the No-Hotel Development Scenario, could have up to 827 residential units). As with the Project, under either development scenario, 76 units would be set aside as affordable housing units. The retail/restaurant component would increase from 95,000 square feet to 200,000 square feet. Specifically, Alternative 4 would include 75,000 square feet of general retail, a 40,000-square-foot grocery store, a 25,000-square-foot health club/spa, a 30,000-square-foot restaurant, and a 30,000-square-foot movie theater. Overall, similar to the No-Hotel Development Scenario, the Retail and Residential Mixed Use Alternative would also construct 994,982 square feet of new floor area within the Project Site with a net FAR of 3.65:1.

As shown in the conceptual site plan of the Retail and Residential Mixed Use Alternative provided in Figure V-5 on page V-107, the proposed retail and residential uses would be distributed throughout the Project Site within four primary structures above a parking podium. The four buildings are referred to herein as Tower A, Tower B, Building C, and the Sunset Building. As shown in the plan overview diagram provided in Figure V-6 on page V-109, the proposed retail and restaurant uses would be concentrated within Building C and within the ground floor and lower levels of Tower A, Tower B, and the Sunset Building. As shown in Figure V-5, Tower A would be situated along the southern portion of the Project Site, similar to the Project, and would include 35 levels with an approximate height of 400 feet (a reduction of 172 feet compared to the Project's height of 572 feet). Tower B would be situated along the eastern portion of the Project Site, also similar to the Project, and would include 26 levels with an approximate height of 360 feet (a reduction of 48 feet compared to the Project's height of 408 feet). Like the Project, the Sunset Building would be located at the southwestern corner of the Project Site, primarily fronting Sunset Boulevard, and would include 24 levels with an approximate height of 315 feet (an increase of 104 feet compared to the Project's height of 211 feet). Building C, which would be located generally where the Courtyard Building is proposed by the Project, would include one retail level with an approximate height of 71 feet (a reduction of 20 feet compared to

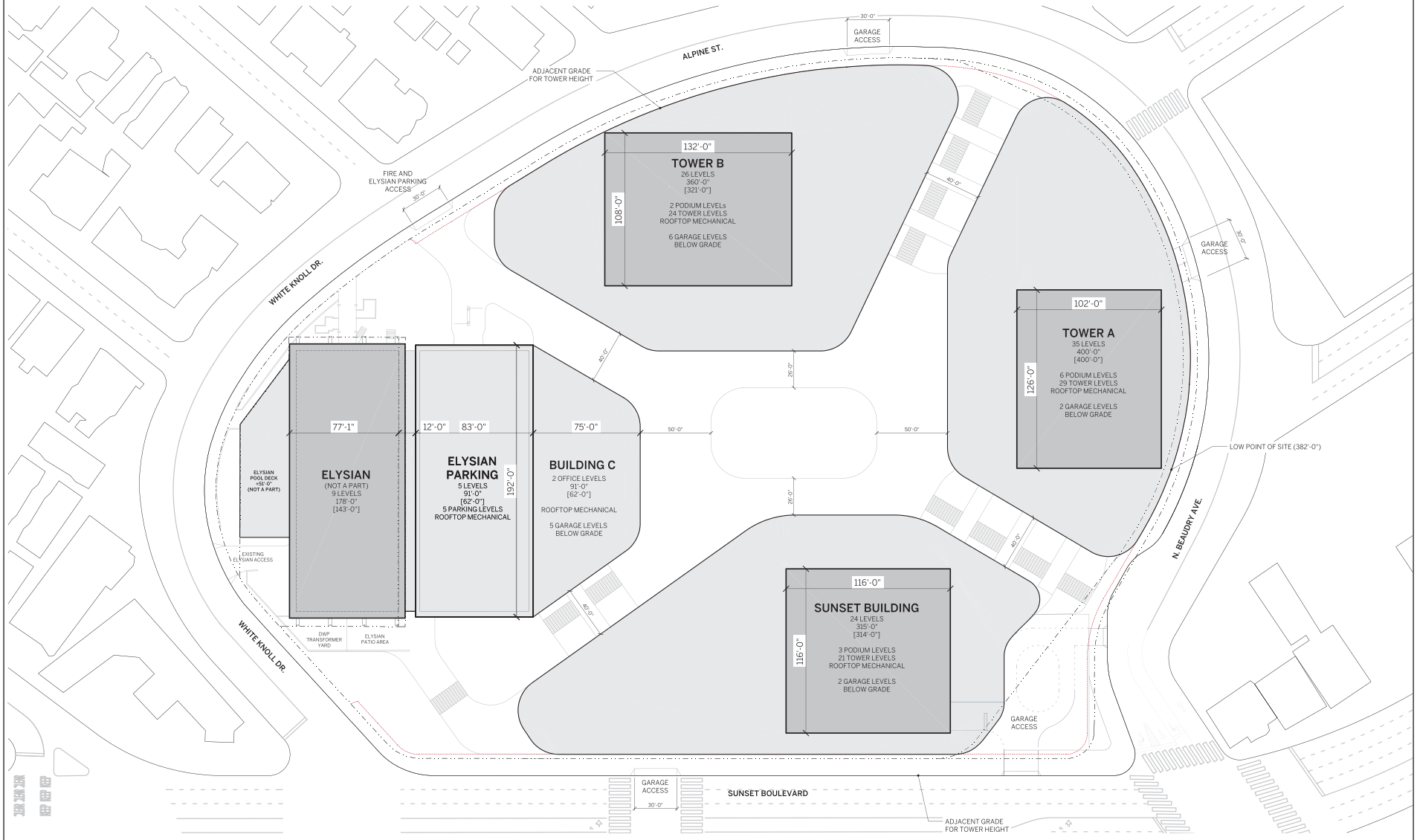

Figure V-5
Alternative 4 Conceptual Site Plan

Source: Skidmore, Owings & Merrill LLP, 2020.

the Project's height of 91 feet). As also illustrated in Figure V-6 on page V-109, a portion of the proposed residential uses (43 units) would be provided within the retail podium (not part of the residential towers). These low-rise residential buildings would include up to four levels with a height of up to 91 feet.

The Retail and Residential Mixed Use Alternative would require and would provide 1,020 parking spaces in accordance with the requirements of the LAMC.[28] As with the Project, parking for this alternative would be provided in a six-level parking podium, which would be partially below grade and partially above grade.[29] As with the Project, the portions of the parking podium that would be above grade would be wrapped in active uses or landscaping. Below grade parking would extend to a depth of 44 feet (a reduction of 20 feet compared to the Project's 64-foot excavation depth, six-level parking podium). Like the Project, an additional 168 parking spaces for the existing Elysian apartment building would be provided within a five-level, partially subterranean parking structure (Elysian Parking Facility) located within the northern portion of the footprint of the proposed Building C.

As with the Project, Alternative 4 would provide a variety of open space and recreational amenities. Trees and other landscaping features would also be planted throughout the Project Site. In total, Alternative 4 would provide 92,938 square feet of open space and recreational amenities in accordance with the open space requirements set forth in the LAMC.

Similar to the Project, to provide for development of Alternative 4, demolition of the existing vacant buildings and surface parking areas would occur. Given the below grade parking would extend to a depth of 44 feet (a reduction of 20 feet compared to the Project's 64-foot excavation depth, six-level parking podium), it is estimated that approximately 462,405 cubic yards of export material would be hauled from the Project Site during the demolition and excavation phase of the Retail and Residential Mixed Use Alternative, a reduction of 9,595 cubic yards compared to the Project's estimated 472,000 cubic yards of export.

As with the Project, Alternative 4 would require a Major Conditional Use Permit, Site Plan Review, removal of a variable width Building Line, a Density Bonus approval, Master Conditional Use Permit to permit the sale of alcoholic beverages, a Zoning Administrator's Adjustment related to the Building Separation, a Director's Determination to reduce the

[28] *As with the Project, parking for Alternative 4 was designed to account for required parking prior to the application of AB 744.*

[29] *It should be noted that the height of each parking level proposed under Alternative 4 was designed to be reduced compared to the Project.*

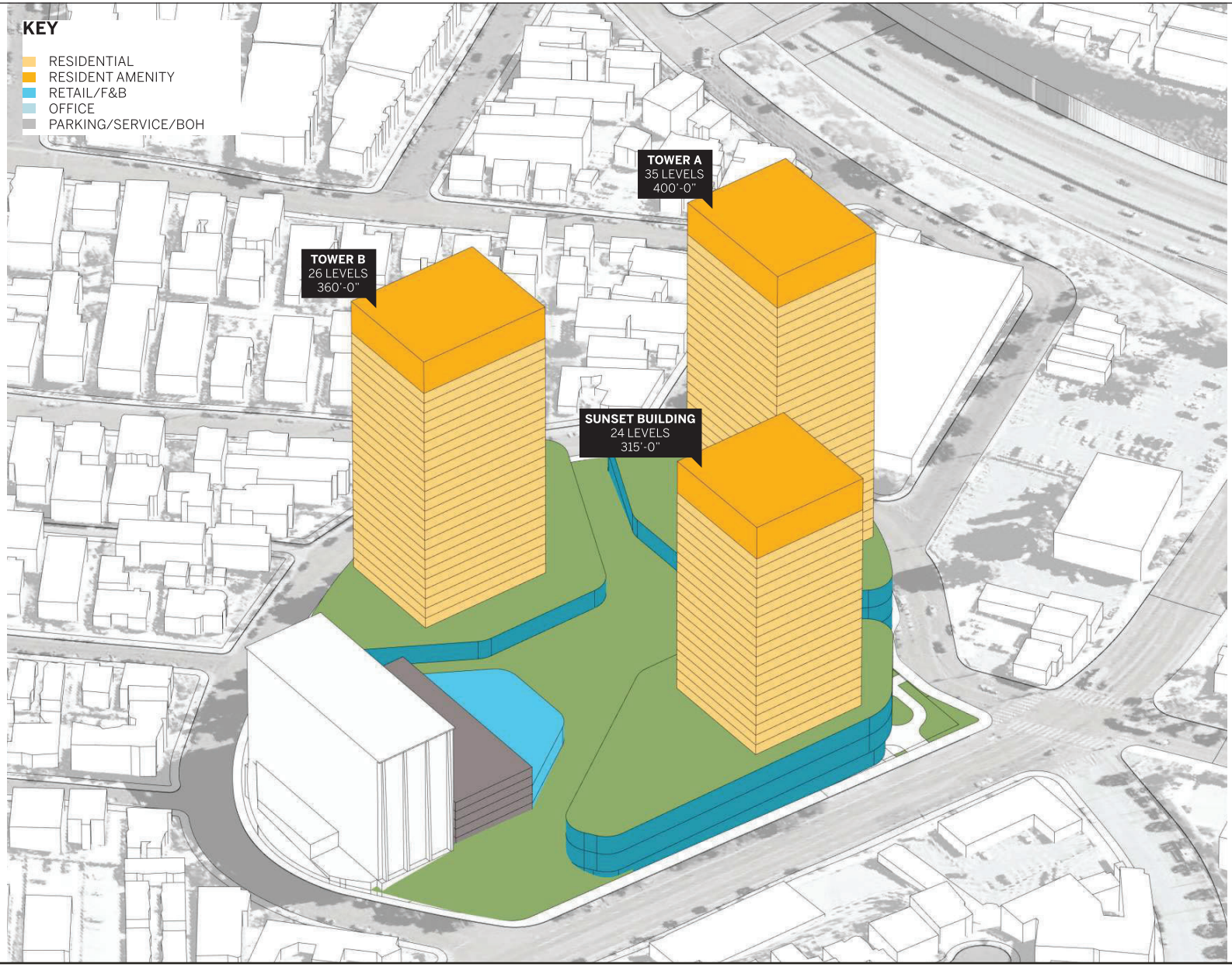

Figure V-6
Alternative 4 Plan Overview

Source: Skidmore, Owings & Merrill LLP, 2020.

number of trees planted on site and a Vesting Tentative Tract Map, and permits from the City Department of Building and Safety. Alternative 4 would not require a Vesting Conditional Use to permit the hotel use.

2. Environmental Impacts

As discussed in the Initial Study prepared for the Project included in Appendix A of this Draft EIR, the Project Site is identified by the City as being located within a transit priority area. In addition, the Project is a mixed use residential project and is located on an infill site which meets PRC Section 21099's definition of an infill site as a lot located within an urban area that has been previously developed. The Project Site is also located within 0.5 mile of several bus lines, the majority of which provide a frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. Therefore, pursuant to SB 743 and ZI No. 2452, the Project's aesthetic impacts shall not be considered significant impacts on the environment.

Similar to the Project, Alternative 4 would meet the provisions of SB 743 as it would be developed within the same Project Site, which is identified as an infill site located within a transit priority area. In addition, Alternative 4 would be considered a mixed use residential project.[30] Therefore, as with the Project, the aesthetics impacts of Alternative 4 would not be considered a significant impact on the environment.

a. Air Quality

(1) Regional Emissions

(a) Construction

As with the Project, construction of the Retail and Residential Mixed Use Alternative has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. Alternative 4 would be required to implement AQ MM-1 through 5.

[30] *Senate Bill 743 [Public Resources Code Section 21099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment."*

Under Alternative 4, construction activities would only be slightly reduced in comparison to the Project due to the minor reduction in excavation activities. The overall phasing of construction would result in similar overlapping construction activities as the Project. Thus, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, regional impacts on these days would be similar to those of the Project and would be significant and unavoidable. Therefore, as with the Project, the Retail and Residential Mixed Use Alternative would result in significant and unavoidable impacts associated with regional construction emissions, and impacts would be similar to those of the Project.

(b) Operation

As described above, the Retail and Residential Mixed Use Alternative would develop 827 residential units and 200,000 square feet of retail uses. As summarized in Appendix T of this Draft EIR, the number of new daily trips generated by Alternative 4 would be greater than the number of new daily trips generated by the Project. Specifically, as provided in Appendix T of this Draft EIR. Alternative 4 would result in a total of 10,174 daily vehicle trips compared to the Mixed Use Development Scenario's 8,257 total daily vehicle trips and the No-Hotel Development Scenario's 7,711 total daily vehicle trips. Alternative 4 would result in 64,438 daily VMT compared to the Mixed Use Development Scenario's 52,517 daily VMT and the No-Hotel Development Scenario's 49,137 daily VMT. Operational regional air pollutant emissions associated with Alternative 4 would be generated by vehicle trips and daily VMT to the Project Site, which are the largest contributors to operational air pollutant emissions, and by the consumption of electricity and natural gas. As vehicular emissions depend on the number of trips and associated VMT, the overall pollutant emissions generated by this alternative would be greater than the emissions generated by both development scenarios because the number of vehicular trips would increase. As a result of increased vehicle trips and associated VMT, total operational emissions under this alternative would exceed SCAQMD regional significance thresholds for NOx.[31] Therefore, impacts associated with regional air pollutant emissions during operation of Alternative 4 would be significant and unavoidable, and greater than the less-than-significant impacts of the Project.

[31] *Refer to Appendix C.5 for the CalEEMod modeling results.*

(2) Localized Emissions

(a) Construction

On-site construction activities associated with Alternative 4 would be located at similar distances from sensitive receptors as the Project. While overall development would be similar to the Project, construction activities under Alternative 4 would be slightly reduced due to the reduction of excavation activities associated with the subterranean parking. Therefore, construction activities and associated localized emissions from construction of the Retail and Residential Mixed Use Alternative would be reduced compared to the Project. Therefore, as with the Project, localized impacts under Alternative 4 would be less than significant and less than the impacts of the Project.

(b) Operation

Localized operational impacts are determined primarily by traffic volumes. As provided in Appendix T of this Draft EIR, the Retail and Residential Mixed Use Alternative would generate 10,174 daily vehicle trips. This alternative would generate more daily trips compared to the Mixed Use Development Scenario's 8,257 daily trips and the No-Hotel Development Scenario's 7,711 trips. As such, total localized vehicular emissions would be greater compared to both development scenarios. In addition, with the development of the same floor area as the Project, area and stationary sources would generate similar on-site operational air emissions compared to the Project. Overall, total contributions to localized air pollutant emissions during operation of the Retail and Residential Mixed Use Alternative would be greater than the Project's contribution. However, localized air quality impacts under Alternative 4 would continue to be less than significant. Such impacts would be greater than the less-than-significant impacts of the Project.

(3) Toxic Air Contaminants

(a) Construction

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. As previously noted, the excavation activities proposed by the Project would be slightly reduced under the Retail and Residential Mixed Use Alternative due to the reduced subterranean parking. Therefore, overall construction TAC emissions generated by Alternative 4 would be less than those of the Project since excavation activities required during construction of Alternative 4 would be reduced. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 4 would be less than significant, and less than the impacts of the Project.

(b) Operation

As set forth in Section IV.B, Air Quality, of this Draft EIR, the primary sources of potential TACs associated with Project operations would include diesel particulate matter from delivery trucks. Under Alternative 4, the overall increase in the number of deliveries and associated diesel particulate matter emissions would be similar to the Project due to comparable total floor area. Similar to the Project, the land uses proposed under Alternative 4 are also not considered land uses that generate substantial TAC emissions. Therefore, Alternative 4 would not release substantial amounts of TACs and impacts would be less than significant. Such impacts would be similar to the less-than-significant impacts of the Project.

b. Cultural Resources

As with the Project, Alternative 4 would require demolition of the existing on-site vacant buildings. As determined in the Historic Report included in Appendix E.1 of this Draft EIR, the existing on-site buildings do not qualify as historical resources. Therefore, the potential for direct impacts to historical resources as a result of removal of the existing vacant buildings would also be less than significant under this alternative.

With regard to indirect impacts on adjacent historical resources, similar to the Project, Alternative 4 would also not impact or diminish architectural design and integrity or impact the setting of any adjacent historical resources. Therefore, as with the Project, Alternative 4 would not indirectly affect adjacent contributing properties in the vicinity of the Project Site, and indirect impacts to historical resources would be less than significant.

Overall, impacts to historical resources under Alternative 4 would be less than significant, and similar to the less-than-significant impacts of the Project.

With regard to archaeological resources, Alternative 4 would require less grading when compared to the Project. Therefore, the potential for Alternative 4 to uncover archaeological resources would be reduced when compared to that of the Project. Like the Project, Alternative 4 would implement the same mitigation measure (CUL-MM-1) as the Project in order to mitigate potential impacts to archaeological resources. As such, as with the Project, impacts to archaeological resources under Alternative 4 would be less than significant with mitigation. However, such impacts would be less than the impacts of the Project.

c. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

(a) Construction

Similar to the Project, construction activities associated with Alternative 4 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. Like the Project, construction activities associated with Alternative 4 would not involve the consumption of natural gas. As with the Project, Alternative 4 would also generate a demand for transportation energy associated with on- and off-road vehicles. The energy consumed during construction of Alternative 4 would be slightly reduced compared to the Project due to the reduction in construction activities associated with the depth of excavation. As with the Project, the electricity demand during construction of Alternative 4 would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Construction equipment used during construction of Alternative 4 would also comply with Title 24 requirements where applicable, similar to the Project. With regard to transportation fuels, trucks and equipment used during construction of Alternative 4 would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. Therefore, as with the Project, construction activities would use energy that is not wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 4 and similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of the Retail and Residential Mixed Use Alternative would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions. As previously discussed, Alternative 4 would develop 827 residential units and 200,000 square feet of retail uses. As previously noted, the number of daily trips under Alternative 4 would be greater when compared to both development scenarios. In addition, the consumption of electricity and natural gas, would be greater than the Project. As with the Project, Alternative 4 would implement design features to reduce energy usage. 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. Overall, impacts related to energy use during

operation of Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Conflict with Plans for Renewable Energy or Energy Efficiency

As discussed in Section IV.C, Energy, of this Draft EIR, the current City of LA Green Building Code requires compliance with CalGreen and California's Building Energy Efficiency Standards (Title 24). Like the Project, Alternative 4 would comply with the City's Green Building Code, as well as be capable of achieving LEED® Certified equivalency. Therefore, similar to the Project, Alternative 4 would incorporate measures that are beyond current State and City energy conservation requirements. Also similar to the Project, Alternative 4 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2019 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code.

With regard to transportation related energy usage, Alternative 4 would also comply with goals of the SCAG's RTP/SCS which incorporates VMT targets established by SB 375. As with the Project, the uses proposed under Alternative 4 and their proximity to major job centers and public transportation would serve to reduce VMT and associated transportation fuel usage within the region. In addition, vehicle trips generated during Project operations would comply with CAFE fuel economy standards. As with the Project, Alternative 4 would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction.

Therefore, based on the above, Alternative 4 would not conflict with plans for renewable energy or energy efficiency. No significant impacts related to renewable energy or energy efficiency plans would occur under Alternative 4, and impacts would be similar to the less-than-significant impacts of the Project.

d. Geology and Soils

Under Alternative 4, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, and site stability 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 of land use proposed. Alternative 4 would be developed within the same site as the Project and 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 comply with the same regulatory requirements as the Project, which require the preparation

of a final design-level geotechnical engineering report to identify and minimize seismic risks. Therefore, as with the Project, Alternative 4 would not cause or accelerate geologic conditions which could result in substantial damage to proposed structures or infrastructure or expose people to substantial risk of injury. Impacts related to geology and soils under Alternative 4 would be less than significant, and similar to the impacts of the Project.

With regard to paleontological resources, below grade parking would extend to a depth of 44 feet (a reduction of 20 feet compared to the Project's 64-foot excavation depth, six-level parking podium); therefore, the potential for Alternative 4 to uncover subsurface paleontological resources would be reduced when compared to that of the Project. Like the Project, Alternative 4 would implement the same mitigation measure (GEO-MM-1) as the Project in order to mitigate potential impacts to paleontological resources. As such, as with the Project, impacts to paleontological resources under Alternative 4 would be less than significant with mitigation. However, such impacts would be less than the impacts of the Project.

e. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily trips generated and associated VMT, as well as energy consumption from proposed land uses. As previously discussed, the number of daily trips and daily VMT under Alternative 4 would increase compared to both development scenarios. In addition, Alternative 4 would result in an increase in energy and water consumption compared to the Project. Thus, the amount of GHG emissions generated by Alternative 4 would be greater than the amount generated by the Project. As with the Project, Alternative 4 would be designed to comply with the requirements of the CALGreen Code and the Los Angeles Green Building Code. Alternative 4 would also incorporate design features to reduce GHG emissions and would be designed to comply with the City's Green Building Ordinance, as applicable. With compliance with the CALGreen Code and the Los Angeles Green Building Code, and with the implementation of comparable sustainability features as the Project, Alternative 4 would also 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. However, such impacts would be greater than the less-than-significant impacts of the Project.

f. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, during demolition, on-site grading, and building construction associated with Alternative 4, fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners would be used, handled, and

stored on the Project Site, and would therefore require proper management and disposal. Such use would be comparable to the Project as the total floor area proposed under Alternative 4 would be the same as that of the Project. Notwithstanding, like the Project, Alternative 4 would fully comply with all applicable federal, state, and local requirements, as well as the manufacturer's instructions concerning the use, handling, storage, and disposal of hazardous materials.

As discussed in detail in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, according to the Phase I ESA, during the Project Site reconnaissance, no evidence of existing underground storage tanks or aboveground storage tanks were observed on the Project Site. However, SCAQMD and LAFD records identified a 500-gallon diesel-fuel underground storage tank near the northern perimeter of the Project Site. As with the Project, Alternative 4 would not involve any construction in or near the area of the existing underground storage tank. Notwithstanding, in the unlikely event that underground storage tanks are uncovered, suspect materials would be removed in accordance with all applicable federal, state, and local regulations similar to the Project.

While asbestos-containing materials and lead-based paints may be present on-site due to the age of the existing buildings, similar to the Project, Alternative 4 would comply with relevant regulations and requirements related to asbestos-containing materials and lead-based paint to ensure that impacts would be less than significant. Furthermore, like the Project, in the event that PCBs are found within areas proposed for demolition during construction of Alternative 4, suspect materials would be removed in accordance with all applicable federal, state, and local regulations.

Additionally, similar to the Project, Alternative 4 would follow applicable CalGEM requirements for site plan review for construction activities proposed in the area of existing wells. The Retail and Residential Mixed Use Alternative would also include implementation of the same mitigation measures as the Project (under both development scenarios) to ensure potential impacts associated with the discovery of buried wells is less than significant. As with the Project, Mitigation Measure HAZ-MM-1 and HAZ-MM-2, may require an additional surface geophysical survey be conducted to attempt to locate the oil wells on the Project Site following demolition of existing structures (as the prior survey did not locate any existing oil wells and existing structures precluded geophysical survey in some areas of the site). If located, the wells would be unearthed and inspected by a licensed Petroleum Engineer and would be reported to CalGEM to assess and prescribe abandonment procedures based on their observed condition, as well as the Petroleum Administrator, LACUPA, and Los Angeles Department of City Planning. Similar to the Project, a soil and site management plan would be developed and implemented pursuant to Mitigation Measure HAZ-MM-3 to address the potential identification and abandonment of the oil wells if encountered during earthwork activities. Furthermore, in the event contaminated soils are encountered during construction, or construction occurs in areas of

known or potential contamination, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166. Additionally, as with the Project, Alternative 4 would implement Project Design Feature HAZ-PDF-1, which would require buildings be placed in a manner so as to not significantly impede future access to the locations of the existing wells as depicted in CalGEM's maps.

