

# **V. Project Alternatives**

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## **A. Introduction**

Public Resources Code (P.R.C.) Section 21002.1(a) 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 or feasible mitigation measures which will avoid or substantially lessen such significant effects. If specific economic, social, or other conditions make infeasible such alternatives, individual projects may be approved in spite of one or more significant effects. P.R.C. Section 21002.1(a) further states, that “[t]he purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.”

Pursuant to CEQA Guidelines Section 15126.6(a), an EIR “shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.”

The CEQA Guidelines indicate that the selection of project alternatives should be based primarily on the ability to avoid or substantially lessen significant impacts relative to the proposed project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. CEQA Guidelines Section 15126.6(f)(1) states that:

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

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

As set forth in Section II, Project Description, the objectives of the Proposed Project are as follows:

1. Provide “smart-growth” infill development that is generally consistent with the zoning and land use designation identified in the Wilshire Community Plan for the Development Site;
2. Enhance and activate an existing commercial retail center by replacing a portion of the existing surface parking lot and commercial uses with an economically viable and aesthetically attractive mixed-use development that will be physically and programmatically compatible with the existing on-site uses to remain as well as surrounding uses in the vicinity;
3. Improve the visual appearance and appeal of the neighborhood by replacing older commercial buildings with a modern mid-rise building and providing enhanced streetscape design and pedestrian-oriented amenities;
4. Support a reduction in vehicle miles traveled by providing high-density multi-family housing and employment opportunities in a designated Transit Priority Area;
5. Create an arrangement of land uses and new development that encourage and contribute to the economic, social, and physical health of the expanding residential community in the Wilshire Community Plan area;
6. To create a sustainable neighborhood with scalable design that fits with the unique context of the adjacent on- and off-site land uses; and
7. Maximize the provision of housing units on an urban infill site to increase multi-family housing supply for the City and Wilshire Community Plan area.

## **1. Analytical Assumptions and Methodology**

The level of detail required in the alternatives analysis does not need to be as detailed as required for the environmental analysis of the Proposed Project. Rather, an EIR should include “sufficient information about each alternative to allow meaningful evaluation,

analysis, and comparison with the Proposed Project.”<sup>1</sup> As such, the alternatives analysis is presented as a comparative qualitative and quantitative analysis to the Proposed Project, and unless specifically indicated otherwise, assumes that all mitigation measures proposed for the Proposed Project would apply to each alternative. Impacts associated with each alternative are evaluated in comparison to the Proposed Project’s impacts and are classified as increased, reduced, or essentially equivalent to the level of impact associated with the Proposed Project.

## **2. Alternatives Considered But Rejected**

CEQA Guidelines Section 15126.6(b) states that “the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” 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, the alternative’s inability to avoid significant environmental impacts, or other grounds considered by the Lead Agency and supported by substantial evidence.

The environmental impact analyses contained in Section IV, Environmental Impact Analysis, concluded that the Proposed Project would result in less than significant impacts or less than significant impacts with mitigation for all impact categories addressed in the EIR. Impacts found to be less than significant with mitigation include noise, hazardous materials, transportation, and tribal cultural resources. Thus, the consideration of feasible alternatives was focused on further reducing the severity of impacts that were already determined to be less than significant with mitigation.

In accordance with CEQA Guidelines Section 15126.6(c), an analysis of an alternative project site was rejected from further consideration. As a basic matter, the Proposed Project is consistent with the zoning and land use designations that apply to the Project Site and would implement existing planning policies, which limits the need to analyze an alternative site. Also, as stated above, no unavoidable significant environmental impacts would occur as a result of the Proposed Project. Thus, the selection of an alternative project site would not eliminate the occurrence of a significant unavoidable impact. An alternative site would not meet the project objective to transform an aging commercial retail center into an integrated smart-growth, mixed-use development that provides mid-rise residential, retail and restaurant uses in the Wilshire Community Plan area of the City of Los Angeles.

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<sup>1</sup> CEQA Guidelines Section 15126.6(d).

Furthermore, the Project Applicant cannot reasonably acquire, control, or access an alternative site in a timely fashion that would result in implementation of a project with similar uses and square footage. Additionally, considering the mixes of uses in the surrounding area, including sensitive uses, development of the Proposed Project at an alternative site could potentially produce other environmental impacts that would otherwise not occur at the current Project Site and result in greater environmental impacts when compared with the Proposed Project. Therefore, an alternative site is not considered feasible as the Applicant does not own another suitable site that would achieve the underlying purpose and objectives of the Proposed Project, and an alternative site would not likely further reduce the Proposed Project's less than significant impacts with mitigation. Thus, this alternative was rejected from further consideration.

### **a) Overview of Selected Alternatives**

The objective of the project alternatives analysis, as directed by CEQA, is to identify alternatives that could 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 to evaluate the comparative merits of the alternatives. The Project Alternatives evaluated within the scope of this EIR are as follows:

- 1) No Project Alternative
- 2) Mixed-Use Office Alternative
- 3) Reduced Density Alternative
- 4) Retail/Office Alternative

A detailed description and environmental analysis for each of these alternatives is provided within Sections V.B through V.E below. The identification of the alternative that would be most capable of reducing the Proposed Project's environmental impacts is presented in Section V.F, Environmentally Superior Alternative.

While the No Project Alternative was identified as the environmentally superior alternative, CEQA requires an alternative other than the No Project Alternative to be identified and evaluated.

Based on the environmental analysis presented in this Section, and as further summarized in Table V.-1 below, the Reduced Density Alternative was identified as the environmentally superior alternative as it would be more effective in reducing vehicle trips that contribute to the Proposed Project's operational transportation impacts, thereby further reducing the Proposed Projects less than significant impacts related to mobile source air quality emissions and greenhouse gas emissions, and would also reduce

construction-related impacts upon tribal cultural resources and construction noise due to the reduced amount and depth of excavation. The reduction in trips associated with the Reduced Density Alternative would also serve to further reduce the Proposed Project's less than significant impacts associated with air quality and greenhouse gas emissions. It would also further reduce the Proposed Project's less than significant impacts related to public services including fire protection, police protection, schools, parks, and libraries and to public utilities, including water, wastewater, solid waste, and infrastructure. Furthermore, the Reduced Density Alternative would provide fewer dwelling units and less floor area than the Proposed Project, which would further reduce the demand for energy. For these reasons, the Reduced Density Alternative was identified as the Environmentally Superior Alternative.

**Table V-1  
Alternative Comparative Impact Matrix**

<b>Environmental Impacts</b>	<b>Proposed Project</b>	<b>No Project Alternative</b>	<b>Mixed-Use Office Alternative</b>	<b>Reduced Density Alternative</b>	<b>Retail/Office Alternative</b>
Air Quality	Less Than Significant	No Impact (reduced)	Less Than Significant (reduced)	Less Than Significant (reduced)	Less Than Significant (reduced)
Energy - Electricity	Less Than Significant	No Impact (reduced)	Less Than Significant (reduced)	Less Than Significant (reduced)	Less Than Significant (increased)
Energy – Natural Gas	Less Than Significant	No Impact (reduced)	Less Than Significant (reduced)	Less Than Significant (reduced)	Less Than Significant (reduced)
Energy - Transportation Energy	Less Than Significant	No Impact (reduced)	Less Than Significant (reduced)	Less Than Significant (reduced)	Less Than Significant (reduced)
Greenhouse Gas Emissions	Less Than Significant	No Impact (reduced)	Less Than Significant (reduced)	Less Than Significant (reduced)	Less Than Significant (reduced)
Hazardous Materials	Less Than Significant with Mitigation	No Impact (reduced)	Less Than Significant with Mitigation (same)	Less Than Significant with Mitigation (reduced)	Less Than Significant with Mitigation (same)
Land Use and Planning	Less Than Significant	No Impact (reduced)	Less Than Significant (same)	Less Than Significant (same)	Less Than Significant (same)
Noise	Less Than Significant with Mitigation	No Impact (reduced)	Less Than Significant with Mitigation (reduced)	Less Than Significant with Mitigation (reduced)	Less Than Significant with Mitigation (reduced)
Population and Housing	Less Than Significant	No Impact (reduced)	Less Than Significant (same)	Less Than Significant (same)	Less Than Significant (same)
Public Services - Fire	Less Than Significant	No Impact (reduced)	Less Than Significant (reduced)	Less Than Significant (reduced)	Less Than Significant (reduced)
Public Services - Police	Less Than Significant	No Impact (reduced)	Less Than Significant (reduced)	Less Than Significant (reduced)	Less Than Significant (reduced)
Public Services - Schools	Less Than Significant	No Impact (reduced)	Less Than Significant (reduced)	Less Than Significant (reduced)	Less Than Significant (increased)
Public Services - Parks and Recreation	Less Than Significant	No Impact (reduced)	Less Than Significant (reduced)	Less Than Significant (reduced)	Less Than Significant (reduced)
Public Services – Libraries	Less Than Significant	No Impact (reduced)	Less Than Significant (reduced)	Less Than Significant (reduced)	Less Than Significant (reduced)

Transportation	Less Than Significant with Mitigation	No Impact (reduced)	Less Than Significant (reduced)	Less Than Significant (reduced)	Less Than Significant (reduced)
Tribal Cultural Resources	Less Than Significant with Mitigation	No Impact (reduced)	Less Than Significant With Mitigation (same)	Less Than Significant With Mitigation (reduced)	Less Than Significant With Mitigation (same)
Public Utilities - Water	Less Than Significant	No Impact (reduced)	Less Than Significant (increased)	Less Than Significant (reduced)	Less Than Significant (increased)
Public Utilities – Wastewater	Less Than Significant	No Impact (reduced)	Less Than Significant (increased)	Less Than Significant (reduced)	Less Than Significant (reduced)
Public Utilities - Solid Waste	Less Than Significant	No Impact (reduced)	Less Than Significant (same)	Less Than Significant (reduced)	Less Than Significant (increased)
Public Utilities - Electric Power, Natural gas and Telecommunications	Less Than Significant	No Impact (reduced)	Less Than Significant (same)	Less Than Significant (same)	Less Than Significant (same)
<i>Parker Environmental Consultants, 2020.</i>					

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# **V. Project Alternatives**

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## **B. No Project Alternative**

### **1. Description of the No Project Alternative**

In accordance with the CEQA Guidelines, the No Project Alternative for a development project on an identifiable property consists of the circumstance under which the proposed Project does not proceed. CEQA Guidelines (Section 15126.6(e)) provides that the “no project” analysis shall discuss the existing conditions at the time the Notice of Preparation is published, as well as what can reasonably be expected to occur in the foreseeable future if the project is not approved based on current plans and consistent with available infrastructure and community services. In February 2019, at the time the NOP was published for the Proposed Project, the Development Site was developed with 151,048 square feet of commercial uses including a 131,873 square-foot K-Mart building, 13,090 square feet of retail, and 6,085 square feet of restaurant space.

Under the No Project Alternative, no buildings would be demolished and no new buildings would be constructed. Building repair and upgrades would be necessary for the commercial uses to be occupied and viable. While it may be possible for commercial vacancies to fluctuate over time, the No Project Alternative assumes that the leasable area in the existing structure would remain similar to current conditions. As such, the Development Site’s active land uses would include operational commercial tenants in the approximately 131,873 square-foot K-Mart building and the 19,175 square feet of patio shops, as summarized in Table V.B-1, No Project Alternative Land Uses, below.

**Table V.B-1**  
**No Project Alternative Land Uses**

<b>Land Use</b>	<b>Leasable Floor Area (sf)</b>
Retail	13,090
Restaurant	6,085
K-Mart	131,873
<b>TOTAL</b>	<b>151,048</b>

## 2. Environmental Analysis

### a) Air Quality

#### (1) Construction

##### *(a) Regional and Localized Emissions*

The No Project Alternative would not create any construction emissions, as demolition and construction activities would not occur. The No Project Alternative would have no impact when compared to the Proposed Project's less than significant impacts with respect to regional and localized air quality emissions during the construction phase.

##### *(b) Toxic Air Contaminants*

Since construction activities would not occur on the Project Site, the No Project Alternative would not result in diesel particulate emissions during construction that could generate substantial toxic air contaminant (TAC) Emissions. The No Project Alternative would not create any short-term construction emissions capable of generating toxic air emissions. As such, no toxic air impacts would occur, and the No Project Alternative would have no impact when compared to the Proposed Project's less than significant impacts with respect to TAC emissions during the construction phase.

#### (2) Operation

##### *(a) Regional and Localized Emissions*

Operational air pollutant emissions are generated at the Development Site by existing commercial land uses. Stationary sources, such as space and water heating, architectural coatings (paint), consumer products and mobile vehicle traffic traveling to and from the Development Site contribute to the Development Site's existing emissions. The similar utilization of the Development Site as compared to existing conditions would create

similar air pollution emissions from stationary sources and mobile sources. Compared to existing conditions, the No Project Alternative would result in no change in air quality. Therefore, no operational air quality impacts associated with regional or localized emissions would occur with the No Project Alternative. Thus, the No Project Alternative would have no air quality impacts when compared to the Proposed Project's less than significant impacts.

*(b) Toxic Air Contaminants*

The No Project Alternative would not result in new development or increase the intensity of the existing uses on the Development Site, and therefore, no new increase in TAC emissions would occur. No impacts associated with TACs would occur under the No Project Alternative, and as such impacts would be less when compared to the Project's less than significant impacts.

**b) Energy**

**(1) Construction**

The No Project Alternative would not result in new development or increase the intensity of the existing uses on the Development Site. As such, no new energy demand would occur. The No Project Alternative would have no impact when compared to the Proposed Project's less than significant impacts with respect to energy consumption during the construction phase.

**(2) Operation**

*(a) Electricity*

As discussed in Section IV.B, Energy, the existing electricity demand consumption by the existing land uses are approximately 2,607,637 kilowatt hours per year (kWh/year) at the Development Site. The No Project Alternative would result in no change to the electricity demand at the Development Site compared to existing conditions. Compared to existing conditions, the No Project Alternative would result in no increased electricity demand. No impacts related to wasteful, inefficient, or unnecessary consumption of energy resources related to electricity would occur under the No Project Alternative. Thus, the No Project Alternative would have a reduced impact when compared to the Proposed Project's less than significant impacts.

*(b) Natural Gas*

The Existing Condition's natural gas demands are estimated to be approximately 1,689,853 kilo British thermal units per year (kBtu/year) or approximately 138,004 cubic

feet (cf) per month at the Development Site. The No Project Alternative would result in no change to the natural gas demand at the Development Site compared to existing conditions. Compared to existing conditions, the No Project Alternative would result in no increased natural gas demand. No impacts related to wasteful, inefficient, or unnecessary consumption of energy resources related to natural gas would occur under the No Project Alternative. Thus, the No Project Alternative would have reduced natural gas impacts when compared to the Proposed Project's less than significant impacts.

(c) *Transportation Energy*

The existing conditions net transportation energy consumption are estimated to be approximately 544,556 gallons of transportation fuel, including approximately 76,484 gallons of diesel per year and 468,072 gallons of gasoline per year at the Development Site. The No Project Alternative would result in no change to the transportation energy demand at the Development Site compared to existing conditions. Compared to existing conditions, the No Project Alternative would result in no increased transportation energy consumption. No impacts related to wasteful, inefficient, or unnecessary consumption of transportation energy resources would occur under the No Project Alternative. Thus, the No Project Alternative would have reduced transportation energy consumption when compared to the Proposed Project's less than significant impacts.

c) **Greenhouse Gas Emissions**

(1) **Construction**

The No Project Alternative would not create any construction related greenhouse gas (GHG) emissions, since demolition and Project construction would not occur. Hence, the No Project Alternative would completely avoid construction GHG emissions when compared to the Proposed Project's less than significant impacts.

(2) **Operation**

GHG emissions are currently generated at the Development Site by stationary sources, such as space and water heating, electricity use, water use, solid waste generation, and mobile vehicle traffic traveling to and from the Development Site. It is reasonable to assume that there would be fluctuation in the active leasable area from time to time, but that utilization of the Development Site would remain similar to existing conditions. Greenhouse gas emissions from stationary sources and mobile sources would be similar to existing operations. Under the current conditions, the Development Site generates approximately 7,398 CO<sub>2</sub>eMT per year. No new GHG emissions beyond what is currently generated on the Development Site would be generated under the No Project Alternative, and no new impacts associated with global climate change would occur. Therefore, no

impacts would occur and GHG emissions under the No Project Alternative would be reduced as compared to the Proposed Project.

#### d) Hazardous Materials and Risk of Upset

The existing K-Mart building, located on the Development Site, is identified on the HAZNET database. The No Project Alternative does not include any construction or alterations to the Development Site and would not include any additional or new sources of hazardous materials that have not been previously in use. Additionally, the No Project Alternative would not remediate these existing conditions. Therefore, the No Project Alternative will not produce any new hazardous emissions or handle hazardous materials. As such, no impact would occur. When compared to the Proposed Project's less than significant impacts, the No Project Alternative would have a reduced impact upon hazards and risk of upset.

#### e) Land Use and Planning

Under the No Project Alternative, there would be no changes to the physical or operational characteristics of the existing on site uses. No land use approvals or permits would be required. Therefore, the No Project Alternative would not result in any inconsistencies with existing land use plans and policies that govern the Project Site, including those that were adopted for the purpose of avoiding or mitigating an environmental effect. No impacts associated with conflicts with land use regulations and plans would occur, and impacts would be reduced compared to the less-than-significant impacts of the Project.

#### f) Noise

##### (1) Construction

The No Project Alternative would involve no new construction. As such, no construction noise or vibration would occur on-site or off-site under this alternative. No earthwork or grading activities would occur under this alternative. Thus, there would be no potential for groundborne construction vibration impacts. Therefore, no impacts associated with construction noise and vibration would occur under the No Project Alternative. Under the No Project Alternative, impacts with respect to construction noise or vibration would be reduced as compared to the Proposed Project's less than significant impacts with mitigation.

##### (2) Operation

The No Project Alternative would not introduce any new activities to the Development Site with the potential to create operational noise impacts or impact off-site sensitive receptors

with potential noise impacts. Operational noise on-site would be typical of the commercial/retail space noise, consistent with existing uses on-site. Under the No Project Alternative, no impact with respect to on-site noise would occur with respect to operational noise. Thus, impacts would be less than the Proposed Project's less than significant impacts with respect to on-site operational noise.

In addition, the No Project Alternative would not result in an increase in vehicle trips during operations; therefore, off-site noise levels along area roadways would not increase, and no off-site noise impacts would occur. Therefore, off-site operational noise impacts under the No Project Alternative would be less than under the Proposed Project's less than significant impact with respect to operational mobile noise. Impacts with respect to operational noise would be reduced when compared to the Proposed Project's less than significant impact.

### g) Population and Housing

The No Project Alternative would result in the continued operation of commercial uses on-site. No residential uses exist on-site. The No Project Alternative would involve no new construction. Under the No Project Alternative, no impact would occur with respect to population, housing, and employment. Impacts with respect to population and employment would be reduced when compared to the Proposed Project's less than significant impact.

### h) Public Services

The No Project Alternative does not include the construction of any new structures or buildings on-site. Use of the existing on-site buildings would not increase the demand on local fire protection services, police protection services, schools, parks, and libraries compared to existing operations. Under the No Project Alternative, no impact would occur with respect to public services. When compared to the Proposed Project, the No Project Alternative would have a reduced impact than the Proposed Project's less than significant impact.

### i) Transportation

#### (1) Construction

The No Project Alternative would not include any demolition or construction activities on the Development Site. Therefore, the No Project Alternative would not generate vehicle trips associated with heavy-duty construction equipment, haul trucks, or construction worker vehicles. As such, no construction-related traffic impacts would occur under the No Project Alternative. In addition, since construction activities would not occur, there

would be no potential for vehicular or pedestrian circulation issues related to construction. Therefore, impacts under the No Project Alternative would be less than the Project's less than significant construction-related traffic impacts.

## (2) Operation

The No Project Alternative would result in the continued operation of the commercial uses on-site, and there would be no change in the vehicle miles traveled (VMT) generated as compared to existing conditions. As estimated in the Proposed Project's VMT Analysis, the existing commercial uses that occupy the Development Site are estimated to generate approximately 4,696 daily trips and approximately 32,405 daily VMT. The No Project Alternative would not create any new traffic impacts or changes to traffic patterns in the Project area. Therefore, no impacts would occur with respect to operational traffic, including conflicts with programs, plans, ordinances, or policies addressing the circulation system; VMT; hazardous design features; and emergency access. When compared to the Proposed Project, the No Project Alternative would have a reduced impact than the Proposed Project's less than significant impact with mitigation.

## j) Tribal Cultural Resources

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

## k) Utilities and Service Systems

### (1) Water

The No Project Alternative would not involve any construction. Therefore, the No Project Alternative would not generate a short-term demand for water during construction, and construction-related impacts to water supply and infrastructure would not occur. The No Project Alternative would have no impact when compared to the Proposed Project's less than significant impacts with respect to water resources during the construction phase.

The No Project Alternative would result in the continued operation of existing commercial land uses. The continuation of the existing on-site operations under the No Project Alternative would not generate any additional demands for water supply or facilities. No impacts to water supply and water infrastructure would occur under the No Project Alternative. When compared to the Proposed Project, the No Project Alternative would

thus have a reduced environmental impact upon water resources as compared to the Proposed Project's less than significant impact.

## (2) Wastewater

The No Project Alternative would not involve any construction. Therefore, the No Project Alternative would not increase the wastewater flow on the Development Site during construction, and construction-related impacts to water supply and infrastructure would not occur. The No Project Alternative would have no impact when compared to the Proposed Project's less than significant impacts with respect to water resources during the construction phase.

The No Project Alternative would not alter the existing land uses or site operations on the Development Site. Therefore, the No Project Alternative would not increase the wastewater flow on the Development Site. No impacts related to wastewater conveyance or treatment would occur under the No Project Alternative. Therefore, the No Project Alternative would have no impact upon wastewater. As compared to the Proposed Project's less than significant impact, the No Project Alternative would have a reduced environmental impact upon wastewater treatment systems.

## (3) Solid Waste

The No Project Alternative would not create any construction solid waste, as demolition and construction activities would not occur. The No Project Alternative would have no impact when compared to the Proposed Project's less than significant impacts with respect to solid waste generation during the construction phase.

The No Project Alternative would not alter the existing land uses or site operations on the proposed Development Site. Therefore, the No Project Alternative would not increase solid waste generation on the Development Site. Therefore, the No Project Alternative would have no impact. When compared to the Proposed Project's less than significant impact, the No Project Alternative would have a reduced environmental impact upon solid waste facilities.

## (4) Electric Power, Natural Gas and Telecommunication Infrastructure

The No Project Alternative would not alter the existing land uses or site operations on the Development Site. Therefore, the No Project Alternative would have no impact upon existing electric power, natural gas, or telecommunication infrastructure or facilities. Impacts to electric power, natural gas, and telecommunication infrastructure would be less when compared to the Proposed Project's less than significant impact.



## I) Impact Conclusion

As discussed above and summarized in Table IV.B-2, below, in comparison to the Proposed Project, the No Project Alternative would have no impact with respect to all of the environmental impact categories evaluated in the EIR.

**Table V.B-2**  
**No Project Alternative Comparative Impact Matrix**

<b>Environmental Impacts</b>	<b>Proposed Project</b>	<b>No Project Alternative</b>
Air Quality	Less Than Significant	No Impact (reduced)
Energy - Electricity	Less Than Significant	No Impact (reduced)
Energy – Natural Gas	Less Than Significant	No Impact (reduced)
Energy - Transportation Fuel	Less Than Significant	No Impact (reduced)
Greenhouse Gas Emissions	Less Than Significant	No Impact (reduced)
Hazardous Materials	Less Than Significant with Mitigation	No Impact (reduced)
Land Use and Planning	Less Than Significant	No Impact (reduced)
Noise	Less Than Significant with Mitigation	No Impact (reduced)
Population and Housing	Less Than Significant	No Impact (reduced)
Public Services - Fire	Less Than Significant	No Impact (reduced)
Public Services - Police	Less Than Significant	No Impact (reduced)
Public Services - Schools	Less Than Significant	No Impact (reduced)
Public Services - Parks and Recreation	Less Than Significant	No Impact (reduced)
Public Services – Libraries	Less Than Significant	No Impact (reduced)
Transportation	Less Than Significant with Mitigation	No Impact (reduced)
Tribal Cultural Resources	Less Than Significant with Mitigation	No Impact (reduced)
Public Utilities - Water	Less Than Significant	No Impact (reduced)
Public Utilities - Wastewater	Less Than Significant	No Impact (reduced)
Public Utilities - Solid Waste	Less Than Significant	No Impact (reduced)
<i>Parker Environmental Consultants, 2020.</i>		

### **3. Relationship of the No Project Alternative to the Project Objectives**

Under the No Project Alternative, the existing uses on-site would continue operating and no new buildings would be developed. As such, the No Project Alternative would not meet any of the Project objectives listed above and in Section II, Project Description. Specifically, the No Project Alternative would not meet the objective of providing “smart-growth” infill development that is generally consistent with the zoning and land use designation identified in the Wilshire Community Plan for the Project Site, as no new development would occur.

