

V. Alternatives

V. Alternatives

1. Introduction

The identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process under CEQA. Specifically, Public Resources Code Section 21001 states, in part, that the environmental review process is intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives which will avoid or substantially lessen such significant effects. In addition, Public Resources Code Section 21002.1(a) states that the 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.

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

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

The CEQA Guidelines indicate that the selection of project alternatives be based primarily on the ability to avoid or substantially lessen significant impacts relative to the proposed project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. The CEQA Guidelines further direct that the range of alternatives be guided by a “rule of reason,” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.

In addition, in selecting project alternatives for analysis, potential alternatives must be feasible. CEQA Guidelines Section 15126.6(f)(1) states that:

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

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

2. Overview of Selected Alternatives

As set forth in Section II, Project Description, of this Draft EIR, the Project would involve a two-tower mixed-use development consisting of: 180 residential for-sale condominium units; 252 residential apartments (including a mix of market rate and affordable units); two hotels with a combined total of 515 guest rooms, restaurants, ballrooms, meeting rooms, and amenities (fitness/spa); and 72,091 square feet of general commercial (retail/restaurant) uses. The proposed uses would be distributed through a series of terraced levels in a podium structure and two towers (Tower A and Tower B) that would be constructed above a three-level subterranean parking garage. Tower A and Tower B would be built on a podium structure over a three-level subterranean parking garage to a depth of approximately 70 feet below ground surface as measured from the elevation of Hill Street. Tower A would include 63 floors with a building height of up to 854 feet. Tower B would include 42 floors with a building height of up to 494 feet. The existing Los Angeles County Metropolitan Transportation Authority (Metro) B (formerly Red) and D (formerly Purple) Lines Pershing Square Station portal would be retained on-site. The Project would also provide public and private open space areas totaling 56,881 square feet. The Project would require the removal of existing landscaping and the excavation and export of approximately 334,000 cubic yards of soil. In all, the Project would result in up to 1,269,150 square feet (sf) of floor area with a maximum floor area ratio (FAR) of up to 13:1.

As indicated above, the intent of the alternatives is to avoid or substantially lessen any of the significant effects of a project while still feasibly obtaining most of the basic project objectives. Based on the analyses in Section IV, Environmental Impact Analysis, of this Draft EIR, the Project would result in significant unavoidable construction noise and vibration impacts (specifically, on-site construction noise, and both on- and off-site construction vibration associated with human annoyance). Also based on the analysis in Section IV, the Project would result in significant unavoidable cumulative construction noise

and vibration impacts (specifically, both on- and off-site construction noise, and off-site construction vibration associated with human annoyance).¹ In addition, cumulative off-site traffic noise impacts along the roadway segment of 4th Street (between Olive Street and Hill Street) would also be significant and unavoidable.

Based on the significant environmental impacts of the Project, the basic objectives established for the Project (refer to Section II, Project Description, of this Draft EIR), and the feasibility of the alternatives considered, the four alternatives to the Project listed below were selected for evaluation in this Draft EIR. Table V-1 on page V-4 compares the amount of development proposed under the Project and the alternatives. Table V-2 on page V-6 compares the number of residents, housing units, and employees under the Project and the alternatives.

- **Alternative 1—No Project/No Build Alternative:** This alternative assumes that no new development would occur within the Project Site. The existing conditions on the Project Site would remain. The Project Site is currently vacant, unmaintained, and fenced to prevent public access. There is an operational Metro transit station located on a portion of the Project Site. The existing conditions would be unchanged by Alternative 1.
- **Alternative 2—Commercial Office Alternative:** Alternative 2 would develop the Project Site with office uses in Tower B and hotel, residential, and commercial uses in Tower A. Similar to the Project, Alternative 2 would be consistent with the uses permitted in the Central City Community Plan and the Bunker Hill Specific Plan. Alternative 2 would include the development of 459,492 square feet (gsf) of office space in Tower B instead of the residential and hotel uses proposed in the Project. To provide the needed floorplates for office uses, Tower B would have a slightly larger footprint and be slightly shorter in height. Tower B would be 30 floors with a maximum height of 428 feet. Tower A and the balance of the site plan would remain the same as proposed with the Project, except that: (1) there would be less code-required open space (e.g., 35,025 sf instead of 56,881 sf) because Alternative 2 would have less residential units; and (2) there would be 400 vehicle parking spaces for Tower B and 275 vehicle parking spaces for Tower A for a total of 675 vehicle parking spaces on the Project Site. This compares to the 750 vehicle parking spaces proposed with the Project. Figure V-1 on page V-7 includes the conceptual site plan for Alternative 2. The total floor area of 1,269,150 sf (with an FAR of approximately 13:1) would be the same as the Project.

¹ On-site construction noise and vibration impacts would be associated with the on-site operation of heavy construction equipment. Off-site construction noise and vibration impacts would be associated with off-site construction trucks traveling to and from the Project Site.

**Table V-1
Development Table for Alternatives**

Land Use	Proposed Project	Alternative 1: No Project/No Build	Alternative 2: Office	Alternative 3: Reduced Density	Alternative 4: Residential
Residential^a	726,942 sf (432 units)	—	507,322 sf (240 units)	545,207 sf (324 units)	1,197,059 sf^e (577 units)
Condominiums	417,185 sf (180 units)	—	417,185 sf (180 units)	312,889 sf (135 units)	554,845 sf (240 units)
Apartments	309,757 sf (252 units)	—	90,137 sf (60 units)	232,318 sf (189 units)	411,969 sf (337 units)
Hotel	470,117 sf	—	230,245 sf	352,588 sf	—
Rooms	273,875 sf (515 rooms)	—	137,600 sf (260 rooms)	205,406 sf (386 rooms)	—
Restaurant	12,170 sf (541 seats)	—	3,930 sf (175 seats)	9,128 sf (406 seats)	—
Ballrooms	16,950 sf	—	10,910 sf	12,713 sf	—
Meeting Rooms	7,390 sf	—	4,550 sf	5,543 sf	—
Amenities (Fitness/Spa)	14,780 sf	—	7,610 sf	11,085 sf	—
Back of House/Hallways/ Lobbies	144,952 sf	—	65,645 sf	108,713 sf	—
General Commercial	72,091 sf	—	72,091 sf	54,068 sf	72,091 sf
Retail	30,466 sf	—	30,466 sf	22,850 sf	30,466 sf
Restaurant	41,625 sf (1,851 seats)	—	41,625 sf (1,851 seats)	31,218 sf (1,388 seats)	41,625 sf (1,851 seats)
Office^b	—	—	459,492 sf	—	—
Total Floor Area^{c,d}	1,269,150 sf	—	1,269,150 sf	951,863 sf	1,269,150 sf
FAR	13:1	—	13:1	10:1	13:1
Total Parking	Three Levels^f 750 spaces	—	Three Levels^f 675 spaces	Three Levels^f 400 spaces	Three Levels^f 750 spaces
Total Open Space	56,881 sf	—	35,025 sf	38,750 sf	68,975 sf