Moreover, the Retail and Residential Mixed Use Alternative would adhere to applicable construction safety measures, as well as comply with California Occupational Safety and Health Act safety requirements, which would serve to reduce the risk in the event that elevated levels of methane gas are encountered during grading and construction. In addition, as with the Project, Alternative 4 would implement controls during construction at the Project Site in order to mitigate the effects of subsurface gases on workers and the public. In addition, as with the Project, Alternative 4 would implement Mitigation Measures HAZ-MM-4 and HAZ-MM-5, to ensure potential impacts related to subsurface gases and associated potential impacts to soil and groundwater are less than significant. Specifically, Mitigation Measure HAZ-MM-4 would install controls during construction at the Project Site to mitigate the effects of subsurface gases on workers and the public and Mitigation Measure HAZ-MM-5 would require the Applicant install a Passive System that would include a standard de-watering system or a reinforced concrete mat slab to accommodate hydrostatic pressure, as well as a sub-slap vapor collection and ventilation system.

With regard to emergency response plans, while construction activities for Alternative 4 are expected to be primarily confined to the Project Site, like the Project, it is expected that construction fences would encroach into the public right-of-way (e.g., sidewalks and roadways) adjacent to the Project Site on White Knoll Drive, Alpine Street, and Beaudry Avenue. As such, sidewalks surrounding the Project Site are expected to be temporarily closed during construction. However, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period and emergency access would not be impeded. In addition, similar to the Project, a Construction Management Plan would be implemented as part of the Retail and Residential Mixed Use Alternative and would include street/lane closure information, a detour plan, haul route(s), and a staging plan.

Based on the above, potential construction-related impacts associated with hazards and hazardous materials under Alternative 4 would be less than significant with mitigation, and similar to the impacts of the Project.

(2) Operation

Similar to the Project, Alternative 4 would not include the use of materials that would contain asbestos, lead based paint, or PCBs. In addition, Alternative 4 would not propose the installation of underground or aboveground storage tanks. The operation of Alternative 4 would involve the limited use of potentially hazardous materials typical of those used in mixed use developments such as Alternative 4, including cleaning agents, paints, pesticides, and other materials used for landscaping. Such use would be comparable to the Project due to the development of the same floor area as the Project. In addition, as with the Project, all hazardous materials on the Project Site would be acquired, handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, state, and local requirements. As with the Project, Alternative 4 would also comply with the City of Los Angeles' Methane Mitigation Ordinance No. 175,790.

With regard to emergency response plans, Alternative 4 would not involve any activities that would impede public access or travel along the public right-of-way or interfere with an adopted emergency response or evacuation plan. In addition, similar to the Project, the increase in traffic generated by Alternative 4 would not significantly impact emergency vehicle response to the Project Site and surrounding uses, including along City-designated disaster routes since the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or driving in the lanes of opposing traffic.

Based on the above, potential impacts related to hazards and hazardous materials during operation of Alternative 4 would be less than significant, and similar to the less-than-significant impacts of the Project.

g. Hydrology and Water Quality

(1) Surface Water Quality

(a) Construction

Under Alternative 4, the degree to which new pollutants could be introduced to the Project Site during construction would be comparable to the Project as Alternative 4 would include similar construction activities with a minor reduction in excavation activities associated with the reduced subterranean parking. As with the Project, a SWPPP would be prepared for Alternative 4 and would specify BMPs to be used during construction. In addition, as discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, due to the depth at which water seepage was encountered, construction activities for the Retail and Residential Mixed Use Alternative could also encounter groundwater and dewatering may be required. Thus, similar to the Project, Alternative 4 would utilize temporary

dewatering systems in compliance with all relevant NPDES requirements related to construction and discharges from dewatering operations.

With the implementation of site-specific BMPs included as part of the SWPPP, Alternative 4 would reduce or eliminate the discharge of potential pollutants from stormwater runoff. In addition, construction of Alternative 4 would be required to comply with City grading permit regulations, which require necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspection to reduce sedimentation and erosion. Therefore, with compliance with NPDES requirements and City of Los Angeles grading permit regulations, construction of Alternative 4 would not result in discharge that would violate any water quality standard or waste discharge requirements, or otherwise substantially degrade water quality. Furthermore, construction of Alternative 4 would not result in discharges that would cause regulatory standards to be violated. Therefore, as with the Project, construction-related impacts to surface water quality under Alternative 4 would be less than significant, and similar to the less-than-significant impacts of the Project due to the comparable construction activities.

(b) Operation

Similar to the Project, Alternative 4 would implement BMPs for managing stormwater runoff in accordance with current City LID Ordinance requirements. The BMPs would control stormwater runoff with no increase in runoff resulting from the alternative. Due to the incorporation of LID BMPs, operation of Alternative 4 would not result in discharges that would violate any water quality standard or waste discharge requirements, or otherwise substantially degrade water quality. Thus, as with the Project, impacts to surface water quality during operation of Alternative 4 would be less than significant. Such impacts would be similar to the less-than-significant impacts of the Project.

(2) Groundwater Quality

(a) Construction

As previously noted, the depth of excavation and associated export would be slightly reduced compared to the Project under Alternative 4 due to the reduction in subterranean parking levels. However, as discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, a geotechnical investigation of the Project Site encountered water seepage at depths of 16 feet to 62 feet. As such, given that the excavation depth for this alternative would extend to a maximum depth of 44 feet[32], construction activities associated with the

[32] *It should be noted that height of each parking level proposed under Alternative 4 was designed to be reduced compared to the Project.*

Retail and Residential Mixed Use Alternative could encounter groundwater, and temporary dewatering may be required. In the event dewatering is required, a temporary dewatering system would be installed and operated in accordance with NPDES requirements. Any discharge of groundwater during construction of the Project would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements. Pursuant to such requirements, the groundwater extracted would be chemically analyzed to determine the appropriate treatment and/or disposal methods. As such, groundwater quality would not be impacted from these potential dewatering activities.

As previously discussed, there is an existing underground storage tank in the northern perimeter of the Project Site. However, as with the Project, construction activities under Alternative 4 would not occur near or in the area of the existing underground storage tank. Therefore, the potential for the underground storage tank to affect groundwater quality is negligible.

As with the Project, construction activities associated with the Retail and Residential Mixed Use Alternative could encounter contaminated soil and groundwater that would require proper handling and disposal. Where construction is proposed in the area of existing wells, applicable CalGEM requirements for site plan review would be followed. In addition, as with the Project, Alternative 4 would implement the same mitigation measures to ensure potential impacts associated with the discovery of buried wells is less than significant. If located, the wells would be unearthed and inspected by a licensed Petroleum Engineer and would be reported to CalGEM to assess and prescribe abandonment procedures based on their observed condition, as well as the Petroleum Administrator, LACUPA, and Los Angeles Department of City Planning. Similar to the Project, a soil and site management plan would be developed and implemented to address the potential identification and abandonment of the oil wells if encountered during earthwork activities. Furthermore, in the event contaminated soils are encountered during construction, or construction occurs in areas of known or potential contamination, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166.[33] Additionally, as with the Project, Alternative 4 would implement the same Project Design Feature (HAZ-PDF-1), which would require buildings be placed in a manner so as to not significantly impede future access to the locations of the existing wells as depicted in CalGEM's maps. Therefore, compliance with existing regulations would ensure construction activities would not create a significant hazard to groundwater quality associated with the existing on-site oil wells.

[33] *South Coast Air Quality Management District. Rules and Compliance, Rule 1166, www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf?sfvrsn=4, accessed January 16, 2021.*

During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would, therefore, require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the potential for hazardous materials releases into groundwater. As with the Project, compliance with all applicable federal, state, and local requirements, concerning the handling, storage and disposal of hazardous waste, would reduce the potential for construction of Alternative 4 to release contaminants into groundwater. As there are no groundwater production wells or public water supply wells on-site or within one mile of the Project Site, construction activities would not be anticipated to affect existing wells.

Based on the above, as with the Project, impacts with respect to groundwater quality during construction of Alternative 4 would be less than significant. Such impacts would be less than the less-than-significant impacts of the Project due to the reduction in excavation activities.

(b) Operation

Similar to the Project, Alternative 4 would not include the surface or subsurface application or introduction of potential contaminants or waste materials. Like the Project, Alternative 4 is not anticipated to result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater through percolation. Therefore, as with the Project, impacts with respect to groundwater quality during operation of Alternative 4 would be less than significant and such impacts would be similar to those of the Project.

(3) Surface Water Hydrology

(a) Construction

Similar to the Project, construction activities for Alternative 4 would include demolition of the existing vacant buildings and surface parking areas. While construction of Alternative 4 would reduce the extent of excavation activities, Alternative 5 would disturb the same surface area as the Project. As with the Project, construction activities, particularly grading of the Project Site, would have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. However, like the Project, Alternative 4 would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, Alternative 4 would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. In addition, Alternative 4 would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion, similar

to the Project. Thus, through compliance with all NPDES Construction General Permit requirements, including preparation of a SWPPP, implementation of BMPs, 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, or flooding on- or off-site. Similarly, with adherence to standard compliance measures (e.g., NPDES requirements), construction activities would not cause flooding, substantially increase or decrease the amount of surface water flow from the Project Site into a water body, or result in a permanent, adverse change to the movement of surface water. Therefore, construction-related impacts to surface water hydrology under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 4 would include development of new buildings, paved areas, and landscaped areas. Like the Project, implementation of Alternative 4 would increase the amount of impervious surfaces compared to the Project Site's existing impervious surfaces. In addition, similar to the Project, Alternative 4 would implement BMPs to control stormwater runoff with no increase in runoff resulting from the Project Site, as required by the City's LID Ordinance. Therefore, like the Project, Alternative 4 would not impact existing storm drain infrastructure serving the Project Site and runoff would continue to follow the same discharge paths and drain to the same storm systems. Consequently, like the Project, Alternative 4 would not cause flooding during the 50-year developed storm event, would not create runoff which would exceed the capacity of existing or planned drainage systems, would not require construction of new stormwater drainage facilities or expansion of existing facilities, would not substantially reduce or increase the amount of surface water in a water body, or result in a permanent adverse change to the movement of surface water. Overall, operational impacts to surface water hydrology under Alternative 4 would be less than significant. However, such impacts would be similar than the less-than-significant impacts of the Project.

(4) Groundwater Hydrology

(a) Construction

As previously discussed, the excavation proposed by Alternative 4 would be slightly reduced compared to the Project due to the reduced subterranean parking. As discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, a geotechnical investigation of the Project Site encountered water seepage at depths ranging between 16 feet to 62 feet below ground surface. Thus, excavation activities under Alternative 4 would also likely encounter groundwater as excavation is anticipated to reach a depth of 44 feet. Therefore, dewatering operations are expected during construction of the Retail and Residential Mixed Use Alternative. Similar to the Project, Alternative 4 would

implement a temporary dewatering system in accordance with NPDES General Construction Permit requirements. Any discharge of groundwater during construction of Alternative 4 would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements.

As discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, no water supply wells are located at the Project Site or within one mile of the Project Site that could be impacted by construction. In addition, as with the Project, Alternative 4 would not include the construction of water supply wells.

Based on the above, construction impacts on groundwater hydrology during construction of Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in excavation activities.

(b) Operation

Similar to the Project, the subterranean levels of Alternative 4 would be designed such that they are able to withstand hydrostatic forces and incorporate comprehensive waterproofing systems in accordance with current industry standards and construction methods such that permanent dewatering operations would not be required. Thus, the potential impact during operation on groundwater level under Alternative 4 would be less than significant.

As discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, the Project Site is currently comprised of approximately 72 percent impervious surfaces. Therefore, there is currently a minimal groundwater recharge potential on the Project Site. As with the Project, with implementation of Alternative 4, the amount of impervious areas would increase compared to the Project Site's existing impervious area. However, like the Project, Alternative 4 would include the installation of capture and use or biofiltration planter BMPs in order to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site. Therefore, potential impacts on groundwater recharge would be less than significant under Alternative 4.

Based on the above, impacts to groundwater hydrology during operation of Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

h. Land Use and Planning

As described above, the Retail and Residential Mixed Use Alternative would develop 827 residential units and 200,000 square feet of retail uses. The Retail and Residential Mixed Use Alternative would result in a net FAR of 3.65:1 similar to the Project. As

previously discussed, land uses permitted within the Project Site include various retail and restaurant spaces, auditoriums, automotive fueling and service stations, churches, drive-in businesses, hospitals, offices, and schools. The zoning of the Project Site does not specify a building height limit, but rather limits the FAR to 3 to 1 (Footnote 4 in General Plan Land Use Map) and a permitted density of one unit per 400 square feet of lot area or one guest room per 200 square feet of lot area. Based on the zoning and land use designation of the Project Site, the proposed residential and retail/residential uses would be permitted on the Project Site and such uses would not conflict with other surrounding multi-family residential and retail/restaurant uses. Thus, as with the Project, the Retail and Residential Mixed Use Alternative would not conflict with the applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. However, as previously discussed, this alternative would generate additional vehicle trips compared to the Project. In addition, Alternative 4 would not provide for the synergy of uses as the Project, which could serve to reduce vehicle trips and vehicle miles traveled. Thus, impacts related to land use consistency would be less than significant and greater than the less-than-significant impacts of the Project.

i. Noise

(1) Noise

(a) Construction

The types of construction activities under Alternative 4 would be substantially similar to the Project, although the amount of construction activities and associated duration would be slightly reduced due to the reduced excavation depth. As with the Project, construction of Alternative 4 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Under Alternative 4, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to that of the Project during maximum activity days since the overall amount and duration, but not the daily intensity of construction activities, would decrease under Alternative 4 when compared to the Project. As such, noise levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Accordingly, noise impacts due to on- and off-site construction activities under Alternative 4 would be similar to those of the Project. As with the Project, Alternative 4 would implement Project Design Features NOI-PDF-1 (requiring muffling of equipment) and NOI-PDF-4 (prohibiting use of impact piles), and Mitigation Measure NOI-MM-1 (requiring sound barriers) to reduce noise levels during construction. Similar to the Project, on- and off-site construction noise would be significant and unavoidable under Alternative 4 even with the application of project design features and mitigation measures. Overall, impacts under Alternative 4 would be similar to those of the Project.

(b) Operation

As discussed in Section IV.I, Noise, of this Draft EIR, sources of operational noise under the Project include: (a) on-site stationary noise sources, including mechanical equipment, activities within the proposed outdoor spaces, parking facilities, loading dock and trash collection areas; and (b) off-site mobile (roadway traffic) noise sources. It is anticipated that Alternative 4 would introduce noise from similar on-site and off-site noise sources as the Project. Similar to the Project, Alternative 4 would include Project Design Features NOI-PDF-2, -3, -5, and -6 that require screening of mechanical equipment and loading docks, specify sound levels for outdoor sound systems, and specify the maximum occupancy of the Elysian Parking outdoor roof deck. In addition, similar to the Project, on-site mechanical equipment used during operation of Alternative 4 would comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. Thus, operational on-site noise impacts would be less than significant and similar to the less-than-significant impacts of the Project.

With regard to off-site noise sources, Alternative 4 would result in an increase in daily vehicle trips compared to the Project. Specifically, as provided in Appendix T of this Draft EIR, Alternative 4 would result in a total of 10,853 daily vehicle trips compared to the Mixed Use Development Scenario's 8,887 total daily vehicle trips and the No-Hotel Development Scenario's 8,304 total daily vehicle trips. The increase in vehicle trips would result in an increase in off-site traffic-related noise levels under Alternative 4. Typically, a doubling of traffic volumes would result in an increase of 3 dBA. As presented in Section IV.I, Noise, of this Draft EIR, the Project would result in highest noise level increase a long White Knoll Drive with a maximum noise level increase of 3.5 dBA (under the Mixed Use Development Scenario) and 3.4 dBA (under the No Hotel Development Scenario) under existing and future conditions, which represents an increase of approximately 124.2 percent (under the Mixed Use Development Scenario) and 117.6 percent (under the No Hotel Development Scenario) in the daily traffic as compared to the existing traffic conditions.[34] When compared with the Mixed Use Development Scenario, Alternative 4 would result in an increase of approximately 22.1 percent in Project-related daily trips and would result in a maximum noise increase of approximately 0.9 dBA. However, when account for the existing traffic volumes, the total noise increase with Alternative 4 would be 4.0 dBA. When compared with the No Hotel Development Scenario, Alternative 4 would result in an increase of approximately 30.7 percent in Project-related daily trips and would result in a maximum noise increase of approximately 1.2 dBA. However, when accounting

[34] *Traffic noise level increase in decibel is calculated based on logarithmic basic. 3.5 dBA increase = 10*log(2.242) and 3.4 dBA increase = 10*log(2.176)*

for existing traffic, the total noise increase with Alternative 4 would be 4.0 dBA. Therefore, the traffic noise level along White Knoll Drive under Alternative 4 would increase from 62.1 dBA CNEL under existing conditions to 66.1 dBA CNEL under future with Alternative 4 conditions. The estimated noise level along White Knoll Drive under Alternative 4 would be below the 5-dBA CNEL significance threshold applicable when noise levels fall within the conditionally acceptable land use category (between 60 dBA and 70 dBA CNEL). Therefore, off-site noise impacts under Alternative 4 would be greater than those of the Project due to the increase in vehicle trips; however, impacts would remain less than significant.

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 4 would be similar to the Project, although the amount and duration of construction activities would be slightly reduced. As with the Project, construction of the Retail and Residential Mixed Use Alternative would generate vibration from the use of heavy-duty construction equipment as well as from truck trips. While the overall amount of construction would be reduced, on- and off-site construction activities and the associated construction vibration levels would be expected to be similar to those of the Project, as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment. As such, peak vibration levels generated by the construction equipment would be similar to those of the Project. Accordingly, vibration impacts due to on- and off-site construction activities under Alternative 4 would similarly be less than significant for on-site and off-site construction vibration (building damage) and significant and unavoidable for on-site and off-site construction vibration (human annoyance). Overall, vibration impacts under Alternative 4 would be similar to the impacts of the Project.

(b) Operation

As described in Section IV.I, Noise, of this Draft EIR, sources of vibration related to operation of the Project would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under Alternative 4. As with the Project, vehicular-induced vibration from Alternative 4, including vehicle circulation within the subterranean parking area, would not generate perceptible vibration levels at off-site sensitive uses. In addition, like the Project, building mechanical equipment installed as part of Alternative 4 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration transmission such that the vibration would not be perceptible at the off-site sensitive receptors. Therefore, as with the Project, operation of Alternative 4 would not increase the existing vibration levels in the immediate vicinity of the Project Site. As such, vibration impacts associated with operation

of Alternative 4 would also be less than significant. However, such impacts would be greater than those of the Project due to the increase in vehicle (truck) trips.

j. Population, Housing, and Employment

(1) Construction

Alternative 4 would be constructed within the same Project Site as the Project. As discussed in Section II, Project Description, of this Draft EIR, the Elysian apartment building is located on the Project Site and contains 96 joint living and work quarter units. As with the Project, Alternative 4 would not involve removal of the existing Elysian apartment building. Therefore, similar to the Project, this alternative would not displace substantial number of existing housing or people, necessitating the construction of replacement housing elsewhere. As discussed in Section IV.J, Population, Housing, and Employment, of this Draft EIR, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by a particular development. Many construction workers are highly specialized (e.g., crane operators, steel workers, masons), and move from job site to job site as dictated by the demand for their skills. Therefore, population impacts related to household growth in the City of Los Angeles or the SCAG Region as a result of construction worker relocation under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Operation

As previously described, Alternative 4 would construct 827 residential units and 200,000 square feet of commercial uses. Based on a household size factor of 2.41 persons per household and 827 units, Alternative 4 would generate a new residential population of 1,994 persons.[35] As such, this Alternative would generate a greater residential population compared to the 1,777 persons generated by the Mixed Use Development Scenario and the same residential population as the No-Hotel Development Scenario. As discussed in Section IV.J, Population, Housing, and Employment, of this Draft EIR, the 1,777 new residents generated by the Mixed Use Development Scenario and the 1,994 new residents generated by the No-Hotel Development Scenario would be within and, thus, consistent with SCAG growth forecasts, constituting a small percentage of projected City and regional growth. Additionally, the up to 737 new residential units

[35] *Based on a household rate of 2.41 persons for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.*

proposed by the Mixed Use Development Scenario and the 827 new residential units proposed by the No-Hotel Development Scenario would represent a small percentage of the housing growth in the SCAG region and in the City. Thus, as with the Project, the residents and new residential units generated by Alternative 4 would similarly be consistent with SCAG growth forecasts.

Similar to the Project, in addition to the proposed residential units, Alternative 4 proposes to construct 200,000 square feet of retail/restaurant uses. The proposed office uses and hotel (under the Mixed Use Development Scenario) would be eliminated under Alternative 4. Based on the generation rates provided by the City of Los Angeles VMT Calculator Documentation, Alternative 4 would generate approximately 473 employees[36] compared to the 582 employees generated by the Mixed Use Development Scenario and the 492 employees generated by the No-Hotel Development Scenario. As with the Project, it is anticipated that the proposed retail/restaurant uses would include a range of permanent and part-time positions that may be filled, in part, by persons already residing in the vicinity of the workplace and who generally do not relocate their households due to such employment opportunities. Nevertheless, as discussed in Section IV.J, Population, Housing, and Employment, of this Draft EIR, the new employees generated by the Mixed Use Development Scenario and the No-Hotel Development Scenario would be within and, thus, consistent with SCAG growth forecasts, constituting a small percentage of projected City and regional growth. As such, similar to the Project, Alternative 4 would not induce substantial population growth or exceed SCAG's population forecast for the City or the SCAG region due to new businesses.

With regard to infrastructure, all circulation improvements planned for Alternative 4 are intended to improve circulation flows and safety throughout the Project Site and vicinity, similar to the Project. Utility and other infrastructure improvements planned for Alternative 4 would also be intended to connect the proposed uses to the existing main infrastructure system and would not require upgrades to the main system.

Overall, impacts related to population, housing, and employment under this alternative would be less than significant and similar to the less-than-significant impacts of the Project.

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[36] *Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the rate 0.002 employee per square foot for "General Retail" land use is applied to the 75,000 square feet of commercial uses, the rate 0.004 employee per square foot for "Supermarket" land use is applied to the 40,000-square-foot grocery store, the rate 0.001 employee per square foot for "Health Club" land use is applied to the 25,000-square-foot health club/spa, the rate 0.004 employee per square foot for "High-Turnover Sit-Down Restaurant" land use is applied to the 30,000-square-foot restaurant, and the rate 0.02 employee per seat for "Movie Theater" land use is applied to the 30,000-square-foot (900 seat movie theater.*

k. Public Services

(1) Fire Protection

(a) Construction

As previously discussed, the types of construction activities required for Alternative 4 would be similar to that of the Project. However, the overall amount and duration of construction activities would be reduced compared to the Project due to the reduced excavation depth. In addition, like the Project, construction would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous waste. Thus, compliance with regulatory requirements would effectively reduce the potential for construction activities to expose people to the risk of fire or explosion related to hazardous materials.

Additionally, while construction activities would primarily be contained within the boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by temporary lane closures (with travel still available in each direction), the hauling of soil and construction materials, construction worker traffic, roadway/access improvements, and the construction of utility line connections. Similar to the Project, it is likely that Alternative 4 would require construction fences that would encroach into the public right-of-way (e.g., sidewalks and roadways) adjacent to the Project Site on White Knoll Drive, Alpine Street, Beaudry Avenue, and Sunset Boulevard. However, a travel lane would be maintained in each direction on all streets around the Project Site throughout the construction period and emergency access would not be impeded. Similar to the Project under both development scenarios, Alternative 4 would be required to implement TR-PDF-1 which would require a Construction Management Plan to be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. In addition, Alternative 4 would implement a similar design feature as the Project in order to allow construction-related traffic, including hauling activities and construction worker trips to occur outside the typical weekday commuter A.M. and P.M. peak periods to the extent feasible, thereby reducing the potential for traffic-related conflicts. Therefore, construction-related impacts related to fire protection services under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 4 would generate a new residential population, as well as a new visitor and employee population on the Project Site that would contribute to

an increased demand for LAFD fire protection services. Specifically, Alternative 4 would generate approximately 1,994 new residents.[37] As such, Alternative 4 would result in a greater residential service population when compared to the 1,777 new residents generated by the Mixed Use Development Scenario and the same residential service population as the No-Hotel Development Scenario. In addition, Alternative 4 would provide 200,000 square feet of commercial uses, which would generate approximately 473 employees.[38] As such, Alternative 4 would result in a smaller employee service population when compared to 582 employees generated by Mixed Use Development Scenario and a greater employee service population when compared to the 492 employees generated by the No-Hotel Development Scenario. Therefore, the overall increased demand for LAFD fire protection and emergency medical services would be similar when compared to that of the Project. However, similar to the Project, Alternative 4 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Alternative 4 would also include the installation of automatic fire sprinklers within all proposed buildings and would not include the installation of barriers that could impede emergency vehicle access. In addition, as this alternative would develop the same amount of total floor area as the Project, it is expected that LADWP would similarly be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for Alternative 4. Therefore, similar to the Project, overall impacts with regard to LAFD fire protection during operation of Alternative 4 would be less than significant and would not require the addition of a new fire station or the expansion of an existing facility in order to maintain service. Operation of the Alternative 4 would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities (fire protection), the construction of which would cause significant environmental impacts, in order to maintain acceptable fire protection services. Such impacts would be similar to the less-than-significant impacts of the Project due to the increased commercial uses.