The No Project Alternative would not enhance or activate an existing commercial retail center by replacing a portion of the existing surface parking lot and commercial uses with an economically viable and aesthetically attractive mixed-use development that will be physically and programmatically compatible with the existing on-site uses to remain as well as surrounding uses in the vicinity, as no new development would occur.

The No Project Alternative would not improve the visual appearance and appeal of the neighborhood by replacing older commercial buildings with a modern mid-rise building and providing enhanced streetscape design and pedestrian-oriented amenities, as no new development would occur.

The No Project Alternative would not support a reduction in vehicle miles traveled by providing high-density multi-family housing and employment opportunities in a designated Transit Priority Area, as no new development would occur.

The No Project Alternative would not create an arrangement of land uses and new development that encourage and contribute to the economic, social, and physical health of the residential community in the Wilshire Community Plan area, as no new development would occur.

The No Project Alternative would not create a sustainable neighborhood with scalable design that fits with the unique context of the adjacent on and off-site land uses, as no new development would occur.

The No Project Alternative would not maximize the provision of housing units on an urban infill site to increase multi-family housing supply for the City and Wilshire Community Plan area, as no new development would occur.

As such, although the No Project Alternative would result in no impacts compared to the Proposed Project's less than significant impacts for air quality, energy, greenhouse gas emissions, land use and planning, population and housing, public services, and public utilities, and the Proposed Project's less than significant impacts with mitigation for hazardous materials, noise, transportation, and tribal cultural resources, this Alternative would not meet the identified Project objectives. The No Project Alternative would also not meet the underlying purpose of the Project to transform an aging commercial retail center into an integrated smart-growth, mixed-use development that provides mid-rise residential, retail and restaurant uses in the Wilshire Community Plan area.

## V. Project Alternatives

### C. Mixed-Use Office Alternative

#### 1. Description of the Mixed-Use Office Alternative

The Mixed-Use Office Alternative would consist of demolition of the existing uses on the Development Site and the construction of a mid-rise, eight-story mixed-use structure with two levels of subterranean parking, for a maximum height of approximately 100 feet. Similar to the Proposed Project, the Mixed-Use Office Alternative would include 331 multi-family dwelling units and 83,994 square feet of commercial space for a total net new floor area of 426,994 square feet. However, under this Alternative, the approximately 63,082 square feet of supermarket space that is proposed on Level 3 would be converted to office space. A summary of the development program under this alternative is provided below in Table V.C-1, Mixed-Use Office Alternative Land Use Summary.

**Table V.C-1**  
**Mixed-Use Office Project Alternative Land Use Summary**

<i>Land Uses</i>	<i>Dwelling Units</i>	<i>Floor Area (Square Feet)</i>
<b>Commercial</b>		
<i>General Commercial/Retail Space</i>	--	<i>13,412 sf</i>
<i>Restaurant</i>	--	<i>7,500 sf</i>
<i>Office</i>	--	<i>63,082 sf</i>
<i>Subtotal Commercial:</i>	--	<i>83,994 sf</i>
<b>Residential</b>		
<i>Studio Units</i>	<i>70</i>	<i>343,000 sf<sup>a</sup></i>
<i>1-Bedroom Units</i>	<i>162</i>	
<i>2-Bedroom Units</i>	<i>66</i>	
<i>3-Bedroom Units</i>	<i>33</i>	
<i>Subtotal Residential:</i>	<i>331</i>	
<b>TOTAL:</b>	<b>331 du</b>	<b>426,994 sf</b>
<i>Notes: du = dwelling units; sf = square feet</i>		
<i><sup>[a]</sup> Includes residential units and support areas such as lobby, leasing office, and amenities.</i>		

The scale and massing of the structure proposed under the Mixed-Use Office Alternative would be the same as the Proposed Project. As such, the floor area, density, and building height would be the same as described for the Proposed Project. The open space and

recreational amenities, vehicular and pedestrian access plan, and architectural features would also be the same as described under the Proposed Project.

The parking requirements for office uses are lower than general retail uses. As a result, the parking requirements for the Mixed-Use Office Alternative would be 126 spaces lower than the Proposed Project, resulting in a surplus of 211 spaces above the code minimum.<sup>2</sup> A summary of the parking requirements under this alternative is provided in Table V.C-2, below.

**Table V.C-2**  
**Summary of Required and Proposed Vehicle Parking Spaces**

Description	Quantity	Parking Required by Code <sup>a, b</sup>		Parking Provided <sup>c</sup>
		Rate	Spaces	
<b>Residential</b>				
Studio	70 du	1.0 space per bedroom	70	70
One- Bedroom	162 du	1.5 spaces per bedroom	243	243
Two-Bedroom	66 du	2.0 spaces per bedroom	132	132
Three-Bedroom	33 du	2.0 spaces per bedroom	66	66
<b>Required Residential Parking</b>			<b>511</b>	<b>511</b>
<b>Commercial</b>				
New Commercial/Retail	13,412 sf	4 spaces per 1,000 sf	54	54
New Commercial Restaurant	7,500 sf	1 space per 100 sf	75	75
Office	63,082 sf	1 space per 500 sf	126	252
Surplus Spaces			--	85
<b>Subtotal Commercial Parking</b>			<b>255</b>	<b>466</b>
<b>TOTAL PARKING</b>			<b>766</b>	<b>977</b>
Notes:				
du = dwelling unit, sf = square feet,				
<sup>a</sup> For Residential Use: Parking calculations based on LAMC Section 12.21 A.4.				
<sup>b</sup> For Commercial Use: Parking calculations based on LAMC Section 12.21.A.4 (c)				
<sup>c</sup> The Project Site would include a total of 1,127 parking spaces which includes a total of 977 parking spaces on the Development Site for the Proposed Project plus 150 restriped surface parking spaces for the 63,688 square feet of existing commercial/retail spaces that is to remain in the western portion of the Project Site.				

<sup>2</sup> *The Proposed Project has a surplus of 85 spaces. If the amount of code required parking is reduced by 126 spaces, there would be a total of 211 surplus spaces (85+126= 211).*

## 2. Environmental Analysis

### a) Air Quality

#### (1) Construction

##### *(a) Regional and Localized Emissions*

As the Mixed-Use Office Alternative would use the same construction equipment on a daily basis as the Proposed Project, maximum daily regional and localized construction emissions under this alternative would be the same as the Proposed Project. As the construction schedule would have the same duration as the Proposed Project, the Mixed-Use Office Alternative would generate the same construction emissions compared to the Proposed Project.

##### *(b) Toxic Air Contaminants*

Similar to the Proposed Project, the Mixed-Use Office Alternative's construction toxic air contaminant (TAC) emissions would be short-term and would also result in a less than significant impact. Therefore, the air quality impacts of the Mixed-Use Office Alternative would be considered the same as the Proposed Project's less than significant impacts.

#### (2) Operation

##### *(a) Regional and Localized Emissions*

The Proposed Project would include a total of 331 dwelling units and the 83,994 square feet of ground floor commercial uses. By comparison, the Mixed-Use Office Alternative includes a total of 331 dwelling units and 83,994 square feet of ground floor commercial uses, but would replace the proposed 63,082 square feet of supermarket space with office space, as compared to the Proposed Project. The Mixed-Use Office Alternative's floor area of commercial space would be the same, but with slightly different land uses than the Proposed Project and would include a mix of restaurant uses, retail, and office space. As noted under the traffic impacts discussion, below, the Mixed-Use Office Alternative would generate 3,635 fewer daily trips than the Proposed Project. As such, this alternative's traffic volumes and associated mobile source emissions would be reduced as compared to the Proposed Project. As shown in Table V.C-3, the Mixed-Use Office Alternative would result in a net reduction in emissions for all criteria pollutants compared to existing conditions. Similar to the Proposed Project, the Mixed-Use Office Alternative would not violate any air quality standards and would be required to implement all required South Coast Air Quality Management District (SCAQMD) rules and regulations. By

meeting SCAQMD rules and regulations, the Mixed-Use Office Alternative would also be consistent with the goals of the 2016 Air Quality Management Plan (AQMP). As shown in Table V.C-3, Mixed-Use Office Alternative Estimated Daily Operational Emissions, the Mixed-Use Office Alternative would result in less than significant air quality impacts for all six criteria pollutants, and operational emissions would be reduced as compared to the less than significant operational air quality emissions generated by the Proposed Project.

**Table V.C-3**  
**Mixed-Use Office Alternative Estimated Daily Regional Operational Emissions**

Emissions Source	Peak Emissions in Pounds per Day					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Area	10.26	0.32	27.42	<0.01	0.15	0.15
Energy	0.16	1.42	0.87	<0.01	0.11	0.11
Mobile (Vehicles)	3.64	16.49	40.04	0.15	13.11	3.58
Stationary	3.28	14.68	8.37	0.02	0.48	0.48
<b>Total Mixed-Use Office Alternative Emissions</b>	<b>17.34</b>	<b>32.91</b>	<b>76.70</b>	<b>0.17</b>	<b>13.85</b>	<b>4.32</b>
<i>Less Existing Project Site</i>	<i>(19.83)</i>	<i>(71.89)</i>	<i>(158.95)</i>	<i>(0.43)</i>	<i>(31.20)</i>	<i>(8.89)</i>
<b>Net Mixed-Use Office Alternative Emissions</b>	<b>(2.49)</b>	<b>(38.98)</b>	<b>(82.25)</b>	<b>(0.26)</b>	<b>(17.35)</b>	<b>(4.57)</b>
<b>SCAQMD Thresholds</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Potentially Significant</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<i>Note: Calculation worksheets are provided in Appendix L to this Draft EIR.</i> <i>Source: Parker Environmental Consultants, 2020.</i>						

(b) Toxic Air Contaminants

Similar to the Proposed Project, the Mixed-Use Office Alternative would consist of a mixed-use development containing multi-family residential units and commercial uses that would not support any land uses or activities that would involve the use, storage, or processing of carcinogenic or non-carcinogenic TACs. Therefore, no significant toxic airborne emissions would result from the operation of the Mixed-Use Office Alternative. Similar to the Proposed Project, potential air toxic impacts to sensitive receptors from Project TAC emissions from this Alternative would also be less than significant.

b) Energy

(1) Construction

As the Mixed-Use Office Alternative would use the same construction equipment on a daily basis as the Proposed Project, energy consumption under this alternative would be

the same as the Proposed Project. As the construction schedule would have the same duration as the Proposed Project, the Mixed-Use Office Alternative would consume the same electricity and transportation fuel compared to the Proposed Project. As with the Proposed Project, construction activities would require energy demand that is not wasteful, inefficient, or unnecessary and would not be expected to have an adverse impact on available energy resources. Therefore, the energy consumption impacts of the Mixed-Use Office Alternative would be considered the same as the Proposed Project's less than significant impacts.

## (2) Operation

### (a) *Electricity*

As discussed in Section IV.B, Energy, the estimated net increase in electricity consumption by the Proposed Project would be approximately 3,904,735 kWh/year. As shown in Table V.C-4, below, the estimated net increase in electricity consumption by the Mixed-Use Office Alternative would be approximately 2,324,790 kWh/year, which is roughly 41 percent less energy demand than the Proposed Project. The projected increase in electrical demand due to the Proposed Project would not have an adverse impact on electrical resources. Energy supplies are adequate to serve the Proposed Project and the installation of needed new infrastructure would not be expected to result in any significant secondary environmental effects. Similar to the Proposed Project, the Mixed-Use Office Alternative would be required to comply with the City of Los Angeles Green Building Code and 2019 Title 24 Standards, which sets additional compliance measures to further promote energy conservation efforts. Accordingly, as with the Project, the consumption of electricity under the Mixed-Use Office Alternative would not be wasteful, inefficient, or unnecessary. Because the Mixed-Use Office Alternative would demand less energy than the Proposed Project, impacts would also be less than significant and reduced as compared to the Proposed Project.



**Table V.C-4  
Estimated Electricity Demand by Mixed-Use Office Alternative**

Land Use	Size	Total Electricity Demand (kWh/year) <sup>a</sup>
<b>Existing Uses</b>		
Regional Shopping Center	144,963 sf	2,313,610
Quality Restaurant	6,085 sf	294,027
<b>Total Existing Electricity Demand:</b>		<b>2,607,637</b>
<b>Mixed-Use Office Alternative</b>		
Multi-Family Residential	331 du	1,310,790
Restaurant	7,500 sf	331,050
Office	63,082 sf	819,435
Commercial/Retail	13,412 sf	181,062
Parking Structure	977 spaces	2,290,090
<b>Total Mixed-Use Office Electricity Demand:</b>		<b>4,932,427</b>
<i>Existing Electricity Demand (to be demolished):</i>		<i>-2,607,637</i>
<b>NET TOTAL Electricity Demand:</b>		<b>2,324,790</b>
<i>Notes: sf =square feet; du = dwelling unit; kWh = kilowatt-hour</i> <sup>a</sup> SCAQMD, CalEEMod Version 2016.3.2, See Appendix L to this Draft EIR. Source: Parker Environmental Consultants, 2020.		

*(b) Natural Gas*

The Proposed Project's net natural gas demands are estimated to be approximately 4,505,873 kBtu/year, or approximately 367,981 cf/month. As shown in Table V.C-5, below, the estimated net increase in natural gas demands by the Mixed-Use Office Alternative would be approximately 3,770,337 kBtu/year or 307,912 cf/month, which is roughly 16 percent less than the natural gas demand of the Proposed Project. Similar to the Proposed Project, the Mixed-Use Office Alternative would promote energy conservation in accordance with the policies identified in 2019 Title 24 Standards, the LA Green Building Code, and LA's Green New Deal - Sustainable City pLAn 2019. Therefore, impacts associated with natural gas consumption under this alternative would be less than significant and similar to the Proposed Project; natural gas demands would be reduced compared to the Proposed Project. Accordingly, as with the Proposed Project, the consumption of natural gas under the Mixed-Use Office Alternative would not be wasteful, inefficient, or unnecessary. Because the Mixed-Use Office Alternative would demand less energy than the Proposed Project, impacts would also be less than significant and reduced as compared to the Proposed Project.

**Table V.C-5**  
**Estimated Net Natural Gas Demand by Mixed-Use Office Alternative**

Land Use	Size	Total Natural Gas Demand (kBTU/yr) <sup>a</sup>	Total Natural Gas Demand (cf/month) <sup>b</sup>
<b>Existing Uses</b>			
Regional Shopping Center	144,963 sf	263,833	21,546
Quality Restaurant	6,085 sf	1,426,020	116,458
<b>Total Existing Natural Gas Demand:</b>		<b>1,689,853</b>	<b>138,004</b>
<b>Mixed-Use Office Alternative</b>			
Multi-Family Residential	331 du	3,050,810	249,149
Restaurant	7,500 sf	1,730,700	141,341
Office	63,082 sf	656,684	53,629
Commercial/Retail	13,412 sf	21,996	1,796
<b>Total Mixed-Use Office Natural Gas Demand:</b>		<b>5,460,190</b>	<b>445,916</b>
<i>Less Existing Natural Gas Demand:</i>		<i>-1,689,853</i>	<i>-138,004</i>
<b>NET TOTAL Natural Gas Demand:</b>		<b>3,770,337</b>	<b>307,912</b>
<i>Notes: sf =square feet; du = dwelling unit</i> <sup>a</sup> SCAQMD, CalEEMod Version 2016.3.2, See Appendix L of this Draft EIR. <sup>b</sup> 1kBTU is equivalent to 0.98 cubic feet of natural gas. Source: Parker Environmental Consultants, 2020.			

(c) *Transportation Energy*

The Proposed Project's net transportation energy demands are estimated to be approximately 23,118 gallons of diesel and 158,436 gallons of gasoline per year. As shown in Table V.C-6, below, the estimated net transportation energy by the Mixed-Use Office Alternative would result in the decrease of approximately 45,353 gallons of diesel and 272,258 gallons of gasoline per year, compared to existing conditions, which is less diesel and gasoline than the Proposed Project's transportation energy. It is anticipated that the Mixed-Use Office Alternative operational transportation fuel demand would represent a reduction in diesel and gasoline use as compared to the existing conditions. As such, the transportation fuel consumption associated with this alternative's vehicle trips and VMT during operation would represent a negligible amount of oil compared to the total amount of oil supplied to California and the fuel sales in Los Angeles County, since it would decrease the demand for transportation energy, compared to existing conditions. Additionally, vehicles are expected to comply with Corporate Average Fuel Economy (CAFE) standards and California Air Resources Board (CARB)'s Advanced Clean Cars Program, which would reduce transportation fuel consumption. Furthermore, as with the Project, the Mixed-Use Office Alternative would be located in proximity to public transit and would incorporate features to reduce vehicle trips, thereby reducing transportation fuel usage. Therefore, the Mixed-Use Office Alternative's transportation

energy consumption and demand would not be wasteful, inefficient, or unnecessary. Impacts associated with transportation energy consumption under the Mixed-Use Office Alternative would be less than significant and would be reduced compared to the Proposed Project.

**Table V.C-6**  
**Estimated Transportation Energy Consumption by Mixed-Use Office Alternative**

	<b>Annual VMTs (miles) <sup>a</sup></b>	<b>Fuel Rate (mpg) <sup>b</sup></b>	<b>Total Fuel Demand (gallons/year)</b>
<b>Diesel</b>			
Existing (to be demolished)	(695,236)	9.09	<b>(76,484)</b>
Mixed-Use Office Alternative	334,343	10.74	<b>31,131</b>
<b>Net Diesel Consumption:</b>			<b>(45,353)</b>
<b>Gasoline</b>			
Existing (to be demolished)	(10,892,028)	23.27	<b>(468,072)</b>
Mixed-Use Office Alternative	5,238,033	26.75	<b>195,814</b>
<b>Net Gasoline Consumption:</b>			<b>(272,258)</b>
<i>Notes: VMTs = vehicle miles traveled; mpg = miles per gallon</i> <sup>a</sup> <i>Appendix E, Greenhouse Gas Emissions: Total Annual VMTs from Operational Mobile; It is assumed that 94% of VMTs are associated with gasoline-powered vehicles and 6% of VMTs are associated with diesel-powered vehicles.</i> <i>Fuel efficiency estimates were based on EMFAC2017 (v1.0.2) Emissions Inventory data. See Appendix D, Energy Demand Worksheets. Parker Environmental Consultants, 2020.</i>			

## c) Greenhouse Gas Emissions

### (1) Construction

The Mixed-Use Office Alternative would have the same general construction activities on a daily basis as the Proposed Project, since both propose the same amount of floor area and the schedule and the length of each construction phase would be the same. Additionally, the Mixed-Use Office Alternative would generate similar greenhouse gas emissions during construction compared to the Proposed Project. Similar to the Proposed Project, the Mixed-Use Office Alternative would result in a less than significant impact, and construction GHG emissions would be the same compared to the Proposed Project.

### (2) Operation

The Proposed Project would include a total of 331 dwelling units and 83,994 square feet of ground floor commercial uses. By comparison, the Mixed-Use Office Alternative

includes a total of 331 dwelling units and 83,994 square feet of ground floor commercial uses, but would replace the proposed 63,082 square feet of supermarket space with office space, as compared to the Proposed Project. The commercial floor area would be the same as proposed under the Proposed Project, but would include a mix of restaurant uses, commercial, retail, and office space. The Mixed-Use Office Alternative would comply with the same energy efficiency requirements of the L.A. Green Building Code, as applicable for a mixed-use residential and commercial project. On-site operations would be required to comply with applicable local, state, and federal regulations governing energy efficiency. With respect to operational GHG emissions from mobile sources, the Mixed-Use Office Alternative would result in 3,635 fewer average daily trips as compared to the Proposed Project with mitigation. Thus, the operational GHG emissions associated with vehicles traveling to and from the Development Site during the operation of the Mixed-Use Office Alternative would be reduced, as compared to the Proposed Project.

As discussed in Section IV.C, Greenhouse Gas Emissions, the Proposed Project's net annual generation of GHG emissions is estimated to be 4,654 CO<sub>2</sub>e MTY. As shown in Table V.C-7, below, the Mixed-Use Office Alternative's estimated annual GHG is 5,939 CO<sub>2</sub>e MTY with a net annual GHG emissions reduction of 1,459 CO<sub>2</sub>e MTY, when compared to existing conditions. When compared to the Proposed Project, the Mixed-Use Office Alternative's GHG emissions would be lower than the Proposed Project's GHG emissions. With compliance with the City's Green Building Code and the implementation of appropriate sustainability features, it is anticipated that the Mixed-Use Office Alternative would also be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans. Compared to the Proposed Project, the Mixed-Use Office Alternative would have reduced impacts relating to GHG emissions. As with the Proposed Project, the Mixed-Use Office Alternative would result in a less than significant impact.

**Table V.C-7**  
**Mixed-Use Office Alternative Operational Greenhouse Gas Emissions**

<b>Emissions Source</b>	<b>CO<sub>2</sub>e Emissions (Metric Tons per Year)</b>
Area	6
Energy	3,026
Mobile	2,421
Stationary	9
Waste	40
Water	354
Construction (amortized)	89
<b>Total Mixed-Use Office Alternative:</b>	<b>5,939</b>
<i>Less Existing Project Site:</i>	<i>(7,398)</i>
<b>NET Mixed-Use Office Alternative Emissions:</b>	<b>(1,459)</b>
<i>Calculation data and results provided in Appendix L to this Draft EIR.</i>	

## d) Hazardous Materials and Risk of Upset

### (1) Construction

The K-Mart, located on the Project Site, is identified on the HAZNET database. The K-Mart is listed as generating hazardous waste under manifest from 1995 through 2015. The Mixed-Use Office Alternative would require similar construction activities and soil disturbance impacts as the Proposed Project. As with the Proposed Project, the Mixed-Use Office Alternative's adherence to applicable regulatory compliance measures (i.e. Cal-OSHA regulations, SCAQMD Rule 1403, NPDES permit) and incorporation of Project Design Feature PDF-HAZ-1 (Methane) and MM-HAZ-1 (Soil Management Plan), discussed in Section IV.D, Hazardous Materials/Risk of Upset would ensure any potential hazardous impacts during the construction phase would be less than significant. Additionally, the Hancock Park Elementary School would be considered a sensitive receptor regarding hazardous materials exposure. Similar to the Proposed Project, adherence to all applicable rules and regulations during construction, which are detailed in Section IV.D, Hazardous Materials/Risk of Upset would ensure potential impacts associated with the Mixed-Use Office Alternative's potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of the Hancock Park Elementary School would be less than significant. When compared to the Proposed Project, the Mixed-Use Office Alternative would have similar less than significant impacts upon hazards and risk of upset.

### (2) Operation

Similar to the Proposed Project, no hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would routinely be transported to the Project Site during the operation of the Mixed-Use Office Alternative. The use of these substances would comply with applicable State Health Codes and Regulations. The operation of the mixed-use residential and commercial office land uses would not use, transport, or require the disposal of hazardous materials. The Mixed-Use Office Alternative would not routinely transport, use, or dispose of hazardous materials in the normal course of operations. The Mixed-Use Office Alternative would comply with current methane hazard regulations set by the Los Angeles Department of Building and Safety (LADBS) pursuant to Table 71 of Ordinance 175,790, Minimum Methane Mitigation Requirements. When compared to the Proposed Project's less than significant impacts, the Mixed-Use Office Alternative's operation would have a similar less than significant impact upon hazards and risk of upset.

## e) Land Use and Planning

The Mixed-Use Office Alternative would seek all of the same general discretionary actions as the Proposed Project. The Mixed-Use Office Alternative would still request a Site Plan Review. Similar to the Proposed Project, the Mixed-Use Office Alternative would be in conformance with applicable provisions of the Los Angeles Municipal Code (LAMC). There is no building height limit for the underlying C2 zone. The “-1” designation indicates that the Project Site is located in Height District 1, which, according to LAMC Section 12.21.1, does not specify a maximum height and prohibits the total floor area from exceeding 1.5 times the buildable area of the lot. Consistent with the allowable 1.5:1 FAR, and similar to the Proposed Project, the Mixed-Use Office Alternative would include a total of 426,994 square feet of new construction.

As with the Proposed Project, the Mixed-Use Office Alternative would also not conflict with local and regional plans applicable to the Project Site. Since the Mixed-Use Office Alternative would comply with the permitted land use and existing zoning requirements, the Mixed-Use Office Alternative would also be generally consistent with the overall intent of the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site, including Southern California Association of Governments’ (SCAG) regional plans, the General Plan Framework Element, the Wilshire Community Plan, and the LAMC. Land use impacts would be less than significant under this Alternative. Therefore, the Mixed-Use Office Alternative would result in similar land use impacts to the Proposed Project’s less than significant impacts.