Table V-1 (Continued)
Development Table for Alternatives

Land Use	Proposed Project	Alternative 1: No Project/No Build	Alternative 2: Office	Alternative 3: Reduced Density	Alternative 4: Residential
Building Heights	Tower A: 63 floors (854 ft) Tower B: 42 floors (494 ft)	—	Tower A: 63 floors (854 ft) Tower B: 30 floors (428 ft)	Tower A: 47 floors (661 ft) Tower B: 32 floors (390 ft)	Tower A: 63 floors (854 ft) Tower B: 42 floors (494 ft)
Maximum Depth of Excavation	70 ft bgs	—	70 ft bgs	70 ft bgs	70 ft bgs
_____ <i>bgs = below ground surface</i> <i>FAR = floor-area ratio</i> <i>ft = feet</i> <i>res. units = residential units</i> <i>sf = square feet</i> ^a Includes both residential units and common residential area (e.g., residential amenities, lobby, halls, elevators, stairwells, etc.). ^b Includes both tenant office space and common office area (e.g., office amenities, lobby, halls, elevators, stairwells, etc.). ^c Floor area as defined by LAMC §12.03. ^d Does not include structured parking (not considered floor area under LAMC §12.03). ^e Assumes that the hotel ballroom and meeting room space proposed in the Podium under the Project is instead developed with residential amenities to serve the additional residential population under this alternative. ^f The Project and Alternatives 2 and 4 would include mechanical parking stackers within the subterranean parking structure to provide for the proposed number of parking spaces. Alternative 3, while having the same three levels of subterranean parking as the Project and Alternatives 2 and 4, would not require/include mechanical parking stackers. Note that due to the presence of the Metro portal, the parking depth cannot be shallower as the lower portion of the structure cannot surcharge the portal.] Source: Eyestone Environmental and Handel Architecture, August 2020.					

**Table V-2
Residents, Housing Units, and Employees for the Alternatives**

	Proposed Project	Alternative 1: No Project	Alternative 2: Office	Alternative 3: Reduced Density	Alternative 4: Residential
Residents	1,042 ^a	—	578 ^a	781 ^a	1,391 ^a
Housing Units	432	—	240	324	577
Employees	535 ^b	—	2,211 ^b	400 ^b	228 ^b
Total Population (Residents + Employees)	1,577	—	2,789	1,181	1,619

^a Based on a rate of 2.41 persons per multi-family unit from the 2018 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.

^b Based on employee generation rates from the Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation Version 1.3, May 2020, Table 1, including: General Retail = 2/1,000 sf; Restaurant (high-turnover sit-down and quality restaurants) = 4/1,000 sf; Hotel = 0.5/rm; and General Office = 4/1,000 sf.

Employee Estimates:

Proposed Project: (30,466 sf retail/2 employees per 1,000 sf) + (53,795 sf restaurant/4 employees per 1,000 sf) + (515 hotel rms/0.5 per rm) = 535 employees.

Alternative 2: (30,466 sf retail/2 employees per 1,000 sf) + (45,555 sf restaurant/4 employees per 1,000 sf) + (260 hotel rms/0.5 per rm) + (459,492 sf/4 employees per 1,000 sf) = 2,211 employees.

Alternative 3: (22,850 sf retail/2 employees per 1,000 sf) + (40,346 sf restaurant/4 employees per 1,000 sf) + (386 hotel rms/0.5 per rm) = 400 employees.

Alternative 4: (30,466 sf retail/2 employees per 1,000 sf) + (41,625 sf restaurant/4 employees per 1,000 sf) = 228 employees.

Source: Eyestone Environmental, November 2020.



Figure V-1
Conceptual Site Plan for the Office Alternative

- **Alternative 3—Reduced Density Alternative:** Alternative 3 would include the same types of uses proposed by the Project while reducing the amount of total new residential units and hotel, retail, restaurant and indoor amenity floor area by 25 percent. Alternative 3 would include 400 vehicle parking spaces, yet the depth of excavation on the Project Site would remain the same as the proposed Project. The total floor area for Alternative 3 would be 951,863 sf with an FAR of approximately 10:1.
- **Alternative 4—Residential Alternative:** Alternative 4 would develop 577 residential units in Tower A and Tower B with a mix of general commercial and residential amenity uses within the podium (this alternative would develop additional residential uses in Towers A and B instead of the hotel use proposed under the Project). The site plan would be similar to that of the Project and Alternative 4 would include 750 vehicle parking spaces, similar to the Project. However, there would be an additional 12,094 additional square feet of open space to satisfy Code requirements. The total floor area of 1,269,150 sf with an FAR of approximately 13:1, and building heights for Tower A and Tower B would also be the same as the Project.

3. Alternatives Considered and Rejected as Infeasible

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

Alternative Addressing the Significant Unavoidable Construction-Related Noise and Vibration Impacts of the Project: As discussed in Section IV.G, Noise, of this Draft EIR, the Project would result in short-term significant unavoidable construction-related noise and vibration (human annoyance) impacts. Specifically, Project construction activities would result in significant unavoidable construction-related noise impacts related to on-site construction activities, and significant unavoidable vibration (human annoyance) impacts related to both on-site construction activities and off-site construction traffic. The following approaches were considered, but rejected as infeasible, to substantially reduce or avoid these impacts:

- Approach (a)—Above-grade Parking: Under this approach parking would be provided above grade rather than below grade, thus avoiding much of the

excavation and hauling activity required under the Project. However, this approach was reviewed and rejected for the following reasons:

- Because of the unique topography of the Project Site (e.g., sloping from northwest to southeast with an elevation differential of approximately 70 feet), a moderate amount of grading activities would be required (with associated noise and vibration impacts) regardless of whether the parking was below or above grade. Furthermore, the City has policies (for example, in the Downtown Design Guide) that support the provision of underground parking instead of above-grade parking so as to enliven the ground-level pedestrian experience.
- Although the on-site construction activities would be shorter in overall duration during site grading due to less excavation, the maximum daily on-site construction noise levels would be similar to the Project as the number of and type of construction equipment mix would be similar on a peak day, which is used for the evaluation of impacts. As such, noise impacts from on-site construction activities would be significant, similar to the Project. Therefore, this alternative would not substantially reduce the significant construction noise impacts.
- Off-site construction noise levels are dependent on truck volumes, i.e., a reduction of 50 percent in truck volume would reduce the noise level by 3 dBA (just perceptible).² This above-grade parking approach would reduce the total number of haul truck trips due to a lower amount of excavation required. However, grading would still be required and the hauling activities on a peak day would likely be similar to the Project. However, feasible reductions in truck trips would not accomplish significant reductions in off-site construction noise levels. For example, a 50 percent reduction in the construction trucks during the site grading phase, from 35 to 18 truck trips per hour, would reduce the truck noise along 3rd Street, 4th Street and Hill Street to 60.4 dBA L_{eq} , 64.5 dBA L_{eq} , and 66.7 dBA L_{eq} , respectively (a 2.9 dBA reduction). However, when accounting for ambient noise levels, the Project plus ambient noise levels due to construction trucks would only be reduced by 0.3 dBA, 0.7 dBA, and 1.6 dBA along 3rd Street, 4th Street and Hill Street, respectively. Thus, as analyzed, even with a 50 percent reduction in the truck trips, the off-site construction noise plus ambient noise would result in a minimal noise reduction (i.e., less than the 3 dBA perceptible level for noise).