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[37] *Based on a household rate of 2.41 persons for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.*

[38] *Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the rate 0.002 employee per square foot for "General Retail" land use is applied to the 75,000 square feet of commercial uses, the rate 0.004 employee per square foot for "Supermarket" land use is applied to the 40,000-square-foot grocery store, the rate 0.001 employee per square foot for "Health Club" land use is applied to the 25,000-square-foot health club/spa, the rate 0.004 employee per square foot for "High-Turnover Sit-Down Restaurant" land use is applied to the 30,000-square-foot restaurant, and the rate 0.02 employee per seat for "Movie Theater" land use is applied to the 30,000-square-foot (900 seat movie theater.*

(2) Police Protection

(a) Construction

As previously noted, the types of construction activities required for Alternative 4 would be similar to that of the Project. However, the overall amount of construction activities and duration of construction would be slightly reduced compared to the Project due to the reduced subterranean parking. Additionally, similar to the Project (under both development scenarios), Alternative 4 would be required to implement Project Design Feature POL-PDF-1, which includes temporary security measures such as security fencing, lighting, locked entry to secure the Project Site during construction, and regular security patrols during non-construction hours, thereby reducing the demand for police protection services.

In addition, similar to the Project, a Construction Management Plan would be implemented as part of the Retail and Residential Mixed Use Alternative to ensure that adequate and safe access is available within and near the Project Site during construction activities. Therefore, construction-related impacts to police protection services under Alternative 4 would be less than significant, and less than the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 4 would generate a new residential population, as well as a new visitor and employee population on the Project Site that would contribute to an increased demand for police protection services. Specifically, Alternative 4 would generate approximately 1,994 new residents.[39] As such, Alternative 4 would result in a greater residential service population when compared to the 1,777 new residents generated by the Mixed Use Development Scenario and a similar residential service population when compare to the No-Hotel Development Scenario. In addition, Alternative 4 would provide 200,000 square feet of commercial uses, which would generate approximately 473 employees.[40] As such, Alternative 4 would result in a smaller employee

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[39] *Based on a household rate of 2.41 persons for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.*

[40] *Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the rate 0.002 employee per square foot for "General Retail" land use is applied to the 75,000 square feet of commercial uses, the rate 0.004 employee per square foot for "Supermarket" land use is applied to the 40,000-square-foot grocery store, the rate 0.001 employee per square foot for "Health Club" land use is applied to the 25,000-square-foot health club/spa, the rate 0.004 employee per square foot for "High-Turnover Sit-Down Restaurant" land use is applied to the 30,000-square-foot restaurant, and the rate 0.02 employee per seat for "Movie Theater" land use is applied to the 30,000-square-foot (900 seat movie theater.*

service population when compared to 582 employees generated by the Mixed Use Development Scenario and a greater employee service population when compared to the 492 employees generated by the No-Hotel Development Scenario. As discussed in Section IV.J.2, Public Services—Police Protection, of this Draft EIR, the LAPD considers the residential population within their service area to evaluate service capacity. Like the Project (under both development scenarios), Alternative 4 would be required to implement Project Design Feature POL-PDF-2 through Project Design Feature POL-PDF-5, which include a 24-hour/seven-day security plan to ensure the safety of its residents and site visitors, on-site security, appropriate lighting to ensure security, and the prevention of concealed spaces. The design features would help offset the increased demand for police protection services generated by Alternative 4. Therefore, the impact on police protection services would be less than significant, and similar to the less-than-significant impacts of the Project when compared with the No-Hotel Development Scenario and less when compared with the Mixed Use Development Scenario.

(3) Schools

(a) Construction

Similar to the Project, Alternative 4 would generate part-time and full-time jobs associated with construction between the start of construction and buildout of the development proposed under Alternative 4. 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 the development of Alternative 4. Therefore, the construction employment generated by Alternative 4 would not result in a notable increase in the resident population or a corresponding increase in demand for schools in the vicinity of the Project Site. As such, impacts on school facilities during construction of Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 4 would generate a new residential population on the Project Site that would contribute to an increased demand for schools. Specifically, Alternative 4 would generate approximately 1,994 new residents[41] which would be comparatively less than the 1,777 new residents generated by the Mixed Use Development Scenario and the same number of new residents generated by the No-Hotel Development

[41] *Based on a household rate of 2.41 persons for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.*

Scenario. Therefore, the overall increased demand in school services would be greater when compared to the Mixed Use Development Scenario and similar when compared to the No-Hotel Development Scenario. Additionally, the construction of commercial uses on the Project Site could indirectly generate students by potentially causing employees to relocate to the vicinity of the Project Site. Specifically, Alternative 4 would generate approximately 473 employees.[42] As such, Alternative 4 would result in a smaller employee service population when compared to 582 employees generated by Mixed Use Development Scenario and a greater employee service population when compared to the 492 employees generated by the No-Hotel Development Scenario. Overall, this Alternative would result in a similar service population when compared that of the Project. As such, like the Project, the Applicant for the Retail and Residential Mixed Use Alternative would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees fully removes all of Alternative 4's related school impacts. Therefore, impacts related to schools would be less than significant under Alternative 4, and similar to the less-than-significant impacts of the Project due to the increased service population.

(4) Parks and Recreation

(a) Construction

Similar to the Project, construction of Alternative 4 would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, the likelihood that construction workers would relocate their households as a consequence of working on Alternative 4 is negligible. Therefore, the construction workers associated with Alternative 4 would not result in a notable increase in the residential population, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site.

Like the Project, during construction of Alternative 4, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. However, any

[42] *Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the rate 0.002 employee per square foot for "General Retail" land use is applied to the 75,000 square feet of commercial uses, the rate 0.004 employee per square foot for "Supermarket" land use is applied to the 40,000-square-foot grocery store, the rate 0.001 employee per square foot for "Health Club" land use is applied to the 25,000-square-foot health club/spa, the rate 0.004 employee per square foot for "High-Turnover Sit-Down Restaurant" land use is applied to the 30,000-square-foot restaurant, and the rate 0.02 employee per seat for "Movie Theater" land use is applied to the 30,000-square-foot (900 seat movie theater.*

resulting increase in the use of such parks and recreational facilities would be temporary and negligible.

Based on the above, construction of Alternative 4 would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities, nor would construction of Alternative 4 interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the vicinity of the Project Site. Therefore, impacts on parks and recreational facilities under Alternative 4 would be less than significant, and similar to the less-than-significant impacts of the Project.

(b) Operation

Residents are considered the primary users of parks and recreational facilities. Similar to the Project, Alternative 4 would generate a new residential population on the Project Site, which could create a demand for parks and recreation services. Specifically, Alternative 4 would generate approximately 1,994 new residents[43] which would be comparatively less than the 1,777 new residents generated by the Mixed Use Development Scenario and the same number of new residents generated by the No-Hotel Development Scenario. Therefore, the overall increased demand in parks would be greater when compared to the Mixed Use Development Scenario and the same when compared to the No-Hotel Development Scenario. Similar to the Project, Alternative 4 would provide a variety of open space and recreational amenities to comply with the open space requirements of the LAMC. As such, it is likely that Project residents would generally utilize on-site open space to meet their recreational needs. Similar to the Project, while it is possible that employees of Alternative 4 may utilize local parks and recreational facilities, the increased demand would be negligible as it is anticipated that employees and visitors would also primarily utilize on-site open space during their time spent at the Project Site, resulting in a negligible demand for surrounding parks and recreational facilities. Thus, Alternative 4 would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities. Also, similar to the Project, under Alternative 4, the Applicant would be required to pay Quimby fees to the City that could be used to add or improve park facilities in the vicinity of the Project Site. Therefore, impacts to park and recreation facilities would be less than significant under Alternative 4, and similar to the less-than-significant impacts of the Project.

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[43] *Based on a household rate of 2.41 persons for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.*

(5) Libraries

(a) Construction

Similar to the Project, construction of Alternative 4 would result in a temporary increase of construction workers on the Project Site. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by Alternative 4. Therefore, construction workers would not result in a material increase in the resident population within the service area of the libraries serving the Project Site and vicinity.

In addition, it is unlikely that construction workers would visit library facilities in the vicinity of the Project Site on their way to/from work or during their lunch hours. Specifically, it is unlikely that construction workers would utilize library facilities on their way to work as the start of their workday generally occurs before the libraries open for service. Additionally, lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. Furthermore, it is unlikely that construction workers would utilize library facilities at the end of the work day, and would instead likely use library facilities near their place of residence. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. As such, impacts to library facilities during construction would be less than significant under Alternative 4, and similar to the less-than-significant impacts of the Project.

(b) Operation

Residents are considered the primary users of library facilities. As previously discussed, Alternative 4 would generate approximately 1,994 new residents[44] which would be comparatively less than the 1,777 new residents generated by the Mixed Use Development Scenario and the same number of new residents generated by the No-Hotel Development Scenario. With regard to employees, the number of employees generated by Alternative 4 would be less than the Mixed Use Development Scenario and greater than the No-Hotel Development Scenario. Employees would generate minimal demand for library services since they would be more likely to use library facilities near their homes during non-work hours. Employees at the Project Site would also have internet access, which provides information and research capabilities and reduces the demand at physical library locations. As with the Project, Alternative 4 would generate revenues to the City's

[44] *Based on a household rate of 2.41 persons for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.*

General Fund (in the form of property taxes, sales tax, and business tax, etc.) that could be applied toward the provision of new library facilities and related staffing for any one of the libraries serving the Project Site and vicinity, as deemed appropriate. Therefore, any indirect or direct demand for library services generated by the employees of Alternative 4 would be unlikely to necessitate the construction of a new or expanded library. As such, impacts under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

I. Transportation

Alternative 4 would be developed within the same Project Site as the Project and would include a mix of uses similar to the No-Hotel Development Scenario. As such, most of the plans, policies, and programs applicable to the Project would also apply to Alternative 4. As discussed above, while Alternative 4 would include a reduction in the uses proposed by both development scenarios, Alternative 4 would feature similar vehicular, pedestrian, and bicycle access as the Project. In addition, parking would generally be provided in a manner similar to the Project. Therefore, overall, as with the Project, Alternative 4 would be consistent with the goals, policies, and requirements of the applicable plans. Specifically, Alternative 4 would widen the sidewalks on all sides of the Project Site, would provide a new signalized pedestrian crossing point on Sunset Boulevard with continental crosswalks, and install all-way stop-control at the intersection of Beaudry Avenue & Alpine Street, where there is currently an uncontrolled crosswalk across Beaudry Avenue. In addition, as with the Project, Alternative 4 would also promote pedestrian activity and reduce vehicle trips and VMT by encouraging multi-modal mobility options such as bicycle and scooter sharing services; providing a Transportation Center; providing convenient and adequate bicycling facilities; and enhancing pedestrian amenities through the provision of gardens, courtyards, and terraces, which would include family play features, a lawn with lounge furniture, and other landscape elements. As such, Alternative 4 would comply with the programs and policies set forth in the Mobility Plan; Plan for a Healthy Los Angeles; LAMC Section 12.21.A.16, LAMC Section 12.26J, and LAMC Section 12.37; Vision Zero; Citywide Design Guidelines, and SCAG RTP/SCS to the same extent as the Project. Therefore, Alternative 4 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Thus, impacts would be similar to the less-than-significant impacts of the Project.

With respect to VMT, when accounting for the same project design features as the Project, the proposed uses would result in a greater total daily VMT when compared to both development scenarios. Specifically, this Alternative would result in 68,821 total daily VMT, which would be comparatively greater than the 56,710 daily VMT generated by the Mixed Use Development Scenario and the 53,035 daily VMT generated by the No-Hotel Development Scenario. Based on the population assumptions, Alternative 4 would

generate an average household VMT of 4.9 per capita.[45] While the total daily VMT generated under Alternative 4 would be greater than both development scenarios (both at 4.8), the average household VMT per capita for Alternative 4 would still fall below the significance threshold of 7.2.[46] Therefore, similar to the Project, impacts with respect to conflicts with CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant.

Alternative 4 would have the same access plan as the Project. Specifically, as with the Project, Alternative 4 would include six different access points around the Project Site. Similar to the Project (under both development scenarios), the final design of the access points would be reviewed by the City Department of Building and Safety, Bureau of Engineering, and LADOT during site plan review to ensure code compliance and safe pedestrian and vehicular design. Therefore, similar to the Project, impacts would be less than significant. Such impacts would be similar to the impacts of the Project. Lastly, similar to the Project, Alternative 4 would not interfere with emergency access. Similar to the Project under both development scenarios, Alternative 4 would be required to implement Project Design Feature TR-PDF-1 which would require a Construction Management Plan to be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. With regard to operation, all driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding emergency access, and would not include the installation of barriers that could impede emergency vehicle access. Lastly, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, Alternative 4 would result in less than significant emergency access impacts that would be similar to the less than significant impacts of the Project.

Alternative 4 would generate 16 morning peak hour trips and 39 afternoon peak hour trips on the SR 110 southbound off-ramp to Figueroa Terrace. Under Future with Alternative 4 Conditions, Alternative 4 would result in a ramp queue of 1.1 vehicles (28 feet) during the morning peak hour and 4.0 vehicles (100 feet) during the afternoon peak hour. The off-ramp provides approximately 500 feet of queuing space before reaching the freeway mainline lanes. Therefore, similar to the Project, no significant impact would occur.

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[45] *Gibson Transportation Consulting, Inc., "Transportation Assessment for the Alternatives to the 1111 Sunset Boulevard Mixed Use Project," October 19, 2020. See Appendix T of this Draft EIR.*

[46] *Gibson Transportation Consulting, Inc., "Transportation Assessment for the Alternatives to the 1111 Sunset Boulevard Mixed Use Project," October 19, 2020. See Appendix T of this Draft EIR.*

m. Tribal Cultural Resources

As previously discussed, Alternative 4 would construct fewer subterranean parking levels compared to the Project and would result in reduced excavation activities. Therefore, the potential for Alternative 4 to uncover subsurface tribal cultural resources would be reduced compared to that of the Project. However, as discussed in Section IV.M, Tribal Cultural Resources, of this Draft EIR and in the Tribal Cultural Resources Report included in Appendix R.1, the likelihood that buried, intact cultural deposits of Native American origin are preserved within the Project Site is low considering the significant landscape modification and construction that has occurred within the Project Site from the 1870s forward. Nonetheless, based on the substantial (and confidential) evidence provided by the Kizh Nation, the possibility exists that intact cultural deposits related to a potential tribal cultural resource may be preserved within the Project Site. As such, Alternative 4 would implement the same mitigation measure (TCR-MM-1) as the Project to mitigate potential impacts to tribal cultural resources. Accordingly, impacts to tribal cultural resources under Alternative 4 would be less than significant with mitigation, and less than the impacts of the Project.

n. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 4 would generate a short-term demand for water. This demand would only be slightly reduced with the reduction in excavation activities associated with the reduced subterranean parking. As evaluated in Section IV.N.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of construction. Since the water demand for construction activities associated with Alternative 4 would be reduced, the temporary and intermittent demand for water during construction of Alternative 4 would similarly be expected to be met by the City's available water supplies.

Furthermore, as with the Project, the design and installation of new service connections under Alternative 4 would be required to meet applicable City standards. The connections and installation of on-site water distribution lines would primarily involve on-site trenching to place the lines below the surface and minor off-site trenching to connect to the existing public water mains or existing meter lateral locations. As with the Project, prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depths of all lines. Furthermore, LADWP would be notified in advance of proposed ground disturbance activities to avoid disruption of water service.

LADWP would review and approve all appropriate connection requirements, pipe depths, and connection location(s). In addition, given that construction activities could temporarily affect access in adjacent rights-of-way, a Construction Management Plan, similar to the Project, would also be implemented as part of the Retail and Residential Mixed Use Alternative to ensure adequate and safe access remains available within and near the Project Site during construction. Therefore, impacts on water supply and infrastructure associated with construction activities would be less than significant under Alternative 4, and less than the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 4 would generate an increased demand for water relative to existing conditions. Based on the proposed uses and the number of units, a Water Supply Assessment would also be required for Alternative 4 to determine whether adequate water supplies would be available to serve Alternative 4. While Alternative 4 would construct a total floor area similar to the Project, the land use changes associated with Alternative 4 would result in a reduced water demand, as compared to both development scenarios. Thus, as with the Project, the estimated water demand under Alternative 4 would not exceed the available supplies projected by LADWP. Therefore, the 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 less than that of the Project. Furthermore, similar to the Project, Alternative 4 would construct the necessary on-site water infrastructure and off-site connections to the LADWP water system pursuant to applicable City requirements under Alternative 4 to accommodate the new buildings. Thus, impacts to water supply and infrastructure under Alternative 4 would be less than significant, and less than the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, Alternative 4 would cap existing sewer laterals during construction. As such, no new sewage would enter the public sewer system, except for sewer services needed for the Elysian apartment building. Temporary facilities, such as portable toilet and hand wash areas, would be provided by the construction contractor; however, any sewage generated from these facilities would be collected and hauled off-site and would not be discharged into the public sewer system. Thus, wastewater generation from construction activities under Alternative 4 is not anticipated to cause a measurable increase in wastewater flows. Therefore, similar to the Project, construction-related impacts to the wastewater system under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 4 would generate greater wastewater flows relative to existing conditions. While Alternative 4 would construct a total floor area similar to the Project, the land use changes associated with Alternative 4 would result in reduced wastewater generation, as compared to both development scenarios. As provided in Section IV.N.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the Project-generated wastewater could be accommodated by the existing capacity of the Hyperion Water Reclamation Plant. Therefore, it is anticipated that Alternative 4 could also be accommodated by the existing capacity of the Hyperion Water Reclamation Plant, and impacts with respect to treatment capacity would be less than significant.

As with the Project, sewer service for Alternative 4 would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site. Given that Alternative 4 would generate less wastewater flows compared to both development scenarios, it is possible that there would be sufficient capacity within the sewer lines serving the Project Site to serve the wastewater flows of Alternative 4. If sufficient capacity is not available, as with the Project, Alternative 4 could potentially require the upsizing of the existing 8-inch line on Beaudry Avenue, or equivalent improvement, as determined by LA Sanitation, to ensure adequate sewer capacity is available in the vicinity of the Project Site to meet the requirements of Alternative 4. However, additional detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for Alternative 4 during the permitting process. All related sanitary sewer connections and on-site infrastructure under Alternative 4 would be designed and constructed in accordance with applicable standards.

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

(3) Energy Infrastructure

(a) Construction

The energy consumed by Alternative 4 would be slightly reduced compared to the Project due to the reduced construction activities and duration associated with reduced excavation. As LADWP has confirmed that the supply and existing infrastructure in the Project area would have the capacity to serve the Project Site, the existing infrastructure would similarly have capacity to supply energy for Alternative 4. Therefore, impacts on infrastructure capacity associated with short-term construction activities under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project due to the reduced construction activities.

(b) Operation

As with the Project, operation of Alternative 4 would generate an increased consumption of electricity and natural gas relative to existing conditions. In addition, based on the uses and amount of total floor area proposed under Alternative 4, the total energy consumption of Alternative 4 would be greater compared to the total energy consumption of the Project. However, as with the Project, the energy consumption under Alternative 4 would represent a small percentage of the region's electricity and natural gas supply capacity. Overall, impacts to infrastructure capacity under Alternative 4 would be less than significant, and greater than the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above, the Retail and Residential Mixed Use Alternative would not avoid any of the Project's significant and unavoidable impacts. Specifically, the Project's significant and unavoidable impacts related to regional air quality during construction, on- and off-site construction noise, and vibration from on- and off-site construction with respect to the significance threshold for human annoyance would remain significant with development of Alternative 4. The Retail and Residential Mixed Use Alternative also would not avoid the Project's significant and unavoidable cumulative impacts related to regional air quality during construction, construction noise from on-site and off-site noise sources, and vibration associated with off-site construction pursuant to the significance threshold for human annoyance. Additionally, since this Alternative would not provide for the synergy of uses as the Project, which could serve to reduce vehicle trips and vehicle miles traveled and associated air and GHG emissions, Alternative 4 would result in a greater impact associated with land use consistency and GHG emissions compared to the Project. Furthermore, as a result of the increase in vehicle trips, Alternative 4 would result in significant and unavoidable impacts with respect to off-site operational noise. All other impacts would be similar to or less than those of the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 4 would include the development of a mixed use project, including 827 residential units and 200,000 square feet of commercial uses. As compared to the Mixed Use Development Scenario, Alternative 4 would construct 90 fewer residential units, increase the commercial square footage by 105,000 square feet, and eliminate the office and hotel uses. As compared to the No-Hotel Development Scenario, Alternatives 4 would increase the commercial square footage by 105,000 square feet and would eliminate the office and hotel uses. Overall, Alternative 4 would not meet the underlying purpose of the Project to provide a high-density, mixed use and transit- and pedestrian-oriented development that includes new housing opportunities that are integrated with commercial

and office uses that provide new employment and commercial opportunities for the surrounding community. In addition, without the office uses and proposed hotel (under the Mixed Use Development Scenario) uses proposed by the Project, Alternative 4 would not achieve the following Project objective to the same extent as the Project:

- Promote the Central City North Community Plan's Objective 2-1 to strengthen viable commercial development in the community and to provide additional opportunities for new commercial development and services by providing a variety of commercial uses, including office space, retail, and restaurant space.

However, Alternative 4 would meet the following remaining objectives of the Project to the same extent as the Project:

- Advance the Central City North Community Plan's Policy 1-2.1 by providing multi-family residential development within a Project Site that is commercially zoned.

- Consistent with Central City North Community Plan Objective 1-3, develop a project that preserves and enhances the varied and distinct residential character and integrity of existing residential neighborhoods by providing a mix of architectural structures that are compatible with the varied scale of surrounding uses.

- Consistent with the Central City North Community Plan's Objective 1-4, promote the provision of new and adequate housing for all persons, including affordable housing units and units for rent and for sale.

- In support of Objective 1-2 and Goal 12 of the Central City North Community Plan, encourage the reduction in vehicle trips by designing a project that includes infrastructure for walking and cycling and ride-sharing hubs and transit nodes for bus and shuttle pick-up.

- In support of the Central City North Community Plan's Goal 4 to provide adequate recreation and park facilities which meet the needs of the residents in the Community Plan area, create a pedestrian-friendly project by introducing active commercial uses along the Project Site frontages, incorporate pedestrian paseos transecting the Project Site, provide publicly accessible open space, and improved streetscapes around the Project Site.

V. Alternatives

E. Alternative 5: Reduced-Density Alternative

1. Description of the Alternative

Alternative 5, the Reduced Density Alternative, would reduce the amount of total new floor area proposed by the Project (under the Mixed Use Development Scenario) by approximately 35 percent. Specifically, Alternative 5 proposes the development of 479 dwelling units (none of which are affordable units), a 117-room hotel, 61,750 square feet of commercial uses, and 31,200 square feet of office uses. Overall, the Reduced Density Alternative would construct 646,738 square feet of new floor area (a reduction of 348,244 square feet compared to the Project) and would result in a net FAR of 2.37:1 compared to the Project's net FAR of 3.65:1.

As shown in the conceptual site plan of the Reduced Density Alternative provided in Figure V-7 on page V-145, similar to the Project, the proposed uses would be built on a parking podium, which would be partially below grade and partially above grade. Above the parking podium, the proposed uses would be provided within four primary structures,[47] including two residential towers (referred to as Tower A and Tower B), a hotel (referred to as the Sunset Building), and a commercial building that could contain office, retail, restaurant, and parking uses (referred to as the Courtyard Building). As with the Project, three low-rise non-residential structures would be oriented towards Sunset Boulevard and Beaudry Avenue. In addition, a portion of the proposed residential uses would be provided in low-rise residential buildings (not in the residential towers) scattered throughout the eastern and southern portions of the Project Site around the base of the two residential towers. Office and commercial uses could be provided in the lower floors of these low-rise residential buildings.