## f) Noise

### (1) Construction

As discussed in Section IV.F, Noise, the construction-related noise and groundborne vibration impacts associated with the Proposed Project would be reduced to less than significant with the incorporation of Mitigation Measures MM-NOI-1 through MM-NOI-3 and Project Design Features PDF-NOI-1 and PDF-NOI-2. The maximum day-to-day noise levels during active construction periods are anticipated to be the same as the Proposed Project under the Mixed-Use Office Alternative. The same construction code compliance requirements identified in Section IV.F, Noise, would also be applicable to this alternative. Thus, construction noise and vibration impacts under the Mixed-Use Office Alternative would have similar construction noise levels as compared to the Proposed Project’s less than significant impacts with mitigation.

## (2) Operation

The operational noise generated under the Mixed-Use Office Alternative would be typical of residential, commercial, and office land uses. The Mixed-Use Office Alternative's on-site noise levels associated with outdoor noise sources, such as courtyards and open space areas, mechanical equipment, parking garage noise, and loading dock activities would be less than significant, similar to the Proposed Project. The Mixed-Use Alternative would have generally similar floorplates and massing, and general location of noise sources. With respect to operational noise from mobile sources, the Mixed-Use Office Alternative would result in 3,635 fewer average daily trips as compared to the Proposed Project with mitigation. Thus, operational mobile noise impacts under the Mixed-Use Office Alternative would have reduced impacts compared to the Proposed Project's less than significant roadway noise impacts.

## g) Population and Housing

As discussed in Section IV.G, Population and Housing, the Proposed Project would be consistent with the SCAG 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) growth projections with respect to population, housing, and employment. By comparison, the Mixed-Use Office Alternative includes a total of 331 dwelling units and 83,994 square feet of ground floor commercial uses, but would replace the proposed 63,082 square feet of supermarket space with office space, as compared to the Proposed Project. Because the Mixed-Use Office Alternative would provide the same number of housing units, this alternative would generate the same number of residents as the Proposed Project. Therefore, similar to the Project, this Alternative would be consistent with SCAG growth projections, and impacts with respect to inducing substantial unplanned population growth would be less than significant.

Because the Mixed-Use Office Alternative would replace the proposed supermarket with office space, the employment growth would be slightly different than the Proposed Project. The Mixed-Use Office Alternative would provide a net increase of approximately five employees, compared to existing on-site activities, as shown in Table V.C-8, below. The Mixed-Use Office Alternative would be consistent with the SCAG 2016-2040 RTP/SCS employment growth projections and would, in a similar manner to the Proposed Project, provide housing and jobs in a High Quality Transit Area (HQTa) that is adequately served by transit and in close proximity to employment centers and services as discussed in Section IV.G, Population and Housing. Therefore, similar to the Project, this Alternative would be consistent with SCAG growth projections, and impacts with respect to inducing

**Table V.C-8  
Mixed-Use Office Alternative Estimated Employee Generation**

<b>Land Use</b>	<b>Quantity Proposed</b>	<b>Employment Generation Rates <sup>a</sup></b>	<b>Total Employees</b>
<b>Existing Uses to be Demolished</b>			
Community Retail	144,963 sf	2 employees / 1,000 sf	290
Restaurant	6,085 sf	4 employees / 1,000 sf	24
<b>Subtotal</b>	151,048 sf		<b>314</b>
<b>Mixed-Use Office Alternative</b>			
Office	63,082 sf	4 employees / 1,000 sf	252
Commercial Retail	13,412 sf	2 employees / 1,000 sf	27
Restaurant	7,500 sf	4 employees / 1,000 sf	30
Residential	331 du	NA <sup>b</sup>	10
<b>Subtotal</b>	83,994 sf		<b>319</b>
<b>Mixed-Use Office Alternative Employees</b>			<b>319</b>
<i>Less Existing Employees</i>			<i>-314</i>
<b>Net Total Employees</b>			<b>5</b>
<b>Notes:</b> <sup>a</sup> Employment rates based on factors provided in LADOT's City of Los Angeles VMT Calculator Documentation, Table 1: Land Use and Trip Generation Base Assumptions, November 2019. <sup>b</sup> Estimate for jobs generated by the residential operations is based on applicant provided data. Source: Parker Environmental Consultants, 2020.			

substantial unplanned population growth would be less than significant. Impacts related to employment growth under the Mixed-Use Office Alternative would also be less than significant, and would be similar to the Proposed Project.

## h) Public Services

### (1) Construction

#### (a) Fire Protection

The Proposed Project was found to have a less than significant construction impacts on fire protection services. Since the Mixed-Use Office Alternative would involve the same level of construction activity with respect to demolition and new construction and the same anticipated construction timeline, construction impacts under this Alternative would be the same as the less than significant construction impacts that would occur under the Proposed Project.

#### (b) Police Protection

The Proposed Project was found to have a less than significant construction impacts on police protection services. Since the Mixed-Use Office Alternative would involve the same



level of construction activity with respect to demolition and new construction and the same anticipated construction timeline, construction impacts under this Alternative would be the same as the less than significant construction impacts that would occur under the Proposed Project.

(c) *Schools*

The Proposed Project was found to have a less than significant construction impacts on schools. Since the Mixed-Use Office Alternative would involve the same level of construction activity with respect to demolition and new construction and the same anticipated construction timeline, construction impacts under this Alternative would be the same as the less than significant construction impacts that would occur under the Proposed Project.

(d) *Parks*

The Proposed Project was found to have a less than significant construction impacts on parks. Since the Mixed-Use Office Alternative would involve the same level of construction activity with respect to demolition and new construction and the same anticipated construction timeline, construction impacts under this Alternative would be the same as the less than significant construction impacts that would occur under the Proposed Project.

(e) *Libraries*

The Proposed Project was found to have a less than significant construction impacts on libraries. Since the Mixed-Use Office Alternative would involve the same level of construction activity with respect to demolition and new construction and the same anticipated construction timeline, construction impacts under this Alternative would be the same as the less than significant construction impacts that would occur under the Proposed Project.

(2) *Operation*

(a) *Fire Protection*

The Proposed Project was found to have less than significant operational impacts on fire protection services. Since the Mixed-Use Office Alternative would provide the same number of residential dwelling units and 83,994 square feet of commercial space as the Proposed Project, impacts to fire protection services would be similar to the Proposed Project. Because these impacts are primarily based on residential service population, this alternative would have similar impacts as compared to the Proposed Project. This

alternative would implement similar site design features and would be subject to the City's routine plan review process, which includes a review by the LAFD to ensure that sufficient security measures, fire flow and accessibility standards are implemented to ensure adequate fire protection services. When compared to the Proposed Project, the Mixed-Use Office Alternative would have similar impacts on fire protection services, as compared to the Proposed Project's less than significant impacts. The Mixed-Use Office Alternative, like the Proposed Project, would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives related to fire protection facilities.

*(b) Police Protection*

The Proposed Project was found to have less than significant operational impacts on police protection services. Since the Mixed-Use Office Alternative would provide the same number of residential dwelling units and 83,994 square feet of commercial space as the Proposed Project, impacts to police protection services would be similar to the Proposed Project. As with the Proposed Project, this alternative would also implement the use of on-site and private security provisions to reduce the potential effects of the Mixed-Use Office Alternative on the need for police services. The Mixed-Use Office Alternative, like the Proposed Project, would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives related to police protection. When compared to the Proposed Project, the Mixed-Use Office Alternative would have similar impacts on police protection services, as compared to the Proposed Project's less than significant impacts.

*(c) Schools*

The Proposed Project was found to have less than significant operational impacts on schools. Since the Mixed-Use Office Alternative would provide the same number of residential dwelling units and 83,994 square feet of commercial space as the Proposed Project, impacts to school capacity would be similar to the Proposed Project. As shown in Table V.C-9, below, the Mixed-Use Office Alternative would generate 139 net new students, including 75 elementary school students, 20 middle school students and 44 high school students.

**Table V.C-9  
Mixed-Use Office Alternative Estimated Student Generation**

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total Students
<b>Existing Uses (to be removed)</b>					
Commercial (151,048 sf) <sup>b</sup>	314 emp	39	11	21	71
<b>Total Existing Students:</b>		<b>39</b>	<b>11</b>	<b>21</b>	<b>71</b>
<b>Mixed-Use Office Alternative</b>					
Multi-Family Residential	331 du	75	20	43	138
New Commercial (83,994 sf) <sup>b</sup>	319 emp <sup>c</sup>	39	11	22	72
<b>Total Mixed-Use Office Alternative Student Generation:</b>		<b>114</b>	<b>31</b>	<b>65</b>	<b>210</b>
<i>Less Existing Students:</i>		<i>-39</i>	<i>-11</i>	<i>-21</i>	<i>-71</i>
<b>Net Student Generation:</b>		<b>75</b>	<b>20</b>	<b>44</b>	<b>139</b>
<i>Notes: sf = square feet; du = dwelling units; emp = employees</i> <sup>a</sup> Student generation rates are as follows for multi-family residential uses: 0.2269 elementary, 0.0611 middle and 0.1296 high school students per unit. <sup>b</sup> Assumes that 0.2249 students are generated per employee (Table 15 of the 2018 Developer Fee Justification Study). Since the LAUSD Developer Fee Justification Study does not specify the grade levels of students that are generated from non-residential land uses, the total number of students was divided among the elementary, middle, and high schools with the same ratio as the residential generation (55% elementary school, 15% middle school, and 30% high school). <sup>c</sup> See Table V.C-8, Mixed-Use Alternative Estimated Employee Generation, above. Source: Los Angeles Unified School District, 2018 Developer Fee Justification Study, March 2018.					

Similar to the Proposed Project, this alternative would be subject to the LAUSD's mandatory developer impact fees to mitigate any impacts associated with school overcrowding. The Mixed-Use Office Alternative, like the Proposed Project, would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives related to public school operations. When compared to the Proposed Project, the Mixed-Use Office Alternative would have similar impacts on schools, as compared to the Proposed Project's less than significant impacts.

*(d) Parks*

The Proposed Project was found to have a less than significant operational impacts on recreation and park services. Since the Mixed-Use Office Alternative would provide the same number of residential dwelling units and 83,994 square feet of commercial space as the Proposed Project, impacts to recreation and park facilities would be similar to the

Proposed Project's less than significant impacts. Because these impacts are primarily based on residential service population, this alternative would have similar impacts as compared to the Proposed Project. This alternative would provide the required amount of open space required by the LAMC to further reduce demands on local parks. The Mixed-Use Office Alternative, like the Proposed Project, would not result in substantial adverse physical impacts associated with the provision of new or physically altered recreation or park facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives related to park facilities. When compared to the Proposed Project, the Mixed-Use Office Alternative would have similar impacts on parks, as compared to the Proposed Project's less than significant impacts.

(e) *Libraries*

The Proposed Project was found to have a less than significant operational impacts on library services. Since the Mixed-Use Office Alternative would provide the same number of residential dwelling units and 83,994 square feet of commercial space as the Proposed Project, impacts to library services would be similar to the Proposed Project's less than significant impacts. Because these impacts are primarily based on residential service population, this alternative would have similar impacts as compared to the Proposed Project. The Mixed-Use Office Alternative, like the Proposed Project, would not result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives related to library facilities. When compared to the Proposed Project, the Mixed-Use Office Alternative would have similar impacts on libraries, as compared to the Proposed Project's less than significant impacts.

i) **Transportation**

(1) **Construction**

The Mixed-Use Office Alternative would involve the same level of construction activity as compared to the Proposed Project with respect to demolition, soil export, and new construction. Similar to the Proposed Project, a Construction Traffic Control/ Management Plan would be submitted to the Los Angeles Department of Transportation (LADOT) for review and approval prior to the start of any construction work (see PDF-TRAFFIC-1). The construction work site traffic control plan would show the location of any traffic detours, haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. The Mixed-Use Office Alternative would also implement Project

Design Features PDF-TRAFFIC-2 and PDF-TRAFFIC-3 to ensure site safety and minimize traffic related hazards and disruptions during the construction period and require notice and coordination with LAUSD and Hancock Park Elementary School administrators. When compared to the Proposed Project, the Mixed-Use Office Alternative would have similar construction impacts on transportation as compared to the Proposed Project's less than significant impacts.

## (2) Operation

The Mixed-Use Office Alternative would be similar to the Proposed Project, but would replace the supermarket use with office space. The proposed driveways and internal circulation of this Alternative would be similar to the Proposed Project. The Mixed-Use Office Alternative would not modify or conflict with any alternative transportation policies, plans, or programs. Similar to the Proposed Project, the Mixed-Use Office Alternative would not conflict with applicable sections, policies or programs of the LAMC, the Mobility Plan 2040, the Transit Oriented Community Guidelines; the Citywide Design Guidelines; the Vision Zero Action Plan; and the Manual of Policies and Procedures Driveway Design Section 321. Additionally, the Mixed-Use Office Alternative would not introduce hazardous design features, and similar to the Proposed Project, a less than significant impact would occur. In addition, similar to the Project, the Mixed-Use Office Alternative would not interfere with emergency access and impacts would be less than significant.

As concluded in Section IV.I, Transportation, the addition of the Proposed Project's trips and VMT would create a significant Household VMT impact prior to the implementation of mitigation. The Proposed Project would incorporate Mitigation Measure MM-TRAFFIC-1 in order to reduce Household VMT per capita to below the VMT threshold for the Central Area Planning Commission (APC), and therefore, impacts would be less than significant with mitigation. The Proposed Project is expected to generate 6,143 daily vehicle trips, a daily VMT of 41,197 miles, and a Household VMT per capita of 5.8 miles after mitigation. As shown in Table V.C-10, below, the Mixed-Use Office Alternative would generate 2,508 daily vehicle trips and a daily VMT of 16,186 miles without mitigation, which is 3,635 fewer daily trips and 25,011 fewer VMTs as compared to the Proposed Project, and a reduction of 2,188 ADT and 16,219 VMT as compared to existing conditions. As such, this alternative would not create a significant VMT impact, resulting in a less than significant impact. As such, the traffic impacts under this alternative would be reduced as compared to the Proposed Project's less than significant impacts with mitigation.

**Table V.C-10**  
**VMT Comparison of the Existing Conditions,**  
**Proposed Project, and the Mixed-Use Office Alternative**

<b>Comparative Scenarios</b>	<b>Daily Trips</b>	<b>Daily VMT</b>
Existing Conditions	4,696	32,405
Proposed Project with Mitigation	6,143	41,197
Mixed-Use Office Alternative	2,508	16,186
<i>Source: Linscott, Law &amp; Greenspan, Engineers, Mixed-Use Alternative, February 5, 2020 (Appendix L to this Draft EIR).</i>		

## j) Tribal Cultural Resources

As discussed in Section IV.J, Tribal Cultural Resources, there is not substantial evidence of any known tribal cultural resources recorded on the Project Site. However, mitigation measures are included given the potential level of sensitivity of the area and its proximity to a asphaltum source, the prehistoric Native American remains found at the La Brea Tar Pits, and the types of alluvium sediments in the area that are capable of preserving tribal cultural resources. The mitigation measures would protect potential tribal cultural resources in the unlikely event that such resources are encountered during construction. Accordingly, with incorporation of these mitigation measures, and adherence to applicable regulations with regards to discovering human remains, the Proposed Project would have a less-than-significant impact upon tribal cultural resources.

The Mixed-Use Office Alternative would involve the same levels of earthwork and grading activity as the Proposed Project. As such, the Mixed-Use Office Alternative would incorporate the same Mitigation Measures, MM-TCR-1 through MM-TCR-4, recommended from the Tribal Cultural Resources Assessment, to protect potential tribal cultural resources in the unlikely event that such resources are encountered during construction. Similar to the Proposed Project, the Mixed-Use Office Alternative would result in similar less than significant impacts with mitigation upon tribal cultural resources.

## k) Utilities and Service Systems

### (1) Water

#### (a) Construction

The Proposed Project was found to have a less than significant construction impacts on water services. Similar to the Proposed Project, the Mixed-Use Office Alternative would not require or result in the relocation or construction of new or expanded water treatment facilities or expansion of existing facilities, the construction or relocation of which could

cause significant environmental effects. Construction impacts under this Alternative would be the same as the less than significant construction impacts that would occur under the Proposed Project.

*(b) Operation*

Impacts associated with local water conveyance and infrastructure upgrades are anticipated to be similar under the Mixed-Use Office Alternative as compared to the Proposed Project and would be less than significant. Under the Proposed Project, the anticipated water demand is expected to result in a net increase of 63,022 gpd or approximately 70.6 acre-feet of water per year (AFY). Comparatively, as shown in Table V.C-11, below, the net water demand associated with the Mixed-Use Office Alternative would be approximately 67,438 gpd or 75.59 AFY, which is roughly 7 percent more than the Proposed Project's water demand.

As discussed in Section IV.K-1, Water Supply, the 2015 Urban Water Management Plan (2015 UWMP) has evaluated the City's water supply in comparison to the 2012 Regional Transportation Plan/Sustainable Communities Strategy (2012 RTP/SCS) growth projections and has determined that the City has adequate capacity to serve the anticipated growth in the region. Similar to the Proposed Project, because the Mixed-Use Office Alternative would not exceed the planned growth projections for SCAG's growth projections in the 2012 RTP/SCS for the Los Angeles subregion, the projected demands associated with this alternative can be accommodated by the City's water supply. Therefore, similar to the Proposed Project, the Mixed-Use Office Alternative would result in less than significant impacts. Compared to the Proposed Project, impacts regarding future water demands would be increased under this alternative.

**Table V.C-11  
Mixed-Use Office Alternative Estimated Water Demand**

Type of Use	Quantity (Unit) <sup>a</sup>	Water Use (gpd/unit) <sup>b</sup>	Proposed Water Demand (gpd) (AFY)	
Existing Uses to be Demolished				
Commercial/Retail	151,048 sf	50 gpd/ksf	7,552	8.46
Existing Water Demand:			7,552	8.46
Mixed-Use Office Alternative				
Residential Units (331 total du)				
Studio	70 du	75 gpd/du	5,250	5.88
One Bedroom	162 du	110 gpd/du	17,820	19.97
Two-Bedroom	66 du	150 gpd/du	9,900	11.1
Three-Bedroom	33 du	190 gpd/du	6,270	7.03
Lease Office <sup>c</sup>	4,370 sf	120 gpd/ksf	524	0.59
Fitness Room <sup>d</sup>	1,963 sf	650 gpd/ksf	1,276	1.43
Amenity Space <sup>e</sup>	2,100 sf	50 gpd/ksf	105	0.12
Club Room <sup>f</sup>	1,577 sf	50 gpd/ksf	79	0.09
Pool	800 sf-	-	21,000	23.54
Spa <sup>g</sup>	128 sf	-	3,360	3.77
Water Feature <sup>h</sup>	16 sf	-	420	0.47
Residential Total:			66,004	74
New Commercial Uses (83,994 total sf)				
Commercial/Retail	20,912 sf	50 gpd/ksf	1,046	1.17
Office	63,082 sf	120 gpd/ksf	7,570	8.49
Commercial Subtotal:			8,616	9.66
Landscaping <sup>c</sup>			370	0.4
Total Mixed-Use Office Alternative Water Demand:			74,990	79.11
Minus Existing Demand:			-7,552	-8.46
Net Additional Water Demand:			67,438	75.59

**Notes:**

- <sup>a</sup> du: dwelling unit, sf: square feet, ksf: one thousand square feet, gpd: gallons per day; AFY: acre feet per year.
- <sup>b</sup> Water consumption rates are based on LASAN's Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012.
- <sup>c</sup> Lease office is considered as "Office Building" for wastewater generation purposes.
- <sup>d</sup> Fitness Room is considered as "Health Club/Spa" for wastewater generation purposes.
- <sup>e</sup> Amenity space is considered as "Lounge" for wastewater generation purposes.
- <sup>f</sup> Club space is considered as "Lounge" for wastewater generation purposes.
- <sup>g</sup> Spa is considered as "Swimming Pool" for wastewater generation purposes.
- <sup>h</sup> Water feature is considered as "Swimming Pool" for wastewater generation purposes.
- <sup>i</sup> Landscaping water demand is based on the Model Water Efficient Landscape Ordinance for estimating the Maximum Applied Water Allowance (LA Green Building Code Sec. 99.04.304). Per the Landscape Composite Plan the Proposed Project's total landscaping area is 7,896 square feet.

Source: Parker Environmental Consultants, 2020.



## (2) Wastewater

### (a) Construction

The Proposed Project was found to have a less than significant construction impacts on wastewater services. Similar to the Proposed Project, the Mixed-Use Office Alternative would not require or result in the relocation or construction of new or expanded wastewater treatment facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects. Construction impacts under this Alternative would be the same as the less than significant construction impacts that would occur under the Proposed Project.

### (b) Operation

As concluded in Section IV.K-2, Wastewater, the existing local wastewater infrastructure would be expected to adequately serve the Proposed Project and the anticipated wastewater flows would be less than significant and within the treatment capacity of the Hyperion Water Reclamation Plant. Under the Proposed Project, the anticipated wastewater generation is expected to result in a net increase of 63,022 gpd. Comparatively, as shown in Table V.C-12, below, the net wastewater generation associated with the Mixed-Use Office Alternative would be approximately 67,438 gpd, or roughly 7 percent more than the Proposed Project's wastewater generation.

With respect to anticipated wastewater generation, the Mixed-Use Office Alternative would result in an increase in wastewater generation. Although the projected demands associated with the Mixed-Use Office Alternative are slightly more than the Proposed Project, the same conclusion can be reached that this alternative can be adequately accommodated by the City's wastewater infrastructure and treatment facilities without any significant impact to the environment as this alternative would not exceed the growth projections of the 2012 RTP/SCS. Further, the 7 percent increase in wastewater flow would not exceed the existing available capacity in the sewer lines serving the Development Site. The 39-inch line under Crescent Heights Blvd. is operating at 83 percent of its 16.43 mgd design capacity. Thus, the remaining capacity of 2.79 mgd could accommodate the 67,438 gpd of wastewater generation estimated under this alternative. Furthermore, the Hyperion Water Reclamation Plant (HWRP) has capacity to treat 450 mgd of wastewater. The HWRP is expected to have an average annual dry weather flow of 275 mgd by 2030 and 283 mgd through 2040, which is well within the HWRP's treatment capacity of 450 mgd. The proposed increase of 67,438 gpd from the Mixed-Use Office Alternative is approximately 0.06 mgd, which equals 0.036 percent of

**Table V.C-12**  
**Mixed-Use Office Alternative Estimated Wastewater Generation**

Type of Use	Quantity (Unit) <sup>a</sup>	Wastewater Generation (gpd/unit) <sup>b</sup>	Total Wastewater Generation (gpd)
<b>Existing Uses - East</b>			
Commercial/Retail	151,048 sf	50 gpd/ksf	7,552
<b>Existing Wastewater Generation:</b>			<b>7,552</b>
<b>Mixed-Use Office Alternative</b>			
<b>Residential Units (331 total du)</b>			
Studio	70 du	75 gpd/du	5,250
One Bedroom	162 du	110 gpd/du	17,820
Two-Bedroom	66 du	150 gpd/du	9,900
Three-Bedroom	33 du	190 gpd/du	6,270
Lease Office <sup>c</sup>	4,370 sf	120 gpd/ksf	524
Fitness Room <sup>d</sup>	1,963 sf	650 gpd/ksf	1,276
Amenity Space <sup>e</sup>	2,100 sf	50 gpd/ksf	105
Club Room <sup>f</sup>	1,577 sf	50 gpd/ksf	79
Pool	800 sf-	-	21,000
Spa <sup>g</sup>	128 sf	-	3,360
Water Feature <sup>h</sup>	16 sf	-	420
<b>Residential Total:</b>			<b>66,004</b>
<b>New Commercial Uses (83,994 total sf)</b>			
Office	63,082 sf	120 gpd/ksf	7,570
New Commercial/Retail	20,912 sf	50 gpd/ksf	1,046
<b>Commercial Subtotal:</b>			<b>8,616</b>
<b>Total Mixed-Use Office Alternative Wastewater Generation:</b>			<b>74,990</b>
<i>Minus Existing Wastewater Generation:</i>			<i>-7,552</i>
<b>Net Additional Wastewater Generation:</b>			<b>67,438</b>

**Notes:**

<sup>a</sup> du: dwelling unit, sf: square feet, ksf: one thousand square feet, gpd: gallons per day;

<sup>b</sup> Water consumption rates are based on LASAN's Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012.

<sup>c</sup> Lease office is considered as "Office Building" for wastewater generation purposes.

<sup>d</sup> Fitness Room is considered as "Health Club/Spa" for wastewater generation purposes.

<sup>e</sup> Amenity space is considered as "Lounge" for wastewater generation purposes.

<sup>f</sup> Club space is considered as "Lounge" for wastewater generation purposes.

<sup>g</sup> Spa is considered as "Swimming Pool" for wastewater generation purposes.

<sup>h</sup> Water feature is considered as "Swimming Pool" for wastewater generation purposes.