² The rule-of-thumb that a 50-percent reduction in traffic volumes results in a 3 dBA reduction in associated noise levels comes from the Caltrans Technical Noise Supplement, Chapter 2.1.3.5, September 2013. This rule-of-thumb is based on the fact that the addition or subtraction of sound level in decibel (dB) are performed based on logarithmic basis per the following equation: $SPL_{total} = SPL_1 + 10\log_{10}(N)$, where $SPL_1 = SPL$ of one source and $N =$ number of identical sources to be added or subtracted. For example, $N=1/2$ for a reduction of 50 percent. Thus, $SPL_{total} = SPL_1 + 10\log_{10}(1/2) = SPL_1 - 3$ dB.

As such, despite potential reductions in truck trips, off-site construction noise would not be significantly reduced.

- Construction equipment utilized under this approach would be similar to the Project (e.g., drill rig and large bulldozer), which would generate similar vibration levels. Therefore, on-site construction vibration impacts (human annoyance) would be significant and similar to the Project, as the vibration impact analysis is based on the peak vibration level generated by individual construction equipment. In addition, off-site construction vibration impacts (human annoyance), due to heavy trucks traveling by sensitive receptors, would also continue to be significant.
- Approach (b)—Extended Construction Duration: An approach that extends the construction period, thus reducing the amount of daily construction activity that would occur under the Project was also evaluated. This approach was rejected for the following reasons:
 - Construction noise levels are dependent on the number of construction equipment (on-site equipment or off-site construction trucks). It is anticipated the number of on-site construction equipment and off-site construction trips would be reduced under this approach. Typically, a reduction of 50 percent in the number of construction equipment pieces or construction traffic (haul and delivery trucks) trips would reduce the construction-related noise levels by approximately 3 dBA (just perceptible).³ For example, a 50 percent reduction in the construction trucks during the site grading phase, from 35 to 18 truck trips per hour, would reduce the truck noise along 3rd Street, 4th Street and Hill Street to 60.4 dBA L_{eq} , 64.5 dBA L_{eq} , and 66.7 dBA L_{eq} , respectively (a 2.9 dBA reduction as compared to the Project). However, when accounting for the ambient noise level (i.e., the Project plus ambient noise levels due to off-site construction trucks) the actual noise levels would only be reduced by 0.3 dBA, 0.7 dBA, and 1.6 dBA along 3rd Street, 4th Street and Hill Street, respectively. Thus, as analyzed, even with a 50 percent reduction in the truck trips, the off-site construction noise plus ambient noise would result in a minimal reduction in noise (i.e., less than the 3 dBA perceptible level). With respect to the on-site construction, a reduction in the number of on-site construction equipment would reduce the construction noise, depending on the number and type of equipment. Specifically, reducing the on-site construction equipment during the site grading phase from 19 pieces to

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

10 pieces (approximately 50 percent) would reduce the construction noise at the off-site receptors by 2.1 dBA L_{eq} at receptor locations R2 and R6, 2.6 dBA L_{eq} at receptor R5, 2.7 dBA L_{eq} at receptor locations R1 and R3, and 2.9 dBA L_{eq} at receptor location R4 (as compared to the Project). The estimated construction noise levels with a 50 percent reduction in the number of construction equipment would still exceed the significance threshold by up to 20.0 dBA L_{eq} at the receptor location R6 (nearest sensitive receptor). Therefore, the construction noise levels under this approach (both on- and off-site construction noise) would be somewhat less than the Project (depending on the amount of reduction) but would not significantly reduce the impact and would still exceed the significance threshold. In addition, the reduction would be less than 3.0 dBA, which is the level where noise is perceptible. In addition, this approach would be inefficient and would increase the number of days that sensitive receptors would be impacted by construction activities. Furthermore, due to the close proximity of the off-site noise sensitive receptors and site elevation changes (up to 70 feet in elevation changes), it would not be practical to reduce the construction noise levels to below the significance threshold as a single piece of equipment would result in noise levels above the significance threshold. As such, the on-site construction noise impacts under this approach would not be substantially less than the Project and would remain significant.

- The on-site construction vibration impacts (human annoyance) would be significant, similar to the Project, as the vibration impact analysis is based on the peak vibration level generated by individual construction equipment, and the approach would utilize similar construction equipment (e.g., drill rig and large bulldozer). In addition, off-site construction vibration impacts (human annoyance), due to heavy trucks traveling by sensitive receptors, would also continue to be significant, similar to the Project.
- Approach (c)—Central Location of Development: An approach where the proposed towers are moved closer to the center of the Project Site (including, potentially a single tower in the center of the site), thus pulling back the proposed development and associated construction activities from the off-site sensitive receptors was reviewed and rejected for the following reasons:
 - This approach would not accomplish several of the Project's and City's planning objectives for the Project. Specifically: (1) this option would limit the ability to provide attractive and ample publicly accessible open spaces that incorporate community amenities as no single centralized large open space plaza for the community would be provided; and (2) this option would not integrate the existing Metro portal as a component of open space and plaza design to enhance the pedestrian and transit user experience as there would be no open space plaza (just landscaping with a few small open space areas between the central tower and the property lines). Furthermore, placing a tower in the center of the Project Site in relatively close proximity of the Metro portal, rather than closer to the perimeters of the site as proposed under the

Project, would bring the tower in closer proximity to the Metro portal and could result in structural building challenges because of the existing underground infrastructure.

- Construction noise levels can be reduced by providing and situating the tower in the center of the site to provide an additional buffer zone between the sensitive receptors and the construction equipment. Noise levels from construction equipment would attenuate approximately 6 dBA per doubling of distance. The construction noise levels associated with the building phases for the proposed towers placed closer to the center of the site would be lower than the Project. However, the noise level reduction, depending the setback from the property line, would be limited due the size of the Project site (approximately 300 feet wide). In addition, noise levels during the site demolition, site preparation and grading would be similar to the Project, as construction activities for these phases would still be up to the property line, similar to the Project. As such, the on-site construction noise impacts under this approach would remain significant as for the Project.
- Similar to the Project, the on-site construction vibration impacts (human annoyance) of this option would be significant as heavy construction equipment (e.g., drill rig and large bulldozer) used for the site grading would still operate near the property line and adjacent sensitive uses under this option. Also similar to the Project, the off-site construction vibration impacts (human annoyance) of this option due to heavy trucks traveling by sensitive receptors would be significant.
- Approach (d)—Reduced Development: An approach that reduces the amount of development that would occur under the Project to the extent that the significant construction-related noise and vibration impacts of the Project would be avoided or substantially reduced was also considered in Alternative 3. As concluded therein, due to the close proximity of the sensitive receptors (i.e., directly across from the Project Site) and a constrained Project Site that does not have the space to create a meaningful buffer zone, it would not be practical to mitigate the on-site construction noise impacts of the Project, especially at the upper levels of the adjacent apartment buildings. In addition, the on-site construction vibration impacts (human annoyance) of this option would be significant since the vibration impact analysis is based on the peak vibration level generated by individual construction equipment pieces that would still be required near the perimeter of the Project Site. In addition, off-site construction vibration impacts (human annoyance), due to heavy trucks traveling by sensitive receptors, would be significant.