As shown in the plan overview diagram provided in Figure V-8 on page V-146, Tower A would be situated along the southern portion of the Project Site, similar to the Project, and would include 32 levels with an approximate height of 370 feet (a reduction of 202 feet compared to the Project's height of 572 feet). Tower B would be situated along the eastern portion of the Project Site, also similar to the Project, and would include

[47] *While the proposed structures would appear as separate buildings, the proposed structures collectively comprise one building per the City's Building Code due to the unifying subterranean parking.*

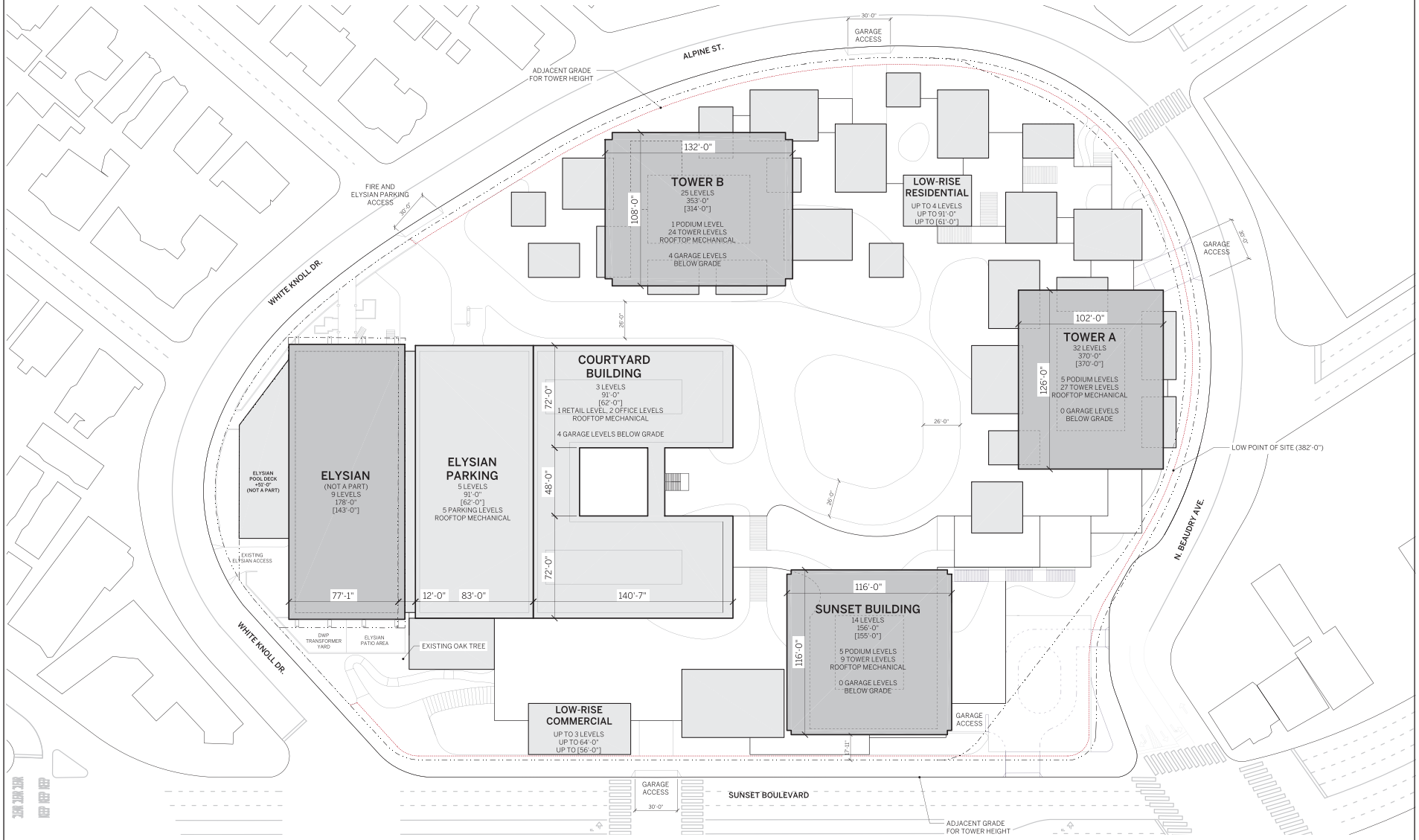

Figure V-7
Alternative 5 Conceptual Site Plan

Source: Skidmore, Owings & Merrill LLP, 2020.

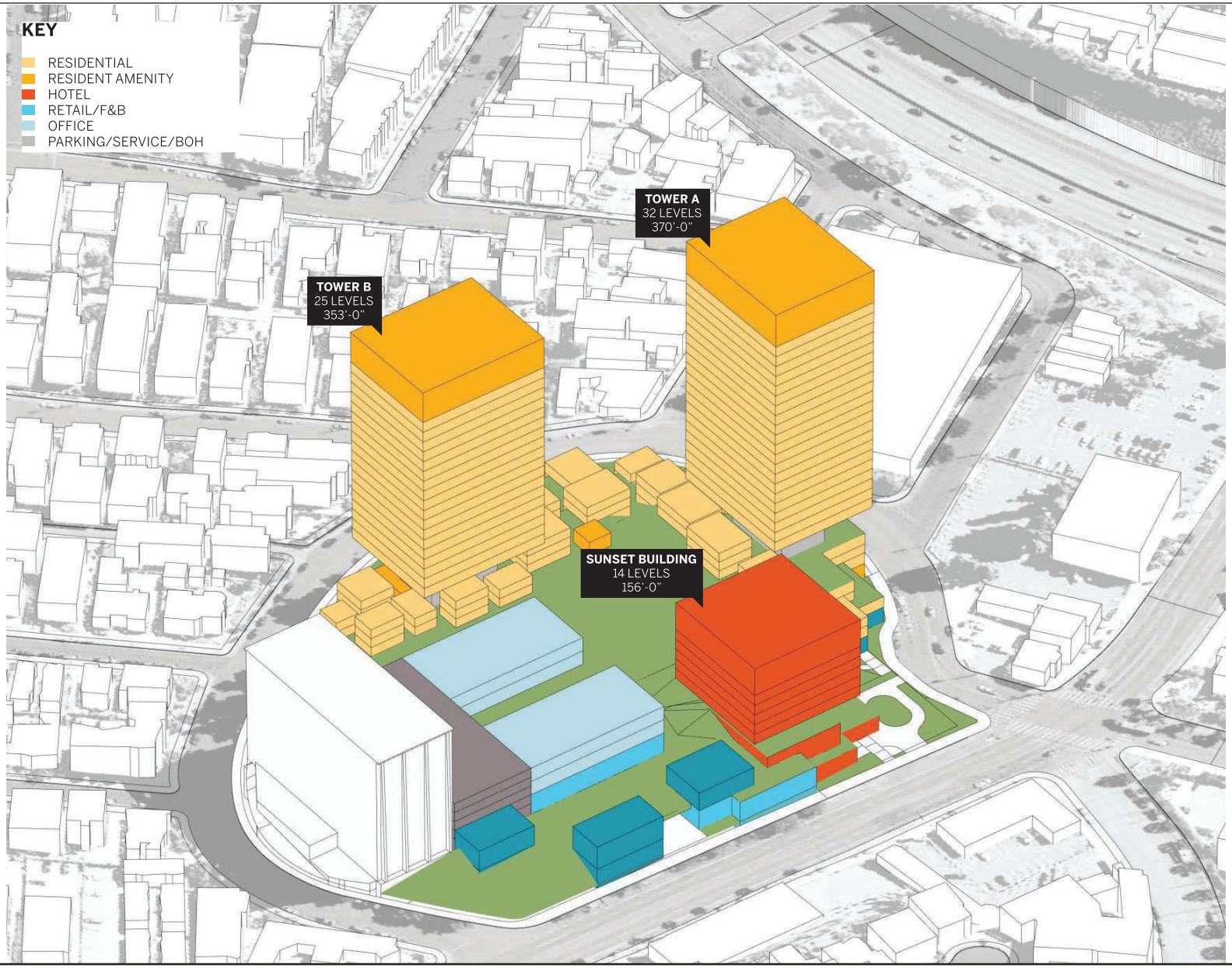

Figure V-8
Alternative 5 Plan Overview

Source: Skidmore, Owings & Merrill LLP, 2020.

25 levels with an approximate height of 353 feet (a reduction of 55 feet compared to the Project's height of 408 feet). Like the Project, the Sunset Building would be located at the southwestern corner of the Project Site, primarily fronting Sunset Boulevard, and would include 14 levels with an approximate height of 156 feet (a reduction of 55 feet compared to the Project's height of 211 feet). The Courtyard Building would also be located similar to the Project and would include three levels with an approximate height of 91 feet, as with the Project. The overall design of the buildings under Alternative 5, including architectural features, lighting and signage, and sustainability, would be similar to that of the Project. Alternative 5 would feature similar vehicular, pedestrian, and bicycle access as the Project.

The Reduced Density Alternative would require and would provide 1,087 parking spaces in accordance with the requirements of the LAMC.[48] Parking for this alternative would be provided in a four-level parking podium, which would be partially below grade and partially above grade, and would be reduced compared to the Project's six-level parking podium. As with the Project, the portions of the parking podium that would be above grade would be wrapped in active uses or landscaping. Below grade parking would extend to a depth of 31 feet (a reduction of 33 feet compared to the Project's six-level parking podium, which would extend to a depth of 64 feet). As with the Project, an additional 168 parking spaces for the existing Elysian apartment building would also be provided as part of the Reduced Density Alternative. The Elysian Parking Facility would be a five-level, partially subterranean parking structure and would be located within the footprint of the proposed Courtyard Building.

As with the Project, Alternative 5 would provide a variety of open space and recreational amenities. Trees and other landscaping features would also be planted throughout the Project Site. In total, Alternative 5 would provide 53,800 square feet of open space and recreational amenities in accordance with the open space requirements set forth in the LAMC.

Similar to the Project, to provide for development of Alternative 5, demolition of the existing vacant buildings and surface parking areas would occur. However, Alternative 5 would require less excavation and export as the Project. Specifically, given the reduction in excavation associated with the reduced subterranean parking garage, it is estimated that approximately 324,142 cubic yards of export material would be hauled from the Project Site during the demolition and excavation phase of the Reduced Density Alternative, a reduction of 147,858 cubic yards compared to the Project's estimated 472,000 cubic yards of export. Therefore, given the reduction in development, the construction period would be reduced compared to the Project.

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[48] *As with the Project, parking for Alternative 5 was designed to account for required parking prior to the application of AB 744.*

As with the Project, Alternative 5 would require a Major Conditional Use Permit, Site Plan Review, removal of a variable width Building Line, a Vesting Conditional Use to permit the Hotel use, Master Conditional Use Permit to permit the sale of alcoholic beverages, a Zoning Administrator's Adjustment related to the Building Separation, a Vesting Tentative Tract Map and various approval and permits from the City Department of Building and Safety. Alternative 5 would not require a Density Bonus request or a Director's Determination to reduce the number of trees planted on-site.

2. Environmental Impacts

As discussed in the Initial Study prepared for the Project included in Appendix A of this Draft EIR, the Project Site is identified by the City as being located within a transit priority area. In addition, the Project is a mixed use residential project and is located on an infill site which meets PRC Section 21099's definition of an infill site as a lot located within an urban area that has been previously developed. The Project Site is also located within 0.5 mile of several bus lines, the majority of which provide a frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. Therefore, pursuant to SB 743 and ZI No. 2452, the Project's aesthetic impacts shall not be considered significant impacts on the environment.

Similar to the Project, Alternative 5 would meet the provisions of SB 743 as it would be developed within the same Project Site, which is identified as an infill site located within a transit priority area. In addition, Alternative 5 would be considered a mixed use residential project.[49] Therefore, as with the Project, the aesthetics impacts of Alternative 5 would not be considered a significant impact on the environment.

a. Air Quality

(1) Regional Emissions

(a) Construction

As with the Project, construction of Alternative 5 has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities.

[49] *Senate Bill 743 [Public Resources Code Section 21099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment."*

As discussed in Section IV.A, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. As with the Project, Alternative 5 would be required to implement AQ MM-1 through 5.

Under Alternative 5, construction activities would be reduced in comparison to the Project due to the reduction in uses and associated square footage. The overall phasing of construction would result in similar overlapping construction activities as the Project. Thus, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities, although the duration that these air emissions would occur would be reduced. Because maximum daily conditions are used for measuring impact significance, regional impacts on these days would be similar to those of the Project. Therefore, as with the Project, Alternative 5 would result in significant and unavoidable impacts associated with regional construction emissions, and impacts would be similar to those of the Project.

(b) Operation

As previously discussed, the development proposed under Alternative 5 would be reduced compared to the Project. As such, the number of new daily trips generated by Alternative 5 would be less than the number of new daily trips generated by the Project. Specifically, as provided in Appendix T of this Draft EIR, Alternative 5 would result in a total of 5,483 daily vehicle trips compared to the Mixed Use Development Scenario's 8,257 total daily vehicle trips and the No-Hotel Development Scenario's 7,711 total daily vehicle trips. Alternative 5 would result in 34,913 daily VMT compared to the Mixed Use Development Scenario's 52,517 daily VMT and the No-Hotel Development Scenario's 49,137 daily VMT. Operational regional air pollutant emissions associated with Alternative 5 would be generated by vehicle trips and VMT to the Project Site, which are the largest contributors to operational air pollutant emissions, and by the consumption of electricity and natural gas. As vehicular emissions depend on the number of trips and daily VMT, the overall pollutant emissions generated by the Reduced Density Alternative would be less than the emissions generated by the Project because the number of vehicular trips and VMT would be less. With the reduction in uses and overall floor area, both area sources and stationary sources would generate less on-site operational air emissions compared to the Project. These reduced emissions would be below the SCAQMD's regional significance thresholds, and the impacts of Alternative 5 related to regional emissions during operation would be less than significant. Therefore, impacts associated with regional air pollutant emissions during operation of Alternative 5 would be less than significant and less than the impacts of the Project.

(2) Localized Emissions

(a) Construction

On-site construction activities associated with Alternative 5 would be located at similar distances from sensitive receptors as the Project. Given the reduction in the proposed development, overall construction activities and associated localized emissions from construction of Alternative 5 would be reduced compared to those of the Project. Therefore, as with the Project, localized impacts under Alternative 5 would be less than significant, and less than the less-than-significant impacts of the Project.

(b) Operation

Localized operational impacts are determined primarily by traffic volumes. As provided in Appendix T of this Draft EIR, the Reduced Density Alternative would generate 5,483 daily vehicle trips. As such, this alternative would generate less daily trips compared to the Mixed Use Development Scenario's 8,257 daily trips and the No-Hotel Development Scenario's 7,711 daily trips. As such, total vehicular emissions would be less compared to the Project under both development scenarios. In addition, with the development of less uses as the Project, area and stationary sources would also generate less on-site operational air emissions compared to the Project. As with the Project, Alternative 5 also would not introduce any major new sources of air pollution within the Project Site. Because the localized impacts analysis from on-site operational activities and the localized CO hotspot analysis associated with off-site operational activities for the Project did not result in any significant impacts, localized impacts under Alternative 5 would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project.

(3) Toxic Air Contaminants

(a) Construction

As with the Project, construction of Alternative 5 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 TAC emissions generated by Alternative 5 would be less than to those of the Project since grading and excavation activities for Alternative 5 would be reduced due to the reduction in subterranean parking levels. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 5 would be less than significant, and less than the impacts of the Project.

(b) Operation

As set forth in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential TACs associated with Project operations would include diesel particulate matter from delivery trucks. Under Alternative 5, the overall increase in the number of deliveries and associated DPM emissions would be reduced compared to the Project due to the reduction in uses. Same as the Project, the land uses proposed under Alternative 5 are not considered land uses that generate substantial TAC emissions. Therefore, Alternative 5 would not release substantial amounts of TACs and impacts would be less than significant. Such impacts would be less than the less-than-significant impacts of the Project.

b. Cultural Resources

As with the Project, Alternative 5 would require demolition of the existing vacant buildings. As determined in the Historic Report included in Appendix E.1 of this Draft EIR, the existing on-site buildings do not qualify as historical resources. Therefore, the potential for direct impacts to historical resources as a result of removal of the existing vacant buildings on-site would also be less than significant under this alternative.

With regard to indirect impacts on adjacent historical resources, similar to the Project, Alternative 5 also would not impact or diminish the architectural design and integrity or impact the setting of any adjacent historical resources. Therefore, as with the Project, Alternative 5 would not indirectly affect adjacent contributing properties in the vicinity of the Project Site, and indirect impacts to historical resources would be less than significant.

Overall, impacts to historical resources under Alternative 5 would be less than significant, and similar to the less-than-significant impacts of the Project.

With regard to archaeological resources, Alternative 5 would require less grading when compared to the Project. Therefore, the potential for Alternative 5 to uncover archaeological resources would be reduced when compared to that of the Project. Like the Project, Alternative 5 would implement the same mitigation measure (CUL-MM-1) as the Project in order to mitigate potential impacts to archaeological resources. As such, as with the Project, impacts to archaeological resources under Alternative 5 would be less than significant with mitigation. However, such impacts would be less than the impacts of the Project.

c. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

(a) Construction

Similar to the Project, construction activities associated with Alternative 5 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. Like the Project, construction activities associated with Alternative 5 would not involve the consumption of natural gas. As with the Project, Alternative 5 would also generate a demand for transportation energy associated with on- and off-road vehicles. However, the energy consumed during construction of Alternative 5 would be reduced compared to the Project due to the reduction in construction activities and duration. As with the Project, the electricity demand during construction of Alternative 5 would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Construction equipment used during construction of Alternative 5 would also comply with Title 24 requirements where applicable, similar to the Project. With regard to transportation fuels, trucks and equipment used during construction of Alternative 5 would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. Therefore, as with the Project, construction activities would use energy that is not wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 5 and similar to the less-than-significant impacts.

(b) Operation

As with the Project, operation of Alternative 5 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions. As previously discussed, Alternative 5 would result in a reduction of the uses proposed by the Project as well as a reduction in the number of daily trips. Specifically, as provided in Appendix T of this Draft EIR, Alternative 5 would result in a total of 5,483 daily vehicle trips compared to the Mixed Use Development Scenario's 8,257 total daily vehicle trips and the No-Hotel Development Scenario's 7,711 total daily vehicle trips. In addition, the change in land uses associated with Alternative 5 would result in a decrease of daily VMT as compared to the Project. As such, the consumption of electricity, natural gas, and petroleum-based fuels would be reduced under the Reduced Density Alternative. In

addition, similar to the Project, Alternative 5 would implement design features to reduce energy usage. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 5 would not be wasteful, inefficient, or unnecessary. Overall, impacts related to energy use during operation of Alternative 5 would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Conflict with Plans for Renewable Energy or Energy Efficiency

As discussed in Section IV.C, Energy, of this Draft EIR, the current City of LA Green Building Code requires compliance with CalGreen and California's Building Energy Efficiency Standards (Title 24). Like the Project, Alternative 5 would comply with the City's Green Building Code, as well as be capable of achieving LEED® Certified equivalency. Therefore, similar to the Project, Alternative 5 would incorporate measures that are beyond current State and City energy conservation requirements. Also similar to the Project, Alternative 5 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2019 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code.

With regard to transportation related energy usage, Alternative 5 would also comply with goals of the SCAG's RTP/SCS which incorporates VMT targets established by SB 375. As with the Project, the uses proposed under Alternative 5 and their proximity to major job centers and public transportation would serve to reduce VMT and associated transportation fuel usage within the region. In addition, vehicle trips generated during Project operations would comply with CAFE fuel economy standards. As with the Project, Alternative 5 would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction.

Based on the above, Alternative 5 would not conflict with plans for renewable energy or energy efficiency. No significant impacts related to renewable energy or energy efficiency plans would occur under Alternative 5, and impacts would be similar to the less-than-significant impacts of the Project.

d. Geology and Soils

Under Alternative 5, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, and soil stability would be similar to those under the Project because such impacts are a function of the Project Site's underlying geologic conditions. Alternative 5 would be developed within the same site as the Project and 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 5 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 5 would also comply with the same regulatory requirements as the Project, which require the preparation of a final design-level geotechnical engineering report to identify and minimize seismic risks. Therefore, as with the Project, Alternative 5 would not cause or accelerate geologic conditions which could result in substantial damage to proposed structures or infrastructure or expose people to substantial risk of injury. Impacts related to geology and soils under Alternative 5 would be less than significant, and similar to the impacts of the Project, which are less than significant.

With regard to paleontological resources, Alternative 5 would construct fewer subterranean parking levels compared to the Project. Therefore, the potential for Alternative 5 to uncover subsurface paleontological resources would be reduced when compared to that of the Project. Like the Project, Alternative 5 would implement the same mitigation measure (GEO-MM-1) as the Project in order to mitigate potential impacts to paleontological resources. As such, as with the Project, impacts to paleontological resources under Alternative 5 would be less than significant with mitigation. However, such impacts would be less than the impacts of the Project.

e. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily trips generated and associated VMT, as well as energy consumption from proposed land uses. As previously discussed, the number of daily the number of daily trips and daily VMT under Alternative 5 would be reduced compared to both Project development scenarios. In addition, energy and water consumption from proposed land uses would be reduced compared to both Project development scenarios due to the reduction in development. Thus, the amount of GHG emissions generated by Alternative 5 would be less than the amount generated by the Project due to the reduction in the number of trips and daily VMT generated when compared to the Project and the reduction in total development. As with the Project, Alternative 5 would be designed to comply with the requirements of the CALGreen Code and the Los Angeles Green Building Code. Alternative 5 would also incorporate design features to reduce GHG emissions and would be designed to comply with the City's Green Building Ordinance, as applicable. With compliance with the CALGreen Code and the Los Angeles Green Building Code, and with the implementation of comparable sustainability features as the Project, Alternative 5 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 5 would be less than significant, and less than the less-than-significant impacts of the Project due to the reduction in GHG emissions.

f. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, during demolition, on-site grading, and building construction associated with Alternative 5, fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners would be used, handled, and stored on the Project Site, and would therefore require proper management and disposal. Such use would be expected to be less due to the reduced construction activities. Notwithstanding, like the Project, Alternative 5 would fully comply with all applicable federal, state, and local requirements, as well as the manufacturer's instructions concerning the use, handling, storage, and disposal of hazardous materials.

Additionally, as with the Project, Alternative 5 would not involve any construction in or near the area of the existing underground storage tank. Notwithstanding, in the unlikely event that underground storage tanks are uncovered, suspect materials would be removed in accordance with all applicable federal, state, and local regulations similar to the Project.

While asbestos-containing materials and lead-based paints may be present on-site due to the age of the existing buildings, Alternative 5 would also comply with relevant regulations and requirements related to asbestos-containing materials and lead-based paint to ensure that impacts would be less than significant. Furthermore, like the Project, in the event that PCBs are found within areas proposed for demolition during construction of Alternative 5, suspect materials would be removed in accordance with all applicable federal, state, and local regulations.

Similar to the Project, Alternative 5 would also follow applicable CalGEM requirements for site plan review for construction activities proposed in the area of existing wells. In addition, this alternative would implement the same mitigation measures as the Project (under both development scenarios) to ensure potential impacts associated with the discovery of buried wells is less than significant. As with the Project, Mitigation Measure HAZ-MM-1 and HAZ-MM-2 may require an additional surface geophysical survey be conducted to attempt to locate the oil wells on the Project Site following demolition of existing structures (as the prior survey did not locate any existing oil wells and existing structures precluded geophysical survey in some areas of the site). If located, the wells would be unearthed and inspected by a licensed Petroleum Engineer and would be reported to CalGEM to assess and prescribe abandonment procedures based on their observed condition, as well as the Petroleum Administrator, LACUPA, and Los Angeles Department of City Planning. Similar to the Project, a soil and site management plan would be developed and implemented pursuant to Mitigation Measure HAZ-MM-3 to address the potential identification and abandonment of the oil wells if encountered during earthwork activities. Furthermore, in the event contaminated soils are encountered during

construction, or construction occurs in areas of known or potential contamination, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166. Additionally, as with the Project, Alternative 5 would implement Project Design Feature HAZ-PDF-1, which would require buildings be placed in a manner so as to not significantly impede future access to the locations of the existing wells as depicted in CalGEM's maps.

Moreover, adherence to the construction safety measures, as well as compliance with California Occupational Safety and Health Act safety requirements, would serve to reduce the risk in the event that elevated levels of methane gas are encountered during grading and construction. In addition, as with the Project, Alternative 5 would implement controls during construction at the Project Site in order to mitigate the effects of subsurface gases on workers and the public. In addition, as with the Project, Alternative 5 would implement Mitigation Measures HAZ MM 4 and HAZ MM 5, to ensure potential impacts related to subsurface gases and associated potential impacts to soil and groundwater are less than significant. Specifically, Mitigation Measure HAZ-MM-4 would install controls during construction at the Project Site to mitigate the effects of subsurface gases on workers and the public and Mitigation Measure HAZ-MM-5 would require the Applicant install a Passive System that would include a standard de-watering system or a reinforced concrete mat slab to accommodate hydrostatic pressure, as well as a sub-slap vapor collection and ventilation system.

With regard to emergency response plans, like the Project, it is expected that construction fences provided as part of this alternative would encroach into the public right-of-way (e.g., sidewalks and roadways) adjacent to the Project Site on White Knoll Drive, Alpine Street, and Beaudry Avenue. As such, sidewalks surrounding the Project Site are expected to be temporarily closed during construction. However, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period and emergency access would not be impeded. In addition, similar to the Project, a Construction Management Plan would be implemented and would include street/lane closure information, a detour plan, haul route(s), and a staging plan.

Based on the above, potential construction-related impacts associated with hazards and hazardous materials under Alternative 5 would be less than significant, and less than the less-than-significant impacts of the Project due to the reduced construction activities.

(2) Operation

Similar to the Project, Alternative 5 would not include the use of materials that would contain asbestos, lead based paint, or PCBs. In addition, Alternative 5 would not propose the installation of underground or aboveground storage tanks. The operation of Alternative

5 would involve the limited use of potentially hazardous materials typical of those used in mixed use developments such as Alternative 5, including cleaning agents, paints, pesticides, and other materials used for landscaping. Such use would be reduced compared to the Project due to the reduction in uses. In addition, as with the Project, all hazardous materials on the Project Site would be acquired, handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, state, and local requirements. As with the Project, Alternative 5 would also comply with the City of Los Angeles' Methane Mitigation Ordinance No. 175,790.

With regard to emergency response plans, Alternative 5 would not involve any activities that would impede public access or travel along the public right-of-way or interfere with an adopted emergency response or evacuation plan. In addition, similar to the Project, the increase in traffic generated by Alternative 5 would not significantly impact emergency vehicle response to the Project Site and surrounding uses, including along City-designated disaster routes since the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or driving in the lanes of opposing traffic. Accordingly, operation of Alternative 5 would not cause a substantial effect on emergency response as a result of increased traffic congestion.