<sup>i</sup> Landscaping water demand is based on the Model Water Efficient Landscape Ordinance for estimating the Maximum Applied Water Allowance (LA Green Building Code Sec. 99.04.304). Per the Landscape Composite Plan the Proposed Project's total landscaping area is 7,896 square feet.

Source: Parker Environmental Consultants, 2020.

HWRP's remaining capacity in 2030 and 0.038 percent of HWRP's remaining capacity in 2040, respectively. Thus, the volume of wastewater generated by the Proposed Project is well with the wastewater treatment capacity of the HWRP at the build out year for the

Proposed Project and through the planning horizon of One Water LA 2040. Similar to the Proposed Project, the Mixed-Use Office Alternative would result in a less than significant impact upon regional wastewater treatment capacity and local conveyance infrastructure. Compared to the Proposed Project, impacts regarding wastewater generation would be increased under this alternative.

### (3) Solid Waste

Similar to the Proposed Project, the Mixed-Use Office Alternative would comply with all federal, state and local statutes and regulations related to solid waste and impacts would be less than significant. The Proposed Project's demolition and construction activities are estimated to generate approximately 13,188 tons of debris. Comparatively, since the Mixed-Use Office Alternative would construct a building with the same floor area, the Mixed-Use Office Alternative would generate the same amount of construction and demolition debris as the Proposed Project. Similar to the Proposed Project, all construction and demolition debris generated by the Mixed-Use Office Alternative would be delivered to a Certified Construction and Demolition Waste Processing Facility. Similar to the conclusion regarding the Proposed Project, the amount of solid waste generated during construction of the Mixed-Use Office Alternative would fall within the available permitted daily intake capacity of area landfills and recycling centers. Therefore, impacts associated with demolition and construction debris would be similar to the Proposed Project and less than significant.

Similar to the Proposed Project, operation of the Mixed-Use Office Alternative would cause on-going generation of solid waste throughout the lifespan of this alternative. As discussed in Section IV.K-3, Solid Waste, the Proposed Project would generate approximately 4,101 pounds (2.05 tons) of solid waste per day, or approximately 748 tons per year. The estimate for solid waste generation is based on the number of dwelling units and anticipated employment generation for commercial uses, which is the same under the Mixed-Use Office Alternative as compared to the Proposed Project. Therefore, similar to the Proposed Project, solid waste impacts under the Mixed-Use Office Alternative would be the same as estimated for the Proposed Project and less than significant.

### (4) Electric Power, Natural Gas and Telecommunication Infrastructure

Similar to the Proposed Project, it is not anticipated that any new electricity, natural gas, or telecommunication infrastructure or facilities would be constructed or expanded as a result of the Mixed-Use Office Alternative. Both the Proposed Project and the Mixed-Use Office Alternative would require on-site or minor off-site infrastructure improvements to connect to the existing infrastructure serving the Project area. However, impacts

associated with utility upgrades or additional connections would be temporary in nature, would be limited to trenching within and adjacent to the Development Site, and would result in less than significant impacts upon the environment.

## I) Impact Conclusion

As discussed above and summarized in Table IV.C-13, below, in comparison to the Proposed Project, the Mixed-Use Office Alternative would have similar less-than-significant impacts as compared to the Proposed Project with respect to land use and planning, public services, (fire protection, police protection, schools, parks, libraries), solid waste, and electric power, natural gas, and telecommunications. The Mixed-Use Office Alternative would have reduced less-than-significant impacts as compared to the Proposed Project with respect to air quality, energy (electricity, natural gas, transportation), greenhouse gas emissions, population and housing. The Mixed-Use Office Alternative would have increased less-than-significant impacts as compared to the Proposed Project for water and wastewater. It is anticipated that this alternative would generate additional water demands and wastewater flows than the Proposed Project. However, impacts associated with water demand and wastewater treatment capacity would remain less than significant under this Alternative. Further, the Mixed-Use Office Alternative would result in similar less than significant impacts with mitigation for hazardous materials and tribal cultural resources, as compared to the Proposed Project; with increased less than significant impacts with mitigation for noise. Furthermore, this alternative would result in less than significant transportation impacts and would not require mitigation, compared to the Proposed Project's less than significant impacts with mitigation.

**Table V.C-13**  
**Mixed-Use Office Alternative Comparative Impact Matrix**

<b>Environmental Impacts</b>	<b>Proposed Project</b>	<b>Mixed-Use Office Alternative</b>
Air Quality	Less Than Significant	Less Than Significant (reduced)
Energy - Electricity	Less Than Significant	Less Than Significant (reduced)
Energy – Natural Gas	Less Than Significant	Less Than Significant (reduced)
Energy - Transportation Fuel	Less Than Significant	Less Than Significant (reduced)
Greenhouse Gas Emissions	Less Than Significant	Less Than Significant (reduced)
Hazardous Materials	Less Than Significant with Mitigation	Less Than Significant With Mitigation (same)
Land Use and Planning	Less Than Significant	Less Than Significant (same)
Noise	Less Than Significant with Mitigation	Less Than Significant with Mitigation (reduced)
Population and Housing	Less Than Significant	Less Than Significant (reduced)
Public Services - Fire	Less Than Significant	Less Than Significant (same)
Public Services - Police	Less Than Significant	Less Than Significant (same)
Public Services - Schools	Less Than Significant	Less Than Significant (same)
Public Services - Parks and Recreation	Less Than Significant	Less Than Significant (same)
Public Services – Libraries	Less Than Significant	Less Than Significant (same)
Transportation	Less Than Significant with Mitigation	Less Than Significant (reduced)
Tribal Cultural Resources	Less Than Significant with Mitigation	Less Than Significant With Mitigation (same)
Public Utilities - Water	Less Than Significant	Less Than Significant (increased)
Public Utilities - Wastewater	Less Than Significant	Less Than Significant (increased)
Public Utilities - Solid Waste	Less Than Significant	Less Than Significant (same)
Public Utilities - Electric Power, Natural gas and Telecommunications	Less Than Significant	Less Than Significant (same)
<i>Parker Environmental Consultants, 2020.</i>		

### 3. Relationship of the Mixed-Use Office Alternative to the Project Objectives

Under the Mixed-Use Office Alternative, the same general land uses as the Proposed Project would be developed, but this alternative develop office space instead of 63,082 square-foot of supermarket space. The Mixed-Use Office Alternative would not meet the underlying purpose of the Proposed Project, which is to transform an aging commercial retail center into an integrated smart-growth, mixed-use development that provides mid-rise residential, retail and restaurant uses in the Wilshire Community Plan area of the City of Los Angeles, to the same extent as the Proposed Project, because the alternative would include office uses instead of either retail and restaurant uses. The land uses associated with the Proposed Project are designed to be community serving and respond to the economic, social, and demographic conditions in the vicinity of the Project Site.

The Mixed-Use Office Alternative would meet some of the objectives listed in Section II, Project Description, but not to the same extent as the Proposed Project.

Specifically, the Mixed-Use Office Alternative relates to Project objectives as follows:

1. *Provide “smart-growth” infill development that is generally consistent with the zoning and land use designation identified in the Wilshire Community Plan for the Development Site.*

Similar to the Proposed Project, the Mixed-Use Office Alternative would meet this objective as the alternative would include residential and office land uses on an infill development site. The residential and office uses are consistent with the Project Site’s existing zoning and land use designations, although it would require entitlements to permit the office use.

2. *Enhance and activate an existing commercial retail center by replacing a portion of the existing surface parking lot and commercial uses with an economically viable and aesthetically attractive mixed-use development that will be physically and programmatically compatible with the existing on-site uses to remain as well as surrounding uses in the vicinity.*

The Mixed-Use Office Alternative would enhance and activate an existing commercial retail center by replacing a portion of the existing surface parking lot and commercial uses aesthetically attractive mixed-use project. However, this alternative would not be as progamatically compatible with existing surrounding uses to the same extent as the Proposed Project because the existing character around the Project Site is composed of primarily community- and regional-serving

retail uses, mostly residential communities, and an adjacent public school, all of which provide an urban context that is more compatible with retail uses than it is with office uses. Therefore, alternative would not meet this objective to the same extent as the Project.

3. *Improve the visual appearance and appeal of the neighborhood by replacing older commercial buildings with a modern mid-rise building and providing enhanced streetscape design and pedestrian-oriented amenities.*

Similar to the Proposed Project, the Mixed-Use Office Alternative would improve the visual appearance of the Development Site. The scale and massing of this Alternative would be similar to the Proposed Project and the level of pedestrian enhancements would also be comparable as to what is proposed under the Proposed Project.

4. *Support a reduction in vehicle miles traveled by providing high-density multi-family housing and employment opportunities in a designated Transit Priority Area.*

Similar to the Proposed Project, the Mixed-Use Office Alternative would support a reduction in vehicle miles traveled by providing high-density multi-family housing and employment opportunities in a designated Transit Priority Area. As stated above this Alternative would result in a net reduction of 2,188 ADT and 16,219 VMT as compared to existing conditions. It would also support employment opportunities to a similar extent as the Proposed Project. This alternative would meet this objective to a similar extent as the Project.

5. *Create an arrangement of land uses and new development that encourage and contribute to the economic, social, and physical health of the expanding residential community in the Wilshire Community Plan area.*

Similar to the Proposed Project, the Mixed-Use Office Alternative would create an arrangement of land uses and new development that would encourage and contribute to the economic, social, and physical health of the expanding residential community in the Wilshire Community Plan area. While this alternative would not provide the same arrangement of retail land uses that occur in existing conditions, it would provide the same amount of residential units as the Proposed Project, and would also develop commercial uses that are consistent with the land use designation and zoning of the Wilshire Community Plan.

6. *Create a sustainable neighborhood with scalable design that fits with the unique context of the adjacent on- and off-site land uses.*

The Mixed-Use Office Alternative would create a sustainable neighborhood with scalable design, but it would not fit with the unique context of the adjacent on- and off-site land uses, to the same extent as the Proposed Project. The scale and massing of this alternative would be similar to the Proposed Project, but the change from retail to office uses would not be as compatible with the on and off site uses because the existing character around the Project Site is composed of primarily community- and regional-serving retail uses, mostly residential communities, and an adjacent public school, all of which provide an urban context that is more compatible with retail uses than it is with office uses. This alternative would not meet this objective to the same extent as the Proposed Project.

7. *Maximize the provision of housing units on an urban infill site to increase multi-family housing supply for the City and Wilshire Community Plan area.*

The Mixed-Use Office Alternative would have the same residential density as the Proposed Project. Therefore, this alternative would similarly maximize the provision of housing units on an urban infill site to increase multi-family housing supply for the City and Wilshire Community Plan area. This alternative would meet this objective to a similar extent as the Proposed Project.



## V. Alternatives

### D. Reduced Density Alternative

#### 1. Description of the Reduced Density Alternative

The Reduced Density Alternative would consist of demolition of the existing uses on the Development Site and the construction of a mixed-use project with 150 multi-family townhome units and approximately 20,912 square feet of commercial space for a total new floor area of 395,912 square feet. Under this alternative, all of the commercial and residential guest parking spaces would be provided at grade level. The parking for the townhome units would be provided within the townhome units. Thus, earthwork and grading activities would be limited to surface grading and soil export would be limited to approximately 3,000 cubic yards. A summary of the development program under this alternative is provided below in Table V.D-1, Reduced Density Alternative.

**Table V.D-1**  
**Reduced Density Project Alternative**

<i>Land Uses</i>	<i>Dwelling Units</i>	<i>Floor Area (Square Feet)</i>
<b>Commercial</b>		
<i>General Commercial/Retail Space</i>	--	<i>13,412 sf</i>
<i>Restaurant</i>	--	<i>7,500 sf</i>
<i>Subtotal Commercial:</i>	--	<b><i>20,912 sf</i></b>
<b>Residential</b>		
<i>2-Bedroom Units</i>	<i>100</i>	<i>375,000</i>
<i>3-Bedroom Units</i>	<i>50</i>	
<i>Subtotal Residential:</i>	<i>150</i>	
<b><i>TOTAL:</i></b>	<b><i>150 du</i></b>	<b><i>395,912 sf</i></b>
<i>Notes: du = dwelling units; sf = square feet</i>		
<i>[a] 375,000 sf is based on an average unit size of 2,500 square feet for townhome units.</i>		

The Reduced Density Alternative would be comprised of two- to three level townhome units and single story retail uses at the ground floor. The height of the townhome structures would be a maximum of 35 feet. Common open space and recreational amenities would be provided consistent with the LAMC requirements. A summary of the parking requirements under this alternative is provided in Table V.D-2, below.

**Table V.D-2  
Summary of Required and Proposed Vehicle Parking Spaces**

Description	Quantity	Parking Required by Code <sup>a, b</sup>		Parking Provided <sup>c</sup>
		Rate	Spaces	
<b>Residential</b>				
Two-Bedroom	100 du	2.0 spaces per bedroom	200	200
Three-Bedroom	50 du	2.0 spaces per bedroom	100	100
<b>Required Residential Parking</b>			<b>300</b>	<b>300</b>
<b>Commercial</b>				
New Commercial/Retail	13,412 sf	4 spaces per 1,000 sf	54	54
New Commercial Restaurant	7,500 sf	1 space per 100 sf	75	75
<b>Subtotal Commercial Parking</b>			<b>129</b>	<b>129</b>
<b>TOTAL PARKING</b>			<b>429</b>	<b>429</b>
Notes: du = dwelling unit, sf = square feet <sup>a</sup> For Residential Use: Parking calculations based on LAMC Section 12.21 A.4. <sup>b</sup> For Commercial Use: Parking calculations based on LAMC Section 12.21.A.4 (c) <sup>c</sup> The Project Site would include a total of 579 parking spaces which includes a total of 429 parking spaces on-site for the Development Site plus 150 restriped surface parking spaces for the 63,688 square feet of existing commercial/retail spaces that is to remain in the western portion of the Project Site.				

## 2. Environmental Analysis

### a) Air Quality

#### (1) Construction

##### (a) Regional and Localized Emissions

While the Reduced Density Alternative has less dwelling units and commercial space, the overall construction schedule would be similar compared to the Proposed Project, but would be shortened by approximately 2 months. However, because the Reduced Density Alternative would not include an intensive grading phase, and would export 3,000 cubic yards off-site, compared to the Proposed Project's 110,000 cubic yards (cy) of export, the Reduced Density Alternative would generate less total construction emissions compared to the Proposed Project. Therefore, the total regional and localized air quality emissions would be less than the Proposed Project. As shown in Table V.D-3 below, Reduced Density Alternative Regional Construction Emissions, the maximum daily emissions under this Alternative would be under the SCAQMD thresholds of significance and would be less than the maximum daily emissions generated under the Proposed Project. The

**Table V.D-3**  
**Reduced Density Alternative**  
**Estimated Regional Peak Daily Construction Emissions**

Construction Year	Emissions (pounds per day) <sup>a</sup>					
	VOC <sup>b</sup>	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
2021	4.35	47.63	32.77	0.08	4.32	2.63
2022	2.70	20.95	24.37	0.05	2.66	1.36
2023	29.79	18.89	23.83	0.05	2.53	1.24
<b>Maximum Unmitigated Construction Emissions <sup>c</sup></b>	<b>29.79</b>	<b>47.63</b>	<b>32.77</b>	<b>0.08</b>	<b>4.32</b>	<b>2.63</b>
<b>SCAQMD Daily Significance Thresholds</b>	75	100	550	150	150	55
<b>Over (Under)</b>	(45.21)	(52.37)	(517.23)	(149.92)	(145.68)	(52.37)
<b>Exceed Threshold?</b>	No	No	No	No	No	No
<b>Notes:</b> <sup>a</sup> Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust and Rule 1113 – Architectural Coatings. <sup>b</sup> As noted in the CalEEMod User Guide, both VOC and ROG are precursors to ozone so they are summed in the CalEEMod report under the header ROG. For the purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably. <sup>c</sup> The CalEEMod worksheets are provided in Appendix L to this EIR. Parker Environmental Consultants, 2020.						

Proposed Project's construction air quality impacts were below the thresholds for all six criteria pollutants. Therefore, the air quality impacts of the Reduced Density Alternative would be reduced compared to the Proposed Project's less than significant impacts.

*(b) Toxic Air Contaminants*

Similar to the Proposed Project, the Reduced Density Alternative's construction toxic air contaminant (TAC) emissions would be short-term and would also result in a less than significant impact. This alternative would require less construction activities with fewer haul trucks and an overall decrease in use of heavy-duty diesel trucks as compared to the Proposed Project. Therefore, the air quality impacts under this Alternative would be reduced as the Proposed Project's less than significant impacts.

## (2) Operation

### (a) Regional and Localized Emissions

The Reduced Density Alternative would include a total of 150 townhome units and the 20,912 square feet of ground floor commercial uses. In comparison to the Proposed Project, the Reduced Density Alternative would reduce the number of dwelling units by 181 dwelling units and would eliminate the proposed 63,082 square feet of supermarket space. As noted under the traffic impacts discussion, below, the Reduced Density Alternative would generate 4,741 fewer daily trips than the Proposed Project with mitigation. As such, this alternative's traffic volumes and associated mobile source emissions would be reduced as compared to the Proposed Project. As shown in Table V.D-3, below, the Reduced Density Alternative would result in net reduction of emissions for all criteria pollutants compared to existing conditions. Similar to the Proposed Project, the Reduced Density Alternative would not violate any air quality standards and would be required to implement all required SCAQMD rules and regulations. By meeting SCAQMD rules and regulations, the Reduced Density Alternative would also be consistent with the goals of the 2016 AQMP. Compared to the Proposed Project, the Reduced Density Alternative would have reduced air quality emission impacts. As shown in Table V.D-4, Reduced Density Alternative Estimated Daily Operational Emissions, the Reduced Density Alternative would result in less than significant air quality impacts for all six criteria pollutants and operational emissions would be reduced as compared to the less than significant operational air quality emissions generated by the Proposed Project.

**Table V.D-4**  
**Reduced Density Alternative Estimated Regional Daily Operational Emissions**

Emissions Source	Peak Emissions in Pounds per Day					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Area	8.93	0.14	12.39	<0.01	0.07	0.07
Energy	0.13	1.16	0.69	<0.01	0.09	0.09
Mobile (Vehicles)	2.15	9.16	22.46	0.08	7.09	1.94
Stationary	0.82	3.67	2.09	<0.01	0.12	0.12
<b>Total Reduced Density Alternative Emissions</b>	<b>12.03</b>	<b>14.13</b>	<b>37.63</b>	<b>0.09</b>	<b>7.37</b>	<b>2.22</b>
<i>Less Existing Project Site</i>	<i>(19.83)</i>	<i>(71.89)</i>	<i>(158.95)</i>	<i>(0.43)</i>	<i>(31.20)</i>	<i>(8.89)</i>
<b>Net Reduced Density Alternative Emissions</b>	<b>(7.80)</b>	<b>(57.76)</b>	<b>(121.32)</b>	<b>(0.35)</b>	<b>(23.83)</b>	<b>(6.67)</b>
<b>SCAQMD Thresholds</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Potentially Significant</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<i>Note: Calculation worksheets are provided in Appendix L to this Draft EIR.</i> <i>Source: Parker Environmental Consultants, 2020.</i>						

(b) *Toxic Air Contaminants*

Similar to the Proposed Project, the Reduced Density Alternative would consist of a mixed-use development containing multi-family residential units and commercial uses that would not support any land uses or activities that would involve the use, storage, or processing of carcinogenic or non-carcinogenic TACs. Therefore, no significant toxic airborne emissions would result from the operation of the Reduced Density Alternative. Similar to the Proposed Project, potential air toxic impacts to sensitive receptors from Project TAC emissions from this Alternative would also be less than significant.

b) **Energy**

(1) **Construction**

As the Reduced Density Alternative would use less construction equipment as compared to the Proposed Project, energy consumption under this alternative would be slightly reduced as compared to the Proposed Project. With a reduction in overall new construction activities, the Reduced Density Alternative would reduce the demand for electricity and transportation fuel as compared to the Proposed Project. As with the Project, construction activities would require energy demand that is not wasteful, inefficient, or unnecessary and would not be expected to have an adverse impact on available energy resources. Therefore, the energy consumption impacts of the Mixed-Use Office Alternative would be considered the same as the Proposed Project's less than significant impacts.

(2) **Operation**

(a) *Electricity*

As discussed in Section IV.B, Energy, the estimated net increase in electricity consumption by the Proposed Project would be approximately 3,904,735 kWh/year. As shown in Table V.D-5, below, the Reduced Density Alternative would result in an estimated net decrease in electricity consumption by approximately 1,330,054 kWh/year compared to existing conditions, which is much less energy demand than the Proposed Project. The projected decrease in electrical demand due to the Proposed Project would not have an adverse impact on electrical resources. Similar to the Proposed Project, the Reduced Density Alternative would meet 2019 Title 24 energy efficiency requirements and further reduce demand for electricity. Accordingly, as with the Proposed Project, the consumption of electricity under the Reduced Density Alternative would not be wasteful,

**Table V.D-5**  
**Estimated Electricity Demand by Reduced Density Alternative**

Land Use	Size	Total Electricity Demand (kWh/year) <sup>a</sup>
<b>Existing Uses</b>		
Regional Shopping Center	144,963. sf	2,313,610
Quality Restaurant	6,085 sf	294,027
<b>Total Existing Electricity Demand:</b>		<b>2,607,637</b>
<b>Reduced Density Alternative</b>		
Townhomes	150 du	747,411
Restaurant	7,500 sf	331,050
Commercial/Retail	13,412 sf	181,062
Parking Lot	129 spaces	18,060
<b>Total Reduced Density Electricity Demand:</b>		<b>1,277,583</b>
<i>Existing Electricity Demand (to be demolished):</i>		<i>(2,607,637)</i>
<b>NET TOTAL Electricity Demand:</b>		<b>(1,330,054)</b>
<i>Notes: sf =square feet; du = dwelling unit; kWh = kilowatt-hour</i> <sup>a</sup> SCAQMD, CalEEMod Version 2016.3.2, See Appendix L to this Draft EIR. Source: Parker Environmental Consultants, 2020.		

inefficient, or unnecessary. Because the Reduced Density Alternative would demand less energy than the Proposed Project, impacts would also be less than significant and reduced as compared to the Proposed Project.

*(b) Natural Gas*

The Proposed Project's net natural gas demands are estimated to be approximately 4,505,873 kBTU/year, or approximately 367,981 cf/month. As shown in Table V.D-6, below, the estimated net increase in natural gas demands by the Reduced Density Alternative would be approximately 3,322,173 kBTU/year, or 228,762 cf/month, which is roughly 38 percent less than the natural gas demand of the Proposed Project. Therefore, impacts associated with natural gas consumption under this alternative would be less than significant and similar to the Proposed Project; natural gas demands would be reduced compared to the Proposed Project. Accordingly, as with the Proposed Project, the consumption of natural gas under the Reduced Density Alternative would not be wasteful, inefficient, or unnecessary.