As indicated above, none of the above approaches would feasibly substantially reduce or avoid the significant unavoidable construction-related on-site noise and both on- and off-site vibration (human annoyance) impacts of the Project. This is because the significant unavoidable construction-related noise and vibration impacts of the Project are

heavily influenced by the close proximity of the Project Site and the proposed haul route to existing noise- and vibration-sensitive uses rather than the amount or duration of Project construction activities. Furthermore, Approaches (a) through (d) would not achieve the underlying purpose and/or objectives of the Project. Approach (b) would cost substantially more to construct than the proposed Project given the extended construction period; Approaches (a) and (d) would not be inconsistent with City land use objectives and requirements for the Project Site (e.g., high density (13:1) transit-oriented development, no parking on the ground floor, etc.); and Approach (c) would not allow for the development of a primary open space amenity within the center of the Project Site that would contribute to enlivening the Bunker Hill area.^{4,5} Therefore, an alternative that includes one or more of these approaches would not substantially reduce or eliminate the significant noise and vibration impacts of the Project and thus no further consideration of these approaches in the EIR is required.

Alternative Project Site: The results of a search to find an alternative site on which the Project could be built determined that suitable similar locations are not available to meet the underlying purpose and objectives of the Project, as set forth in City plans (Central City Community Plan, Draft Downtown Community Plan,⁶ Bunker Hill Specific Plan, etc.) and the Project objectives to develop a high-density mixed-use development at the City-owned Project Site immediately adjacent to the Los Angeles County Metropolitan Transportation Authority (Metro) Pershing Square Station portal (Metro portal). In addition,

⁴ *The underlying purpose of the Project referred to here is to redevelop the site by providing a high-density, mixed-use, transit- and pedestrian-oriented development that includes a mix of housing types (including affordable units) integrated with hotel, retail, restaurant and open space uses to transform the vacant site into a marquee destination and functional linkage between the Historic Core and Bunker Hill areas of downtown. The Project objectives being referred to in this paragraph include, but are not limited to: (1) maximize density and floor area ratio on the site with a high level of intensity to create a high-energy urban experience with an interrelated mix of land uses that function to transform the site into an iconic development; and (2) create a mix of interactive land uses with expanded for-sale and for-rent housing opportunities blended together with commercial uses to enhance the 24-hour downtown environment and provide an infill development that enlivens streets and integrated public spaces.*

⁵ *The land use objectives/requirements being referred to in this paragraph include, but are not limited to: (1) development of high-density (up to 13:1 FAR) mixed-use development on the site per the existing Regional Center Commercial land use designation and C2-4 zoning of the Project Site and the objectives of the Bunker Hill Specific Plan and Draft Downtown Community Plan; (2) reduce vehicle trips, vehicle miles traveled and air pollution through the provision of a high density mixed-use development in the Bunker Hill area and greater Downtown within close proximity to transit as called for by City General Plan Framework Element Land Use Chapter Policy 3.2 and a purpose of the Bunker Hill Specific Plan; (3) locating high-density and commercial mixed-use development in a transit priority area adjacent to major public transit, and providing a design with amenities and uses that promote pedestrian and bicycle activity as called for by City General Plan Framework Element Land Use Chapter Policy 3.2.3, Mobility Element Policy 3.1, and the purposes of the Specific Plan; and (4) development of ground floor commercial rather than ground floor parking as required by the Bunker Hill Specific Plan Section 8.B.2.*

⁶ *Analysis of the Draft Downtown Community Plan is provided for informational purposes only (not adopted plan).*

it is not expected that the Applicant could reasonably acquire, control, or have access to an alternative urban infill site of similar size adjacent to a Metro portal. Therefore, an alternative site is not considered. Furthermore, even if a suitable alternative site (e.g., an urban infill site of adequate size adjacent to a Metro portal) could be found, it is anticipated that the significant unavoidable construction-related noise and vibration (human annoyance) impacts of the Project would still occur, just at a different location. Lastly, the Project does not represent a typical development where the developer has control of the site; the Project must occur at this exact site per the Request for Proposal (RFP) and current Exclusive Negotiating Agreement (ENA) with the City. Thus, in accordance with Section 15126.6(f) of the State CEQA Guidelines, this alternative was rejected from further consideration.

All Office Alternative: An alternative whereby the Project Site would be developed with 100 percent office uses to the same 13:1 FAR as the proposed Project was initially considered. Such an alternative would reduce the less than significant public services and utilities impacts of the Project. However, such an alternative would neither meet the City's plans for the Project Site or the Project objectives to develop a high-density mixed-use development at the Project Site that would both: (1) reduce vehicle trips and VMT due to the mix of complimentary on-site uses; and (2) enliven the Bunker Hill neighborhood with a 24-hour community. Furthermore, this alternative would not substantially reduce or avoid the significant unavoidable construction-related noise and vibration (human annoyance) impacts of the Project.

4. Alternatives Analysis Format

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the Project as measured against the baseline (existing conditions). Furthermore, each alternative is evaluated to determine whether the Project's underlying purpose and objectives, identified in Section II, Project Description, of this Draft EIR, would be substantially attained by the alternative.⁷ The evaluation of each of the alternatives follows the process described below:

- a. The net environmental impacts of the alternative are determined for each environmental issue area analyzed in Section IV, Environmental Impact Analysis, of this Draft EIR assuming that the alternative would implement the same Project Design Features (PDFs) and mitigation measures identified in Section IV, Environmental Impact Analysis, of this Draft EIR.

⁷ *State of California, CEQA Guidelines Section 15126.6(c).*

- b. Post-mitigation significant and non-significant environmental impacts of the alternative and the Project are compared for each environmental issue area as follows:
- Less: Where the net impact of the alternative would be clearly less adverse or more beneficial than the impact of the Project, the comparative impact is said to be “less.”
 - Greater: Where the net impact of the alternative would clearly be more adverse or less beneficial than the Project, the comparative impact is said to be “greater.”
 - Similar: Where the impact of the alternative and Project would be roughly equivalent, the comparative impact is said to be “similar.”
- c. The comparative analysis of the impacts is followed by a general discussion of whether the underlying purpose and Project objectives are feasibly and substantially attained by the alternative.

A summary matrix that compares the impacts associated with the Project with the impacts of each of the analyzed alternatives is provided in Table V-3 on page V-16.

As evaluated in the Initial Study prepared for the Project included in Appendix A.1 of this Draft EIR, the Project would not result in significant impacts related to aesthetics, agriculture and forestry resources, biological resources, hazards and hazardous materials, hydrology and water quality, mineral resources, public services (parks, recreation), utilities and service systems (solid waste), and wildfire. Therefore, no further analysis of these topics in this section is required or provided.