Based on the above, potential impacts related to hazards and hazardous materials during operation of Alternative 5 would be less than significant, and less than the less-than-significant impacts of the Project due to the reduction in development.

g. Hydrology and Water Quality

(1) Surface Water Quality

(a) Construction

Under Alternative 5, the degree to which new pollutants could be introduced to the Project Site during construction would be reduced compared to the Project as Alternative 5 would include less construction activities. As with the Project, a SWPPP would be prepared for Alternative 5 and would specify BMPs to be used during construction. In addition, as discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, a geotechnical investigation of the Project Site encountered water seepage at depths of 16 feet to 62 feet. Given the below grade parking proposed by this alternative would extend to a maximum depth of 31 feet, construction activities associated with the Reduced Density Alternative could encounter groundwater and dewatering may be required. Thus, similar to the Project, Alternative 5 would utilize temporary dewatering systems in compliance with all relevant NPDES requirements related to construction and discharges from dewatering operations.

With the implementation of site-specific BMPs included as part of the SWPPP, Alternative 5 would reduce or eliminate the discharge of potential pollutants from stormwater runoff. In addition, construction of Alternative 5 would be required to comply with City grading permit regulations, which require necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspection to reduce sedimentation and erosion. Therefore, with compliance with NPDES requirements and City of Los Angeles grading permit regulations, construction of Alternative 5 would not result in discharge that would violate any water quality standard or waste discharge requirements, or otherwise substantially degrade water quality. Furthermore, construction of Alternative 5 would not result in discharges that would cause regulatory standards to be violated. Therefore, as with the Project, construction-related impacts to surface water quality under Alternative 5 would be less than significant, and less than the less-than-significant impacts of the Project due to the reduction in overall construction activities.

(b) Operation

Similar to the Project, Alternative 5 would implement BMPs for managing stormwater runoff in accordance with current City LID Ordinance requirements. The BMPs would control stormwater runoff with no increase in runoff resulting from the alternative. Due to the incorporation of LID BMPs, operation of Alternative 5 would not result in discharges that would violate any water quality standard or waste discharge requirements, or otherwise substantially degrade water quality. Thus, as with the Project, impacts to surface water quality during operation of Alternative 5 would be less than significant. Such impacts would be less than the less-than-significant impacts of the Project due to the reduction in development.

(2) Groundwater Quality

(a) Construction

As previously noted, the depth of excavation and associated export would be reduced compared to the Project under Alternative 5 due to the reduction in subterranean parking levels. However, due to the depth at which water seepage was encountered, construction activities associated with Alternative 5 could also encounter groundwater, thus temporary dewatering may be required. In the event dewatering is required, a temporary dewatering system would be installed and operated in accordance with NPDES requirements. Any discharge of groundwater during construction of the Project would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements. Pursuant to such requirements, the groundwater extracted would be chemically analyzed to determine the appropriate treatment and/or disposal methods. As such, groundwater quality would not be impacted from these potential dewatering activities.

Additionally, as with the Project, construction activities under Alternative 5 would not occur near or in the area of the existing underground storage tank. Therefore, the potential for the underground storage tank to effect groundwater quality is negligible.

As with the Project, construction activities associated with Alternative 5 could also encounter contaminated soil and groundwater that would require proper handling and disposal. Where construction is proposed in the area of existing wells, applicable CalGEM requirements for site plan review would be followed. In addition, as with the Project, Alternative 5 would implement the same mitigation measures to ensure potential impacts associated with the discovery of buried wells is less than significant. If located, the wells would be unearthed and inspected by a licensed Petroleum Engineer and would be reported to CalGEM to assess and prescribe abandonment procedures based on their observed condition, as well as the Petroleum Administrator, LACUPA, and Los Angeles Department of City Planning. Similar to the Project, a soil and site management plan would be developed and implemented to address the potential identification and abandonment of the oil wells if encountered during earthwork activities. Furthermore, in the event contaminated soils are encountered during construction, or construction occurs in areas of known or potential contamination, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166.[50] Additionally, as with the Project, Alternative 5 would implement the same Project Design Feature (HAZ-PDF-1), which would require buildings be placed in a manner so as to not significantly impede future access to the locations of the existing wells as depicted in CalGEM's maps. Therefore, compliance with existing regulations would ensure construction activities would not create a significant hazard to groundwater quality associated with the existing on-site oil wells.

During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would, therefore, require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the potential for hazardous materials releases into groundwater. Compliance with all applicable federal, state, and local requirements, concerning the handling, storage and disposal of hazardous waste, would reduce the potential for construction of Alternative 5 to release contaminants into groundwater. In addition, as there are no groundwater production wells or public water supply wells on-site or within one mile of the Project Site, construction activities would not be anticipated to affect existing wells.

[50] *South Coast Air Quality Management District. Rules and Compliance, Rule 1166.*

Based on the above, as with the Project, impacts with respect to groundwater quality during construction of Alternative 5 would be less than significant. Such impacts would be less than the less-than-significant impacts of the Project due to the reduction in excavation and overall construction activities.

(b) Operation

Similar to the Project, Alternative 5 would not include the surface or subsurface application or introduction of potential contaminants or waste materials. Like the Project, Alternative 5 is not anticipated to result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater through percolation. Therefore, as with the Project, impacts with respect to groundwater quality during operation of Alternative 5 would be less than significant and such impacts would be similar to those of the Project.

(3) Surface Water Hydrology

(a) Construction

Similar to the Project, construction activities for Alternative 5 would include demolition of the existing vacant on-site buildings. While construction of Alternative 5 would reduce the extent of excavation activities, Alternative 5 would disturb the same surface area as the Project. As with the Project, construction activities, particularly grading of the Project Site, would have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. However, Alternative 5 would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, Alternative 5 would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. In addition, Alternative 5 would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion, similar to the Project. Thus, through compliance with all NPDES Construction General Permit requirements, including preparation of a SWPPP, implementation of BMPs, and compliance with applicable City grading regulations, Alternative 5 would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, or flooding on- or off-site. Similarly, with adherence to standard compliance measures (e.g., NPDES requirements), construction activities would not cause flooding, substantially increase or decrease the amount of surface water flow from the Project Site into a water body, or result in a permanent, adverse change to the movement of surface water. Therefore, construction-related impacts to surface water hydrology under Alternative 5 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 5 would include development of new buildings, paved areas, and landscaped areas. Like the Project, implementation of Alternative 5 would increase the amount of impervious surfaces compared to the Project Site's existing impervious surfaces. In addition, similar to the Project, Alternative 5 would implement BMPs to control stormwater runoff with no increase in runoff resulting from the Project Site. Therefore, like the Project, Alternative 5 would not impact existing storm drain infrastructure serving the Project Site and runoff would continue to follow the same discharge paths and drain to the same storm systems. Consequently, as with the Project, Alternative 5 would not cause flooding during the 50-year developed storm event, would not create runoff which would exceed the capacity of existing or planned drainage systems, would not require construction of new stormwater drainage facilities or expansion of existing facilities, would not substantially reduce or increase the amount of surface water in a water body, or result in a permanent adverse change to the movement of surface water. Operational impacts to surface water hydrology under Alternative 5 would be less than significant, and similar to the less-than-significant impacts of the Project.

(4) Groundwater Hydrology

(a) Construction

As previously discussed, similar to the Project, excavation activities under Alternative 5 would likely encounter groundwater. Therefore, dewatering operations are expected during construction of Alternative 5. Similar to the Project, a temporary dewatering system would be installed and operated as part of Alternative 5 in accordance with NPDES General Construction Permit requirements. Any discharge of groundwater during construction of Alternative 5 would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements.

As discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, no water supply wells are located at the Project Site or within one mile of the Project Site that could be impacted by construction of Alternative 5. In addition, as with the Project, Alternative 5 would not include the construction of water supply wells.

Based on the above, construction impacts on groundwater hydrology during construction of Alternative 5 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Operation

Similar to the Project, the subterranean levels of Alternative 5 would be designed such that they are able to withstand hydrostatic forces and incorporate comprehensive

waterproofing systems in accordance with current industry standards and construction methods such that permanent dewatering operations would not be required. Thus, the potential impact during operation on groundwater level under Alternative 5 would be less than significant.

As discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, the Project Site is currently comprised of approximately 72 percent impervious surfaces. Therefore, there is currently a minimal groundwater recharge potential on the Project Site. As with the Project, with implementation of Alternative 5, the amount of impervious areas would increase compared to the Project Site's existing impervious area. Alternative 5 would also implement an infiltration system that would improve the groundwater recharge capacity of the Project Site compared to existing conditions. Therefore, potential impacts on groundwater recharge would be less than significant under Alternative 5.

Based on the above, impacts to groundwater hydrology during operation of Alternative 5 would be less than significant and similar to the less-than-significant impacts of the Project.

h. Land Use and Planning

As previously described, Alternative 5 would include a mix of uses similar to the Mixed Use Development Scenario but would reduce the amount of total floor area by approximately 35 percent. Specifically, Alternative 5 would develop 258 fewer dwelling units; 63 fewer hotel rooms; 33,250 less square feet of commercial uses; and 16,800 less square feet of office uses. When compared to the No-Hotel Development Scenario, this Alternative would develop 348 fewer dwelling units; a 117-room hotel; 33,250 less square feet of commercial uses; and 16,800 less square feet of office uses. As with the Project, the uses proposed by the Reduced Density Alternative would also not conflict with other surrounding multi-family residential and commercial uses. In addition, like the Project, this alternative would offer a mix of uses within one site, thereby reducing the need for residents to travel off-site to meet their retail needs. Providing a variety of uses within one site would reduce vehicle trips and associated air emissions. Thus, as with the Project, Alternative 5 would not conflict with the applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect, including those set forth in the Los Angeles General Plan Framework Element, the Housing Element, the Central City North Community Plan, and SCAG's RTP/SCS. Thus, impacts related to land use consistency would be less than significant and similar to the less-than-significant impacts of the Project.

i. Noise

(1) Noise

(a) Construction

The types of construction activities under Alternative 5 would be substantially similar to the Project, although the amount of construction activities and duration of construction would be reduced due to the reduction in total floor area. As with the Project, construction of Alternative 5 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Construction noise levels can be reduced with a smaller number of on-site construction equipment pieces and with a buffer zone between the sensitive receptors and the construction equipment. However, due to the close proximity of the sensitive receptors (i.e., directly across from the Project Site) and a constrained Project Site that does not have the space to create a meaningful buffer zone, it would not be practical to mitigate the on-site construction noise impacts of the Project, especially at the upper levels of the residential uses along Sunvue Place (receptor location R6) and the on-site Elysian residential building even with a reduced equipment mix. In addition, under Alternative 5, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to that of the Project during maximum activity days since the overall amount and duration, but not the daily intensity of construction activities, would decrease under Alternative 5 when compared to the Project. As such, noise levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Accordingly, noise impacts due to on- and off-site construction activities under Alternative 5 would be similar to those of the Project. As with the Project, Alternative 5 would implement Project Design Features NOI-PDF-1 (requiring muffling of equipment) and NOI-PDF-4 (prohibiting use of impact piles), and Mitigation Measure NOI-MM-1 (requiring sound barriers) to reduce noise levels during construction. Similar to the Project, on- and off-site construction noise would be significant and unavoidable under Alternative 5 even with the application of project design features and mitigation measures. Overall, impacts under Alternative 5 would be similar to those of the Project.

(b) Operation

As discussed in Section IV.I, Noise, of this Draft EIR, sources of operational noise under the Project include: (a) on-site stationary noise sources, including mechanical equipment, activities within the proposed outdoor spaces, parking facilities, loading dock and trash collection areas; and (b) off-site mobile (roadway traffic) noise sources. Alternative 5 would introduce noise from similar on-site and off-site noise sources as the Project. However, it is anticipated that with the overall reduction in total floor area and uses, the noise levels from building mechanical equipment, outdoor spaces, and parking facilities would be reduced. In addition, similar to the Project, Alternative 5 would include

Project Design Features NOI-PDF-2, -3, -5, and -6 that require screening of mechanical equipment and loading docks, specify sound levels for outdoor sound systems, and specify the maximum occupancy of the Elysian Parking outdoor roof deck. In addition, similar to the Project, on-site mechanical equipment used during operation of Alternative 5 would also comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. The proposed loading dock and trash collection areas for Alternative 5 would also be located in enclosed areas, similar to the Project. Thus, operational on-site noise impacts would be less than significant and less than the less-than-significant impacts of the Project due to the reduction in total floor area and implementation of the product design features.

With regard to off-site noise sources, Alternative 5 would result in a reduction in daily vehicle trips compared to the both development scenarios. The reduction in vehicle trips would result in a decrease in off-site traffic-related noise levels under Alternative 5. Therefore, as with the Project, off-site noise impacts under Alternative 5 would be less than significant. Such impacts would be less than those of the Project due to the reduction in vehicle trips.

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 5 would be similar to the Project, although the amount and duration of construction activities would be reduced. As with the Project, construction of the Reduced Density Alternative would generate vibration from the use of heavy-duty construction equipment as well as from truck trips. While the overall amount of construction would be reduced, on- and off-site construction activities and the associated construction vibration levels would be expected to be similar to those of the Project, as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment. As such, peak vibration levels generated by the construction equipment would be similar to those of the Project. Accordingly, vibration impacts due to on- and off-site construction activities under Alternative 5 would similarly be less than significant for on-site and off-site construction vibration (building damage) and significant and unavoidable for on-site and off-site construction vibration (human annoyance). Overall, vibration impacts under Alternative 5 would be similar to the impacts of the Project.

(b) Operation

As described in Section IV.I, Noise, of this Draft EIR, sources of vibration related to operation of the Project would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under

Alternative 5. As with the Project, vehicular-induced vibration from Alternative 5, including vehicle circulation within the subterranean parking area, would not generate perceptible vibration levels at off-site sensitive uses. In addition, like the Project, building mechanical equipment installed as part of Alternative 5 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration transmission such that the vibration would not be perceptible at the off-site sensitive receptors. Therefore, as with the Project, operation of Alternative 5 would not increase the existing vibration levels in the immediate vicinity of the Project Site. As such, vibration impacts associated with operation of Alternative 5 would also be less than significant and would be less than those of the Project due to the reduction in vehicle trips and floor area.

j. Population, Housing, and Employment

(1) Construction

Alternative 5 would be constructed within the same Project Site as the Project. As discussed in Section II, Project Description, of this Draft EIR, the Elysian apartment building is located on the Project Site and contains 96 joint living and work quarter units. As with the Project, Alternative 5 would not involve removal of the existing Elysian apartment building. Therefore, similar to the Project, this alternative would not displace substantial number of existing housing or people, necessitating the construction of replacement housing elsewhere. As discussed in Section IV.J, Population, Housing, and Employment, of this Draft EIR, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by a particular development. Many construction workers are highly specialized (e.g., crane operators, steel workers, masons), and move from job site to job site as dictated by the demand for their skills. Therefore, population impacts related to household growth in the City of Los Angeles or the SCAG Region as a result of construction worker relocation under Alternative 5 would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Operation

As previously discussed, Alternative 5 would reduce the total floor area compared to both development scenarios. Based on a household size factor of 2.41 persons per household and 479 units, the Reduced Density Alternative would generate a new

residential population of 1,155 persons,[51] which would be comparatively less than the Mixed Use Development Scenario's new residential population of 1,777 and the No-Hotel Development Scenario's new residential population of 1,994 persons. As discussed in Section IV.J, Population, Housing, and Employment, of this Draft EIR, the new residents generated by both development scenarios would be within and, thus, consistent with SCAG growth forecasts, constituting a small percentage of projected City and regional growth. Additionally, the new residential units proposed by both development scenarios would represent a small percentage of the housing growth in the SCAG region and in the City. Thus, as with the Project, the residents and new residential units generated by Alternative 5, which would be reduced compared to the Project, would similarly be consistent with SCAG growth forecasts.

With regard to indirect population impacts, the proposed commercial, office and hotel uses, would generate employment opportunities. Based on the generation rates provided by the City of Los Angeles VMT Calculator Documentation, Alternative 5 would generate approximately 378 employees[52] compared to the 582 employees generated by the Mixed Use Development Scenario and the 492 employees generated by the No-Hotel Development Scenario. Similar to the Project, these new employment opportunities may be filled, in part, by persons already residing in the vicinity of the workplace and who would not relocate their households due to such employment opportunities. Nevertheless, as discussed in Section IV.J, Population, Housing, and Employment, of this Draft EIR, the new employees generated by the Mixed Use Development Scenario and the No-Hotel Development Scenario would be within and, thus, consistent with SCAG growth forecasts, constituting a small percentage of projected City and regional growth. As such, like the Project, this alternative would not induce substantial population growth or exceed SCAG's population forecast for the City or the SCAG Region due new businesses. Similarly, any indirect demand for housing associated with the proposed new businesses would be fulfilled by vacancies in the surrounding housing market and from other new units in the vicinity of the Project Site. As such, this alternative's indirect housing demand would not induce substantial population growth.

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[51] *Based on a household rate of 2.41 persons for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.*

[52] *Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the employee generation rate 0.5 employee per room for "Hotel" land use is applied to the 117 hotel rooms, the rate 0.002 employee per square foot for "General Retail" land use is applied to the 11,830 square feet of commercial uses, the rate 0.004 employee per square foot for "Supermarket" land use is applied to the 17,745-square-foot grocery store, the rate 0.001 employee per square foot for "Health Club" land use is applied to the 9,425-square-foot health club/spa, the rate 0.004 employee per square foot for "High-Turnover Sit-Down Restaurant" land use is applied to the 22,750-square-foot restaurant, and the rate 0.004 employee per square foot for "General Office" land use is applied to the 31,200 square feet of office uses.*

Additionally, with regard to infrastructure, all circulation improvements planned for Alternative 5 would be intended to improve circulation flows and safety throughout the Project Site and vicinity, similar to the Project. Utility and other infrastructure improvements planned for Alternative 5 would also be intended to connect the proposed uses to the existing main infrastructure system and would not require upgrades to the main system.

Overall, impacts related to population, housing, and employment under this alternative would be less than significant and less than the less-than-significant impacts of the Project.

k. Public Services

(1) Fire Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 5 would be similar to that of the Project. However, the overall amount of construction activities and duration of construction would be reduced compared to the Project due to the reduction in development. Construction would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous waste. Thus, compliance with regulatory requirements would effectively reduce the potential for construction activities to expose people to the risk of fire or explosion related to hazardous materials.

Additionally, while construction activities would primarily be contained within the boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by temporary lane closures (with travel still available in each direction), roadway/access improvements, and the construction of utility line connections. Similar to the Project, it is likely that Alternative 5 would require construction fences that would encroach into the public right-of-way (e.g., sidewalks and roadways) adjacent to the Project Site on White Knoll Drive, Alpine Street, Beaudry Avenue, and Sunset Boulevard. However, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period and emergency access would not be impeded. Similar to the Project, under both development scenarios, Alternative 5 would be required to implement TR-PDF-1 which would require a Construction Management Plan to be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities.

Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. However, Alternative 5 would implement a

similar design feature in order to allow construction-related traffic, including hauling activities and construction worker trips, to occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts. In addition, as mentioned above, a Construction Management Plan would be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Therefore, construction-related impacts related to fire protection services under Alternative 5 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in construction activities and duration.

(b) Operation

Similar to the Project, Alternative 5 would generate a new residential population, as well as a new visitor and employee population on the Project Site that would contribute to an increase in demand for LAFD fire protection and emergency medical services. However, due to the reduction in total new floor area and uses, Alternative 5 would generate a smaller service population compared to both development scenarios. As such, the overall increased demand for LAFD fire protection and emergency medical services would be reduced compared to that of the Project. In addition, similar to the Project, Alternative 5 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Alternative 5 would also include the installation of automatic fire sprinklers within all proposed buildings and would not include the installation of barriers that could impede emergency vehicle access. As with the Project, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for Alternative 5. Therefore, similar to the Project, impacts with regard to LAFD fire protection during operation of Alternative 5 would be less than significant and would not require the addition of a new fire station or the expansion of an existing facility in order to maintain service. Operation of the Alternative 5 would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities (fire protection), the construction of which would cause significant environmental impacts, in order to maintain acceptable fire protection services. Such impacts would be less than the less-than-significant impacts of the Project due to the reduction in total floor area and uses.

(2) Police Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 5 would be similar to that of the Project. However, the overall amount of construction activities and duration of construction would be reduced compared to the Project due to the reduction in development. Alternative 5 would also implement similar design features as

the Project. Specifically, pursuant to Project Design Feature POL-PDF-1, Alternative 5 would be required to provide temporary security measures such as security fencing, lighting, locked entry to secure the Project Site during construction, and regular security patrols during non-construction hours, thereby reducing the demand for police protection services.

In addition, similar to the Project, a Construction Management Plan would be implemented to ensure that adequate and safe access is available within and near the Project Site during construction activities. Therefore, construction-related impacts to police protection services under Alternative 5 would be less than significant, and less than the less-than-significant impacts of the Project due to the reduction in construction activities and duration.

(b) Operation

Given the reduction in uses proposed under Alternative 5, the police service population generated by this alternative would be less than the Mixed Use Development Scenario and the No-Hotel Development Scenario's estimated police service population. While Alternative 5 would increase the existing police service population of the Central Area compared to existing conditions, the increase would be less than both development scenarios due to the reduction of all uses. Like the Project, Alternative 5 would implement similar design features as the Project (under both development scenarios). Pursuant to Project Design Feature POL-PDF-2 through Project Design Feature POL-PDF-5, this alternative would be required to provide a 24-hour camera network, on-site security, appropriate lighting to ensure security, and the prevention of concealed spaces. The design features would help offset the increase in demand for police protection services generated by Alternative 5. Thus, as with the Project, Alternative 5 would not result in the need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service. As such, the impact on police protection services under Alternative 5 would be less than significant, and less than the less-than-significant impacts of the Project.

(3) Schools

(a) Construction

Similar to the Project, the Reduced Density Alternative would generate part-time and full-time jobs associated with construction of the alternative between the start of construction and buildout of the development proposed. 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 the alternative. Therefore, the construction employment generated by Alternative 5 would not result in a notable

increase in the resident population or a corresponding increase in demand for schools in the vicinity of the Project Site. As such, construction-related impacts to schools under Alternative 5 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 5 would generate a new residential population on the Project Site that would contribute to an increased demand for schools. However, the overall increased demand in school services would be reduced compared to both Project development scenarios due to the reduction in residential units. Additionally, the number of students that could be indirectly generated by Alternative 5 as a result of employment opportunities would be less due to the reduction in total new floor area of non-residential uses. In addition, as with the Project, pursuant to Senate Bill 50, the Applicant for this alternative would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees fully removes all of Alternative 5's related school impacts. Therefore, impacts related to schools under Alternative 5 would be less than significant, and less than the less-than-significant impacts of the Project.

(4) Parks and Recreation

(a) Construction

Similar to the Project, construction of Alternative 5 would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, the likelihood that construction workers would relocate their households as a consequence of working on Alternative 5 is negligible. Therefore, the construction workers associated with Alternative 5 would not result in a notable increase in the residential population, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site.

Like the Project, during construction of Alternative 5, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. However, any resulting increase in the use of such parks and recreational facilities would be temporary and negligible.

Based on the above, construction of Alternative 5 would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or

planned facilities, nor would construction workers interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the vicinity of the Project Site. Therefore, impacts on parks and recreational facilities under Alternative 5 would be less than significant, and similar to the less-than-significant impacts of the Project.

(b) Operation

Residents are considered the primary users of parks and recreation facilities. Similar to the Project, the Reduced Density Alternative would generate a new residential population on the Project Site, which could create a demand for parks and recreation services. However, Alternative 5 would generate fewer residents at the Project Site than the Mixed Use Development Scenario and the No-Hotel Development Scenario due to the reduction in residential units. As with the Project, Alternative 5 would provide a variety of open space and recreational amenities to comply with the open space requirements of the LAMC. In addition, while it is possible that employees of Alternative 5 may utilize local parks and recreational facilities, the increased demand would be negligible as it is anticipated that employees and visitors would also primarily utilize on-site open space during their time spent at the Project Site, resulting in a negligible demand for surrounding parks and recreational facilities. Therefore, Alternative 5 would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities. In addition, similar to the Project, under Alternative 5 the Applicant would be required to pay Quimby fees to the City that could be used to add or improve park facilities in the vicinity of the Project Site. Therefore, impacts to park and recreation facilities would be less than significant under Alternative 5 and less than the less-than-significant impacts of the Project due to the reduction in residential units.

(5) Libraries

(a) Construction

Similar to the Project, construction of Alternative 5 would result in a temporary increase of construction workers on the Project Site. 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 5. Therefore, construction workers would not result in a material increase in the resident population within the service area of the libraries serving the Project Site and vicinity.

In addition, it is unlikely that construction workers would visit library facilities in the vicinity of the Project Site on their way to/from work or during their lunch hours. Specifically, it is unlikely that construction workers would utilize library facilities on their way

to work as the start of their workday generally occurs before the libraries open for service. Additionally, lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. Furthermore, it is unlikely that construction workers would utilize library facilities at the end of the work day, and would instead likely use library facilities near their place of residence. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. As such, impacts to library facilities during construction of the Reduced Density Alternative would be less than significant, and similar to the less-than-significant impacts of the Project.

(b) Operation

Residents are considered the primary users of library facilities. As with the Project, Alternative 5 would generate a new residential population on the Project Site, which could create a demand for library facilities. However, Alternative 5 would generate fewer residents than the Mixed Use Development Scenario and the No-Hotel Development Scenario due to the reduction in residential units. In addition, the number of employees generated by Alternative 5 would also be reduced compared to the Project due to the reduction in commercial, office and hotel (under the Mixed Use Development Scenario) uses. Employees would generate minimal demand for library services since they would be more likely to use library facilities near their homes during non-work hours. Furthermore, employees at the Project Site would also have internet access, which provides information and research capabilities and reduces the demand at physical library locations. Therefore, any indirect or direct demand for library services generated by the employees of Alternative 5 would be unlikely to necessitate the construction of a new or expanded library. As such, impacts under Alternative 5 would be less than significant and less than the less-than-significant impacts of the Project.