**Table V.D-6**  
**Estimated Net Natural Gas Demand by Reduced Density Alternative**

Land Use	Size	Total Natural Gas Demand (kBTU/yr) <sup>a</sup>	Total Natural Gas Demand (cf/month) <sup>b</sup>
<b>Existing Uses</b>			
Regional Shopping Center	144,963 sf	263,833	21,546
Quality Restaurant	6,085 sf	1,426,020	116,458
<b>Total Existing Natural Gas Demand:</b>		<b>1,689,853</b>	<b>138,004</b>
<b>Reduced Density Alternative</b>			
Townhomes	150 du	2,738,330	223,630
Restaurant	7,500 sf	1,730,700	141,341
Commercial/Retail	13,412 sf	21,996	1,796
<b>Total Reduced Density Natural Gas Demand:</b>		<b>4,491,026</b>	<b>366,767</b>
<i>Less Existing Natural Gas Demand:</i>		<i>-1,168,853</i>	<i>-138,004</i>
<b>NET TOTAL Natural Gas Demand:</b>		<b>3,322,173</b>	<b>228,762</b>
<i>Notes: sf =square feet; du = dwelling unit</i> <sup>a</sup> SCAQMD, CalEEMod Version 2016.3.2, See Appendix L of this Draft EIR. <sup>b</sup> 1kBTU is equivalent to 0.98 cubic feet of natural gas. <i>Source: Parker Environmental Consultants, 2020.</i>			

(c) *Transportation Energy*

The Proposed Project's net transportation energy demands are estimated to be approximately 23,118 gallons of diesel and 158,436 gallons of gasoline per year. As shown in Table V.D-7, below, the estimated net transportation energy by the Reduced Density Alternative would result in a net reduction of approximately 58,790 gallons of diesel and 356,775 gallons of gasoline per year compared to existing conditions, which is less diesel and gasoline than the Proposed Project's demands. It is anticipated that the Reduced Density Alternative's operational transportation fuel demand would represent a reduction in diesel and gasoline use as compared to existing conditions, whereas the proposed Project would result in a net increase in fuel demand. As such, the transportation fuel consumption associated with this alternative's vehicle trips during operation would represent a net reduction of transportation energy of to the total amount of transportation energy supplied to California and fuel sales in Los Angeles County. Additionally, vehicles are expected to comply with CAFE standards and CARB's Advanced Clean Cars Program, which would reduce transportation fuel consumption. Furthermore, as with the Proposed Project, the Reduced Density Alternative would be located in proximity to public transit and would incorporate features to reduce vehicle trips, thereby reducing transportation fuel usage. Therefore, the Reduced Density Alternative's transportation energy consumption and demand would not be wasteful, inefficient, or

**Table V.D-7**  
**Estimated Transportation Energy Consumption by Reduced Density Alternative**

	Annual VMTs (miles) <sup>a</sup>	Fuel Rate (mpg) <sup>b</sup>	Total Fuel Demand (gallons/year)
<b>Diesel</b>			
Existing (to be demolished)	(695,236)	9.09	<b>(76,484)</b>
Reduced Density Alternative	190,033	10.74	<b>17,694</b>
<b>Net Diesel Consumption:</b>			<b>(58,790)</b>
<b>Gasoline</b>			
Existing (to be demolished)	(10,892,028)	23.27	<b>(468,072)</b>
Reduced Density Alternative	2,977,187	26.75	<b>111,297</b>
<b>Net Gasoline Consumption:</b>			<b>(356,775)</b>
<i>Notes: VMTs = vehicle miles traveled; mpg = miles per gallon</i> <sup>a</sup> <i>Appendix E, Greenhouse Gas Emissions: Total Annual VMTs from Operational Mobile; It is assumed that 94% of VMTs are associated with gasoline-powered vehicles and 6% of VMTs are associated with diesel-powered vehicles.</i> <sup>b</sup> <i>Fuel efficiency estimates were based on EMFAC2017 (v1.0.2) Emissions Inventory data. See Appendix D, Energy Demand Worksheets Parker Environmental Consultants, 2020.</i>			

unnecessary. Therefore, impacts associated with transportation energy consumption under the Reduced Density Alternative would be less than significant and would be reduced compared to the Proposed Project.

## c) Greenhouse Gas Emissions

### (1) Construction

The Reduced Density Alternative would have similar general construction activities on a daily basis as the Proposed Project. However, because the Reduced Density Alternative does not include below-grade parking, there would be less grading and would generate less overall GHG emissions during construction compared to the Proposed Project. Accordingly, the duration of the construction period would be reduced by approximately two months as compared to the Proposed Project. Similar to the Proposed Project, the Reduced Density Alternative would result in a less than significant impact, and construction GHG emissions would be reduced compared to the Proposed Project.



## (2) Operation

The Proposed Project would include a total of 331 dwelling units and 83,994 square feet of ground floor commercial uses. By comparison, the Reduced Density Alternative includes a total of 150 townhouse units and 20,912 square feet of ground floor commercial uses, as compared to the Proposed Project. The commercial space would be the same as proposed under the Proposed Project (restaurant and general commercial/retail), but would exclude the 63,082 square-foot supermarket. The Reduced Density Alternative would comply with the same energy efficiency requirements of the L.A. Green Building Code, as applicable for a mixed-use residential and commercial project. On-site operations would be required to comply with applicable local, state, and federal regulations governing energy efficiency. With respect to operational GHG emissions from mobile sources, the Reduced Density Alternative would result in 4,741 fewer average daily trips as compared to the Proposed Project with mitigation. Thus, the operational GHG emissions associated with vehicles traveling to and from the Project Site during the operation of the Reduced Density Alternative would be reduced, as compared to the Proposed Project.

As discussed in Section IV.C, Greenhouse Gas Emissions, the Proposed Project's annual generation of GHG emissions is estimated to be 10,782 CO<sub>2</sub>e MTY with a net annual increase of 3,384 CO<sub>2</sub>e MTY when compared to existing conditions. As shown in Table V.D-8, below, the Reduced Density Alternative's estimated annual GHG is 2,472 CO<sub>2</sub>e MTY with a net annual GHG emissions reduction of 4,926 CO<sub>2</sub>e MTY, when compared to existing conditions. When compared to the Proposed Project, the Reduced Density Alternative's GHG emissions would be more than four times less than the Proposed Project's GHG emissions. With compliance with the City's Green Building Code and the implementation of appropriate sustainability features, it is anticipated that the Reduced Density Alternative would also be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans. Compared to the Proposed Project, the Reduced Density Alternative would have reduced impacts relating to GHG emissions. As with the Proposed Project, the Reduced Density Alternative would result in a less than significant impact.

**Table V.D-8**  
**Reduced Density Alternative Operational Greenhouse Gas Emissions**

<b>Emissions Source</b>	<b>CO<sub>2</sub>e Emissions (Metric Tons per Year)</b>
Area	3
Energy	943
Mobile	1,322
Stationary	5
Waste	22
Water	130
Construction (Amortized)	47
<b>Total Reduced Density Alternative:</b>	<b>2,472</b>
<i>Less Existing Project Site:</i>	<i>(7,398)</i>
<b>NET Reduced Density Alternative Emissions:</b>	<b>(4,926)</b>
<i>Calculation data and results provided in Appendix L to this Draft EIR.</i>	

#### d) Hazardous Materials and Risk of Upset

##### (1) Construction

The K-Mart, located on the Project Site, is identified on the HAZNET databases. The K-Mart is listed as generating hazardous waste under manifest from 1995 through 2015. The Reduced Density Alternative would require similar construction activities as the Proposed Project, but with substantially less grading and export. As with the Proposed Project, the Reduced Density Alternative's adherence to applicable regulatory compliance measures (i.e. Cal-OSHA regulations, SCAQMD Rule 1166, NPDES permit) and incorporation of Project Design Feature PDF-HAZ-1 (Methane) and MM-HAZ- 1 (Soil Management Plan), discussed in Section IV.D, Hazardous Materials/Risk of Upset that would ensure any potential hazardous impacts during the construction phase would be less than significant. Additionally, the Hancock Park Elementary School would be considered a sensitive receptor regarding hazardous materials exposure. Similar to the Proposed Project, adherence to all applicable rules and regulations during construction, which are detailed in Section IV.D, Hazardous Materials/Risk of Upset would ensure potential impacts associated with the Reduced Density Alternative's potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of the Hancock Park Elementary School would be less than significant. When compared to the Proposed Project, the Reduced Density Alternative would have reduced less than significant impacts upon hazards and risk of upset.

## (2) Operation

Similar to the Proposed Project, no hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would routinely be transported to the Project Site during the operation of the Reduced Density Alternative. The use of these substances would comply with applicable State Health Codes and Regulations. The operation of the mixed-use residential and commercial land uses would not use, transport, or require the disposal of hazardous materials. The Reduced Density Alternative would not routinely transport, use, or disposal of hazardous materials in the normal course of operations. The Reduced Density Alternative would comply with current regulations set by the LADBS pursuant to Table 71 of Ordinance 175,790, Minimum Methane Mitigation Requirements. When compared to the Proposed Project's less than significant impacts, the Reduced Density Alternative's operation would have a similar less than significant impact upon hazards and risk of upset.

## e) Land Use and Planning

The Reduced Density Alternative would seek all of the same general discretionary action as the Proposed Project. The Reduced Density Alternative would still request a Site Plan Review. Similar to the Proposed Project, the Reduced Density Alternative would be in conformance with applicable provisions of the LAMC. Consistent with the maximum allowable 1.5:1 FAR, and reduced as compared to the Proposed Project, the Reduced Density Alternative would include a total of 395,912 square feet of new construction. Since the Reduced Density Alternative would comply with the permitted land use and existing zoning requirements, this Alternative would also be generally consistent with the overall intent of the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site, including SCAG's regional plans, the General Plan Framework Element, the Wilshire Community Plan, and the LAMC. As with the Proposed Project, the Reduced Density Alternative would also not conflict with local and regional plans applicable to the Project Site. Land use impacts would be less than significant under this alternative. Therefore, the Reduced Density Alternative would result in similar land use impacts to the Proposed Project's less than significant impacts.

## f) Noise

### (1) Construction

As discussed in Section IV.F, Noise, the construction-related noise and groundborne vibration impacts associated with the Proposed Project would be reduced to less than significant with the incorporation of Mitigation Measures MM-NOI-1 through MM-NOI-3

and Project Design Features PDF-NOI- 1 and PDF-NOI- 2. The day-to-day noise levels during active construction periods are anticipated to be the same as the Proposed Project under the Reduced Density Alternative. The same construction code compliance requirements identified in Section IV.F, Noise, would also be applicable to this alternative. Thus, construction noise and vibration impacts under the Reduced Density Alternative would have similar construction noise levels as compared to the Proposed Project's less than significant impacts with mitigation. However, as the Reduced Density Alternative would require less soil export, off-site roadway noise impacts associated with haul trucks would be reduced.

## (2) Operation

The operational noise generated under the Reduced Density Alternative would be typical of residential and commercial land uses. The Reduced Density Alternative's on-site noise levels associated with outdoor noise sources such as courtyards and open space areas, mechanical equipment, parking garage noise and delivery areas and loading dock activities, would be less than significant, but reduced as compared to the Proposed Project because there would be fewer dwelling units. The amount of outdoor open space and courtyards would be reduced as this alternative would include 181 fewer residential dwelling units than the Proposed Project. With respect to operational noise from mobile sources, the Reduced Density Alternative would result in 4,741 fewer average daily trips as compared to the Proposed Project with mitigation. Thus, operational noise under the Reduced Density Alternative would have reduced impacts compared to the Proposed Project's less than significant impacts.

## g) Population and Housing

As discussed in Section IV.G, Population and Housing, the Proposed Project would be consistent with the SCAG 2016-2040 RTP/SCS growth projections with respect to population, housing, and employment. By comparison, the Reduced Density Alternative includes a total of 150 townhouse units and 20,912 square feet of ground floor commercial uses, as compared to the Proposed Project, which would provide 331 dwelling units and 83,994 square feet of commercial/retail land uses. Because the Reduced Density Alternative would provide fewer housing units, this alternative would generate fewer residents than the Proposed Project. As shown in Table V.D-9, below, the Reduced Density Alternative would generate a net increase of 363 new residents, approximately 55 percent less than the estimated 801 residents generated by the Proposed Project. Therefore, similar to the Project, this Alternative would also be consistent with SCAG growth projections and policies of placing new housing growth within a HQTAs, but would not contribute as many dwelling units to the housing supply as the Proposed Project, and

**Table V.D-9  
Reduced Density Alternative Housing and Population Estimates**

<b>Land Use</b>	<b>Dwelling Units</b>	<b>Occupancy Rate (persons per unit)<sup>a</sup></b>	<b>Resident Population</b>
Townhouses	150	2.42/du	363
<i>Source: Based on the American Community Survey (ACS) Public Use Microdata Sample (PUMS) data the City of Los Angeles citywide average population for multifamily housing is estimated to be 2.42 persons per household. (Jack Tsao, Department of City Planning Demographic Unit, July 31 2019).</i>			

impacts with respect to inducing substantial unplanned population growth would be less than significant. As such, the Reduced Density Alternative would have similar impacts to population and housing compared to the Proposed Project's less than significant impacts.

Because the Reduced Density Alternative would not include the proposed supermarket, the employment growth would decrease compared to the Proposed Project. The Proposed Project would provide a net increase of approximately five jobs, compared to existing on-site activities. Table V.D-10, below, shows that the Reduced Density Alternative would generate a net decrease of 247 employees, compared to existing conditions. As there would be no net increase in the number of jobs created, the Reduced Density Alternative would not exceed the SCAG 2016-2040 RTP/SCS employment growth projections. When compared to the Proposed Project, the Reduced Density Alternative would have a reduced impact with respect to substantial unplanned population growth due to employment. Impacts related to employment growth under the Reduced Density Alternative would also be less than significant, similar to the Proposed Project.

## **h) Public Services**

### **(1) Construction**

#### *(a) Fire Protection*

The Proposed Project was found to have a less than significant construction impacts on fire protection services. Since the Reduced Density Alternative would involve the same level of construction activity with respect to demolition but reduced activity associated with new construction, construction impacts under this Alternative would be slightly reduced but similar to the less than significant construction impacts that would occur under the Proposed Project.

**Table V.D-10**  
**Reduced Density Alternative Estimated Employee Generation**

<b>Land Use</b>	<b>Quantity Proposed</b>	<b>Employment Generation Rates <sup>a</sup></b>	<b>Total Employees</b>
<b>Existing Uses to be Demolished</b>			
Community Retail	144,963 sf	2 employees / 1,000 sf	290
Restaurant	6,085 sf	4 employees / 1,000 sf	24
<b>Subtotal</b>	151,048 sf		<b>314</b>
<b>Reduced Density Alternative</b>			
Commercial Retail	13,412 sf	2 employees / 1,000 sf	27
Restaurant	7,500 sf	4 employees / 1,000 sf	30
Residential	150 du	NA <sup>b</sup>	10
<b>Subtotal</b>	20,912 sf		<b>67</b>
<b>Reduced Density Alternative Employees</b>			<b>67</b>
<i>Less Existing Employees</i>			<i>-314</i>
<b>Net Total Employees</b>			<b>(247)</b>
<b>Notes:</b> <sup>a</sup> Employment rates based factors provided in LADOT's City of Los Angeles VMT Calculator Documentation, Table 1: Land Use and Trip Generation Base Assumptions, November 2019. <sup>b</sup> Estimate for jobs generated by the residential operations is based on applicant provided data. Source: Parker Environmental Consultants, 2020.			

*(b) Police Protection*

The Proposed Project was found to have a less than significant construction impacts on police protection services. Since the Reduced Density Alternative would involve the same level of construction activity with respect to demolition but reduced activity associated with new construction, construction impacts under this Alternative would be slightly reduced but similar to the less than significant construction impacts that would occur under the Proposed Project.

*(c) Schools*

The Proposed Project was found to have a less than significant construction impacts on schools. Since the Reduced Density Alternative would involve the same level of construction activity with respect to demolition but reduced activity associated with new construction, construction impacts under this Alternative would be slightly reduced but similar to the less than significant construction impacts that would occur under the Proposed Project.

*(d) Parks*

The Proposed Project was found to have a less than significant construction impacts on parks. Since the Mixed-Use Office Alternative would involve the same level of

construction activity with respect to demolition and new construction and the same anticipated construction timeline, construction impacts under this Alternative would be the same as the less than significant construction impacts that would occur under the Proposed Project.

(e) *Libraries*

The Proposed Project was found to have a less than significant construction impacts on libraries. Since the Reduced Density Alternative would involve the same level of construction activity with respect to demolition but reduced activity associated with new construction, construction impacts under this Alternative would be reduced but similar to the less than significant construction impacts that would occur under the Proposed Project.

(2) **Operation**

(a) *Fire Protection*

The Proposed Project was found to have a less than significant impact on fire protection services. Since the Reduced Density Alternative would provide 181 fewer residential dwelling units and 63,082 less square feet of commercial space as compared to the Proposed Project, the impacts on fire protection services would decrease. Because demands for fire protection services are primarily based on residential service population, this alternative would have reduced impacts with respect to fire protection services.

Similar to the Proposed Project, this alternative would implement similar design features during construction and would be subject to the City's routine plan review process, which includes a review by the LAFD to ensure that sufficient security measures, fire flow, and accessibility standards are implemented to reduce potential impacts to fire protection services. The Reduced Density Alternative, like the Proposed Project, would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives related to fire protection.

(b) *Police*

The Proposed Project was found to have a less than significant impact on police protection services. Since the Reduced Density Alternative would provide 181 fewer residential dwelling units and 63,082 less square feet of commercial space as compared to the Proposed Project, the impacts on police protection services would decrease.

Because these impacts are primarily based on residential service population, this alternative would have reduced impacts with respect to police protection services. Similar to the Proposed Project, this alternative would implement similar design features and would be subject to the City's plan review process, which includes a review by the LAPD to ensure that sufficient security measures and accessibility standards are implemented to reduce potential impacts to police protection services. The Reduced Density Alternative would have reduced impacts on police protection services as compared to the Proposed Project's less than significant impacts. The Reduced Density Alternative, like the Proposed Project, would not result in substantial adverse physical impacts associated with the provision of new or physically altered LAPD facilities, the need for new or physically altered LAPD facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives related to police protection services.

(c) *Schools*

The Proposed Project was found to have a less than significant impact on school services. Since the Reduced Density Alternative would provide 181 fewer residential dwelling units and 63,082 less square feet of commercial space as compared to the Proposed Project, the impacts on school services would decrease. Table V.D-11, below, shows that the estimated student generation from the Reduced Density Alternative would result in a net increase of three elementary students, no middle school students, and one high school student, for a net increase of four students when compared to existing conditions. The Reduced Density Alternative would generate approximately 135 fewer students than the Proposed Project. As compared to the Proposed Project, the Reduced Density Alternative would decrease the demand on local schools. Similar to the Proposed Project, this alternative would pay applicable developer school fees required pursuant to SB 50. The Reduced Density Alternative would have reduced impacts on school services as compared to the Proposed Project's less than significant impacts. The Reduced Density Alternative, like the Proposed Project, would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, the need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives related to school facilities.



**Table V.D-11**  
**Reduced Density Alternative Estimated Student Generation**

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total Students
<b>Existing Uses (to be removed)</b>					
Commercial (151,048 sf) <sup>b</sup>	314 emp	39	11	21	71
<b>Total Existing Students:</b>		<b>39</b>	<b>11</b>	<b>21</b>	<b>71</b>
<b>Reduced Density Alternative</b>					
Multi-Family Townhouse <sup>a</sup>	150 du	34	9	19	62
New Commercial (20,912 sf) <sup>b</sup>	67 emp	8	2	3	13
<b>Total Alternative Student Generation:</b>		<b>42</b>	<b>11</b>	<b>22</b>	<b>75</b>
<i>Less Existing Students:</i>		<i>(39)</i>	<i>(11)</i>	<i>(21)</i>	<i>(71)</i>
<b>NET Student Generation:</b>		<b>3</b>	<b>0</b>	<b>1</b>	<b>4</b>
<i>Notes: sf = square feet; du = dwelling units; emp = employees</i> <sup>d</sup> Student generation rates are as follows for multi-family residential uses: 0.2269 elementary, 0.0611 middle and 0.1296 high school students per unit. <sup>e</sup> It is assumed that 0.2249 students are generated per employee (Table 15 of the 2018 Developer Fee Justification Study). Since the LAUSD Developer Fee Justification Study does not specify the grade levels of students that are generated from non-residential land uses, the total number of students was divided among the elementary, middle, and high schools with the same ratio as the residential generation (55% elementary school, 15% middle school, and 30% high school). Source: Los Angeles Unified School District, 2018 Developer Fee Justification Study, March 2018.					

(d) *Parks*

The Proposed Project was found to have a less than significant impact on park facilities. Since the Reduced Density Alternative would provide 181 fewer residential dwelling units and 63,082 less square feet of commercial space as compared to the Proposed Project, the impacts on park and recreation facilities would decrease. Because these impacts are primarily based on residential service population, this alternative would have reduced impacts with respect to parks. Similar to the Proposed Project, this alternative would provide the required amount of open space area and residential amenities required by the LAMC to further reduce demands on local parks. The Reduced Density Alternative would have reduced impacts on parks as compared to the Proposed Project's less than significant impacts. The Reduced Density Alternative, like the Proposed Project, would not result in substantial adverse physical impacts associated with the provision of new or physically altered park and recreation facilities, the need for new or physically altered park facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, or other performance objectives related to park facilities.

(e) *Libraries*

The Proposed Project was found to have a less than significant impact on libraries. The Reduced Density Alternative would provide 181 fewer residential dwelling units and 63,082 less square feet of commercial space as compared to the Proposed Project. Because demands for library services and facilities are primarily based on residential service population, this alternative would have reduced impacts with respect to libraries as compared to the Proposed Project's less than significant impacts. The Reduced Density Alternative, like the Proposed Project, would not result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, the need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives related to library facilities.

i) **Transportation**

(1) **Construction**

The Reduced Density Alternative would involve a similar level of construction activity as compared to the Proposed Project with respect to demolition, but less activity with respect to the amount of soil export and new construction. The grading phase for the Reduced Density Alternative is estimated to require approximately 3,000 cubic yards of soil export, resulting in approximately 375 haul trips. As compared to the Proposed Project, which would generate approximately 13,750 haul trips, the Reduced Density Alternative would result in a substantial reduction in the number of haul trips. Similar to the Proposed Project, a Construction Traffic Control / Management Plan would be submitted to LADOT for review and approval prior to the start of any construction work. The construction work site traffic control plan would show the location of any traffic detours, haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. The Reduced Density Alternative would also implement Project Design Features PDF-TRAFFIC-1 through PDF-TRAFFIC-3 to reduce and minimize this alternative's potential for temporary traffic disruptions during construction. As such, the construction traffic impacts under this alternative would be reduced as compared to the Proposed Project's less than significant impacts.

(2) **Operation**

The Reduced Density Alternative would be a smaller project with 150 townhouse units and 20,912 square feet of commercial space, when compared to the Proposed Project, which includes 331 dwelling units and 83,994 square feet of commercial/retail land uses. The proposed driveways would be similar to the Proposed Project, but the internal

circulation of this alternative would be different since this alternative would consist of a townhouse development. Each townhouse would include a two-car garage. Nevertheless, the Reduced Density Alternative would be required to submit a site plan for review to the Los Angeles Fire Department (LAFD) and LADOT to ensure there are no impacts to emergency access, hazardous design features, and internal circulation. Similar to the analysis provided in Section IV, I, Transportation for the Proposed Project, the Reduced Density Alternative would not conflict with applicable sections, policies or programs of the LAMC, the Mobility Plan 2035, the Transit Oriented Community Guidelines; the Citywide Design Guidelines; the Vision Zero Action Plan; and the Manual of Policies and Procedures Driveway Design Section 321. As such, the Reduced Density Alternative would not introduce hazardous design features, and similar to the Proposed Project, a less than significant impact would occur. In addition, similar to the Proposed Project, the Reduced Density Alternative would not interfere with emergency access and impacts would be less than significant.

As concluded in Section IV.I, Transportation, the addition of Proposed Project's trips and VMT would create a significant Household VMT impact prior to the implementation of mitigation. The Proposed Project would incorporate Mitigation Measure MM-TRAFFIC-1 in order to reduce Household VMT per capita to below the VMT threshold for the Central Area Planning Commission (APC), and therefore, impacts would be less than significant with mitigation. The Proposed Project is expected to generate 6,143 daily vehicle trips, a daily VMT of 41,197 miles, and a Household VMT per capita of 5.8 miles after mitigation. As shown in Table V.D-12, below, the Reduced Density Alternative would generate 1,402 daily trips and a daily VMT of 9,040 miles without mitigation, a reduction of 4,741 ADT and 32,157 VMT as compared to the Proposed Project, and a net reduction of 3,294 ADT and 23,365 VMT as compared to the existing conditions. As discussed in the VMT Analysis for the Reduced Density Alternative (Appendix L to this Draft EIR), this alternative would not create a significant VMT impact, resulting in a less than significant impact. As such, the traffic impacts under this alternative without mitigation would be reduced as compared to the Proposed Project's less than significant impacts with mitigation.

**Table V.D-12**  
**VMT Comparison of the Existing Conditions,**  
**Proposed Project, and the Reduced Density Alternative**

<b>Comparative Scenarios</b>	<b>Daily Trips</b>	<b>Daily VMT</b>
Existing Conditions	4,696	32,405
Proposed Project with Mitigation	6,143	41,197
Reduced Density Alternative	1,402	9,040
<i>Source: Linscott, Law &amp; Greenspan, Engineers, Reduced Density Alternative, February 5, 2020 (Appendix L to this Draft EIR).</i>		

## j) Tribal Cultural Resources

As discussed in Section IV.J, Tribal Cultural Resources, there is no evidence of any known tribal cultural resources recorded on the Project Site. However, mitigation measures are included given the potential level of sensitivity of the area and its proximity to an asphaltum source, the prehistoric Native American remains found at the La Brea Tar Pits, and the types of alluvium sediments in the area that are capable of preserving tribal cultural resources. The mitigation measures would protect potential tribal cultural resources in the unlikely event that such resources are encountered during construction. Accordingly, with incorporation of these mitigation measures, and adherence to applicable regulations with regards to discovering human remains, the Proposed Project would have a less-than-significant impact upon California Native American tribal cultural resources.

The Reduced Density Alternative would involve minor earthwork and grading activity but would not include any subterranean parking levels. Therefore, the potential to discover tribal cultural resources would be less likely for the Reduced Density Alternative. Nevertheless, the Reduced Density Alternative would incorporate the same Mitigation Measures, MM-TCR-1 through MM-TCR-4, from the Tribal Cultural Resources Assessment to protect potential tribal cultural resources in the unlikely event that such resources are encountered during construction. Therefore, due to the reduced amount and depth of excavation, the Reduced Density Alternative's impacts would be reduced compared to the Proposed Project's less than significant impacts upon tribal cultural resources with mitigation.