Table V-3
Comparison of Impacts Associated with the Development Alternatives

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Commercial Office Alternative	Alternative 3: Reduced Density Alternative	Alternative 4: Residential Alternative
A. AIR QUALITY					
<i>Regional Emissions</i>					
<i>Construction</i>	Less Than Significant w/Mitigation	Less (No Impact)	Similar (Less Than Significant w/Mitigation)	Similar (Less Than Significant w/Mitigation)	Similar (Less Than Significant w/Mitigation)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Greater (Significant and Unavoidable)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Localized Emissions</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Greater (Less than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Toxic Air Contaminants</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
B. CULTURAL RESOURCES					
<i>Historical Resources</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Archaeological Resources</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Human Remains</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
C. ENERGY					
<i>Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)

Table V-3 (Continued)
Comparison of Impacts Associated with the Development Alternatives

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Commercial Office Alternative	Alternative 3: Reduced Density Alternative	Alternative 4: Residential Alternative
<i>Operation</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Conflict with Plans for Renewable Energy or Energy Efficiency</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
D. GEOLOGY AND SOILS (PALEONTOLOGICAL RESOURCES)					
<i>Paleontological Resources</i>	Less Than Significant w/Mitigation	Less (No Impact)	Similar (Less Than Significant w/Mitigation)	Similar (Less Than Significant w/Mitigation)	Similar (Less Than Significant w/Mitigation)
E. GREENHOUSE GAS EMISSIONS					
<i>GHG Emissions</i>	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Conflict with GHG Reduction Plans/Policies/Regulation s</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
F. LAND USE AND PLANNING					
<i>Conflict with Land Use Plans</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
G. NOISE					
<i>Construction</i>					
<i>On-Site Noise</i>	Significant Unavoidable (project level) Significant Unavoidable (cumulative)	Less (No Impact)	Similar (Significant Unavoidable— project level) (Significant Unavoidable— cumulative)	Similar (Significant Unavoidable— project level) (Significant Unavoidable— cumulative)	Similar (Significant Unavoidable— project level) (Significant Unavoidable— cumulative)
<i>Off-Site Noise</i>	Less Than Significant (project level) Significant Unavoidable (cumulative)	Less (No Impact)	Similar (Less Than Significant— project level) (Significant Unavoidable— cumulative)	Similar (Less Than Significant— project level) (Significant Unavoidable— cumulative)	Similar (Less Than Significant— project level) Significant Unavoidable— cumulative)

Table V-3 (Continued)
Comparison of Impacts Associated with the Development Alternatives

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Commercial Office Alternative	Alternative 3: Reduced Density Alternative	Alternative 4: Residential Alternative
<i>On-Site Vibration (Building Damage)</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>On-Site Vibration (Human Annoyance)</i>	Significant Unavoidable	Less (No Impact)	Similar (Significant Unavoidable)	Similar (Significant Unavoidable)	Similar (Significant Unavoidable)
<i>Off-Site Vibration (Building Damage)</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Off-Site Vibration (Human Annoyance)</i>	Significant Unavoidable (project level) Significant Unavoidable (cumulative)	Less (No Impact)	Similar (Significant Unavoidable— project level) (Significant Unavoidable— cumulative)	Similar (Significant Unavoidable— project level) (Significant Unavoidable— cumulative)	Similar (Significant Unavoidable— project level) (Significant Unavoidable— cumulative)
Operation					
<i>On-Site Noise</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Off-Site Noise</i>	Less Than Significant (project-level) Significant Unavoidable (cumulative)	Less (No Impact)	Greater (Less Than Significant— project-level) (Significant Unavoidable— cumulative)	Less (Less Than Significant— project level) (Significant unavoidable— cumulative)	Less (Less Than Significant— project level) (Significant Unavoidable— cumulative)
<i>Vibration</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
H. POPULATION AND HOUSING					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)
I. PUBLIC SERVICES					
Fire Protection					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)

Table V-3 (Continued)
Comparison of Impacts Associated with the Development Alternatives

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Commercial Office Alternative	Alternative 3: Reduced Density Alternative	Alternative 4: Residential Alternative
<i>Operation</i>	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)
<i>Police Protection</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)
<i>Schools</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)
J. TRANSPORTATION					
<i>Conflict with Transportation Plans</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Vehicle Miles Traveled</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Hazardous Design Features or Incompatible Uses</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Emergency Access</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
K. TRIBAL CULTURAL RESOURCES					
<i>Tribal Cultural Resources</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
L. UTILITIES AND SERVICE SYSTEMS					
<i>Water Supply and Infrastructure</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)

Table V-3 (Continued)
Comparison of Impacts Associated with the Development Alternatives

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Commercial Office Alternative	Alternative 3: Reduced Density Alternative	Alternative 4: Residential Alternative
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Wastewater</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)
<i>Energy Infrastructure</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)
Total					
<i>Less / Similar / Greater</i>	—	44 / 0 / 0	5 / 33 / 6	25 / 19 / 0	8 / 30 / 6
<i>Overall</i>	—	Less	Greater	Less	Less
Source: Eyestone Environmental, November 2020.					

5. Overview of Proposed Project and Project Objectives

The Project would involve a two-tower mixed-use development consisting of: 180 residential for-sale condominium units; 252 residential apartments (including a mix of market rate and affordable units, with affordable housing comprising five percent (e.g., 13) of the total for-rent units); two hotels with a combined total of 515 guest rooms, restaurants, ballrooms, meeting rooms, and amenities (fitness/spa); and 72,091 square feet of general commercial (retail/restaurant) uses. The proposed uses would be distributed through a series of terraced levels in a podium structure and two towers (Tower A and Tower B) that would be constructed above a three-level subterranean parking garage. The Project would also provide public and private open space areas totaling 56,881 square feet. The Project would result in up to 1,269,150 square feet of floor area with a maximum floor area ratio (FAR) of up to 13:1.

The underlying purpose of the Project is to redevelop the site by providing a high-density, mixed-use, transit- and pedestrian-oriented development that includes a mix of housing types (including affordable units) integrated with hotel, retail, restaurant and open space uses to transform the vacant site into a marque destination and functional linkage between the Historic Core and Bunker Hill areas of downtown. As set forth in the CEQA Guidelines, the Project's basic and fundamental objectives are provided below.

- Maximize density and floor area ratio on the site with a high level of intensity to create a high-energy urban experience with an interrelated mix of land uses that function to transform the site into an iconic development.
- Provide attractive and ample publicly accessible open spaces that incorporate community amenities and integrate the Angels Flight funicular into the experience of the site.
- Establish and maintain active and accessible linkages between the residential, office, and cultural amenities on Bunker Hill and in the Historic Core area to enhance the interconnectivity of these communities.
- Integrate the existing Metro portal as a component of open space and plaza design to enhance the pedestrian and transit user experience at the site.
- Create a mix of interactive land uses with expanded for-sale and for-rent housing opportunities blended together with commercial uses to enhance the 24-hour downtown experience and provide an infill development that enlivens adjacent streets and integrated public spaces.
- Develop a high-quality mixed-use project that provides residential dwelling units that contribute to the City's housing supply, while integrating hotel uses capable

of enhancing the experience in Bunker Hill and contributing to the supply of downtown hotel rooms for convention and tourist activities.