I. Transportation

Alternative 5 would be developed within the same Project Site as the Project and would include a mix of uses similar to the Mixed Use Development Scenario. As such, the plans, policies, and programs applicable to the Project would also apply to Alternative 5. As discussed above, while Alternative 5 would include a reduction in the uses proposed by either development scenario, Alternative 5 would feature similar vehicular, pedestrian, and bicycle access as the Project. Therefore, overall, as with the Project, Alternative 5 would be consistent with the goals, policies, and requirements of the applicable plans. Specifically, Alternative 5 would widen the sidewalks on all sides of the Project Site, would provide a new signalized pedestrian crossing point on Sunset Boulevard with continental crosswalks, and install all-way stop-control at the intersection of Beaudry Avenue & Alpine Street, where there is currently an uncontrolled crosswalk across Beaudry Avenue. In addition, as with the Project, Alternative 5 would also promote pedestrian activity and

reduce vehicle trips and VMT by encouraging multi-modal mobility options such as bicycle and scooter sharing services; providing a Transportation Center; providing convenient and adequate bicycling facilities; and enhancing pedestrian amenities through the provision of gardens, courtyards, and terraces, which would include family play features, a lawn with lounge furniture, and other landscape elements. As such, Alternative 5 would comply with the programs and policies set forth in the Mobility Plan; Plan for a Healthy Los Angeles; LAMC Section 12.21.A.16, LAMC Section 12.26J, and LAMC Section 12.37; Vision Zero; Citywide Design Guidelines, and SCAG RTP/SCS to the same extent as the Project. Therefore, Alternative 5 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Thus, impacts would be similar to the less-than-significant impacts of the Project.

When accounting for the same project design features as the Project, the proposed uses would result in a lower daily VMT when compared to both development scenarios. Specifically, as shown in Appendix T of this Draft EIR, Alternative 5 would result in 37,460 total daily VMT, which would be comparatively less than the 56,710 daily VMT generated by the Mixed Use Development Scenario and the 53,035 daily VMT generated by the No-Hotel Development Scenario. Based on the population assumptions, this Alternative would generate an average household VMT of 5.1 per capita and an average work VMT per employee of 8.5, which would be comparatively more than the Mixed Use Development Scenario's average household VMT of 4.8 per capita and average work VMT per employee of 8.4 and the No-Hotel Development Scenario's average household VMT of 4.9 per capita and average work VMT per employee of 8.3.[53] Nevertheless, the average household VMT per capita for Alternative 5 would still fall below the significance threshold of 7.2 and the average work VMT per employee of 12.7.[54] Therefore, impacts with respect to conflicts with CEQA Guidelines Section 15064.3, subdivision (b) would be less-than-significant and greater than the impacts of the Project.

Alternative 5 would have the same access plan as the Project. Specifically, as with the Project, Alternative 5 would include six different access points around the Project Site. Similar to the Project (under both development scenarios), the final design of the access points would be reviewed by the City Department of Building and Safety, Bureau of Engineering, and LADOT during site plan review to ensure code compliance and safe pedestrian and vehicular design. Therefore, similar to the Project, impacts would be less than significant. Such impacts would be similar to the impacts of the Project. Lastly, similar to the Project, Alternative 5 would not interfere with emergency access. Similar to the

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[53] *Gibson Transportation Consulting, Inc., "Transportation Assessment for the Alternatives to the 1111 Sunset Boulevard Mixed Use Project," October 19, 2020. See Appendix T of this Draft EIR.*

[54] *Gibson Transportation Consulting, Inc., "Transportation Assessment for the Alternatives to the 1111 Sunset Boulevard Mixed Use Project," October 19, 2020. See Appendix T of this Draft EIR.*

Project under both development scenarios, Alternative 5 would be required to implement Project Design Feature TR-PDF-1 which would require a Construction Management Plan to be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. With regard to operation, all driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding emergency access, and would not include the installation of barriers that could impede emergency vehicle access. Lastly, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, Alternative 5 would result in less than significant emergency access impacts that would be similar to the less than significant impacts of the Project.

Alternative 5 would generate 15 morning peak hour trips and 22 afternoon peak hour trips on the SR 110 southbound off-ramp to Figueroa Terrace. Therefore, Alternative 5 does not meet the 25-trip threshold requiring analysis for freeway off-ramps. Nevertheless, under Future with Alternative 5 Conditions, Alternative 5 would result in a ramp queue of 1.1 vehicles (28 feet) during the morning peak hour and 3.5 vehicles (88 feet) during the afternoon peak hour. The off-ramp provides approximately 500 feet of queuing space before reaching the freeway mainline lanes. Therefore, similar to the Project, no significant impact would occur.

m. Tribal Cultural Resources

As previously discussed, Alternative 5 would construct fewer subterranean parking levels than the Project. Therefore, the potential for Alternative 5 to uncover subsurface tribal cultural resources would be reduced when compared to that of the Project. However, as discussed in Section IV.M. Tribal Cultural Resources, of this Draft EIR and in the Tribal Cultural Resources Report included in Appendix R.1, the likelihood that buried, intact cultural deposits of Native American origin are preserved within the Project Site is low considering the significant landscape modification and construction that has occurred within the Project Site from the 1870s forward. Nonetheless, based on the substantial (and confidential) evidence provided by the Kizh Nation, the possibility exists that intact cultural deposits related to a potential tribal cultural resource may be preserved within the Project Site. Thus, Alternative 5 would implement same mitigation measure (TCR-MM-1) as the Project in order to mitigate potential impacts to tribal cultural resources. Accordingly, impacts to tribal cultural resources would be less than significant with mitigation and less than the less-than-significant with mitigation impacts of the Project.

n. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 5 would generate a short-term demand for water. This demand would be less than the Project due to the reduction in construction activities and duration. As evaluated in Section IV.N.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of construction. Since the water demand for construction activities would be reduced, the temporary and intermittent demand for water during construction under Alternative 5 would also be expected to be met by the City's available water supplies.

Furthermore, as with the Project, the design and installation of new service connections under Alternative 5 would be required to meet applicable City standards. The connections and installation of on-site water distribution lines would primarily involve on-site trenching to place the lines below the surface and minor off-site trenching to connect to the existing public water mains or existing meter lateral locations. As with the Project, prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depths of all lines. Furthermore, LADWP would be notified in advance of proposed ground disturbance activities to avoid disruption of water service. LADWP would review and approve all appropriate connection requirements, pipe depths, and connection location(s). In addition, given that construction activities could temporarily affect access in adjacent rights-of-way, a Construction Management Plan, similar to the Project, would be implemented to ensure adequate and safe access remains available within and near the Project Site during construction. Therefore, impacts on water supply and infrastructure associated with short-term construction activities under Alternative 5 would be less than significant, and less than the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 5 would generate an increased demand for water relative to existing conditions. However, based on the reduction in total development, water demand for Alternative 5 would be less than the Project's estimated increase in water demand. Therefore, as with the Project, the estimated water demand under Alternative 5 would not exceed the available supplies projected by LADWP. Furthermore, the estimated water demand under Alternative 5 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 5 since the water demand would be less than the water demand generated by the Project. Moreover, similar to the Project, the Reduced Density Alternative would construct the necessary on-site water infrastructure and off-site connections to the LADWP water system pursuant to applicable City requirements to accommodate the new building. Thus, impacts to water supply under Alternative 5 would be less than significant, and less than the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

As with the Project, Alternative 5 would cap existing sewer laterals during construction. As such, no new sewage would enter the public sewer system, except for sewer services needed for the Elysian apartment building. As with the Project, temporary facilities, such as portable toilet and hand wash areas, would be provided by the construction contractor; however, any sewage generated from these facilities would be collected and hauled off-site and would not be discharged into the public sewer system. Thus, wastewater generation from construction activities under Alternative 5 is not anticipated to cause a measurable increase in wastewater flows. Therefore, similar to the Project, construction-related impacts to the wastewater system under Alternative 5 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of the Reduced Density Alternative 5 would generate greater wastewater flows relative to existing conditions. However, based on the reduction in total development, wastewater generation under Alternative 5 would be less than the Project's estimated wastewater flow. As provided in Section IV.N.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the Project-generated wastewater could be accommodated by the existing capacity of the Hyperion Water Reclamation Plant. Therefore, it is anticipated that the wastewater generated by Alternative 5 could also be accommodated by the existing capacity of the Hyperion Water Reclamation Plant, and impacts with respect to treatment capacity would be less than significant.

Like the Project, sewer service for the Reduced Density Alternative would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site. Given that the wastewater flows generated by Alternative 5 would be less than the estimated wastewater flows of the Project, it is possible that there would be sufficient capacity within the sewer lines serving the Project Site to serve the wastewater flows of Alternative 5. If sufficient capacity is not available, as with the Project, Alternative 5 would require the upsizing of the existing 8-inch line on Beaudry Avenue, or equivalent improvement, as determined by LA Sanitation, to ensure adequate sewer capacity is available in the vicinity of the Project Site to meet the requirements of

Alternative 5. However, additional detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for Alternative 5 during the permitting process. All related sanitary sewer connections and on-site infrastructure under Alternative 5 would be designed and constructed in accordance with applicable standards.

Based on the above, impacts with regard to wastewater generation and infrastructure capacity under Alternative 5 would be less than significant, and less than the impacts of the Project.

(3) Energy Infrastructure

(a) Construction

The energy consumed by Alternative 5 would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. As LADWP has confirmed that the supply and existing infrastructure in the Project area would have the capacity to serve the Project Site, the existing infrastructure would similarly have capacity to supply energy for Alternative 5. Therefore, impacts on infrastructure capacity associated with short-term construction activities under Alternative 5 would be less than significant and less than the less-than-significant impacts of the Project due to the reduction in development.

(b) Operation

As with the Project, operation of Alternative 5 would generate an increased consumption of electricity and natural gas relative to existing conditions. However, based on the reduction in total new floor area and uses, the total energy consumption of Alternative 5 would be less than the total energy consumption of the Project. Therefore, impacts to infrastructure capacity under Alternative 5 would be less than significant, and less than the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above, the Reduced Density Alternative would not avoid any of the Project's significant and unavoidable impacts. Specifically, the Project's significant and unavoidable impacts related to regional air quality emissions during construction, on- and off-site construction noise, and vibration from on- and off-site construction with respect to the significance threshold for human annoyance would remain with development of the Reduced Density Alternative. Alternative 5 also would not avoid the Project's significant and unavoidable cumulative impacts related to regional air quality during construction, construction noise from on-site and off-site noise sources, and vibration impacts associated

with off-site construction, pursuant to the significance threshold for human annoyance. In addition, since this Alternative would result in a greater average household VMT per capita and a greater average work VMT per employee, Alternative 5 would result in a greater impact associated with VMT. All other impacts would be similar to or less than those of the Project.

4. Relationship of the Alternative to Project Objectives

With a similar mix of uses as the Mixed Use Development Scenario and the No-Hotel Development Scenario, Alternative 5 would mostly meet the underlying purpose of the Project to provide a high-density, mixed use and transit- and pedestrian-oriented development that includes new housing opportunities that are integrated with commercial and office uses that provide new employment and commercial opportunities for the surrounding community. However, with the reduction in uses and elimination of affordable housing units, the Reduced Density Alternative would not achieve the following objectives to the same extent as the Project:

- Consistent with the Central City North Community Plan's Objective 1-4, promote the provision of new and adequate housing for all persons, including affordable housing units and units for rent and for sale.

- Promote the Central City North Community Plan's Objective 2-1 to strengthen viable commercial development in the community and to provide additional opportunities for new commercial development and services by providing a variety of commercial uses, including office space, retail, and restaurant space.

However, the Reduced Density Alternative would meet the following objectives of the Project:

- Advance the Central City North Community Plan's Policy 1-2.1 by providing multi-family residential development within a Project Site that is commercially zoned.

- Consistent with Central City North Community Plan Objective 1-3, develop a project that preserves and enhances the varied and distinct residential character and integrity of existing residential neighborhoods by providing a mix of architectural structures that are compatible with the varied scale of surrounding uses.

- In support of Objective 1-2 and Goal 12 of the Central City North Community Plan, encourage the reduction in vehicle trips by designing a project that includes

infrastructure for walking and cycling and ride-sharing hubs and transit nodes for bus and shuttle pick-up.

- In support of the Central City North Community Plan's Goal 4 to provide adequate recreation and park facilities which meet the needs of the residents in the Community Plan area, create a pedestrian-friendly project by introducing active commercial uses along the Project Site frontages, incorporate pedestrian paseos transecting the Project Site, provide publicly accessible open space, and improved streetscapes around the Project Site.

V. Alternatives

F. Alternative 6: Residential Townhomes Alternative

1. Description of the Alternative

Alternative 6, the Residential Townhomes Alternative, would include the development of 250 multi-family residential townhome units. The Residential Townhomes Alternative would not include affordable housing units and would not develop any retail, office, or hotel uses proposed by the Project. As with the Project, the existing vacant buildings and surface parking areas within the Project Site would be removed. Alternative 6 would construct 300,000 square feet of new floor area within the Project Site, a reduction of 694,982 square feet compared to the Project's 994,982 square feet of new floor area within the Project Site, and would result in a net FAR of 1.10:1.

As shown in the conceptual site plan of the Residential Townhomes Alternative provided in Figure V-9 on page V-181, the proposed residential uses would be distributed throughout the Project Site within individual townhomes above a parking podium. As shown in Figure V-10 on page V-182, the residential buildings would include up to four levels and would reach a maximum height of 60 feet (a reduction of 512 feet compared to the Project's maximum height of 572 feet).

The proposed uses would require 500 parking spaces in accordance with the requirements of the Los Angeles Municipal Code (LAMC). Parking would be provided in a partially subterranean parking podium. The portions of the parking that would be above grade would be wrapped in active uses or landscaping. Below grade parking would extend to a maximum depth of 17 feet (a reduction of 47 feet compared to the Project's six-level parking podium). An additional 168 parking spaces for the existing Elysian apartment building would be provided within a five-level, partially subterranean parking structure (Elysian Parking Facility).

The Residential Townhomes Alternative would include 37,500 square feet of open space, including approximately 21,875 square feet of exterior common area and 9,375 square feet of interior common area, pursuant to the requirements of the LAMC. Alternative 6 would also include 6,250 square feet of private balconies.

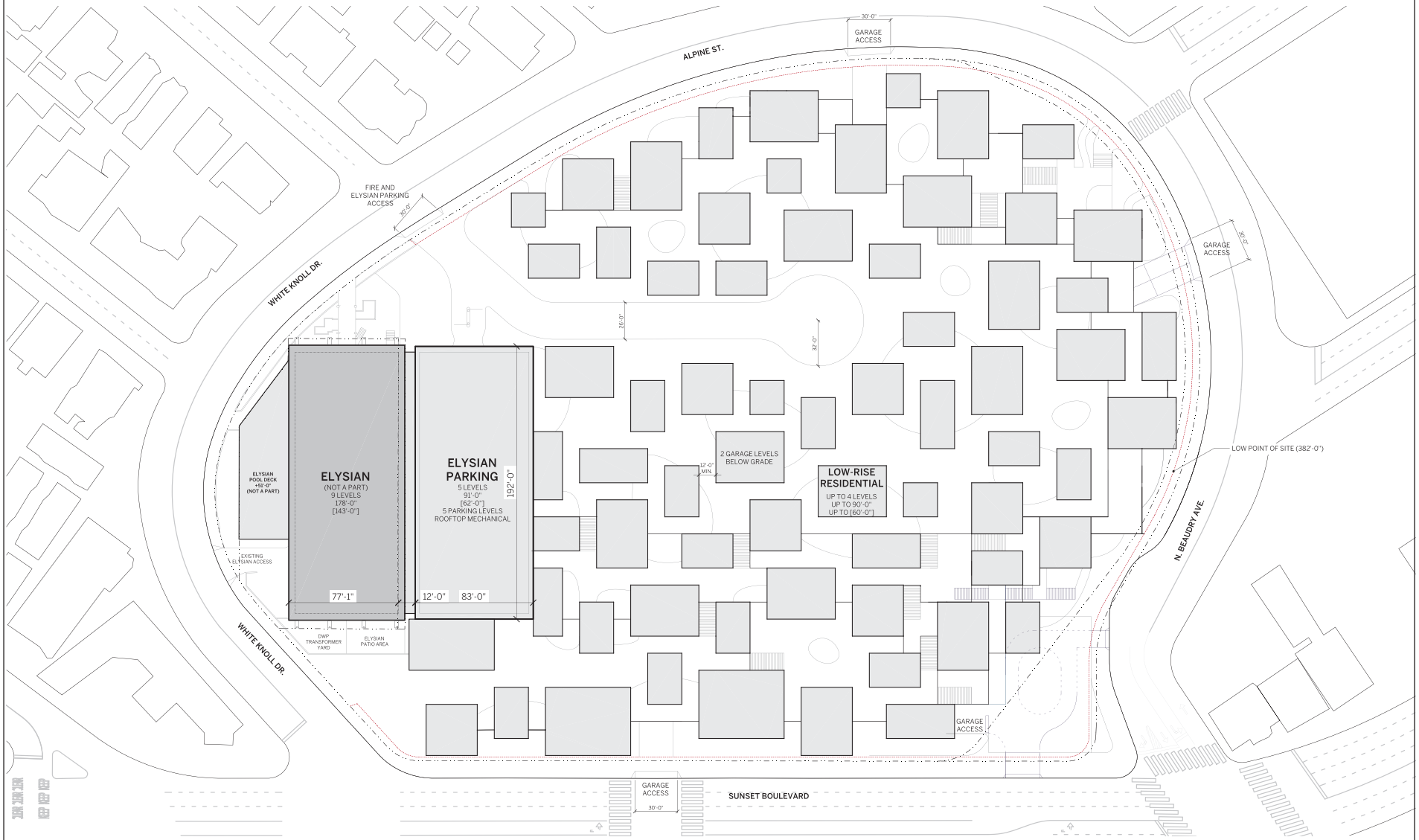

Figure V-9
Alternative 6 Conceptual Site Plan

Source: Skidmore, Owings & Merrill LLP, 2020.

Figure V-10
Alternative 6 Plan Overview

Source: Skidmore, Owings & Merrill LLP, 2020.

Given the reduction in the number of subterranean levels, it is estimated that approximately 177,245 cubic yards of export material would be hauled from the Project Site during the demolition and excavation phase, a reduction of 294,755 cubic yards compared to the Project's estimated 472,000 cubic yards of export.

As with the Project, the Residential Townhomes Alternative would require Site Plan Review, removal of a variable width building line, a Zoning Administrator's Adjustment related to the Building Separation, a Vesting Tentative Tract Map, and various approvals and permits from the City Department of Building and Safety. The Residential Townhomes Alternative would not require a Major Conditional Use Permit, a Density Bonus request, a Vesting Conditional Use to permit the Hotel use, a Master Conditional Use Permit to permit the sale of alcoholic beverages, or a Director's Determination to reduce the number of trees planted on-site.

2. Environmental Impacts

As discussed in the Initial Study prepared for the Project included in Appendix A of this Draft EIR, the Project Site is identified by the City as being located within a transit priority area. In addition, the Project is a mixed use residential project and is located on an infill site which meets PRC Section 21099's definition of an infill site as a lot located within an urban area that has been previously developed. The Project Site is also located within 0.5 mile of several bus lines, the majority of which provide a frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. Therefore, pursuant to SB 743 and ZI No. 2452, the Project's aesthetic impacts shall not be considered significant impacts on the environment.

Similar to the Project, Alternative 6 would meet the provisions of SB 743 as it would be developed within the same Project Site, which is identified as an infill site located within a transit priority area. In addition, Alternative 6 would be considered a residential project.[55] Therefore, as with the Project, the aesthetics impacts of Alternative 6 would not be considered a significant impact on the environment.

[55] *Senate Bill 743 [Public Resources Code Section 21099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment."*

a. Air Quality

(1) Regional Emissions

(a) Construction

As with the Project, construction of Alternative 6 has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. Alternative 6 would be required to implement Mitigation Measures AQ-MM-1 through AQ-MM-5.

Under Alternative 6, construction activities would be reduced in comparison to the Project due to the reduction in development of 694,982 square feet as compared to the Project. The overall development under Alternative 6 would avoid much of the overlapping construction activities, export, and large mat foundation concrete pours associated with the Project. With a substantial reduction in development compared to the Project, the intensity of air emissions and fugitive dust from site preparation and construction activities would be less on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, regional impacts on these days would be less compared to those of the Project. Based on the reduction of development and associated construction activities, Alternative 6 would result in less-than-significant impacts related to regional construction emissions. Therefore, Alternative 6 would eliminate the Project's significant and unavoidable impacts associated with regional construction emissions, and impacts would be less than those of the Project.

(b) Operation

As previously discussed, the development proposed under Alternative 6 would be reduced compared to the Project. As such, the number of daily trips generated by Alternative 6 would be less than the number of new daily trips generated by the Project. Specifically, as provided in Appendix T of this Draft EIR, Alternative 6 would result in a total of 986 daily vehicle trips compared to the Mixed Use Development Scenario's 8,257 total daily vehicle trips and the No-Hotel Development Scenario's 7,711 total daily vehicle trips. Alternative 6 would result in 6,211 daily VMT compared to the Mixed Use Development Scenario's 52,517 daily VMT and the No-Hotel Development Scenario's 49,137 daily VMT. Operational regional air pollutant emissions associated with Alternative 6 would be generated by vehicle trips and daily VMT to the Project Site, which are the largest contributors to operational air pollutant emissions, and by the consumption of electricity and natural gas. As vehicular emissions depend on the number of trips and VMT, the overall

pollutant emissions generated by the Residential Townhomes Alternative would be less than the emissions generated by the Project due to the reduction in the number of vehicular trips. Given the reduction in uses and overall floor area, both area sources and stationary sources would also generate less on-site operational air emissions associated with energy consumption compared to the Project. Based on the reduction of development and vehicle trips, Alternative 6 would not exceed the SCAQMD's regional significance thresholds, and impacts would be less than significant. Therefore, impacts associated with regional air pollutant emissions during operation of Alternative 6 would be less than significant and less than the impacts of the Project.

(2) Localized Emissions

(a) Construction

On-site construction activities under Alternative 6 would be located at similar distances from sensitive receptors as the Project. Given the reduction in the proposed development, overall construction activities and associated localized emissions from construction of Alternative 6 would be reduced compared to those of the Project. Therefore, as with the Project, localized impacts under Alternative 6 would be less than significant, and less than the less-than-significant impacts of the Project.

(b) Operation

Localized operational impacts are determined primarily by traffic volumes. As provided in Appendix T of this Draft EIR, Alternative 6 would generate 986 daily vehicle trips. As such, this alternative would generate less daily trips compared to the Mixed Use Development Scenario's 8,257 daily trips and the No-Hotel Development Scenario's 7,711 daily trips. As such, total vehicular emissions would be less compared to the Project under both development scenarios. In addition, the development proposed under Alternative 6 would be reduced compared to the Mixed Use Development Scenario and the No-Hotel Development Scenario; therefore, area and stationary sources would also generate less on-site operational air emissions compared to the Project. As such, under the Residential Townhomes Alternative, total contributions to localized air pollutant emissions during operation would be less than the Project's contribution. Accordingly, localized air quality impacts under Alternative 6 would be less than significant, and less than the less-than-significant impacts of the Project.

(3) Toxic Air Contaminants

(a) Construction

As with the Project, construction of Alternative 6 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation

activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. Overall construction TAC emissions generated by Alternative 6 would be less than those of the Project since grading and excavation activities required during construction of Alternative 6 would be reduced under this alternative. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 6 would be less than significant, and less than the impacts of the Project.

(b) Operation

As set forth in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential TACs associated with Project operations would include diesel particulate matter from delivery trucks. Alternative 6 would reduce the number of residential units compared to the Project and would eliminate the retail, office, and hotel (under the Mixed Use Development Scenario) uses proposed by the Project. Consequently, Alternative 6 would result in a decrease in the number of deliveries and diesel particulate matter emissions. Similar to the Project, the land uses proposed under Alternative 6 are not considered land uses that generate substantial TAC emissions. Therefore, Alternative 6 would not release substantial amounts of TACs. Impacts under Alternative 6 would be less than significant, and less than the less-than-significant impacts of the Project.

b. Cultural Resources

Similar to the Project, Alternative 6 would require the removal of the existing vacant on-site buildings and surface parking areas. As determined in the Historic Report included in Appendix E.1 of this Draft EIR, the existing on-site buildings do not qualify as historical resources. Therefore, as with the Project, the potential for direct impacts to historical resources as a result of the removal of the existing vacant on-site buildings would also be less than significant.

With regard to indirect impacts on adjacent historical resources, similar to the Project, Alternative 6 would not impact or diminish the architectural design and integrity or impact the setting of any adjacent historical resources. Therefore, as with the Project, Alternative 6 would not indirectly affect adjacent contributing properties in the vicinity of the Project Site, and indirect impacts to historical resources would be less than significant.

Overall, impacts to historical resources under Alternative 6 would be less than significant, and similar to the less-than-significant impacts of the Project.