## k) Utilities and Service Systems

### (1) Water

#### (a) *Construction*

The Proposed Project was found to have a less than significant construction impacts on water services. Similar to the Proposed Project, the Reduced Density Alternative would not require or result in the relocation or construction of new or expanded water treatment facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects. Construction impacts under this Alternative would be the slightly reduced as compared to the less than significant construction impacts that would occur under the Proposed Project.

*(b) Operation*

Impacts associated with local water conveyance and infrastructure upgrades are anticipated to be similar under the Reduced Density Alternative as compared to the Proposed Project and would be less than significant. Under the Proposed Project, the anticipated water demand is expected to result in a net increase of 63,022 gallons per day or approximately 70.6 acre-feet of water per year. Comparatively, as shown in Table V.D-13, below, the net water demand associated with the Reduced Density Alternative would be approximately 45,128 gpd or 50.52 acre-feet per year, which is roughly 28 percent less than the Proposed Project's water demand of 63,022 gpd (70.6 AFY).

As discussed in Section IV.K-1, Water Supply, the 2015 UWMP has evaluated the City's water supply in comparison to the 2012 RTP/SCS growth projections and has determined that the City has adequate capacity to serve the anticipated growth in the region. Similar to the Proposed Project, because the Reduced Density Alternative would not exceed the planned growth projections for SCAG's growth projections in the 2012 RTP/SCS for the Los Angeles subregion, the projected demands associated with this alternative can be accommodated by the City's water supply. Therefore, similar to the Proposed Project, the Reduced Density Alternative would result in less than significant impacts. Compared to the Proposed Project, impacts regarding future water demands would be decreased under this alternative.

**Table V.D-13  
Reduced Density Alternative Estimated Water Demand**

Type of Use	Quantity (Unit) <sup>a</sup>	Water Use (gpd/unit) <sup>b</sup>	Proposed Water Demand (gpd) (AFY)	
Existing Uses to be Demolished				
Commercial/Retail	151,048 sf	50 gpd/ksf	7,552	8.46
Existing Water Demand:			7,552	8.46
Reduced Density Alternative				
Residential Units (150 total du)				
Two-Bedroom	100 du	150 gpd/du	15,000	16.8
Three-Bedroom	50 du	190 gpd/du	9,500	10.6
Lease Office <sup>c</sup>	4,370 sf	120 gpd/ksf	524	0.59
Fitness Room <sup>d</sup>	1,963 sf	650 gpd/ksf	1,276	1.43
Amenity Space <sup>e</sup>	2,100 sf	50 gpd/ksf	105	0.12
Club Room <sup>f</sup>	1,577 sf	50 gpd/ksf	79	0.09
Pool	800 sf-	-	21,000	23.54
Spa <sup>g</sup>	128 sf	-	3,360	3.77
Water Feature <sup>h</sup>	16 sf	-	420	0.47
Residential Total:			51,264	57.41
New Commercial Uses (20,912 total sf)				
Commercial/Retail	20,912 sf	50 gpd/ksf	1,046	1.17
Commercial Subtotal:			1,046	1.17
Landscaping <sup>c</sup>			370	0.4
Total Reduced Density Alternative Water Demand:			52,680	58.98
Minus Existing Demand:			-7,552	-8.46
Net Additional Water Demand:			45,128	50.52

Notes:

<sup>a</sup> du: dwelling unit, sf: square feet, ksf: one thousand square feet, gpd: gallons per day; AFY: acre feet per year.

<sup>b</sup> Water consumption rates are based on LASAN's Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012.

<sup>c</sup> Lease office is considered as "Office Building" for wastewater generation purposes.

<sup>d</sup> Fitness Room is considered as "Health Club/Spa" for wastewater generation purposes.

<sup>e</sup> Amenity space is considered as "Lounge" for wastewater generation purposes.

<sup>f</sup> Club space is considered as "Lounge" for wastewater generation purposes.

<sup>g</sup> Spa is considered as "Swimming Pool" for wastewater generation purposes.

<sup>h</sup> Water feature is considered as "Swimming Pool" for wastewater generation purposes.

<sup>i</sup> Landscaping water demand is based on the Model Water Efficient Landscape Ordinance for estimating the Maximum Applied Water Allowance (LA Green Building Code Sec. 99.04.304). Per the Landscape Composite Plan the Proposed Project's total landscaping area is 7,896 square feet. Source: Parker Environmental Consultants, 2020.

## (2) Wastewater

### (a) Construction

The Proposed Project was found to have a less than significant construction impacts on wastewater services. Similar to the Proposed Project, the Reduced Density Alternative would not require or result in the relocation or construction of new or expanded wastewater treatment facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects. Construction impacts under this Alternative would be the same as the less than significant construction impacts that would occur under the Proposed Project.

### (b) Operation

As concluded in Section IV.K-2, Wastewater, the existing local wastewater infrastructure would be expected to adequately serve the Proposed Project and the anticipated wastewater flows would be less than significant and within the treatment capacity of the Hyperion Water Reclamation Plant. Under the Proposed Project, the anticipated wastewater generation is expected to result in a net increase of 63,022 gpd. Comparatively, as shown in Table V.D-14, below, the net wastewater generation associated with the Reduced Density Alternative would be approximately 45,128 gpd, or roughly 28 percent less than the Proposed Project's wastewater generation.

Since the projected demands associated with the Reduced Density Alternative are less than the Proposed Project, the same conclusion can be reached that this alternative can be adequately accommodated by the City's wastewater infrastructure and treatment facilities without any significant impact to the environment. Similar to the Proposed Project, the Reduced Density Alternative would result in a less than significant impact upon regional wastewater treatment capacity and local conveyance infrastructure. Compared to the Proposed Project, impacts regarding wastewater generation would be decreased under this alternative.

**Table V.D-14**  
**Reduced Density Alternative Estimated Wastewater Generation**

Type of Use	Quantity (Unit) <sup>a</sup>	Wastewater Generation (gpd/unit) <sup>b</sup>	Total Wastewater Generation (gpd)
<b>Existing Uses – East</b>			
Retail (K-Mart)	131,873 sf	50 gpd/ksf	6,594
Retail (Patio Shops East)	13,090 sf	25 gpd/ksf	327
Restaurant	6,085 sf	300 gpd/ksf	1,826
Commercial/Retail	151,048 sf	50 gpd/ksf	7,552
<b>Existing Wastewater Generation:</b>			<b>7,552</b>
<b>Reduced Density Alternative</b>			
<b>Residential Units (150 total du)</b>			
Two-Bedroom	100 du	150 gpd/du	15,000
Three-Bedroom	50 du	190 gpd/du	9,500
Lease Office <sup>c</sup>	4,370 sf	120 gpd/ksf	524
Fitness Room <sup>d</sup>	1,963 sf	650 gpd/ksf	1,276
Amenity Space <sup>e</sup>	2,100 sf	50 gpd/ksf	105
Club Room <sup>f</sup>	1,577 sf	50 gpd/ksf	79
Pool	800 sf-	-	21,000
Spa <sup>g</sup>	128 sf	-	3,360
Water Feature <sup>h</sup>	16 sf	-	420
<b>Residential Total:</b>			<b>51,264</b>
<b>New Commercial Uses (20,912 total sf)</b>			
Commercial/Retail	20,912 sf	50 gpd/ksf	1,046
<b>Commercial Subtotal:</b>			<b>1,046</b>
<b>Total Reduced Density Alternative Wastewater Generation:</b>			<b>52,680</b>
<i>Minus Existing Wastewater Generation:</i>			<i>-7,552</i>
<b>Net Additional Wastewater Generation:</b>			<b>45,128</b>
<b>Notes:</b> <sup>a</sup> du: dwelling unit, sf: square feet, ksf: one thousand square feet, gpd: gallons per day; <sup>b</sup> Water consumption rates are based on LASAN's Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012. <sup>c</sup> Lease office is considered as "Office Building" for wastewater generation purposes. <sup>d</sup> Fitness Room is considered as "Health Club/Spa" for wastewater generation purposes. <sup>e</sup> Amenity space is considered as "Lounge" for wastewater generation purposes. <sup>f</sup> Club space is considered as "Lounge" for wastewater generation purposes. <sup>g</sup> Spa is considered as "Swimming Pool" for wastewater generation purposes. <sup>h</sup> Water feature is considered as "Swimming Pool" for wastewater generation purposes. <sup>i</sup> Landscaping water demand is based on the Model Water Efficient Landscape Ordinance for estimating the Maximum Applied Water Allowance (LA Green Building Code Sec. 99.04.304). Per the Landscape Composite Plan the Proposed Project's total landscaping area is 7,896 square feet. Source: Parker Environmental Consultants, 2020.			

### (3) Solid Waste

Similar to the Proposed Project, the Reduced Density Alternative would comply with all federal, state and local statutes and regulations related to solid waste and impacts would be less than significant. The Proposed Project's demolition and construction activities are



estimated to generate approximately 13,188 tons of debris. Comparatively, since the Reduced Density Alternative would construct a development with less building floor area, the Reduced Density Alternative would generate less construction and demolition debris. As shown in Table V.D-15, below, the Reduced Density Alternative would generate 13,084 tons of construction and demolition debris, which equates to a roughly one percent decrease in the solid waste material as compared to the Proposed Project.

Similar to the Proposed Project, all construction and demolition debris generated by the Reduced Density Alternative would be delivered to a Certified Construction and Demolition Waste Processing Facility. Similar to the conclusion regarding the Proposed Project, the amount of solid waste generated during construction of the Reduced Density Alternative would fall within the available permitted daily intake capacity of area landfills and recycling centers. Therefore, impacts associated with demolition and construction debris would be similar to the Proposed Project and less than significant.

**Table V.D-15**  
**Estimated Construction and Demolition Debris by the**  
**Reduced Density Alternative**

Construction Activity	Size	Rate (lbs./sf) <sup>a b</sup>	Generated Waste (tons)
<b>Demolition</b>			
Commercial	151,048 sf	155 lbs/sf	11,706
<b>Total Demolition Debris Generation:</b>			<b>11,706</b>
<b>Construction</b>			
Residential (150 dwelling units)	375,000 sf	4.39 lb/sf	823
New Commercial/Retail/Retail	20,912 sf	4.34 lb/sf	45
Parking Areas/Garage	171,600 sf	4.34 lb/sf	372
<b>Total Construction Debris Generation:</b>			<b>1,240</b>
<b>Reduced Density Alternative TOTAL (Demolition and Construction):</b>			<b>12,946</b>
<i>Notes: sf = square feet; lbs = pounds</i> <sup>a</sup> USEPA Report No EPA530-98-010, <i>Characterization of Building Related Construction and Demolition Debris in the United States</i> , July 1998. <sup>b</sup> United States Environmental Protection Agency, <i>Estimating 2003 Building-Related Construction and Demolition Materials Amounts</i> , 2003. <i>Source: Parker Environmental Consultants, 2020.</i>			

Similar to the Proposed Project, operation of the Reduced Density Alternative would cause on-going generation of solid waste throughout the lifespan of this alternative. As discussed in Section IV.K-3, Solid Waste, the Proposed Project would generate approximately 4,101 pounds (2.05 tons) of solid waste per day, or approximately 748 tons per year. Comparatively, as shown in Table V.D-16 below, the Reduced Density Alternative would generate a net decrease of approximately 765 lbs/day of solid waste, when compared to existing conditions. Operational solid waste under the Reduced

Density Alternative would be approximately 3,336 lbs/day less than the solid waste generated by the Proposed Project.

**Table V.D-16**  
**Reduced Density Alternative Estimated Operational Solid Waste Generation**

Type of Use	Size	Solid Waste Generation Rate <sup>a</sup> (lbs/unit/day)	Total Solid Waste Generated (lbs/day)
<b>Existing Uses (to be demolished)</b>			
Commercial (151,048 sf)	314 employees <sup>b</sup>	10.53 lbs/emp/day	3,306
<b>Proposed Project</b>			
Townhouse	150 du	12.23 lbs/du/day	1,835
New Commercial/Retail (20,912 sf)	67 employees <sup>b</sup>	10.53 lbs/emp/day	706
<b>Total Project Solid Waste Generation:</b>			<b>2,541</b>
<i>Less Existing Uses:</i>			<i>(3,306)</i>
<b>NET TOTAL Solid Waste Generation:</b>			<b>(765)</b>
<i>Notes: sf =square feet; du = dwelling units; emp = employees</i> <sup>a</sup> <i>L.A. CEQA Thresholds Guide, page M.3-2. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.</i> <sup>b</sup> <i>Employees were Employment rates based on factors provided in LADOT's City of Los Angeles VMT Calculator Documentation, Table 1: Land Use and Trip Generation Base Assumptions, November 2019.</i> <i>Source: Parker Environmental Consultants, 2020.</i>			

Therefore, similar to the Proposed Project, solid waste impacts under the Reduced Density Alternative would be less than significant. Compared to the Proposed Project, the operational solid waste impacts would be decreased under the Reduced Density Alternative.

#### (4) Electric Power, Natural Gas and Telecommunication Infrastructure

Similar to the Proposed Project, it is not anticipated that any new electric power, natural gas, or telecommunication infrastructure or facilities would be constructed or expanded as a result of the Reduced Density Alternative. Both the Proposed Project and the Reduced Density Alternative would require on-site or minor off-site infrastructure improvements to connect to the existing infrastructure serving the Project area. However, impacts associated with utility upgrades or additional connections would be temporary in nature, and would result in less than significant impacts upon the environment.

## I) Impact Conclusion

As discussed above and summarized in Table V.D-17, below, in comparison to the Proposed Project, the Reduced Density Alternative would have reduced less than significant impacts as compared to the Proposed Project with respect to air quality, energy (electricity, natural gas, transportation fuel), greenhouse gas emissions, population and housing, public services, (fire protection, police protection, schools, parks, libraries), water, wastewater, and solid waste. The Reduced Density Alternative would have similar less-than-significant impacts as compared to the Proposed Project with respect to land use and planning and public services – electric power, natural gas, and telecommunications. Further, the Reduced Density Alternative would result in similar less than significant impacts with mitigation for hazardous materials, as compared to the Proposed Project; with reduced less than significant impacts with mitigation for noise and tribal cultural resources. Furthermore, this alternative would result in less than significant transportation impacts and would not require mitigation, compared to the Proposed Project's less than significant impacts with mitigation.

**Table V.D-17**  
**Reduced Density Alternative Comparative Impact Matrix**

<b>Environmental Impacts</b>	<b>Proposed Project</b>	<b>Reduced Density Alternative</b>
Air Quality	Less Than Significant	Less Than Significant (reduced)
Energy - Electricity	Less Than Significant	Less Than Significant (reduced)
Energy – Natural Gas	Less Than Significant	Less Than Significant (reduced)
Energy - Transportation Energy	Less Than Significant	Less Than Significant (reduced)
Greenhouse Gas Emissions	Less Than Significant	Less Than Significant (reduced)
Hazardous Materials	Less Than Significant with Mitigation	Less Than Significant with Mitigation (reduced)
Land Use and Planning	Less Than Significant	Less Than Significant (same)
Noise	Less Than Significant with Mitigation	Less Than Significant with Mitigation (reduced)
Population and Housing	Less Than Significant	Less Than Significant (reduced)
Public Services - Fire	Less Than Significant	Less Than Significant (reduced)
Public Services - Police	Less Than Significant	Less Than Significant (reduced)
Public Services - Schools	Less Than Significant	Less Than Significant (reduced)
Public Services - Parks and Recreation	Less Than Significant	Less Than Significant (reduced)
Public Services – Libraries	Less Than Significant	Less Than Significant (reduced)
Transportation	Less Than Significant with Mitigation	Less Than Significant (reduced)
Tribal Cultural Resources	Less Than Significant with Mitigation	Less Than Significant with mitigation (reduced)
Public Utilities - Water	Less Than Significant	Less Than Significant (reduced)
Public Utilities - Wastewater	Less Than Significant	Less Than Significant (reduced)
Public Utilities - Solid Waste	Less Than Significant	Less Than Significant (reduced)
Public Utilities - Electric Power, Natural Gas and Telecommunications	Less Than Significant	Less Than Significant (same)
<i>Parker Environmental Consultants, 2020.</i>		

### **3. Relationship of the Reduced Density Alternative to the Project Objectives**

Under the Reduced Density Alternative, similar land uses as the Proposed Project would be developed, but the number of dwelling units would be reduced from 331 to 150 (a reduction of 181 units) and the commercial/retail component would eliminate the 63,082 square-foot supermarket resulting in a total of 20,912 square feet of commercial retail area instead of 83,994 square feet as proposed under the Proposed Project.

The Reduced Density Alternative would meet some of the objectives listed in Section II, Project Description, but not to the same extent as the Proposed Project.

Specifically, the Reduced Density Alternative relates to the objectives as follows:

1. *Provide “smart-growth” infill development that is generally consistent with the zoning and land use designation identified in the Wilshire Community Plan for the Development Site;*

Similar to the Proposed Project, the Reduced Density Alternative would provide a smart-growth infill development with retail and multi-family residential uses that are consistent with the existing zoning and land use designations.

2. *Enhance and activate an existing commercial retail center by replacing a portion of the existing surface parking lot and commercial uses with an economically viable and aesthetically attractive mixed-use development that will be physically and programmatically compatible with the existing on-site uses to remain as well as surrounding uses in the vicinity.*

Similar to the Proposed Project, the Reduced Density Alternative would enhance and activate an existing commercial retail center by replacing a portion of the existing surface parking lot and commercial uses with an aesthetically attractive residential and commercial mixed-use development that would be physically and programmatically compatible with the existing on-site uses to remain, as well as the existing surrounding residential and commercial uses in the Project Site’s vicinity.

3. *Improve the visual appearance and appeal of the neighborhood by replacing older commercial buildings with a modern mid-rise building and providing enhanced streetscape design and pedestrian-oriented amenities.*

Similar to the Proposed Project, the Reduced Density Alternative would improve the visual appearance and appeal of the neighborhood by replacing older buildings with a modern mid-rise building with an enhanced streetscape design and pedestrian-oriented amenities.

4. *Support a reduction in vehicle miles traveled by providing high-density multi-family housing and employment opportunities in a designated Transit Priority Area.*

The Reduced Density Alternative does not provide a high-density multi-family housing opportunity on the Development Site because it reduces dwelling unit density by over 50% (from 331 units to 150 units) on a site designated and zoned to accommodate high-density uses per the LAMC and community plan. Neither would this alternative provide the same extent of employment opportunities, as the Proposed Project, because it would reduce commercial uses by approximately twenty five percent, which in turn results in a net loss of employment opportunities on the Development Site. The Reduced Density Alternative would support a reduction in vehicle miles traveled by providing high-density multi-family housing and employment opportunities in a designated Transit Priority Area. As discussed above, this alternative would generate 1,402 daily trips and a daily VMT of 9,040 miles without mitigation, a reduction of 4,741 ADT and 32,157 VMT as compared to the Proposed Project, and a net reduction of 3,294 ADT and 23,365 VMT as compared to the existing conditions. This alternative would not meet this objective to the same extent as the Proposed Project.

5. *Create an arrangement of land uses and new development that encourage and contribute to the economic, social, and physical health of the residential community in the Wilshire Community Plan area.*

Similar to the Proposed Project, the Reduced Density Alternative would create an arrangement of land uses and new development that encourages and contributes to the economic, social, and physical health of the expanding residential community in the Wilshire Community Plan area. Both the Proposed Project and this alternative would introduce residential uses on a commercial retail site that currently does not support any residential uses. However, this alternative would provide 181 fewer residential units as compared to the Proposed Project.

6. *Create a sustainable neighborhood with scalable design that fits with the unique context of the adjacent on and off-site land uses.*

As with the Proposed Project, the Reduced Density Alternative would create a sustainable neighborhood with scalable design that fits with the unique context of

the adjacent on and off-site land uses, which is composed of primarily community- and regional-serving retail uses, mostly residential communities, and an adjacent public school. The Reduced Density Alternative would be comprised of two- to three level townhome units and single story retail uses at the ground floor. The height of the townhome structures would be a maximum of 35 feet. However, townhomes would not fit, to the same extent as the high-density apartments in the Proposed Project, with the high-intensity commercial context of a currently operating commercial center on the Project Site and with nearby regional-serving commercial and multi-family residential uses. This alternative would there not meet this objective to the same extent as the Proposed Project.

*7 . Maximize the provision of housing units on an urban infill site to increase multi-family housing supply for the City and Wilshire Community Plan area.*

The Reduced Density Alternative would not achieve this objective because it does not maximize housing units on the Development Site. Nor would this alternative increase multi-family housing supply to the same extent as the Proposed Project because it would develop 181 fewer residential units, which is a forty five percent reduction. The Reduced Density Alternative would not develop the amount of dwelling units permitted on the Development Site per the LAMC, and thus it would not maximize the number of housing units within the City and Wilshire Community Plan Area.

## V. Alternatives

### E. Retail/Office Alternative

#### 1. Description of the Retail/Office Alternative

The Retail/Office Alternative would include the demolition of the 151,048 square feet of existing uses on the Development Site and the construction of a mixed-use retail/office project with approximately 30,000 square feet of ground floor commercial space (including approximately 22,500 general commercial/retail space and 7,500 square feet of restaurant space) and 396,994 square feet of office space. The Retail/Office Alternative would not include any residential dwelling units. Under this Alternative, the proposed structure would include two levels of subterranean parking, at-grade retail/restaurant space and three levels of office space. The structure would be four levels above grade with a maximum height of 65 feet. Access to the subterranean parking garage would be through one driveway entering from the adjacent retail parking lot, and two driveways on S. Ogden Drive. The service driveway/loading dock would also be accessed from S. Ogden Drive. A summary of the development program under this alternative is provided below in Table V.E-1, Development Summary for the Retail/Office Alternative. A summary of the code required parking is provided in Table V.E-2, Summary of Required and Proposed Vehicle Parking Spaces for the Retail/Office Alternative, below.

**Table V.E-1**  
**Development Summary for the Retail/Office Alternative**

<i>Land Uses</i>	<i>Floor Area (Square Feet)</i>
<b>Commercial</b>	
<i>General Commercial/Retail Space</i>	<i>22,500 sf</i>
<i>Restaurant</i>	<i>7,500 sf</i>
<i>Subtotal Commercial:</i>	<i>30,000 sf</i>
<b>Office</b>	
<i>General Office</i>	<i>396,994 sf</i>
<b>TOTAL:</b>	<b>426,994 sf (3:1 FAR)</b>
<i>Notes: sf = square feet</i>	



**Table V.E-2**  
**Summary of Required and Proposed Vehicle Parking Spaces**  
**for the Retail/Office Alternative**

Description	Quantity	Parking Required by Code <sup>a, b</sup>		Parking Provided <sup>c</sup>
		Rate	Spaces	
Commercial				
New Commercial/Retail	22,500 sf	4 spaces per 1,000 sf	90	90
New Commercial Restaurant	7,500 sf	1 space per 100 sf	75	75
Office	396,994	1 space per 500 sf	794	794
Surplus Spaces			--	18
Total			959	977
Notes: du = dwelling unit, sf = square feet, <sup>a</sup> Parking calculations based on LAMC Section 12.21.A.4 (c) <sup>b</sup> The Project Site would include a total of 1,147 parking spaces which includes a total of 977 parking spaces on-site for the Retail/Office Alternative plus 150 restriped surface parking spaces for the 63,688 square feet of existing commercial/retail spaces that is to remain in the western portion of the Project Site.				

## 2. Environmental Analysis

### a) Air Quality

#### (1) Construction

##### (a) Regional and Localized Emissions

As the Retail/Office Alternative would use the same construction equipment on a daily basis as the Proposed Project, maximum daily regional and localized construction emissions under this alternative would be the same as the Proposed Project. As the construction schedule would have the same duration as the Proposed Project, the Retail/Office Alternative would generate the same construction emissions compared to the Proposed Project. Therefore, the air quality impacts of the Retail/Office Alternative would be considered the same as the Proposed Project's less than significant impacts.

##### (b) Toxic Air Contaminants

Similar to the Proposed Project, the Retail/Office Alternative's construction TAC emissions would be short-term and would also result in a less than significant impact. Therefore, the TAC impacts under this Alternative would be considered the same as the Proposed Project's less than significant impacts.