- Construct an economically feasible project that expands the economic base of the City and provides employment opportunities and new sources of tax revenue for the City by providing construction and permanent jobs, attracting commercial tenants and hotel operators, and increasing hotel patrons that collectively increase City tax revenues directly and indirectly.
- Utilize public investment in public transit by redeveloping an urban infill location with on-site mass transit capabilities to further smart growth land use planning practices and align with policies related to the reduction of greenhouse gas emissions and vehicle miles travelled.

V. Alternatives

A. Alternative 1: No Project/No Build Alternative

1. Description of the Alternative

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states in part that, “in certain instances, the No Project/No Build Alternative means ‘no build’ wherein the existing environmental setting is maintained.” Accordingly, for purposes of this analysis, Alternative 1, the No Project/No Build Alternative, assumes that no new development would occur at the Project Site. The existing conditions on the Project Site, including vacant, unmaintained, fenced land and the Metro portal, would remain. Thus, existing conditions at the Project Site would remain unchanged under Alternative 1 (e.g., the Project Site would continue to represent a largely undeveloped and underutilized City-owned urban infill parcel adjacent to a Metro light rail station).

2. Environmental Impacts

a. Air Quality

(1) Regional Emissions

(a) Construction

Alternative 1 would not include any grading, excavation, building development, painting or other construction activities, and thus would not generate construction-related fugitive dust, diesel emission from construction-related truck and construction equipment use, gasoline emissions from construction worker traffic, or other forms of construction-related regional emissions. No construction-related regional emissions impacts would occur. Therefore, the construction-related regional emissions impacts under Alternative 1 would be less than the less than significant (with mitigation incorporated) impacts of the Project.

(b) Operation

Alternative 1 would not result in new development or increased operations that could generate additional operational regional emissions related to vehicular traffic or the consumption of electricity and natural gas beyond what is currently generated by the existing Metro portal at the Project Site. No new operation-related regional emissions impacts would occur. Therefore, the operations-related regional emissions impacts under Alternative 1 would be less than the less than significant impacts of the Project.

(2) Localized Emissions

(a) Construction

As indicated previously, Alternative 1 would not result in any construction activities. As such, Alternative 1 would not result in construction-related localized emissions. No construction-related localized emissions impacts would occur. Therefore, the construction-related localized emissions impacts under Alternative 1 would be less than the less than significant impacts of the Project.

(b) Operation

Alternative 1 would not result in new development or increased operations that could generate additional operational emissions related to vehicular traffic or the consumption of electricity and natural gas beyond what is currently generated by the Metro portal at the Project Site. No operational localized emissions impacts would occur. Therefore, the operations-related localized emissions impacts under Alternative 1 would be less than the less than the less than significant impacts of the Project.

(3) Toxic Air Contaminants

(a) Construction

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

(b) Operation

As discussed in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations would include diesel particulate matter (DPM) from delivery trucks (e.g., truck traffic on local streets and idling on adjacent

streets) and, to a lesser extent, facility operations (e.g., natural gas fired boilers). Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, petroleum refinery). Since Alternative 1 would not result in new development at the Project Site, no increase in operations-related TAC emissions would occur. Therefore, the operations-related TAC impacts under Alternative 1 would be less than the less than significant impacts of the Project.

b. Cultural Resources

(1) Historical Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, there are no historical resources on the Project Site. In addition, Alternative 1 would not include any construction activities or new development such that could potentially impact off-site historical resources. No impacts to historical resources would occur. Therefore, the impacts to historical resources under Alternative 1 would be less than the less than significant impacts of the Project.

(2) Archaeological Resources

As Alternative 1 would not include any construction activities, it would not have the potential to impact archaeological resources. No impacts to archaeological resources would occur. Therefore, the impacts to archaeological resources under Alternative 1 would be less than the less than significant impacts of the Project.

(3) Human Remains

As Alternative 1 would not include any construction activities, it would not have the potential to impact human remains. No impacts to human remains would occur. Therefore, the impacts to human remains under Alternative 1 would be less than the less than significant impacts (with adherence to applicable regulations) of the Project.

c. Energy

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

(a) Construction

Construction activities would not occur under the No Project/No Build Alternative. Therefore, Alternative 1 would not generate a short-term demand for energy during construction, which could result in the wasteful, inefficient, or unnecessary consumption of

energy resources. No construction-related energy impacts would occur. Therefore, the construction-related energy impacts of Alternative 1 would be less than the less than significant impacts of the Project.

(b) Operation

Alternative 1 would not include new development or alter the existing uses at the Project Site. Therefore, Alternative 1 would not increase long-term operational energy use at the Project Site, and thus would have no potential to result in the wasteful, inefficient, or unnecessary consumption of energy resources. No operations-related energy impacts would occur. Therefore, the operations-related energy impacts of Alternative 1 would be less than the less than significant impacts of the Project.

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

Alternative 1 would not include new development or alter the existing uses at the Project Site. Therefore, Alternative 1 would not increase energy use at the Project Site, and thus would have no potential to conflict with plans for renewable energy or energy efficiency. Therefore, no energy impacts would occur under Alternative 1, and the energy impacts of this alternative would be less than the less than significant impacts of the Project.

d. Geology and Soils (Paleontological Resources)

As Alternative 1 would not include any construction activities, it would not have the potential to impact paleontological resources. No impacts would occur. Therefore, the paleontological resources impacts of Alternative 1 would be less than the less than significant (with mitigation incorporated) impacts of the Project.

e. Greenhouse Gas Emissions

Alternative 1 would not include any new development, and thus would not generate GHG emissions. Therefore, no impacts would occur and the GHG impacts of Alternative 1 would be less than the less than significant GHG impacts of the Project.

f. Land Use and Planning

Under Alternative 1, there would be no changes to the existing physical or operational characteristics of the Project Site. No impacts associated with conflicts with land use plans or regulations (including but not limited to the General Plan Framework, Central City Community Plan, Bunker Hill Specific Plan, and LAMC) would occur.

Therefore, the land use impacts of Alternative 1 would be less than the less than significant impacts of the Project.

g. Noise

(1) Noise

(a) Construction

No new construction activities would occur under Alternative 1. As such, no construction-related noise would be generated on- or off-site under this alternative, and no construction noise impacts would occur. Therefore, Alternative 1 would eliminate the significant and unavoidable on- and off-site construction noise impacts that would occur under the Project (both project-level and cumulative).

(b) Operation

Alternative 1 would not develop new uses on the Project Site, and no changes to existing site operations would occur; the existing vacant use of most of the Project Site, and the operation of the existing Metro portal in the southeast portion of the Project Site, would continue. As such, no new stationary or mobile noise sources (e.g., traffic) would be introduced on or within the vicinity of the Project Site under this alternative, and no operational noise impacts would occur. Therefore, Alternative 1 would avoid the significant and unavoidable cumulative off-site operational traffic noise impact that would occur under the Project.

(2) Vibration

(a) Construction

No new construction activities would occur under Alternative 1. As such, no construction-related vibration would be generated on- or off-site under this alternative, and no construction vibration impacts would occur. Therefore, Alternative 1 would eliminate the significant unavoidable on- and off-site operational vibration impacts (human annoyance), the less than significant on- and off-site operational vibration impacts (building damage), and the significant unavoidable cumulative off-site construction vibration impacts (human annoyance) of the Project.