With regard to archaeological resources, Alternative 6 would require less grading when compared to the Project. Therefore, the potential for Alternative 6 to uncover

archaeological resources would be reduced when compared to that of the Project. Like the Project, Alternative 6 would implement the same mitigation measure (CUL-MM-1) as the Project in order to mitigate potential impacts to archaeological resources. As such, as with the Project, impacts to archaeological resources under Alternative 6 would be less than significant with mitigation. However, such impacts would be less than the impacts of the Project.

c. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

(a) Construction

Similar to the Project, construction activities associated with Alternative 6 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. Like the Project, construction activities associated with Alternative 6 would not involve the consumption of natural gas. As with the Project, Alternative 6 would also generate a demand for transportation energy associated with on- and off-road vehicles. However, the energy consumed during construction of Alternative 6 would be reduced compared to the Project due to the reduction in construction activities and duration. As with the Project, the electricity demand during construction of Alternative 6 would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Construction equipment used during construction of Alternative 6 would also comply with Title 24 requirements where applicable, similar to the Project. With regard to transportation fuels, trucks and equipment used during construction of Alternative 6 would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. Therefore, as with the Project, construction activities would use energy that is not wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 6 and less than the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of the Residential Townhomes Alternative would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions. As previously discussed, Alternative 6 would result in a

reduction of the uses proposed by the Project as well as a reduction in the number of daily trips. Specifically, as provided in Appendix T of this Draft EIR, Alternative 6 would result in a total of 986 daily vehicle trips compared to the Mixed Use Development Scenario's 8,257 total daily vehicle trips and the No-Hotel Development Scenario's 7,711 total daily vehicle trips. In addition, the change in land uses associated with Alternative 6 would result in a decrease of daily VMT as compared to the Project. As such, the consumption of electricity, natural gas, and petroleum-based fuels would be reduced under Alternative 6. In addition, similar to the Project, Alternative 6 would implement design features to reduce energy usage. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 6 would not be wasteful, inefficient, or unnecessary. Overall, impacts related to energy use during operation of Alternative 6 would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Conflict with Plans for Renewable Energy or Energy Efficiency

As discussed in Section IV.C, Energy, of this Draft EIR, the current City of LA Green Building Code requires compliance with CalGreen and California's Building Energy Efficiency Standards (Title 24). Similar to the Project, Alternative 6 would comply with the City's Green Building Code, as well as be capable of achieving LEED® Certified equivalency. Therefore, as with the Project, Alternative 6 would incorporate measures that are beyond current State and City energy conservation requirements. Also similar to the Project, Alternative 6 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2019 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code.

With regard to transportation related energy usage, Alternative 6 would also comply with goals of the SCAG's RTP/SCS which incorporates VMT targets established by SB 375. As with the Project, the use proposed under Alternative 6 and its proximity to major job centers and public transportation would serve to reduce VMT and associated transportation fuel usage within the region. In addition, vehicle trips generated during Project operations would comply with CAFE fuel economy standards. As with the Project, Alternative 6 would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction.

Based on the above, the Residential Townhomes Alternative would not conflict with plans for renewable energy or energy efficiency. No impacts related to renewable energy or energy efficiency plans would occur under Alternative 6, and impacts would be similar to the less-than-significant impacts of the Project.

d. Geology and Soils

Under Alternative 6, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, and site stability 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 of land use proposed. However, it is noted that the depth of excavation under Alternative 6 would only be approximately 17 feet, a reduction of 47 feet compared to the Project. Accordingly, Alternative 6 would also require less soil to be excavated from the Project Site. Notwithstanding, Alternative 6 would be developed within the same site as the Project and 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 6 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 6 would also comply with the same regulatory requirements as the Project, which require the preparation of a final design-level geotechnical engineering report to identify and minimize seismic risks. Therefore, as with the Project, Alternative 6 would not cause or accelerate geologic conditions which could result in substantial damage to proposed structures or infrastructure or expose people to substantial risk of injury. Impacts related to geology and soils under Alternative 6 would be less than significant, and similar to the impacts of the Project, which are less than significant.

With regard to paleontological resources, Alternative 6 would construct fewer subterranean parking levels compared to the Project. Therefore, the potential for Alternative 6 to uncover subsurface paleontological resources would be reduced when compared to that of the Project. Like the Project, Alternative 6 would implement the same mitigation measure (GEO-MM-1) as the Project in order to mitigate potential impacts to paleontological resources. As such, as with the Project, impacts to paleontological resources under Alternative 6 would be less than significant with mitigation. However, such impacts would be less than the impacts of the Project.

e. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily trips generated and associated VMT, as well as energy consumption from proposed land uses. As previously discussed, the number of daily trips and daily VMT under Alternative 6 would be reduced compared to both development scenarios. In addition, energy and water consumption from proposed land use would be reduced compared to the Project due to the reduction in residential uses and the elimination of the non-residential uses proposed by the Project. Thus, the amount of GHG emissions generated by Alternative 6 would be less than the amount generated by the Project due to the reduction in the number of trips and daily VMT generated when compared to the

Project and the reduction in total development. As with the Project, Alternative 6 would be designed to comply with the requirements of the CALGreen Code and the Los Angeles Green Building Code. Alternative 6 would also incorporate design features to reduce GHG emissions and would be designed to comply with the City's Green Building Ordinance, as applicable. With compliance with the CALGreen Code and the Los Angeles Green Building Code, and with the implementation of comparable sustainability features as the Project, Alternative 6 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 6 would be less than significant, and less than the less-than-significant impacts of the Project due to the reduction in GHG emissions.

f. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, during demolition, on-site grading, and building construction associated with Alternative 6, fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners would be used, handled, and stored on the Project Site, and would therefore require proper management and disposal. Such use would be expected to be less due to the reduced construction activities. Notwithstanding, like the Project, Alternative 6 would fully comply with all applicable federal, state, and local requirements, as well as the manufacturer's instructions concerning the use, handling, storage, and disposal of hazardous materials.

As discussed in detail in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, according to the Phase I ESA, during the Project Site reconnaissance, no evidence of existing underground storage tanks or aboveground storage tanks were observed on the Project Site. However, SCAQMD and LAFD records indicate the permitting of a 500-gallon diesel-fuel underground storage tank located on the northern perimeter of the Project Site. As with the Project, Alternative 6 would not involve any construction in or near the area of the existing underground storage tank. Notwithstanding, in the unlikely event that underground storage tanks are uncovered, suspect materials would be removed in accordance with all applicable federal, state, and local regulations similar to the Project.

While asbestos-containing materials and lead-based paints may be present on-site due to the age of the existing buildings, similar to the Project, Alternative 6 would comply with relevant regulations and requirements related to asbestos-containing material and lead-based paint to ensure that impacts would be less than significant. Furthermore, like the Project, in the event that PCBs are found within areas proposed for demolition during construction of Alternative 6, suspect materials would be removed in accordance with all applicable federal, state, and local regulations.

Additionally, similar to the Project, Alternative 6 would follow applicable CalGEM requirements for site plan review for construction activities proposed in the area of existing wells. This alternative would also include implementation of the same mitigation measures as the Project (under both development scenarios) to ensure potential impacts associated with the discovery of buried wells is less than significant. As with the Project, Mitigation Measure HAZ-MM-1 and HAZ-MM-2, may require an additional surface geophysical survey be conducted to attempt to locate the oil wells on the Project Site following demolition of existing structures (as the prior survey did not locate any existing oil wells and existing structures precluded geophysical survey in some areas of the site). If located, the wells would be unearthed and inspected by a licensed Petroleum Engineer and would be reported to CalGEM to assess and prescribe abandonment procedures based on their observed condition, as well as the Petroleum Administrator, LACUPA, and Los Angeles Department of City Planning. Similar to the Project, a soil and site management plan would be developed and implemented pursuant to Mitigation Measure HAZ-MM-3 to address the potential identification and abandonment of the oil wells if encountered during earthwork activities. Furthermore, in the event contaminated soils are encountered during construction, or construction occurs in areas of known or potential contamination, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166. Additionally, as with the Project, Alternative 6 would implement Project Design Feature HAZ-PDF-1, which would require buildings be placed in a manner so as to not significantly impede future access to the locations of the existing wells as depicted in CalGEM's maps. Moreover, the Residential Townhomes Alternative's adherence to the construction safety measures, as well as compliance with California Occupational Safety and Health Act safety requirements, would serve to reduce the risk in the event that elevated levels of methane gas are encountered during grading and construction. In addition, as with the Project, Alternative 6 would implement controls during construction at the Project Site in order to mitigate the effects of subsurface gases on workers and the public. In addition, as with the Project, Alternative 6 would implement Mitigation Measures HAZ-MM-4 and HAZ-MM-5, to ensure potential impacts related to subsurface gases and associated potential impacts to soil and groundwater are less than significant. Specifically, Mitigation Measure HAZ-MM-4 would install controls during construction at the Project Site to mitigate the effects of subsurface gases on workers and the public and Mitigation Measure HAZ-MM-5 would require the Applicant install a Passive System that would include a standard de-watering system or a reinforced concrete mat slab to accommodate hydrostatic pressure, as well as a sub-slap vapor collection and ventilation system.

With regard to emergency response plans, although construction activities for Alternative 6 are expected to be primarily confined to the Project Site, like the Project, it is expected that construction fences would encroach into the public right-of-way (e.g., sidewalks and roadways) adjacent to the Project Site on White Knoll Drive, Alpine Street,

and Beaudry Avenue. As such, sidewalks surrounding the Project Site are expected to be temporarily closed during construction. However, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period and emergency access would not be impeded. In addition, similar to the Project, a Construction Management Plan would be implemented and would include street/lane closure information, a detour plan, haul route(s), and a staging plan.

Based on the above, potential construction-related impacts associated with hazards and hazardous materials under Alternative 6 would be less than significant with mitigation, and less than the less-than-significant with mitigation impacts of the Project due to the reduction in construction activities and duration.

(2) Operation

Similar to the Project, Alternative 6 would not include the use of materials that would contain asbestos, lead based paint, or PCBs. In addition, Alternative 6 would not propose the installation of underground or aboveground storage tanks. The operation of Alternative 6 would involve the limited use of potentially hazardous materials typical of those used in residential uses, including cleaning agents, paints, pesticides, and other materials used for landscaping. Such use would be reduced compared to the Project due to the reduction in development. In addition, as with the Project, all hazardous materials on the Project Site would be acquired, handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, state, and local requirements. As with the Project, Alternative 6 would also comply with the City of Los Angeles' Methane Mitigation Ordinance No. 175,790.

With regard to emergency response plans, Alternative 6 would not involve any activities that would impede public access or travel along the public right-of-way or interfere with an adopted emergency response or evacuation plan. In addition, similar to the Project, the increase in traffic generated by Alternative 6 would not significantly impact emergency vehicle response to the Project Site and surrounding uses, including along City-designated disaster routes since the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or driving in the lanes of opposing traffic. Furthermore, as Alternative 6 would reduce traffic as compared to the Project, Alternative 6 would have a lesser impact on emergency response within, and in, the vicinity of the Project Site compared to the Project.

Based on the above, potential impacts related to hazards and hazardous materials during operation of Alternative 6 would be less than significant, and less than the less-than-significant impacts of the Project due to the reduction in development.

g. Hydrology and Water Quality

(1) Surface Water Quality

(a) Construction

Under Alternative 6, the degree to which new pollutants could be introduced to the Project Site during construction would be reduced compared to the Project as Alternative 6 would result in the reduction of construction activities and duration. As with the Project, a SWPPP would be prepared for Alternative 6 and would specify BMPs to be used during construction. In addition, as discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, a geotechnical investigation of the Project Site performed exploratory test borings and encountered water seepage at depths of 16 feet to 62 feet. As previously described, the below grade parking proposed by this alternative would extend to a maximum depth of 17 feet. Therefore, construction activities on the Project Site could encounter groundwater and dewatering may be required. Thus, similar to the Project, Alternative 6 would utilize temporary dewatering systems in compliance with all relevant NPDES requirements related to construction and discharges from dewatering operations.

With the implementation of site-specific BMPs included as part of the SWPPP, Alternative 6 would reduce or eliminate the discharge of potential pollutants from stormwater runoff. In addition, construction of Alternative 6 would be required to comply with City grading permit regulations, which require necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspection to reduce sedimentation and erosion. Therefore, with compliance with NPDES requirements and City of Los Angeles grading permit regulations, construction of Alternative 6 would not result in discharge that would violate any water quality standard or waste discharge requirements, or otherwise substantially degrade water quality. Furthermore, construction of Alternative 6 would not result in discharges that would cause regulatory standards to be violated. Therefore, as with the Project, construction-related impacts to surface water quality under Alternative 6 would be less than significant, and less than the less-than-significant impacts of the Project due to the reduction in excavation and overall construction activities.

(b) Operation

Similar to the Project, Alternative 6 would implement BMPs for managing stormwater runoff in accordance with current City LID Ordinance requirements. The BMPs would control stormwater runoff with no increase in runoff resulting from the alternative. Due to the incorporation of the LID BMPs, operation of Alternative 6 would not result in discharges that would violate any water quality standard or waste discharge requirements, or otherwise substantially degrade water quality. Thus, as with the Project, impacts to surface

water quality during operation of Alternative 6 would be less than significant, and less than the less-than-significant impacts of the Project due to the reduction in development.

(2) Groundwater Quality

(a) Construction

As discussed above, Project construction activities could encounter groundwater and temporary dewatering may be required. In the event dewatering is required as part of Alternative 6, like the Project, a temporary dewatering system would be installed and operated in accordance with NPDES requirements. Any discharge of groundwater during construction of Alternative 6 would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements. Pursuant to such requirements, the groundwater extracted would be chemically analyzed to determine the appropriate treatment and/or disposal methods. As such, groundwater quality would not be impacted from potential dewatering activities.

As previously discussed, there is an existing underground storage tank in the northern perimeter of the Project Site. However, as with the Project, construction activities under Alternative 6 would not occur near or in the area of the existing underground storage tank. Therefore, the potential for the underground storage tank to affect groundwater quality is negligible.

As with the Project, construction activities associated with the Residential Townhomes Alternative could also encounter contaminated soil and groundwater that would require proper handling and disposal. Where construction is proposed in the area of existing wells, applicable CalGEM requirements for site plan review would be followed. In addition, as with the Project, Alternative 6 would implement the same mitigation measures to ensure potential impacts associated with the discovery of buried oil wells is less than significant. If located, the wells would be unearthed and inspected by a licensed Petroleum Engineer and will be reported to CalGEM to assess and prescribe abandonment procedures based on their observed condition, as well as the Petroleum Administrator, LACUPA, and Los Angeles Department of City Planning. Similar to the Project, a soil and site management plan would be developed and implemented to address the potential identification and abandonment of the oil wells if encountered during earthwork activities. Furthermore, in the event contaminated soils are encountered during construction, or construction occurs in areas of known or potential contamination, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements,

including SCAQMD Rule 1166.[56] Additionally, as with the Project, Alternative 6 would implement the same Project Design Feature (HAZ-PDF-1), which would require buildings be placed in a manner so as to not significantly impede future access to the locations of the existing wells as depicted in CalGEM's maps.

Therefore, compliance with existing regulations would ensure Alternative 6 would not create a significant hazard to groundwater quality associated with the existing on-site oil wells.

During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would therefore require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials to be released into groundwater. However, as this alternative would require less construction activities than the Project, the use of hazardous materials would be reduced. Moreover, compliance with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste, would reduce the potential for the construction of Alternative 6 to release contaminants into groundwater, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well downstream.

Based on the above, as with the Project, impacts with respect to groundwater quality during construction under Alternative 6 would be less than significant. Such impacts would be less than the less-than-significant impacts of the Project due to a reduction in excavation and overall construction activities.

(b) Operation

Similar to the Project, Alternative 6 would not include the surface or subsurface application or introduction of potential contaminants or waste materials. Like the Project, Alternative 6 is not anticipated to result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater through percolation. Therefore, as with the Project, impacts with respect to groundwater quality during operation of Alternative 6 would be less than significant and such impacts would be similar to those of the Project.

[56] *South Coast Air Quality Management District. Rules and Compliance, Rule 1166.*

(3) Surface Water Hydrology

(a) Construction

Similar to the Project, construction activities for Alternative 6 would include demolition of the existing vacant on-site buildings. While construction of Alternative 6 would reduce the extent of excavation activities and construction activities, Alternative 6 would disturb the same surface area as the Project. Like the Project, construction activities, particularly grading of the Project Site, would have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. However, Alternative 6 would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, Alternative 6 would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. In addition, Alternative 6 would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion, similar to the Project. Thus, through compliance with all NPDES Construction General Permit requirements, including preparation of a SWPPP, implementation of BMPs, and compliance with applicable City grading regulations, Alternative 6 would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, or flooding on- or off-site. Similarly, with adherence to standard compliance measures (e.g., NPDES requirements), construction activities would not cause flooding, substantially increase or decrease the amount of surface water flow from the Project Site into a water body, or result in a permanent, adverse change to the movement of surface water. Therefore, construction-related impacts to surface water hydrology under Alternative 6 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 6 would include development of new buildings, paved areas, and landscaped areas. As discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, the Project Site is currently comprised of 72 percent impervious surfaces. Like the Project, implementation of Alternative 6 would increase the amount of impervious surfaces compared to the Project Site's existing impervious surfaces. However, similar to the Project, Alternative 6 would implement BMPs to control stormwater runoff with no increase in runoff resulting from the Project Site. Therefore, like the Project, Alternative 6 would not impact existing storm drain infrastructure serving the Project Site and runoff would continue to follow the same discharge paths and drain to the same storm systems. Consequently, as with the Project, Alternative 6 would not cause flooding during the 50-year developed storm event, would not create runoff which would exceed the capacity of existing or planned drainage systems, would not require construction of new stormwater

drainage facilities or expansion of existing facilities, would not substantially reduce or increase the amount of surface water in a water body, or result in a permanent adverse change to the movement of surface water. Operational impacts to surface water hydrology under Alternative 6 would be less than significant, and similar to the less-than-significant impacts of the Project.

(4) Groundwater Hydrology

(a) Construction

As previously discussed, as with the Project, Alternative 6 could require a temporary dewatering system during construction. Similar to the Project, in the event dewatering is required during construction of Alternative 6, a temporary dewatering system would be installed and operated in accordance with NPDES General Construction Permit requirements. Any discharge of groundwater during construction of Alternative 6 would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements.

As discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, no water supply wells are located at the Project Site or within one mile of the Project Site that could be impacted by construction, nor would Alternative 6 include the construction of water supply wells.

Based on the above, construction impacts on groundwater hydrology during construction of Alternative 6 would be less than significant, and less than the less-than-significant impacts of the Project due to the reduction in excavation and construction activities.

(b) Operation

Similar to the Project, the subterranean levels of Alternative 6 would be designed such that they are able to withstand hydrostatic forces and incorporate comprehensive waterproofing systems in accordance with current industry standards and construction methods such that permanent dewatering operations would not be required. Thus, the potential impact during operation on groundwater level under Alternative 6 would be less than significant.

As discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, the Project Site is currently comprised of approximately 72 percent impervious surfaces. Therefore, there is currently a minimal groundwater recharge potential on the Project Site. Given that the Project Site is currently mostly paved and developed with four vacant buildings and the Elysian apartment building, the amount of impervious areas would

increase compared to the Project Site's existing impervious area as Alternative 6 would provide approximately 37,500 square feet of open space. However, like the Project, Alternative 6 would include the installation of capture and use or biofiltration planter BMPs in order to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site. Therefore, potential impacts on groundwater recharge would be less than significant under Alternative 6.

Based on the above, impacts to groundwater hydrology during operation of Alternative 6 would be less than significant and similar to the less-than-significant impacts of the Project.

h. Land Use and Planning

As described above, Alternative 6 would develop residential uses only and would eliminate the non-residential uses proposed by the Mixed Use Development Scenario and the No-Hotel Development Scenario. The existing land use designation and zoning on the Project Site are General Commercial and C2-2D (Commercial Zone, Height District 2 with Development Limitation), respectively. Land uses permitted within the C2 Zone include, but are not limited to, various retail and restaurant spaces, auditoriums, automotive fueling and service stations, churches, drive-in businesses, hospitals, offices, and schools. The zoning of the Project Site specifies a permitted density of one unit per 400 square feet of lot area or one guest room per 200 square feet of lot area. Therefore, residential uses are permitted on the Project Site and such use, as proposed by Alternative 6, would not conflict with other surrounding multi-family residential uses. In addition, as with the Project, the Residential Townhomes Alternative also would not conflict with the applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect related to housing, including those set forth in the Los Angeles General Plan Framework Element, the Housing Element, the Central City North Community Plan, and SCAG's RTP/SCS. However, without providing a variety of complementary uses on one site, the Residential Townhomes Alternative would not provide for the synergy of uses as the Project, which could serve to reduce vehicle trips and vehicle miles traveled and associated air emissions. Therefore, unlike the Project, Alternative 6 would conflict with the goals, objectives, and policies in applicable plans related to the development of a mix of complementary uses within one site. Alternative 6 would also conflict with those goals, objectives, and policies in applicable plans encouraging the development of a range of housing types to meet the varied needs of the City's population. Thus, impacts related to land use consistency would be less than significant and greater than the less-than-significant impacts of the Project.

i. Noise

(1) Noise

(a) Construction

While the types of construction activities under Alternative 6 would be substantially similar to the Project, the amount of construction activities and duration would be reduced due to the reduction in total floor area. As with the Project, construction of Alternative 6 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Under Alternative 6, on- and off-site construction activities and the associated construction noise levels would be expected to be reduced compared to the Project during maximum activity days since the overall amount, duration, and daily intensity of construction activities would decrease under Alternative 6 when compared to the Project. As such, noise levels during maximum activity days, which are used for measuring impact significance, would be reduced compared to those of the Project. As with the Project, Alternative 6 would implement Project Design Features NOI-PDF-1 (requiring muffling of equipment) and NOI-PDF-4 (prohibiting use of impact piles), and Mitigation Measure NOI-MM-1 (requiring sound barriers) to reduce noise levels during construction. However, given the proximity of the surrounding noise receptor locations and the fact that similar if not identical construction equipment would need to be used, similar to the Project, on-site and off-site construction noise would be significant and unavoidable under Alternative 6 even with implementation of project design features and mitigation measures. Overall, impacts under Alternative 6 would be less than those of the Project but still significant and unavoidable.

(b) Operation

As discussed in Section IV.I, Noise, of this Draft EIR, sources of operational noise under the Project include: (a) on-site stationary noise sources, including mechanical equipment, activities within the proposed outdoor spaces, parking facilities, loading dock and trash collection areas; and (b) off-site mobile (roadway traffic) noise sources. Alternative 6 would introduce noise from similar on-site and off-site noise sources as the Project. However, it is anticipated that with the overall reduction in development, the noise levels from building mechanical equipment, outdoor spaces, and parking facilities would be reduced. In addition, similar to the Project, Alternative 6 would include Project Design Features NOI-PDF-2, -3, -5, and -6 that require screening of mechanical equipment and loading docks, specify sound levels for outdoor sound systems, and specify the maximum occupancy of outdoor roof decks. Alternative 6 would also comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. The proposed loading dock and trash collection areas for Alternative 6 would be located in enclosed areas, similar to

the Project. Thus, operational on-site noise impacts would be less than significant and less than the less-than-significant impacts of the Project due to reduction in development.

With regard to off-site noise sources, Alternative 6 would result in a reduction in daily vehicle trips compared to both development scenarios. The reduction in vehicle trips would result in a decrease in off-site traffic-related noise levels under Alternative 6. Therefore, as with the Project, off-site noise impacts under Alternative 6 would be less than significant. Such impacts would be less than those of the Project due to the reduction in vehicle trips.

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 6 would be similar to the Project, although the amount and duration of construction activities would be reduced. As with the Project, construction of the Residential Townhomes Alternative would generate vibration from the use of heavy-duty construction equipment as well as from truck trips. As the overall amount of construction would be reduced, on- and off-site construction activities and the associated construction vibration levels would also be expected to be reduced compared to those of the Project. As such, peak vibration levels generated by the construction equipment would be less than those of the Project. However, the reduction in construction activities under Alternative 6 would not be sufficient to reduce the Project's significant impacts. As with the Project, vibration impacts due to on- and off-site construction activities under Alternative 6 would similarly be less than significant for on-site and off-site construction vibration (building damage) and significant and unavoidable for on-site and off-site construction vibration (human annoyance). Overall, vibration impacts under Alternative 6 would be less than the impacts of the Project.

(b) Operation

As described in Section IV.I, Noise, of this Draft EIR, sources of vibration related to operation of the Project would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under Alternative 6. As with the Project, vehicular-induced vibration from Alternative 6, including vehicle circulation within the subterranean parking area, would not generate perceptible vibration levels at off-site sensitive uses. In addition, like the Project, building mechanical equipment installed as part of Alternative 6 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration transmission such that the vibration would not be perceptible at the off-site sensitive receptors. Therefore, as with the Project, operation of Alternative 6 would not increase the existing vibration levels in the immediate vicinity of the Project Site. As such, vibration impacts associated with operation

of Alternative 6 would also be less than significant. However, such impacts would be less than those of the Project due to the reduction in vehicle trips and floor area.

j. Population, Housing, and Employment

(1) Construction

Alternative 6 would be constructed within the same Project Site as the Project. As with the Project, Alternative 6 would not involve removal of the existing Elysian apartment building located within the Project Site. Therefore, similar to the Project, this alternative would not displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere. As discussed in Section IV.J, Population, Housing, and Employment, of this Draft EIR, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by a particular development. Many construction workers are highly specialized (e.g., crane operators, steel workers, masons), and move from job site to job site as dictated by the demand for their skills. Therefore, population impacts related to household growth in the City of Los Angeles or the SCAG Region as a result of construction worker relocation under Alternative 6 would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Operation

As previously described, Alternative 6 would construct 250 residential units and would eliminate the non-residential uses proposed by the Mixed Use Development Scenario and the No-Hotel Development Scenario. Based on a household size factor of 2.41 persons per household and 250 units, Alternative 6 would generate a new residential population of 603 persons, which would be comparatively less than the Mixed Use Development Scenario's new residential population of 1,777 and the No-Hotel Development Scenario's new residential population of 1,994 persons. As discussed in Section IV.J, Population, Housing, and Employment, of this Draft EIR, the new residents generated by both development scenarios would be within and, thus, consistent with SCAG growth forecasts, constituting a small percentage of projected City and regional growth. Similarly, the 603 new residents generated by Alternative 6 would represent a small percentage of the housing growth in the SCAG region and in the City. Thus, as with the Project, the residents and new residential units generated by Alternative 6 would similarly be consistent with SCAG growth forecasts.