## (2) Operation

### (a) Regional and Localized Emissions

The Retail/Office Alternative would include a total of 30,000 square feet of commercial/retail space and 396,994 square feet of office space. The Retail/Office Alternative would not include any residential units or supermarket, as compared to the Proposed Project. As noted under the traffic impacts discussion, below, the Retail/Office Alternative would generate 2,564 less daily trips without mitigation than the Proposed Project with mitigation. This Alternative would generate 1,117 fewer daily trips than under the existing conditions. As such, this alternative's traffic volumes and associated mobile source emissions would be reduced as compared to the Proposed Project. As shown in Table V.E-3, below, the Retail/Office Alternative would result in a net reduction in emissions for all criteria pollutants compared to existing conditions. Similar to the Proposed Project, the Retail/Office Alternative would not violate any air quality standards and would be required to implement all required SCAQMD rules and regulations. By meeting SCAQMD rules and regulations, the Retail/Office Alternative would also be consistent with the goals of the 2016 AQMP. As shown in Table V.E-3, Retail/Office Alternative Estimated Daily Operational Emissions, this Alternative would result in less than significant air quality impacts for all six criteria pollutants, and operational emissions would be reduced as compared to the less than significant operational air quality emissions generated by the Proposed Project.

**Table V.E-3**  
**Retail/Office Alternative Estimated Regional Daily Operational Emissions**

Emissions Source	Peak Emissions in Pounds per Day					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Area	9.72	<0.01	0.14	<0.01	<0.01	<0.01
Energy	0.17	1.58	1.33	<0.01	0.12	0.12
Mobile (Vehicles)	5.35	24.41	61.09	0.23	20.46	5.59
Stationary	3.28	14.68	8.37	0.02	0.48	0.48
<b>Total Retail/Office Alternative Emissions</b>	<b>18.52</b>	<b>40.67</b>	<b>70.93</b>	<b>0.25</b>	<b>21.06</b>	<b>6.19</b>
<i>Less Existing Development Site Emissions</i>	<i>(19.83)</i>	<i>(71.89)</i>	<i>(158.95)</i>	<i>(0.43)</i>	<i>(31.20)</i>	<i>(8.89)</i>
<b>Net Retail/Office Alternative Emissions</b>	<b>(1.31)</b>	<b>(31.22)</b>	<b>(88.02)</b>	<b>(0.18)</b>	<b>(10.14)</b>	<b>(2.70)</b>
<b>SCAQMD Thresholds</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Potentially Significant</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<i>Note: Calculation worksheets are provided in Appendix L to this Draft EIR.</i> <i>Source: Parker Environmental Consultants, 2020.</i>						

(b) *Toxic Air Contaminants*

Similar to the Proposed Project, the Retail/Office Alternative's operational TAC emissions would not support any land uses or activities that would involve the use, storage, or processing of carcinogenic or non-carcinogenic TACs. Therefore, no significant toxic airborne emissions would result from the operation of the Retail/Office Alternative. Similar to the Proposed Project, potential air toxic impacts to sensitive receptors from Project TAC emissions from this Alternative would also be less than significant.

b) **Energy**

(1) **Construction**

As the Retail/Office Alternative would use the same construction equipment on a daily basis as the Proposed Project, energy consumption under this alternative would be the same as the Proposed Project. As the construction schedule would have the same duration as the Proposed Project, the Retail/Office Alternative would consume the same electricity and transportation fuel compared to the Proposed Project during construction. As with the Proposed Project, construction activities would require energy demand that is not wasteful, inefficient, or unnecessary and would not be expected to have an adverse impact on available energy resources. Therefore, the energy consumption impacts of the Retail/Office Alternative would be considered the same as the Proposed Project's less than significant impacts.

(2) **Operation**

(a) *Electricity*

As discussed in Section IV.B, Energy, the estimated net increase in electricity consumption by the Proposed Project would be approximately 3,904,735 kWh/year. As shown in Table V.E-4, below, the estimated net increase in electricity consumption by the Retail/Office Alternative would be approximately 5,474,203 kWh/year, which is roughly 40 percent more energy demand than the Proposed Project. Similar to the Proposed Project, it is not anticipated that any new electricity distribution infrastructure or facilities would be constructed or expanded as a result of the Retail/Office Alternative. Similar to the Proposed Project, the Retail/Office Alternative would comply with the L.A. Green Building Code and Title 24 energy efficiency requirements and the increase energy demand would still be well within the energy service providers capacity to service this alternative. The projected increase in electrical demand due to the Proposed Project was concluded not to have an adverse impact on electrical resources. Energy supplies are

adequate to serve the Proposed Project and the installation of needed new infrastructure would not be expected to result in any significant secondary environmental effects. Although the Retail/Office Alternative would demand more electricity than the Proposed Project, impacts from this alternative are expected to increase as compared to the Proposed Project, but would also result in less than significant impacts. Like the Proposed Project, the Retail/Office Alternative would comply with L.A. Green Building Code and Title 24 energy efficiency requirements and incorporate eco-friendly building materials, systems, and features, including Energy Star appliances, water saving and low-flow fixtures, non-VOC paints and adhesives, drought tolerant planting, and high performance building envelopment. With these modern energy-efficient fixtures and appliances, the Retail/Office Alternative would promote energy conservation in accordance with the policies identified in Title 24, the LA Green Building Code, L.A's Green New Deal - Sustainable City pLAn 2019, LADWP's 2017 SLTRP, and the City of Los Angeles General Plan Framework. It should be noted that the estimate of the Proposed Project's energy use is conservative, as it only factors in compliance with 2016 Title 24 Standards. Accordingly, as with the Proposed Project, the consumption of electricity under the Retail Office Alternative would not be wasteful, inefficient, or unnecessary.

**Table V.E-4**  
**Estimated Electricity Demand by Retail/Office Alternative**

Land Use	Size	Total Electricity Demand (kWh/year) <sup>a</sup>
<b>Existing Uses</b>		
Regional Shopping Center	144,963 sf	2,313,610
Quality Restaurant	6,085 sf	294,027
<b>Total Existing Electricity Demand:</b>		<b>2,607,637</b>
<b>Retail/Office Alternative</b>		
Office	396,994 sf	5,156,950
Restaurant	7,500 sf	331,050
Commercial/Retail	22,500 sf	303,750
Parking Lot	977 spaces	2,290,090
<b>Total Retail/Office Electricity Demand:</b>		<b>8,081,840</b>
<i>Existing Electricity Demand (to be demolished):</i>		<i>(2,607,637)</i>
<b>NET TOTAL Electricity Demand:</b>		<b>5,474,203</b>
<p><i>Notes: sf =square feet; du = dwelling unit; kWh = kilowatt-hour</i></p> <p><sup>a</sup> SCAQMD, CalEEMod Version 2016.3.2, See Appendix L to this Draft EIR.</p> <p><sup>b</sup> Five percent of total spaces would be EV-ready (49 spaces). It is estimated that one Level 1 charging station consumes 867 kWh/year of electricity for drivers who commute average 10 miles one way. Source: U.S. Department of Energy, Level 1 Electric Vehicle Charging Stations at the Workplace, page 8, July 2016.</p> <p>Source: Parker Environmental Consultants, 2020.</p>		

(b) *Natural Gas*

The Proposed Project's net natural gas demands are estimated to be approximately 4,505,873 kBTU/year, or approximately 367,981 cf/month. As shown in Table V.E-5, below, the estimated net increase in natural gas demands by the Retail/Office Alternative would be approximately 4,210,457 kBTU/year, or 343,855 cf/month, which is roughly 7 percent less than the natural gas demand of the Proposed Project. Therefore, impacts associated with natural gas consumption under this alternative would be less than significant and reduced compared to the Proposed Project. Accordingly, as with the Proposed Project, the consumption of natural gas under the Retail/Office Alternative would not be wasteful, inefficient, or unnecessary.

**Table V.E-5**  
**Estimated Net Natural Gas Demand by Retail/Office Alternative**

Land Use	Size	Total Natural Gas Demand (kBTU/yr) <sup>a</sup>	Total Natural Gas Demand (cf/month) <sup>b</sup>
<b>Existing Uses</b>			
Regional Shopping Center	144,963 sf	263,833	21,546
Quality Restaurant	6,085 sf	1,426,020	116,548
<b>Total Existing Natural Gas Demand:</b>		<b>1,689,853</b>	<b>138,004</b>
<b>Retail/Office Alternative</b>			
Office	396,994 sf	4,132,710	337,505
Restaurant	7,500 sf	1,730,700	141,341
Commercial/Retail	22,500 sf	36,900	3,014
<b>Total Retail/Office Natural Gas Demand:</b>		<b>5,900,310</b>	<b>481,859</b>
<i>Less Existing Natural Gas Demand:</i>		<i>-1,689,853</i>	<i>-138,004</i>
<b>NET TOTAL Natural Gas Demand:</b>		<b>4,210,457</b>	<b>343,855</b>
<i>Notes: sf =square feet; du = dwelling unit</i> <sup>a</sup> SCAQMD, CalEEMod Version 2016.3.2, See Appendix L of this Draft EIR. <sup>b</sup> 1kBTU is equivalent to 0.98 cubic feet of natural gas. Source: Parker Environmental Consultants, 2020.			

(c) *Transportation Energy*

The Proposed Project's net transportation energy demands are estimated to be approximately 23,118 gallons of diesel and 158,436 gallons of gasoline per year. As shown in Table V.E-6, below, the estimated net transportation energy by the Retail/Office Alternative would result in a net decrease of approximately 32,114 gallons of diesel and 188,979 gallons of gasoline per year, when compared to existing conditions, which is less transportation energy demand than the Proposed Project. It is anticipated that the Retail/Office Alternative operational transportation fuel demand would represent an overall decrease in diesel and gasoline fuel use when compared to existing conditions,

whereas the Proposed Project would result in a net increase in transportation fuel use over existing conditions. As such, the transportation fuel consumption associated with this alternative's vehicle trips during operation would represent a negligible amount of oil compared to the total amount of oil supplied to California and fuel sales in Los Angeles County. Additionally, vehicles are expected to comply with CAFE standards and CARB's Advanced Clean Cars Program, which would reduce transportation fuel consumption. Furthermore, as with the Proposed Project, the Retail/Office Alternative would be located in proximity to public transit and would incorporate features to reduce vehicle trips, thereby reducing transportation fuel usage. Therefore, the Retail/Office Alternative's transportation energy consumption and demand would not be wasteful, inefficient, or unnecessary. As such, impacts associated with transportation energy consumption under the Retail/Office Alternative would be less than significant and would be reduced compared to the Proposed Project.

**Table V.E-6**  
**Estimated Transportation Energy Consumption by the Retail/Office Alternative**

	<b>Annual VMTs (miles) <sup>a</sup></b>	<b>Fuel Rate (mpg) <sup>b</sup></b>	<b>Total Fuel Demand (gallons/year)</b>
<b>Diesel</b>			
Existing (to be demolished)	(695,236)	9.09	<b>(76,484)</b>
Retail/Office Alternative	476,537	10.74	<b>44,370</b>
<b>Net Diesel Consumption:</b>			<b>(32,114)</b>
<b>Gasoline</b>			
Existing (to be demolished)	(10,892,028)	23.27	<b>(468,072)</b>
Retail/Office Alternative	7,465,741	26.75	<b>279,093</b>
<b>Net Gasoline Consumption:</b>			<b>(188,979)</b>
<i>Notes: VMTs = vehicle miles traveled; mpg = miles per gallon</i> <sup>a</sup> Appendix E, Greenhouse Gas Emissions: Total Annual VMTs from Operational Mobile; It is assumed that 94% of VMTs are associated with gasoline-powered vehicles and 6% of VMTs are associated with diesel-powered vehicles. <sup>b</sup> Fuel efficiency estimates were based on EMFAC2017 (v1.0.2) Emissions Inventory data. See Appendix D, Energy Demand Worksheets. Parker Environmental Consultants, 2020.			

## c) Greenhouse Gas Emissions

### (1) Construction

The Retail/Office Alternative would have the same general construction activities on a daily basis as the Proposed Project. Since this alternative includes the same floor area as the Proposed Project, but with different land uses, the Retail/Office Alternative would

overall generate the same greenhouse gas emissions during construction compared to the Proposed Project. Similar to the Proposed Project, the Retail/Office Alternative would result in a less than significant impact, and construction GHG emissions would be similar compared to the Proposed Project.

## (2) Operation

The Proposed Project would include a total of 331 dwelling units and 83,994 square feet of ground floor commercial uses. By comparison, the Retail/Office Alternative includes 396,994 square feet of office space and 30,000 square feet of commercial/retail space. This alternative includes the same floor area as the Proposed Project, but with different land uses. The Retail/Office Alternative would comply with the same energy efficiency requirements of the L.A. Green Building Code, as applicable for a mixed-use office and commercial project. On-site operations would be required to comply with applicable local, state, and federal regulations governing energy efficiency. With respect to operational GHG emissions from mobile sources, the Retail/Office Alternative would result in 2,564 less average daily trips as compared to the Proposed Project. Thus, the operational GHG emissions associated with vehicles traveling to and from the Development Site during the operation of the Retail/Office Alternative would be reduced, as compared to the Proposed Project.

As discussed in Section IV.C, Greenhouse Gas Emissions, the Proposed Project's annual generation of GHG emissions is estimated to be 10,782 CO<sub>2</sub>e MTY with a net annual increase 3,384 CO<sub>2</sub>e MTY when compared to existing conditions. As shown in Table V.E-7, below, the Retail/Office Alternative's estimated annual GHG is 9,067 CO<sub>2</sub>e MTY with a net annual GHG emissions increase of 1,669 CO<sub>2</sub>e MTY, when compared to existing conditions. When compared to the Proposed Project, the Retail/Office Alternative's GHG emissions would be approximately 64 percent less than the Proposed Project's net GHG emissions. With compliance with the City's Green Building Code and the implementation of appropriate sustainability features, it is anticipated that the Retail/Office Alternative would also be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans, including SCAG's RTP/SCS. Compared to the Proposed Project, the Retail/Office Alternative would have reduced impacts relating to GHG emissions. As with the Proposed Project, the Retail/Office Alternative would result in a less than significant impact.

**Table V.E-7**  
**Retail/Office Alternative Operational Greenhouse Gas Emissions**

<b>Emissions Source</b>	<b>CO<sub>2</sub>e Emissions (Metric Tons per Year)</b>
Area	<1
Energy	4,827
Mobile	3,309
Stationary	9
Waste	61
Water	773
Construction (amortized)	88
<b>Total Retail/Office Alternative:</b>	<b>9,067</b>
<i>Less Existing Project Site:</i>	<i>(7,398)</i>
<b>NET Retail/Office Alternative Emissions:</b>	<b>1,669</b>
<i>Calculation data and results provided in Appendix L to this Draft EIR.</i>	

#### d) Hazardous Materials and Risk of Upset

##### (1) Construction

The K-Mart, located on the Project Site, is identified on the HAZNET databases. The K-Mart is listed as generating hazardous waste under manifest from 1995 through 2015. The Retail/Office Alternative would require similar construction activities and soil disturbance impacts as the Proposed Project. As with the Proposed Project, the Retail/Office Alternative's adherence to applicable regulatory compliance measures (i.e. Cal-OSHA regulations, SCAQMD Rule 1166, NPDES permit) and incorporation of Project Design Features PDF-HAZ-1 (Methane) and MM-HAZ-1 (Soil Management Plan), discussed in Section IV.D, Hazardous Materials/Risk of Upset that would ensure any potential hazardous impacts during the construction phase would be less than significant. Additionally, the Hancock Park Elementary School would be considered a sensitive receptor regarding hazardous materials exposure. Similar to the Proposed Project, adherence to all applicable rules and regulations during construction, which are detailed in Section IV.D, Hazardous Materials/Risk of Upset would ensure potential impacts associated with the Retail/Office Alternative's potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of the Hancock Park Elementary School would be less than significant. When compared to the Proposed Project, the Retail/Office Alternative would have similar less than significant impacts upon hazards and risk of upset.



## (2) Operation

Similar to the Proposed Project, no hazardous materials other than modest amounts of typical cleaning supplies and solvents used for janitorial purposes would routinely be transported to the Project Site during the operation of the Retail/Office Alternative. The use of these substances would comply with applicable State Health Codes and Regulations. The operation of the mixed-use office and commercial land uses would not use, transport, or require the disposal of hazardous materials. The Retail/Office Alternative would not routinely transport, use, or disposal of hazardous materials in the normal course of operations. The Retail/Office Alternative would comply with current regulations set by the LADBS pursuant to Table 71 of Ordinance 175,790, Minimum Methane Mitigation Requirements. When compared to the Proposed Project's less than significant impacts, the Retail/Office Alternative's operation would have a similar less than significant impact upon hazards and risk of upset.

## e) Land Use and Planning

Similar to the Proposed Project, the Retail/Office Alternative would require Site Plan Review. Similar to the Proposed Project, the Retail/Office Alternative would be in conformance with applicable provisions of the LAMC. As with the Proposed Project, the Retail/Office Alternative would also not conflict with local and regional plans applicable to the Project Site. Consistent with the allowable 1.5:1 FAR, and similar to the Proposed Project, the Office/Retail Alternative would include a total of 426,994 square feet of new construction. Since the Retail/Office Alternative would comply with the permitted land use and existing zoning requirements, the Retail/Office Alternative would also be generally consistent with the overall intent of the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site, including Southern California Association of Governments' (SCAG) regional plans, the General Plan Framework Element, the Wilshire Community Plan, and the LAMC. Land use impacts would be less than significant under this alternative. Therefore, the Retail/Office Alternative would result in similar land use impacts to the Proposed Project's less than significant impacts.

## f) Noise

### (1) Construction

As discussed in Section IV.F, Noise, the construction-related noise and groundborne vibration impacts associated with the Proposed Project would be reduced to less than significant with the incorporation of Mitigation Measures MM-NOI-1 through MM-NOI-3 and Project Design Features PDF-NOI-1 and PDF-NOI-2. The maximum day-to-day

noise levels during active construction periods are anticipated to be the same as the Proposed Project under the Retail/Office Alternative. The same construction code compliance requirements identified in Section IV.F, Noise, would also be applicable to this alternative. Thus, construction noise and vibration impacts under the Retail/Office Alternative would have similar construction noise levels as compared to the Proposed Project's less than significant impacts with mitigation.

## (2) Operation

The operational noise generated under the Retail/Office Alternative would be typical of office and commercial land uses. The Retail/Office Alternative's noise levels associated with outdoor noise sources, on-site mechanical equipment, and parking garage noise would be less than significant, similar to the Proposed Project. Outdoor noise associated with outdoor open space use areas such as courtyards would be eliminated as the retail/office use would not include residential amenity areas. With respect to operational noise from mobile sources, the Retail/Office Alternative would result in 2,564 fewer average daily trips as compared to the Proposed Project with mitigation. Thus, operational noise under the Retail/Office Alternative would have reduced impacts compared to the Proposed Project's less than significant impacts.

## g) Population and Housing

As discussed in Section IV.G, Population and Housing, the Proposed Project would be consistent with the SCAG 2016-2040 RTP/SCS growth projections with respect to population, housing, and employment. The Retail/Office Alternative would include a total of 426,994 square feet of office/commercial space and no residential uses. The Retail/Office Alternative would not directly induce substantial unplanned population growth, since this alternative would not provide any new housing. Compared to the Proposed Project, the Retail/Office Alternative would have a reduced impact related to population and housing.

The Proposed Project would provide a net increase of approximately five jobs, compared to existing on-site activities. Table V.E-8, below, shows that the Retail/Office Alternative would generate a net increase of 1,349 employees. As discussed in Section IV.G, Population and Housing, it is estimated that the City's employment would increase by approximately 67,529 additional jobs from 2019 to 2023. The Retail/Office Alternative estimated employment generation would therefore be within the SCAG 2016-2040 RTP/SCS employment growth projections. When compared to the Proposed Project, the Retail/Office Alternative would have an increase with respect to employment growth. Thus, the 1,349 net new employees generated under this Alternative would constitute approximately 1.9 percent of the employment growth forecasted between 2018 and 2022.

Therefore, the Retail/Office Alternative would not cause an exceedance of SCAG's employment projections or induce substantial unplanned population growth. Impacts related to employment growth under the Retail/Office Alternative would also be less than significant, similar to the Proposed Project.

**Table V.E-8  
Retail/Office Alternative Estimated Employee Generation**

<b>Land Use</b>	<b>Quantity Proposed</b>	<b>Employment Generation Rates <sup>a</sup></b>	<b>Total Employees</b>
<b>Existing Uses to be Demolished</b>			
Community Retail	144,963 sf	2 employees / 1,000 sf	290
Restaurant	6,085 sf	4 employees / 1,000 sf	24
<b>Subtotal</b>	151,048 sf		<b>314</b>
<b>Retail/Office Alternative</b>			
Commercial Retail	22,500 sf	2 employees / 1,000 sf	45
Restaurant	7,500 sf	4 employees / 1,000 sf	30
Office	396,994 sf	4 employees / 1,000 sf	1,588
<b>Subtotal</b>	426,994 sf		<b>1,663</b>
<b>Retail/Office Alternative Employees</b>			<b>1,663</b>
<i>Less Existing Employees</i>			<i>-314</i>
<b>Net Total Employees</b>			<b>1,349</b>
<b>Notes:</b>			
<sup>a</sup> Employment rates based on factors provided in LADOT's City of Los Angeles VMT Calculator Documentation, Table 1: Land Use and Trip Generation Base Assumptions, November 2019. Source: Parker Environmental Consultants, 2020.			

## h) Public Services

### (1) Construction

#### (a) Fire

The Proposed Project was found to have a less than significant construction impacts on fire protection services. Since the Retail/Office Alternative would involve the same level of construction activity with respect to demolition and new construction and the same anticipated construction timeline, construction impacts under this Alternative would be the same as the less than significant construction impacts that would occur under the Proposed Project.

#### (b) Police

The Proposed Project was found to have a less than significant construction impacts on police protection services. Since the Retail/Office Alternative would involve the same level of construction activity with respect to demolition and new construction and the same

anticipated construction timeline, construction impacts under this Alternative would be the same as the less than significant construction impacts that would occur under the Proposed Project.

(c) *Schools*

The Proposed Project was found to have a less than significant construction impacts on schools. Since the Retail/ Office Alternative would involve the same level of construction activity with respect to demolition and new construction and the same anticipated construction timeline, construction impacts under this Alternative would be the same as the less than significant construction impacts that would occur under the Proposed Project.

(d) *Parks*

The Proposed Project was found to have a less than significant construction impacts on parks. Since the Retail/Office Alternative would involve the same level of construction activity with respect to demolition and new construction and the same anticipated construction timeline, construction impacts under this Alternative would be the same as the less than significant construction impacts that would occur under the Proposed Project.

(e) *Libraries*

The Proposed Project was found to have a less than significant construction impacts on libraries. Since the Retail/Office Alternative would involve the same level of construction activity with respect to demolition and new construction and the same anticipated construction timeline, construction impacts under this Alternative would be the same as the less than significant construction impacts that would occur under the Proposed Project.

(2) *Operation*

(a) *Fire*

The Proposed Project was found to have a less than significant operational impacts on fire protection services. The Retail/Office Alternative would generate an on-site population of 1,349 employees, whom would generally only occupy the site during daytime business hours. Compared to the Proposed Project, the impacts on fire protection services would decrease. Because these impacts are primarily based on residential service population, this alternative would have reduced impacts with respect to fire protection services.

This alternative would also implement similar site design features and would be subject to the City's routine plan review process, which includes a review by the LAFD to ensure that sufficient security measures, fire flow, and site accessibility standards are implemented to reduce additional demands on fire protection services. The Retail/Office Alternative would have reduced impacts on fire protection services as compared to the Proposed Project's less than significant impacts. The Retail/Office Alternative, like the Proposed Project, would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives related to fire protection.

*(b) Police*

The Proposed Project was found to have a less than significant operational impacts on police protection services. The Retail/Office Alternative would generate an on-site population of 1,349 employees, whom would generally only occupy the site during daytime business hours. Compared to the Proposed Project, the impacts on police protection services would decrease. Because impacts to police services are primarily based on residential and on-site service population, this alternative would have reduced impacts with respect to police protection services. This alternative would also implement the use of on-site and private security provisions to reduce the potential effects of the Retail/Office Alternative on the need for police services. The Proposed Project was found to have a less than significant operational impacts on police protection services. The Retail/Office Alternative, like the Proposed Project, would not result in substantial adverse physical impacts associated with the provision of new or physically altered LAPD facilities, need for new or physically altered LAPD facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives related to police protection.