(b) Operation

Alternative 1 would not develop new uses on the Project Site, and no changes to existing site operations would occur; the existing vacant use of most of the Project Site, and the operation of the existing Metro portal in the southeast portion of the Project Site,

would continue. As such, no new operations-related vibration sources would be introduced on- or off-site under this alternative, and no operational vibration impacts would occur. Therefore, Alternative 1 would result in less operational vibration impacts than the less than significant impacts of the Project.

h. Population and Housing

(1) Construction

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

(2) Operation

No changes to existing on-site land uses or operations would occur under Alternative 1: the existing vacant use of most of the Project Site, and operation of the existing Metro portal in the southeastern portion of the Project Site, would continue. Alternative 1 would not include the development of residential uses which could directly increase population, nor would it not include either the extension of roads/other infrastructure or the development of job-generating uses which could indirectly increase population. Therefore, Alternative 1 would not induce substantial unplanned population growth or displace substantial numbers of existing people or housing, and no population and housing impacts would occur. The population and housing impacts of Alternative 1 would thus be less than the less than significant impacts of the Project.

i. Public Services

(1) Fire Protection

(a) Construction

As Alternative 1 would not require construction, this alternative would not result in construction-related demand for LAFD fire protection facilities or services, construction traffic that could potentially slow emergency response times, or the potential for construction-related obstruction of emergency access. No impact would occur. Therefore, Alternative 1 would result in less construction-related fire protection impacts than the less than significant impacts of the Project.

(b) Operation

No changes to existing land uses or operations on-site would occur under Alternative 1; the existing vacant use of most of the Project Site, and the existing Metro portal operations in the southeastern portion of the site, would continue. Therefore, this alternative would not result in operations-related demand for LAFD fire protection facilities or services, traffic that could potentially slow emergency response times, the potential for obstruction of emergency access, or a demand for fire flow. No impact would occur. Therefore, Alternative 1 would result in less operations-related fire protection impacts than the less than significant impacts of the Project.

(2) Police Protection*(a) Construction*

As Alternative 1 would not require construction, this alternative would not result in construction-related demand for police protection facilities or services from LAPD's Central Community Police Station, construction traffic that could potentially slow emergency response times, or the potential for construction-related obstruction of emergency access. No impact would occur. Therefore, Alternative 1 would result in less construction-related police protection impacts than the less than significant impacts of the Project.

(b) Operation

No changes to existing land uses or operations on-site would occur under Alternative 1; the existing vacant use of most of the Project Site, and the existing Metro portal operations in the southeastern portion of the site, would continue. Therefore, this alternative would not result in operations-related demand for police protection facilities or services from LAPD's Central Community Police Station, traffic that could potentially slow emergency response times, or the potential for obstruction of emergency access. No impact would occur. Therefore, Alternative 1 would result in less operations-related police protection impacts than the less than significant impacts of the Project.

(3) Schools*(a) Construction*

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

(b) Operation

No changes to existing land uses or operations on-site would occur under Alternative 1; the vacant condition of most of the Project Site, and operations at the Metro portal in the southeastern portion of the Project Site, would continue. Therefore, there would be no potential to increase the population of school-aged children in the attendance boundaries of the schools (e.g., 9th Street Elementary, Liechty Middle School, and Belmont Zone of Choice high schools) that serve the Project Site. No impacts to schools would occur. Therefore, the operational school impacts of Alternative 1 would be less than the less than significant impacts of the Project.

j. Transportation

Since the No Project Alternative would not develop new or additional land uses on the Project Site, Alternative 1 would not generate any additional construction- or operations-related vehicle trips or alter existing access or circulation within the Project Site. Therefore, no impacts would occur with respect to construction and operational traffic, including: conflicts with programs, plans, ordinances, or policies addressing the circulation system; vehicle miles traveled (VMT); hazardous design features; and emergency access. However, Alternative 1 would not further many of the goals, objectives and policies of the applicable transportation plans (e.g., transportation portions of the General Plan Framework, Central City Community Plan, Bunker Hills Specific Plan, SCAG RTP/SCS, etc.) for high-density mixed-use development on urban infill sites in close proximity to transit to increase transit usage and reduce per capita VMT. Nonetheless, the overall transportation impacts of Alternative 1 would be less than less than significant impacts of the Project.

k. Tribal Cultural Resources

As Alternative 1 would not include any construction activities, it would not have the potential to impact tribal cultural resources. Therefore, no impacts to tribal resources would occur under Alternative 1, and the tribal cultural resources impacts of this alternative would be less than the less than significant impacts of the Project.

l. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Construction activities would not occur under Alternative 1. As such, Alternative 1 would not generate construction-related demand for either water or associated infrastructure, and no impact would occur. Therefore, water supply and infrastructure

impacts under Alternative 1 would be less than the less than significant impacts of the Project.

(b) Operation

Alternative 1 would not alter the existing land uses or site operations on the Project Site; the existing vacant use of most of the Project site, and the existing Metro portal in the southeastern portion of the site, would be retained. As such, Alternative 1 would not increase operations-related water demand or the need for associated infrastructure. No operations-related water supply and infrastructure impacts would occur. Therefore, the operations-related water supply and infrastructure impacts of Alternative 1 would be less than the less than significant impacts of the Project.

(2) Wastewater

(a) Construction

Construction activities would not occur under Alternative 1. As such, Alternative 1 would not generate a construction-related demand for wastewater conveyance or treatment infrastructure, and no impact would occur. Therefore, the construction-related wastewater impacts of Alternative 1 would be less than the less than significant impacts of the Project.

(b) Operation

Alternative 1 would not alter the existing land uses or site operations on the Project Site; the existing vacant use of most of the Project site, and the existing Metro portal in the southeastern portion of the site, would be retained. As such, Alternative 1 would not generate a long-term demand for wastewater conveyance and treatment infrastructure. No operations-related wastewater impacts would occur. Therefore, the operations-related wastewater impacts of Alternative 1 would be less than the less than significant impacts of the Project.

(3) Energy Infrastructure

(a) Construction

Construction activities would not occur under Alternative 1. As such, Alternative 1 would not generate a demand for construction-related infrastructure, and no impact would occur. Therefore, the construction-related energy infrastructure impacts under Alternative 1 would be less than the less than significant impacts of the Project.

(b) Operation

Alternative 1 would not alter the existing land uses or site operations on the Project Site; the existing vacant use of most of the Project site, and the existing Metro portal in the southeastern portion of the site, would be retained. As such, Alternative 1 would not generate a demand for operations-related energy infrastructure, and no impact would occur. Therefore, the operations-related energy infrastructure impacts of Alternative 1 would be less than the less than significant impacts of the Project.

3. Comparison of Impacts

As evaluated above, Alternative 1 would avoid the significant unavoidable project and cumulative construction-related noise and vibration (human annoyance) impacts, and the significant unavoidable cumulative operations-related off-site traffic noise impact, of the Project. Furthermore, as indicated in Table V-3 on page V-16, Alternative 1 would result in less impacts than the Project for all of the environmental topics evaluated in the Draft EIR (owing to a lack of development and associated environmental effects under this alternative).