With regard to indirect population impacts, the residential uses are not expected to generate employment opportunities other than a few employment positions associated with management and maintenance of the new buildings that would likely be filled by persons

already residing in Los Angeles. As such, like the Project, this alternative would not induce substantial population growth or exceed SCAG's population forecast for the City or the SCAG Region due to indirect population growth.

Additionally, with regard to infrastructure, all circulation improvements planned for Alternative 6 would be intended to improve circulation flows and safety throughout the Project Site and vicinity, similar to the Project. Utility and other infrastructure improvements planned for Alternative 6 would also be intended to connect the proposed uses to the existing main infrastructure system.

Overall, impacts related to population, housing, and employment under this alternative would be less than significant and less than the less-than-significant impacts of the Project.

k. Public Services

(1) Fire Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 6 would be similar to that of the Project. However, the overall amount of construction activities and duration of construction would be reduced compared to the Project due to the reduction in development. Construction would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous waste. Thus, compliance with regulatory requirements would effectively reduce the potential for construction activities to expose people to the risk of fire or explosion related to hazardous materials.

Additionally, while construction activities would primarily be contained within the boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by temporary lane closures (with travel still available in each direction), the hauling of soil and construction materials, construction worker traffic, roadway/access improvements, and the construction of utility line connections. Similar to the Project, it is likely that Alternative 6 would require construction fences that would encroach into the public right-of-way (e.g., sidewalks and roadways) adjacent to the Project Site on White Knoll Drive, Alpine Street, Beaudry Avenue, and Sunset Boulevard. However, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period and emergency access would not be impeded. Similar to the Project, under both development scenarios, Alternative 6 would be required to implement Project Design Feature TR-PDF-1 which would require a Construction Management Plan to be implemented to ensure that adequate and safe access remains available within and near

the Project Site during construction activities. In addition, Alternative 6 would implement a similar design feature in order to allow construction-related traffic, including hauling activities and construction worker trips, to occur outside the typical weekday commuter A.M. and P.M. peak periods to the extent feasible, thereby reducing the potential for traffic-related conflicts Therefore, construction-related impacts related to fire protection services under Alternative 6 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in construction activities and duration.

(b) Operation

As with the Project, Alternative 6 would generate a new residential population, as well as a new visitor population on the Project Site that would contribute to an increase in demand for LAFD fire protection and emergency medical services. However, with the reduction in residential uses and the elimination of the non-residential uses proposed by the Mixed Use Development Scenario and the No-Hotel Development Scenario, the overall increased demand for LAFD fire protection and emergency medical services would be reduced compared to that of the Project. In addition, similar to the Project, Alternative 6 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Alternative 6 would also include the installation of automatic fire sprinklers within all proposed buildings and would not include the installation of barriers that could impede emergency vehicle access. As with the Project, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for Alternative 6. Therefore, similar to the Project, this alternative would not necessitate the construction of new fire protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service. Operation of the Alternative 6 would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities (fire protection), the construction of which would cause significant environmental impacts, in order to maintain acceptable fire protection services. Overall impacts with regard to LAFD fire protection during operation of Alternative 6 would be less than significant. Such impacts would be less than the less-than-significant impacts of the Project due to the reduction in residential uses and the elimination of non-residential uses proposed by the Project.

(2) Police Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 6 would be similar to that of the Project. However, the overall amount of construction activities and duration of construction would be reduced compared to the Project due to the

reduction in development. Alternative 6 would also implement the same design features as the Project. Specifically, pursuant to Project Design Feature POL-PDF-1, this alternative would be required to provide temporary security measures such as security fencing, lighting, locked entry to secure the Project Site during construction, and regular security patrols during non-construction hours, thereby reducing the demand for police protection services.

In addition, similar to the Project, a Construction Management Plan would be implemented to ensure that adequate and safe access is available within and near the Project Site during construction activities. Therefore, construction-related impacts to police protection services under Alternative 6 would be less than significant, and less than the less-than-significant impacts of the Project due to the reduction in construction activities and duration.

(b) Operation

While Alternative 6 would increase the existing police service population of the Central Area compared to existing conditions, the increase would be less than the Project due to the reduction in residential uses and the elimination of non-residential uses proposed by the Mixed Use Development Scenario and the No-Hotel Development Scenario. Like the Project, Alternative 6 would implement the same design features as the Project. Specifically, pursuant to Project Design Feature POL-PDF-2 through Project Design Feature POL-PDF-5, Alternative 6 would be required to provide a 24-hour camera network, on-site security, appropriate lighting to ensure security, and the prevention of concealed spaces. The design features would help offset the increase in demand for police protection services generated by Alternative 6. Thus, as with the Project, Alternative 6 would not result in the need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service. As such, the impact on police protection services under Alternative 6 would be less than significant, and less than the less-than-significant impacts of the Project.

(3) Schools

(a) Construction

Similar to the Project, Alternative 6 would generate part-time and full-time jobs associated with construction of the alternative between the start of construction and buildout of the development proposed under Alternative 6. 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 the alternative. Therefore, the construction employment generated by Alternative 6 would not result in a notable increase in the resident population or a corresponding increase in

demand for schools in the vicinity of the Project Site. Therefore, there would be no need for a new school facility and impacts under Alternative 6 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 6 would generate a new residential population on the Project Site that would contribute to an increased demand for schools. However, the overall increased demand in school services would be reduced compared to the Project due to the reduction in residential units. Specifically, Alternative 6 would include 250 units while the Mixed Use Development Scenario would include up to 737 units and the No-Hotel Development Scenario would include up to 827 units. Additionally, given the elimination of non-residential uses proposed by the Mixed Use Development Scenario and the No-Hotel Development Scenario, employment opportunities would be limited to a few employment positions associated with management and maintenance of the new buildings that would likely be filled by persons already residing within Los Angeles. Thus, it is expected that Alternative 6 would not indirectly generate new students as a result of employment opportunities. As with the Project, pursuant to Senate Bill 50, the Applicant for the Residential Townhomes Alternative would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees fully removes all of Alternative 6's related school impacts. Therefore, impacts related to schools under Alternative 6 would be less than significant, and less than the less-than-significant impacts of the Project.

(4) Parks and Recreation

(a) Construction

Similar to the Project, construction of Alternative 6 would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, the likelihood that construction workers would relocate their households as a consequence of working on Alternative 6 is negligible. Therefore, the construction workers associated with Alternative 6 would not result in a notable increase in the residential population, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site.

As with the Project, during construction of Alternative 6, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. However, any resulting increase in the use of such parks and recreational facilities would be temporary and negligible.

Based on the above, construction of Alternative 6 would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities, nor would construction workers interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the vicinity of the Project Site. Therefore, impacts on parks and recreational facilities under Alternative 6 would be less than significant, and similar to the less-than-significant impacts of the Project.

(b) Operation

Residents are considered the primary users of parks and recreation facilities. Similar to the Project, Alternative 6 would generate a new residential population on the Project Site, which could create a demand for parks and recreation services. However, Alternative 6 would generate fewer residents at the Project Site than the Mixed Use Development Scenario and the No-Hotel Development Scenario due to the reduction in residential units. As with the Project, Alternative 6 would provide a variety of open space and recreational amenities to comply with the open space requirements of the LAMC. In addition, given the elimination of non-residential uses proposed by the Mixed Use Development Scenario and the No-Hotel Development Scenario, employment opportunities would be limited to a few employment positions associated with management and maintenance of the new buildings that would likely be filled by persons already residing within Los Angeles. Thus, the Residential Townhomes Alternative would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities. In addition, similar to the Project, under Alternative 6 the Applicant would be required to pay Quimby fees to the City that could be used to add or improve park facilities in the vicinity of the Project Site. Therefore, impacts to park and recreation facilities would be less than significant under Alternative 6 and less than the less-than-significant impacts of the Project.

(5) Libraries

(a) Construction

Similar to the Project, construction of Alternative 6 would result in a temporary increase of construction workers on the Project Site. 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 6. Therefore, construction workers would not result in a material increase in the resident population within the service area of the libraries serving the Project Site and vicinity.

In addition, it is unlikely that construction workers would visit library facilities in the vicinity of the Project Site on their way to/from work or during their lunch hours. Specifically, it is 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. Additionally, lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. Furthermore, it is unlikely that construction workers would utilize library facilities at the end of the work day, and would instead likely use library facilities near their place of residence. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. As such, impacts to library facilities during construction would be less than significant under Alternative 6, and similar to the less-than-significant impacts of the Project.

(b) Operation

Residents are considered the primary users of library facilities. As with the Project, Alternative 6 would generate a new residential population on the Project Site, which could create a demand for library facilities. However, Alternative 6 would generate fewer residents than the Mixed Use Development Scenario and the No-Hotel Development Scenario due to the reduction in residential units. In addition, given the elimination of non-residential uses proposed by the Mixed Use Development Scenario and the No-Hotel Development Scenario, it is expected that employment opportunities would be limited to a few employment positions associated with management and maintenance of the new buildings that would likely be filled by persons already residing within Los Angeles. These limited employees would generate minimal demand for library services since they would be more likely to use library facilities near their homes during non-work hours. Furthermore, employees at the Project Site would have internet access, which provides information and research capabilities and reduces the demand at physical library locations. As such, impacts associated with the potential to necessitate the construction of new or expanded library services under Alternative 6 would be less than significant and less than the less-than-significant impacts of the Project.

I. Transportation

As previously discussed, Alternative 6 is a residential-only alternative with far less density. In addition, Alternative 6 would be developed within the same Project Site as the Project. As such, the plans, policies, and programs applicable to the Project Site and that address residential uses would also apply to Alternative 6. As discussed above, while Alternative 6 would include a reduction in the uses proposed by either development scenario, Alternative 6 would feature similar vehicular, pedestrian, and bicycle access as the Project. Specifically, Alternative 6 would widen the sidewalks on all sides of the Project Site, would provide a new signalized pedestrian crossing point on Sunset Boulevard with

continental crosswalks, and install all-way stop-control at the intersection of Beaudry Avenue & Alpine Street, where there is currently an uncontrolled crosswalk across Beaudry Avenue. In addition, as with the Project, Alternative 6 would also promote pedestrian activity and reduce vehicle trips and VMT by encouraging multi-modal mobility options such as bicycle and scooter sharing services; providing a Transportation Center; providing convenient and adequate bicycling facilities; and enhancing pedestrian amenities through the provision of gardens, courtyards, and terraces, which would include family play features, a lawn with lounge furniture, and other landscape elements. As such, Alternative 6 would comply with the programs and policies set forth in the Mobility Plan; Plan for a Healthy Los Angeles; LAMC Section 12.21.A.16, LAMC Section 12.26J, and LAMC Section 12.37; Vision Zero; Citywide Design Guidelines, and SCAG RTP/SCS to the same extent as the Project. Therefore, Alternative 6 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Thus, impacts would be similar to the less-than-significant impacts of the Project.

When accounting for the same project design features as the Project, the proposed uses would result in a lower daily VMT when compared to both development scenarios. Specifically, as shown in Appendix T of this Draft EIR, Alternative 6 would result in 6,896 total daily VMT, which would be comparatively less than the 56,710 daily VMT generated by the Mixed Use Development Scenario and the 53,035 daily VMT generated by the No-Hotel Development Scenario. As previously discussed, this Alternative would eliminate the non-residential uses proposed by both development scenarios; therefore, this alternative would not result in any work VMT per employee. Based on the population assumptions, this Alternative would generate an average household VMT of 6.1 per capita, which would be comparatively more than the Mixed Use Development Scenario's average household VMT of 4.8 per capita and the No-Hotel Development Scenario's average household VMT of 4.9 per capita.[57] As such, the average household VMT per capita for Alternative 6 would still fall below the significance threshold of 7.2.[58] Therefore, impacts with respect to conflicts with CEQA Guidelines Section 15064.3, subdivision (b) would be less-than-significant; however, impacts would be greater than the less-than-significant impacts of the Project.

Alternative 6 would have the same access plan as the Project. Specifically, as with the Project, Alternative 6 would include six different access points around the Project Site. Similar to the Project (under both development scenarios), the final design of the access

[57] *Gibson Transportation Consulting, Inc., "Transportation Assessment for the Alternatives to the 1111 Sunset Boulevard Mixed Use Project," October 19, 2020. See Appendix T of this Draft EIR.*

[58] *Gibson Transportation Consulting, Inc., "Transportation Assessment for the Alternatives to the 1111 Sunset Boulevard Mixed Use Project," October 19, 2020. See Appendix T of this Draft EIR.*

points would be reviewed by the City Department of Building and Safety, Bureau of Engineering, and LADOT during site plan review to ensure code compliance and safe pedestrian and vehicular design. Therefore, similar to the Project, impacts would be less than significant. Lastly, similar to the Project, Alternative 6 would not interfere with emergency access. Similar to the Project, under both development scenarios, Alternative 6 would be required to implement Project Design Feature TR-PDF-1 which would require a Construction Management Plan to be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. With regard to operation, all driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding emergency access, and would not include the installation of barriers that could impede emergency vehicle access. Lastly, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, Alternative 6 would result in less than significant emergency access impacts that would be similar to the less than significant impacts of the Project.

Alternative 6 would generate three morning peak hour trips and nine afternoon peak hour trips on the SR 110 southbound off-ramp to Figueroa Terrace. Therefore, Alternative 6 does not meet the 25-trip threshold requiring analysis of freeway off-ramps. Nevertheless, under Future with Alternative Conditions, Alternative 6 would result in a ramp queue of 0.9 vehicles (23 feet) during the morning peak hour and 3.2 vehicles (80 feet) during the afternoon peak hour. The off-ramp provides approximately 500 feet of queuing space before reaching the freeway mainline lanes. Therefore, similar to the Project, no significant impact would occur.

m. Tribal Cultural Resources

Alternative 6 would construct fewer subterranean parking levels compared to the Project. Therefore, the potential for Alternative 6 to uncover subsurface tribal cultural resources would be reduced when compared to that of the Project. However, as discussed in Section IV.M. Tribal Cultural Resources, of this Draft EIR and the Tribal Cultural Resources Report included in Appendix R.1, the likelihood that buried, intact cultural deposits of Native American origin are preserved within the Project Site is low considering the significant landscape modification and construction that has occurred within the Project Site from the 1870s forward. Nonetheless, based on the substantial (and confidential) evidence provided by the Kizh Nation, the possibility exists that intact cultural deposits related to a potential tribal cultural resource may be preserved within the Project Site. Thus, Alternative 6 would implement a same mitigation measure as the Project (TCR-MM-1) to mitigate potential impacts to tribal cultural resources. As such, as with the Project, impacts to tribal cultural resources under Alternative 6 would be less than

significant with mitigation. However, such impacts would be less than the impacts of the Project.

n. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 6 would generate a short-term demand for water. This demand would be less than the Project due to the reduction in construction activities and duration. As evaluated in Section IV.N.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of construction. Since the water demand for construction activities would be reduced under Alternative 6, the temporary and intermittent demand for water during construction under Alternative 6 would also be expected to be met by the City's available water supplies.

Furthermore, as with the Project, the design and installation of new service connections under Alternative 6 would be required to meet applicable City standards. The connections and installation of on-site water distribution lines would primarily involve on-site trenching to place the lines below the surface and minor off-site trenching to connect to the existing public water mains or existing meter lateral locations. As with the Project, prior to ground disturbance associated with the Residential Townhomes Alternative, Project contractors would coordinate with LADWP to identify the locations and depths of all lines. Furthermore, LADWP would be notified in advance of proposed ground disturbance activities to avoid disruption of water service. LADWP would review and approve all appropriate connection requirements, pipe depths, and connection location(s). In addition, given that construction activities could temporarily affect access in adjacent rights-of-way, a Construction Management Plan, similar to the Project, would be implemented to ensure adequate and safe access remains available within and near the Project Site during construction. Therefore, impacts on water supply and infrastructure associated with short-term construction activities under Alternative 6 would be less than significant, and less than the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 6 would generate an increased demand for water relative to existing conditions. Based on the number of units proposed as part of this alternative (250 units), Alternative 6 would not be considered a "water demand project," as defined in Section 15155 of the CEQA Guidelines, as it would not include 500 or more dwelling units for a residential development. Therefore, a Water Supply Assessment would

not be required for Alternative 6 to determine whether adequate water supplies would be available to serve Alternative 6. In addition, based on the reduction in total development as compared to the Project, water demand for Alternative 6 would be less than the Mixed Use Development Scenario and the No-Hotel Development Scenario's estimated increase in water demand. Thus, as with the Project, the estimated water demand under Alternative 6 would not exceed the available supplies projected by LADWP. Therefore, the estimated water demand under Alternative 6 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 6 since the water demand would be less than the water demand generated by the Project. Furthermore, similar to the Project, the Residential Townhomes Alternative would construct the necessary on-site water infrastructure and off-site connections to the LADWP water system pursuant to applicable City requirements to accommodate the new buildings. Thus, impacts to water supply under Alternative 6 would be less than significant, and less than the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, the existing sewer laterals would be capped during construction of the Residential Townhomes Alternative. As such, no new sewage would enter the public sewer system, except for sewer services needed for the Elysian apartment building. As with the Project, temporary facilities, such as portable toilet and hand wash areas, would be provided by the construction contractor; however, any sewage generated from these facilities would be collected and hauled off-site and would not be discharged into the public sewer system. Thus, wastewater generation from construction activities under Alternative 6 is not anticipated to cause a measurable increase in wastewater flows. Therefore, similar to the Project, construction-related impacts to the wastewater system under Alternative 6 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 6 would generate greater wastewater flows relative to existing conditions. However, based on the reduction in total development, wastewater generation under the Residential Townhomes Alternative would be less than the Mixed Use Development Scenario and the No-Hotel Development Scenario's estimated wastewater flow. As provided in Section IV.N.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the Project-generated wastewater could be accommodated by the existing capacity of the Hyperion Water Reclamation Plant. Therefore, it is anticipated that the wastewater generated by Alternative 6 could also be accommodated by

the existing capacity of the Hyperion Water Reclamation Plant, and impacts with respect to treatment capacity would be less than significant.

Similar to the Project, sewer service for Alternative 6 would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site. Given that the wastewater flows generated by Alternative 6 would be less than the estimated wastewater flows of the Project, it is possible that there would be sufficient capacity within the sewer lines serving the Project Site to serve the wastewater flows of Alternative 6. However, as with the Project, Alternative 6 could potentially require the upsizing of the existing 8-inch line on Beaudry Avenue, or equivalent improvement, as determined by LA Sanitation, to ensure adequate sewer capacity is available in the vicinity of the Project Site to meet the requirements of Alternative 6. However, additional detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for Alternative 6 during the permitting process. All related sanitary sewer connections and on-site infrastructure under Alternative 6 would be designed and constructed in accordance with applicable standards.

Based on the above, impacts with regard to wastewater generation and infrastructure capacity under Alternative 6 would be less than significant, and less than the less than impacts of the Project.

(3) Energy Infrastructure

(a) Construction

As previously noted, the energy consumed by Alternative 6 would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. As LADWP has confirmed that the supply and existing infrastructure in the Project area would have the capacity to serve the Project Site, the existing infrastructure would similarly have capacity to supply energy for Alternative 6. Therefore, impacts on infrastructure capacity associated with short-term construction activities under Alternative 6 would be less than significant and less than the less-than-significant impacts of the Project due to the reduction in development.

(b) Operation

As with the Project, operation of Alternative 6 would generate an increased consumption of electricity and natural gas relative to existing conditions. However, based on the reduction in residential units and the elimination of the non-residential uses proposed by the Mixed Use Development Scenario and the No-Hotel Development Scenario's, the total energy consumption of Alternative 6 would be less than the total energy consumption of the Project. Therefore, impacts to infrastructure capacity under

Alternative 6 would be less than significant, and less than the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above, Alternative 6 would not eliminate any of the Project's significant and unavoidable impacts. Specifically, the Project's significant and unavoidable impacts related to regional air quality emissions during construction; on- and off-site construction noise; and vibration from on- and off-site construction with respect to the significance threshold for human annoyance would remain with the Residential Townhomes Alternative. Furthermore, Alternative 6 would not avoid the Project's significant and unavoidable cumulative regional air quality impacts during construction; cumulative construction noise impacts from on-site and off-site noise sources; cumulative and vibration impacts associated with off-site construction, pursuant to the significance threshold for human annoyance. In addition, since this Alternative would not provide for the synergy of uses as the Project, which could serve to reduce vehicle trips and associated air emissions, Alternative 6 would result in a greater impact associated with land use consistency and VMT compared to the Project. The remaining impacts would be similar to or less than those of the Project.

4. Relationship of the Alternative to Project Objectives

With the reduction in residential units and the elimination of the non-residential uses proposed by the Mixed Use Development and the No-Hotel Development Scenario, Alternative 6 would not fully meet the underlying purpose of the Project to provide a high-density, mixed use and transit- and pedestrian-oriented development that includes new housing opportunities (including affordable housing) that are integrated with commercial and office uses that provide new employment and commercial opportunities for the surrounding community. In addition, Alternative 6 would only generally meet the following objectives of the Project as Alternative 6 would include only residential units:

- Advance the Central City North Community Plan's Policy 1-2.1 by providing multi-family residential development within a Project Site that is commercially zoned.

- Consistent with Central City North Community Plan Objective 1-3, to develop a project that preserves and enhances the varied and distinct residential character and integrity of existing residential neighborhoods by providing a mix of architectural structures that are compatible with the varied scale of surrounding uses.

- Be consistent with the Central City North Community Plan's Objective 1-4, and promote the provision of new and adequate housing for all persons, including affordable housing units and units for rent and for sale.

The Residential Townhomes Alternative would only partially meet the following Project objective:

- Support the Central City North Community Plan's Goal 4 to provide adequate recreation and park facilities which meet the needs of the residents in the Community Plan area, create a pedestrian-friendly project by introducing active commercial uses along the Project Site frontages, incorporate pedestrian paseos transecting the Project Site, provide publicly accessible open space, and improved streetscapes around the Project Site.

The Residential Townhomes Alternative would not achieve the following Project objective:

- Promote the Central City North Community Plan's Objective 2-1 to strengthen viable commercial development in the community and to provide additional opportunities for new commercial development and services by providing a variety of commercial uses, including office space, retail, and restaurant space.

- In support of Objective 1-2 and Goal 12 of the Central City North Community Plan, encourage the reduction in vehicle trips by designing a project that includes infrastructure for walking and cycling and ride-sharing hubs and transit nodes for bus and shuttle pick-up.

V. Alternatives

G. Environmentally Superior Alternative

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

With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible alternatives includes the No Project/No Build Alternative; the Zoning Compliant Alternative; the Office Campus Alternative; the Retail and Residential Campus Alternative; the Reduced Density Alternative; and the Residential Townhomes Alternative. Table V-2 on page V-10 provides a comparative summary of the environmental impacts anticipated under each alternative with the environmental impacts associated with the Project. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project/No Build Alternative would avoid all of the Project's significant environmental impacts, including the Project's significant and unavoidable impacts related to regional air quality emissions during construction, on- and off-site construction noise, and vibration from on- and off-site construction with respect to the significance threshold for human annoyance. Alternative 1 would also avoid the Project's significant and unavoidable cumulative impacts related to regional air quality emissions during construction, cumulative construction noise from on-site and off-site noise sources, and cumulative vibration impacts associated with off-site construction, pursuant to the significance threshold for human annoyance. Alternative 1 would also avoid most of the Project's remaining less-than-significant and less-than-significant with mitigation impacts as no changes to the existing conditions would occur. However, as Alternative 1 would not implement best management practices that would improve existing stormwater flows, this alternative would result in a greater impact with respect to surface water quality, surface water hydrology, and groundwater hydrology during operation. In addition, without updating the existing older and more energy consuming buildings, Alternative 1 would result in a greater impact associated with energy use compared to the Project.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative 6, the Residential Townhomes Alternative, would be the Environmentally Superior Alternative. As discussed above, although Alternative 6 would not include affordable housing units or the range of housing types, other than the No Project Alternative, Alternative 6 is the only alternative that would eliminate the Project's significant and unavoidable impacts related to regional air quality emissions during construction. In addition, other than the No Project Alternative, Alternative 6 is the only alternative that would reduce the Project's significant and unavoidable impacts related to on- and off-site construction noise and vibration from on- and off-site construction with respect to the significance threshold for human annoyance, but even then those impacts would remain significant and unavoidable. Furthermore, Alternative 6 would also reduce most of the Project's remaining impacts. Thus, of the range of alternatives analyzed, Alternative 6, the Residential Townhomes Alternative, would be the Environmentally Superior Alternative.