*(c) Schools*

The Proposed Project was found to have a less than significant operational impacts on schools. As shown in Table V-E-9, below, the Retail/Office Alternative would generate a net increase of 304 students, with 167 elementary students, 46 middle school students and 91 high school students. Compared to the Proposed Project, which would generate a total of 139 net new students, the impacts on school services would increase. Similar to the Proposed Project, pursuant to SB 50 the Retail/Office Alternative would be required to pay developer fees to the LAUSD to off-set the impacts of any increase to student enrollment. The Retail/Office Alternative, like the Proposed Project, would not result in

**Table V.E-9  
Retail/Office Alternative Estimated Student Generation**

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total Students
<b>Existing Uses (to be removed)</b>					
Commercial (151,048 sf) <sup>b</sup>	314 emp	39	11	21	71
<b>Total Existing Students:</b>		<b>39</b>	<b>11</b>	<b>21</b>	<b>71</b>
<b>Retail/Office Alternative</b>					
Commercial Retail (22,500 sf) <sup>b</sup>	45 emp	6	2	3	11
Restaurant (7,500 sf) <sup>b</sup>	30 emp	4	1	2	7
Office (396,994 sf) <sup>b</sup>	1,588 emp	196	54	107	357
<b>Total Alternative Student Generation:</b>		<b>206</b>	<b>57</b>	<b>112</b>	<b>375</b>
<i>Less Existing Students:</i>		<i>-39</i>	<i>-11</i>	<i>-21</i>	<i>-71</i>
<b>NET Student Generation:</b>		<b>167</b>	<b>46</b>	<b>91</b>	<b>304</b>
<p><i>Notes: sf = square feet; du = dwelling units; emp = employees</i></p> <p><sup>a</sup> <i>It is assumed that 0.2249 students are generated per employee (Table 15 of the 2018 Developer Fee Justification Study). Since the LAUSD Developer Fee Justification Study does not specify the grade levels of students that are generated from non-residential land uses, the total number of students was divided among the elementary, middle, and high schools with the same ratio as the residential generation (55% elementary school, 15% middle school, and 30% high school).</i></p> <p><i>Source: Los Angeles Unified School District, 2018 Developer Fee Justification Study, March 2018.</i></p>					

substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives related to schools.

*(d) Parks*

The Proposed Project was found to have a less than significant operational impacts on recreation and park services. The Retail/Office Alternative would generate an on-site population of 1,349 employees, whom would generally only occupy the site during daytime business hours. Since the Retail/Office Alternative would provide no residential uses, impacts to recreation and park facilities would be reduced as compared to the Proposed Project's less than significant impacts. Because these impacts are primarily based on residential service population, this alternative would have reduced impacts as compared to the Proposed Project. The Retail/Office Alternative, like the Proposed Project, would not result in substantial adverse physical impacts associated with the provision of new or physically altered recreation or park facilities, need for new or physically altered park facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives related to park facilities.

(e) *Libraries*

The Proposed Project was found to have a less than significant operational impacts on library services. The Retail/Office Alternative would generate an on-site population of 1,349 employees, whom would generally only occupy the site during daytime business hours. Demands for library services are primarily based on residential service population. Since the Retail/Office Alternative would provide no residential uses, impacts to library facilities would be reduced as compared to the Proposed Project's less than significant impacts. The Retail/Office Alternative, like the Proposed Project, would not result in substantial adverse physical impacts associated with the provision of new or physically altered recreation or library facilities, need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives related to library facilities.

i) **Transportation**

(1) **Construction**

The Retail/Office Alternative would involve the same level of construction activity as compared to the Proposed Project with respect to demolition, soil export, and new construction. Similar to the Proposed Project, a Construction Traffic Control/ Management Plan would be submitted to LADOT for review and approval prior to the start of any construction work (see PDF-TRAFFIC-1). The construction work site traffic control plan would show the location of any traffic detours, haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. The Retail/Office Alternative would also implement Project Design Features PDF-TRAFFIC-2 through PDF-TRAFFIC-3 to reduce and minimize this alternative's potential for temporary traffic disruptions during construction. As such, the construction traffic impacts under this alternative would be similar as compared to the Proposed Project's less than significant impacts.

(2) **Operation**

The Retail/Office Alternative would not include a residential component and would include 396,994 square feet of office space and 30,000 square feet of commercial/retail space. The proposed driveways and internal circulation of this Alternative would be similar to the Proposed Project. Similar to the Proposed Project the Retail/Office Alternative would not conflict with applicable sections, policies or programs of the LAMC, the Mobility Plan 2035, the Transit Oriented Community Guidelines; the Citywide Design Guidelines; the Vision Zero Action Plan; and the Manual of Policies and Procedures Driveway Design Section 321. The Retail/Office Alternative would not introduce hazardous design features,

and similar to the Proposed Project, a less than significant impact would occur. In addition, similar to the Proposed Project, the Retail/Office Alternative would not interfere with emergency access and impacts would be less than significant.

As concluded in Section IV.I, Transportation, the addition of the Proposed Project's trips and VMT would create a significant Household VMT impact prior to the implementation of mitigation. The Proposed Project would incorporate Mitigation Measure MM-TRAFFIC-1 in order to reduce Household VMT per capita to below the VMT threshold for the Central Area Planning Commission (APC), and therefore, impacts would be less than significant with mitigation. The Proposed Project is expected to generate 6,143 daily vehicle trips, a daily VMT of 41,197 miles, and a Household VMT per capita of 5.8 miles after mitigation. As shown in Table V.E-10, below, the Retail/Office Alternative would generate 3,579 daily vehicle trips and a daily VMT of 26,175 miles without mitigation, which represents 2,564 fewer daily trips and 15,022 fewer VMT than the Proposed Project and 1,117 fewer daily trips and 6,230 fewer VMT as compared to existing conditions. This alternative would overall have reduced impacts compared to the Proposed Project. As discussed in the VMT Analysis for the Retail/Office Alternative (Appendix L to this Draft EIR), this alternative would have a less than significant VMT impacts without mitigation. As such, the traffic impacts under this alternative would be reduced as compared to the Proposed Project's less than significant impacts with mitigation.

**Table V.E-10**  
**VMT Comparison of the Existing Conditions,**  
**Proposed Project, and the Retail/Office Alternative**

<b>Comparative Scenarios</b>	<b>Daily Trips</b>	<b>Daily VMT</b>
Existing Conditions	4,696	32,405
Proposed Project with Mitigation	6,143	41,197
Retail/Office Alternative	3,579	26,175
<i>Source: Linscott, Law &amp; Greenspan, Engineers, Retail/Office Alternative, February 5, 2020 (Appendix L to this Draft EIR).</i>		

## j) Tribal Cultural Resources

As discussed in Section IV.J, Tribal Cultural Resources, there is no evidence of any known tribal cultural resources recorded on the Project Site. However, mitigation measures are included given the potential level of sensitivity of the area and its proximity to a asphaltum source, the prehistoric Native American remains found at the La Brea Tar Pits, and the types of alluvium sediments in the area that are capable of preserving tribal cultural resources. The mitigation measures have been recommended for the Proposed Project to protect potential tribal cultural resources in the unlikely event that such resources are encountered during construction. Accordingly, with incorporation of these



mitigation measures, and adherence to applicable regulations with regards to discovering human remains, the Proposed Project would have a less-than-significant impact upon California Native American tribal cultural resources.

The Retail/Office Alternative would involve the same levels of earthwork and grading activity as the Proposed Project. As such, the Retail/Office Alternative would incorporate the same Mitigation Measures, MM-TCR-1 through MM-TCR-4, from the Tribal Cultural Resources Assessment to protect potential tribal cultural resources in the unlikely event that such resources are encountered during construction. Similar to the Proposed Project, the Retail/Office Alternative would result in similar less than significant impacts upon tribal cultural resources.

## k) Utilities and Service Systems

### (1) Water

#### *(a) Construction*

The Proposed Project was found to have a less than significant construction impacts on water services. Similar to the Proposed Project, the Retail/Office Alternative would not require or result in the relocation or construction of new or expanded water treatment facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects. Construction impacts under this Alternative would be the same as the less than significant construction impacts that would occur under the Proposed Project.

#### *(b) Operation*

Impacts associated with local water conveyance and infrastructure upgrades are anticipated to be similar under the Retail/Office Alternative as compared to the Proposed Project and would be less than significant. Under the Proposed Project, the anticipated water demand is expected to result in a net increase of 63,022 gallons per day or approximately 70.6 acre-feet of water per year. Comparatively, as shown in Table V.E-11, below, the net water demand associated with the Retail/Office Alternative would be approximately 41,957 gpd or 47.04 acre-feet per year, which is roughly 33 percent less than the Proposed Project's water demand.

**Table V.E-11  
Retail/Office Alternative Estimated Water Demand**

Retail/Office Alternative Estimated Water Demand				
Type of Use	Quantity (Unit) <sup>a</sup>	Water Use (gpd/unit) <sup>b</sup>	Proposed Water Demand (gpd) (AFY)	
Existing Uses to be Demolished				
Commercial/Retail	151,048 sf	50 gpd/ksf	7,552	8.46
Existing Water Demand:			7,552	8.46
Retail/Office Alternative				
New Commercial Uses (426,994 total sf)				
New Commercial/Retail	30,000 sf	50 gpd/ksf	1,500	1.68
Office	396,994 sf	120 gpd/ksf	47,639	53.40
Landscaping <sup>c</sup>			370	0.42
Total Retail/Office Alternative Water Demand:			49,509	55.5
Minus Existing Demand:			-7,552	-8.46
Net Additional Water Demand:			41,957	47.04
Notes:				
<sup>a</sup> du: dwelling unit, sf: square feet, ksf: one thousand square feet, gpd: gallons per day; AFY: acre feet per year.				
<sup>b</sup> Water consumption rates are based on LASAN's Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012.				
<sup>c</sup> Landscaping water demand is based on the Model Water Efficient Landscape Ordinance for estimating the Maximum Applied Water Allowance (LA Green Building Code Sec. 99.04.304). Per the Landscape Composite Plan this Alternative's total landscaping area is 7,896 square feet.				
Source: Parker Environmental Consultants, 2020.				

As discussed in Section IV.K-1, Water Supply, the 2015 UWMP has evaluated the City's water supply in comparison to the 2012 RTP growth projections and has determined that the City has adequate capacity to serve the anticipated growth in the region. Similar to the Proposed Project, because the Retail/Office Alternative would not exceed the planned employment growth projections for SCAG's growth projections in the 2012 RTP/SCS for the Los Angeles subregion, the projected demands associated with this alternative can be accommodated by the City's water supply. Therefore, similar to the Proposed Project, the Retail/Office Alternative would result in less than significant impacts. Compared to the Proposed Project, impacts regarding future water demands would be increased under this alternative.

## (2) Wastewater

### (a) Construction

The Proposed Project was found to have a less than significant construction impacts on wastewater services. Similar to the Proposed Project, the Retail/Office Alternative would not require or result in the relocation or construction of new or expanded wastewater treatment facilities or expansion of existing facilities, the construction or relocation of

which could cause significant environmental effects. Construction impacts under this Alternative would be the same as the less than significant construction impacts that would occur under the Proposed Project.

(b) *Operation*

As concluded in Section IV.K-2, Wastewater, the existing local wastewater infrastructure would be expected to adequately serve the Proposed Project and the anticipated wastewater flows would be less than significant and within the treatment capacity of the HWRP. Under the Proposed Project, the anticipated wastewater generation is expected to result in a net increase of 63,022 gpd. Comparatively, as shown in Table V.E-12, below, the net wastewater generation associated with the Retail/Office Alternative would be approximately 41,587 gpd, or roughly 34 percent less than the Proposed Project's wastewater generation.

With respect to anticipated wastewater generation, the Retail/Office Alternative would result in a decrease in wastewater generation as compared to the Proposed Project. As such, the same conclusion can be reached that this alternative can be adequately accommodated by the City's wastewater infrastructure and treatment facilities without any significant impact to the environment. Similar to the Proposed Project, the Retail/Office Alternative would result in a less than significant impact upon regional wastewater treatment capacity and local conveyance infrastructure. Compared to the Proposed Project, impacts regarding future wastewater generation would be increased under this alternative.

**Table V.E-12**  
**Retail/Office Alternative Estimated Wastewater Generation**

Type of Use	Quantity (Unit) <sup>a</sup>	Wastewater Generation (gpd/unit) <sup>b</sup>	Total Wastewater Generation (gpd)
<b>Existing Uses - East</b>			
Commercial/Retail	151,048 sf	50 gpd/ksf	7,552
<b>Existing Wastewater Generation:</b>			<b>7,552</b>
<b>Retail/Office Alternative</b>			
<b>New Commercial Uses</b>			
New Commercial/Retail	30,000 sf	50 gpd/ksf	1,500
Office	396,994 sf	120 gpd/ksf	47,639
<b>Total Retail/Office Alternative Wastewater Generation:</b>			<b>49,139</b>
<i>Minus Existing Wastewater Generation:</i>			<i>-7,552</i>
<b>Net Additional Wastewater Generation:</b>			<b>41,587</b>
<i>Notes:</i> <sup>a</sup> du: dwelling unit, sf: square feet, ksf: one thousand square feet, gpd: gallons per day; <sup>b</sup> Water consumption rates are based on LASAN's Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012. Source: Parker Environmental Consultants, 2020.			

### (3) Solid Waste

Similar to the Proposed Project, the Retail/Office Alternative would comply with all federal, state and local statutes and regulations related to solid waste and impacts would be less than significant. The Proposed Project's demolition and construction activities are estimated to generate approximately 13,188 tons of debris. Comparatively, since the Retail/Office Alternative would construct a development with the same building floor area, the Retail/Office Alternative would generate almost the same construction and demolition debris. As shown in Table V.E-13, below, the Retail/Office Alternative would generate 13,042 tons of construction and demolition debris, which is 8 tons less than what would be generated under the Proposed Project.

Similar to the Proposed Project, all construction and demolition debris generated by the Retail/Office Alternative would be delivered to a Certified Construction and Demolition Waste Processing Facility. Similar to the conclusion regarding the Proposed Project, the amount of solid waste generated during construction of the Retail/Office Alternative would fall within the available permitted daily intake capacity of area landfills and recycling centers. Therefore, impacts associated with demolition and construction debris would be similar to the Proposed Project and less than significant.

**Table V.E-13**  
**Estimated Construction and Demolition Debris by the**  
**Retail/Office Alternative**

Construction Activity	Size	Rate (lbs./sf) <sup>a b</sup>	Generated Waste (tons)
<b>Demolition</b>			
Commercial	151,048 sf	155 lbs/sf	11,706
<b>Total Demolition Debris Generation:</b>			<b>11,706</b>
<b>Construction</b>			
New Commercial/Retail/Retail	426,994 sf	4.34 lb/sf	927
Parking Garage	188,400 sf	4.34 lb/sf	409
<b>Total Construction Debris Generation:</b>			<b>1,336</b>
<b>Retail/Office Alternative TOTAL (Demolition and Construction):</b>			<b>13,042</b>
<i>Notes: sf = square feet; lbs = pounds</i> <sup>a</sup> USEPA Report No EPA530-98-010, <i>Characterization of Building Related Construction and Demolition Debris in the United States</i> , July 1998. <sup>b</sup> United States Environmental Protection Agency, <i>Estimating 2003 Building-Related Construction and Demolition Materials Amounts</i> , 2003 <i>Source: Parker Environmental Consultants, 2020.</i>			

Similar to the Proposed Project, operation of the Retail/Office Alternative would cause on-going generation of solid waste throughout the lifespan of this alternative. As discussed

in Section IV.K-3, Solid Waste, the Proposed Project would generate approximately 4,101 pounds (2.05 tons) of solid waste per day, or approximately 748 tons per year. Comparatively, as shown in Table V.E-14 below, the Retail/Office Alternative would generate approximately 14,205 lbs/day of solid waste or approximately 2,592 tons per year. Operational solid waste under the Retail/Office Alternative would be approximately 3.5 times more solid waste generated by the Proposed Project. As discussed in Section IV.K-3, the Chiquita Canyon Landfill has a current unused daily capacity of 9,693 tpd to accommodate the Retail/Office Alternative's 7.6 tons of waste. Compared to the Proposed Project, the operational solid waste impacts would be increased under the Retail/Office Alternative. However, because the regional landfills would be able to accommodate the solid waste generated by this Alternative, solid waste impacts under the Retail/Office Alternative would be less than significant.

**Table V.E-14**  
**Retail/Office Alternative Estimated Operational Solid Waste Generation**

Type of Use	Size	Solid Waste Generation Rate <sup>a</sup> (lbs/unit/day)	Total Solid Waste Generated (lbs/day)
<b>Existing Uses (to be demolished)</b>			
Commercial (151,048 sf)	314 employees <sup>b</sup>	10.53 lbs/emp/day	3,306
<b>Proposed Project</b>			
Office and Commercial/Retail (426,994 sf)	1,663 employees <sup>b</sup>	10.53 lbs/emp/day	17,511
<b>Total Project Solid Waste Generation:</b>			<b>17,511</b>
<i>Less Existing Uses:</i>			<i>-3,306</i>
<b>NET TOTAL Solid Waste Generation:</b>			<b>14,205</b>
<i>Notes: sf =square feet; du = dwelling units; emp = employees</i> <sup>a</sup> L.A. CEQA Thresholds Guide, page M.3-2. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill. <sup>b</sup> Employees were Employment rates based on factors provided in LADOT's City of Los Angeles VMT Calculator Documentation, Table 1: Land Use and Trip Generation Base Assumptions, November 2019. Source: Parker Environmental Consultants, 2020.			

#### (4) Electric Power, Natural Gas and Telecommunication Infrastructure

Similar to the Proposed Project, it is not anticipated that any new electric power, natural gas, or telecommunication infrastructure or facilities would be constructed or expanded as a result of the Retail/Office Alternative. Both the Proposed Project and this Alternative would require on-site or minor off-site infrastructure improvements to connect to the existing infrastructure serving the Project area. However, impacts associated with utility upgrades or additional connections would be temporary in nature, would be limited to

trenching within and adjacent to the Development Site, and thus would result in less than significant impacts upon the environment.

## I) Impact Conclusion

As discussed above and summarized in Table V.E-15, below, in comparison to the Proposed Project, the Retail/Office Alternative would have similar less than significant impacts as compared to the Proposed Project with respect to land use and planning, population and housing, public services - electric power, natural gas, and telecommunications. The Retail/Office Alternative would have reduced less-than-significant impacts as compared to the Proposed Project with respect to air quality, energy (natural gas, transportation), GHG emissions, public services, (fire protection, police protection, parks, libraries), and public utilities (water, wastewater). The Retail/Office Alternative would have increased less-than-significant impacts as compared to the Proposed Project for energy (electricity) and public services (schools) and public utilities (solid waste). It is anticipated that this alternative would generate additional electricity demands and solid waste than the Proposed Project. However, impacts associated with electricity demand, schools, and solid waste landfill capacity would remain less than significant under this Alternative. Further, the Retail/Office Alternative would result in similar less than significant impacts with mitigation for hazardous materials and tribal cultural resources, as compared to the Proposed Project; with reduced less than significant impacts with mitigation for noise. Furthermore, this alternative would result in less than significant transportation impacts and would not require mitigation, compared to the Proposed Project's less than significant impacts with mitigation.

**Table V.E-15**  
**Retail Office Alternative Comparative Impact Matrix**

<b>Environmental Impacts</b>	<b>Proposed Project</b>	<b>Retail/Office Alternative</b>
Air Quality	Less Than Significant	Less Than Significant (reduced)
Energy - Electricity	Less Than Significant	Less Than Significant (increased)
Energy – Natural Gas	Less Than Significant	Less Than Significant (reduced)
Energy - Transportation Fuel	Less Than Significant	Less Than Significant (reduced)
Greenhouse Gas Emissions	Less Than Significant	Less Than Significant (reduced)
Hazardous Materials	Less Than Significant with Mitigation	Less Than Significant with Mitigation (same)
Land Use and Planning	Less Than Significant	Less Than Significant (same)
Noise	Less Than Significant with Mitigation	Less Than Significant with Mitigation (reduced)
Population and Housing	Less Than Significant	Less Than Significant (same)
Public Services - Fire	Less Than Significant	Less Than Significant (reduced)
Public Services - Police	Less Than Significant	Less Than Significant (reduced)
Public Services - Schools	Less Than Significant	Less Than Significant (increased)
Public Services - Parks and Recreation	Less Than Significant	Less Than Significant (reduced)
Public Services – Libraries	Less Than Significant	Less Than Significant (reduced)
Transportation	Less Than Significant with Mitigation	Less Than Significant (reduced)
Tribal Cultural Resources	Less Than Significant with Mitigation	Less Than Significant with Mitigation (same)
Public Utilities - Water	Less Than Significant	Less Than Significant (reduced)
Public Utilities - Wastewater	Less Than Significant	Less Than Significant (reduced)
Public Utilities - Solid Waste	Less Than Significant	Less Than Significant (increased)
Public Utilities - Electric Power, Natural Gas and Telecommunications	Less Than Significant	Less Than Significant (same)
<i>Parker Environmental Consultants, 2020.</i>		

### 3. Relationship of the Retail/Office Alternative to the Project Objectives

Under the Retail/Office Alternative, only proposes general office and commercial/retail uses. Therefore, the Retail/Office Alternative would not meet the underlying purpose of the Proposed Project, which is to transform an aging commercial retail center into an integrated smart-growth, mixed-use development that provides mid-rise residential, retail and restaurant uses in the Wilshire Community Plan area of the City of Los Angeles. Neither would the Retail/Office Alternative meet most of the Project objectives in Section II, Project Description.

Specifically, the Retail/Office Alternative relates to the objectives as follows:

1. *Providing “smart-growth” infill development that is generally consistent with the zoning and land use designation identified in the Wilshire Community Plan for the Development Site.*

The Retail/Office Alternative does not meet this objective to the same extent as the Proposed Project because two key elements of smart growth are to provide a mix of land uses and to create a range of housing opportunities and choices by development in existing communities. This alternative does not provide any housing, and does not provide a mix of uses because it is all commercial uses, compared to the residential, retail, and commercial uses associated with the Proposed Project.

2. *Enhance and activate an existing commercial retail center by replacing a portion of the existing surface parking lot and commercial uses with an economically viable and aesthetically attractive mixed-use development that will be physically and programmatically compatible with the existing on-site uses to remain as well as surrounding uses in the vicinity.*

The Retail/Office Alternative does not meet this objective to the same extent as the Proposed Project because it is not a residential and commercial mixed-use development. Also, this alternative is not, to the same extent as the Proposed Project, programmatically compatible as an office building with surrounding uses in the vicinity, which are primarily community serving retail onsite, and surrounding residential and retail offsite.

3. *Improve the visual appearance and appeal of the neighborhood by replacing older commercial buildings with a modern mid-rise building and providing enhanced streetscape design and pedestrian-oriented amenities.*



The Retail/Office Alternative would achieve this project objective, to a similar extent as the Proposed Project, because it would replace older buildings with new construction would improve the visual appearance and appeal of the neighborhood.

4. *Support a reduction in vehicle miles traveled by providing high-density multi-family housing and employment opportunities in a designated Transit Priority Area.*

The Retail/Office Alternative would not meet this objective because it would not provide any high-density multi-family housing in a designated Transit Priority Area.

5. *Create an arrangement of land uses and new development that encourage and contribute to the economic, social, and physical health of the residential community in the Wilshire Community Plan area.*

The Retail/Office Alternative would not meet this objective, to the same extent as the Proposed Project, because its commercial-only land uses do not create a diverse arrangement of land uses, and it does not contribute residential units to the residential community in the Wilshire Community Plan area. This alternative would contribute to the economic health of the community by providing commercial uses that stimulate job growth.

6. *Create a sustainable neighborhood with scalable design that fits with the unique context of the adjacent on and off-site land uses.*

The Retail/Office Alternative would not achieve this objective, to the same extent as the Proposed Project, because it is office building that would be placed within the off-site context that includes a school, residential, and retail uses. Whereas the Proposed Project develops uses (residential, retail, and restaurants) that fit into the existing neighborhood context and provide for sustainable neighborhood growth.

7. *Maximize the provision of housing units on an urban infill site to increase multi-family housing supply for the City and Wilshire Community Plan area.*

Retail/Office Alternative does not meet this objective because it would not provide any housing units. It would not increase multi-family housing supply for the City and Wilshire Community Plan area.

## **V. Alternatives**

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### **F. Environmentally Superior Alternative**

As discussed in this chapter, the environmentally superior alternative would be the No Project Alternative. The No Project Alternative would eliminate the Proposed Project's less than significant impacts after mitigation related to hazardous materials, construction noise and vibration, traffic impacts, and tribal cultural resources. As discussed above, the No Project Alternative would not achieve any of the Applicant's stated Project Objectives.

However, as required by CEQA, when the No Project Alternative is shown to be environmentally superior over the Proposed Project, a separate Environmentally Superior Project Alternative shall be identified among the alternatives analyzed within the EIR. Table V-1, Environmentally Superior Alternative Matrix presents a summary of the impact conclusions for each alternative relative to the impact statements for the impact areas evaluated in the EIR.

The Reduced Density Alternative would be a less impactful development than the Proposed Project, which would be effective in reducing vehicle trips, air quality emissions, greenhouse gas emissions, and total energy demand. As compared to the Proposed Project, the Reduced Density Alternative would generate fewer daily trips and VMT than the Proposed Project, and would not require incorporation of mitigation measures to ensure transportation impacts would be less than significant. As compared to the Proposed Project, the reduction in development would be advantageous from an environmental perspective as it would result in fewer daily trips and VMT and, as such, would generate fewer GHG emissions. For these reasons, the Reduced Density Alternative was identified as the Environmentally Superior Alternative.