4. Relationship of the Alternative to Project Objectives

Under Alternative 1, the existing buildings and surface parking areas would remain on the Project Site, and no new development would occur. As such, Alternative 1 would not meet the underlying purpose of the Project which is to redevelop the site by providing a high-density, mixed-use, transit- and pedestrian-oriented development that includes a mix of housing types (including affordable units) integrated with hotel, retail, restaurant and open space uses to transform the vacant site into a marquee destination and functional linkage between the Historic Core and Bunker Hill areas of downtown. Furthermore, Alternative 1 would not meet any of the Project objectives as listed below:

- Maximize density and floor area ratio on the site with a high level of intensity to create a high-energy urban experience with an interrelated mix of land uses that function to transform the site into an iconic development.
- Provide attractive and ample publicly accessible open spaces that incorporates community amenities and integrates the Angels Flight funicular into the experience of the site.
- Establish and maintain active and accessible linkages between the residential, office, and cultural amenities on Bunker Hill and the Historic Core area to enhance the interconnectivity of these communities.

- Integrate the existing Metro portal as a component of open space and plaza design to enhance the pedestrian and transit user experience at the site.
- Create a mix of interactive land uses with expanded for-sale and for-rent housing opportunities blended together with commercial uses to enhance the 24-hour downtown experience and provide an infill development that enlivens adjacent streets and integrated public spaces.
- Develop a high-quality mixed-use project that provides residential dwelling units that contribute to the City's housing supply, while integrating hotel uses capable of enhancing the experience in Bunker Hill and contributing to the supply of downtown hotel rooms for convention and tourists activities.
- Construct an economically feasible project that expands the economic base of the City and provides employment opportunities and new sources of tax revenue for the City by providing construction and permanent jobs, attracting commercial tenants and hotel operators, and increasing hotel patrons that collectively increase City tax revenues directly and indirectly.
- Utilize public investment in public transit by redeveloping an urban infill location with on-site mass transit capabilities to further smart growth land use planning practices and align with policies related to the reduction of greenhouse gas emissions and vehicle miles travelled.

V. Alternatives

B. Alternative 2: Commercial Office Alternative

1. Description of the Alternative

In accordance with CEQA Guidelines Section 15126.6(e)(3)(B), “if the project is other than a land use or regulatory plan, for example a development project on an identifiable property, the ‘no project’ alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved.” If disapproval of the project under consideration would result in actions by others, such as the proposal of some other project, this “no project” consequence should be discussed... and the analysis should identify the practical result of the project’s non-approval...” CEQA Guidelines Section 15126.6(e)(3)(C) further states that the No Project Alternative should project “what would reasonably be expected to occur in the foreseeable future if the project were not approved based on current plans and consistent with available infrastructure and community services.” The Project Site is a vacant development parcel located within an urbanized area with existing infrastructure and immediate proximity to mass transit. As such, it is reasonably expected that the Project Site will be developed if the Project is not approved. Hence, Alternative 2, the Commercial Office Alternative, considers development of the Project Site in accordance with the development parameters of the existing land use plans as a likely scenario for development of the Project Site if the Project is not approved. These parameters are summarized below:

- Framework Element: The Framework Element identifies the Project Site as being located within the City’s Downtown Center. The Downtown Center is defined as follows: “...an international center for finance and trade that serves the population of the five county metropolitan region. Downtown is the largest government center in the region and the location for major cultural and entertainment facilities, hotels, professional offices, corporate headquarters, financial institutions, high-rise residential towers, regional transportation facilities,

*and the Convention Center. The Downtown Center is generally characterized by a floor area ratio up to 13:1 and high-rise buildings.*⁸

- Community Plan Land Use Designation: The Central City Community Plan designates the Project Site as Regional Center Commercial.⁹ Regional Centers are intended to serve as the focal points of regional commerce, identity, and activity, and are characterized as providing a diversity of uses. Mixed-use developments are encouraged in Regional Centers, integrating housing and commercial uses in concert with supporting services, recreational uses, open spaces, and amenities. Regional Centers typically provide a significant number of jobs and should function as a hub for regional bus and rail transit.
- Zoning: The Zoning Code zones the Project Site as C2-4D (Commercial Zone, Height District 4 with Development Limitations).¹⁰ The Commercial zones permit a wide array of commercial land uses, such as retail stores, offices, hotels, schools, parks, and theaters. The C2 zone also permits any land uses permitted in the R4 (Multiple Residential) zone, which includes one-family dwellings, two-family dwellings, apartment houses, multiple dwellings, and home occupations. Height District No. 4 within the C2 zone does not impose any height limit, but restricts development to a maximum FAR of 13:1. While the maximum permitted floor area on the Project Site is restricted by the “D” limitation to an FAR to 6:1 without a transfer of floor area rights (TFAR), the “D” restriction is superseded by the Bunker Hill Specific Plan’s 13:1 FAR allowance for the Project Site.

Based on the existing land use parameters for the Project Site described above, Alternative 2 would include the development of office and commercial uses in Tower B and residential, hotel, and commercial uses in Tower A. Similar to the Project, Alternative 2 would be consistent with the uses permitted at the Project Site by the Framework Plan, Central City Community Plan, Bunker Hills Specific Plan, and the Zoning Code.

As shown in Table V-1 on page V-4, Alternative 2 would include the development of 459,492 square feet of office space in Tower B instead of the residential and hotel uses proposed in Tower B under the Project. To provide the needed floorplates for office uses, Tower B would have a slightly larger footprint and be slightly shorter in height. Tower B would be 30 floors with a maximum height of 428 feet. Tower A and the balance of the site

⁸ Los Angeles Department of City Planning, *The Citywide General Plan Framework: An Element of the City of Los Angeles General Plan, Figure 3-1: Long Range Land Use Diagram—Metro, re-adopted by City Council on August 9, 2001.*

⁹ City of Los Angeles Department of City Planning, *Zoning Information and Map Access System (ZIMAS), Parcel Profile Report for 332 South Olive Street, <http://zimas.lacity.org>, accessed May 18, 2020.*

¹⁰ City of Los Angeles Department of City Planning, *Zoning Information and Map Access System (ZIMAS), Parcel Profile Report for 332 South Olive Street, <http://zimas.lacity.org>, accessed May 18, 2020.*

plan would remain the same as proposed with the Project, except that: (1) there would be less code-required open space (e.g., 35,025 sf instead of 56,881 sf) since Alternative 2 would have less residential units; and (2) there would be 400 vehicle parking spaces for Tower B and 275 vehicle parking spaces for Tower A for a total of 675 vehicle parking spaces on the Project Site (although the 70 foot depth of the subterranean parking would be the same as the Project). This results in a reduction in parking compared to the 750 vehicle parking spaces proposed with the Project. Similar to the Project, the Metro portal in the southeastern portion of the Project Site would be retained under this alternative. The total floor area of 1,269,150 sf (with an FAR of approximately 13:1) would be the same as the Project. Figure V-1 on page V-7 is the site plan for Alternative 2 and is similar to that of the proposed Project, except that the floor plate of Tower B is slightly larger with a shorter building height.

2. Environmental Impacts

a. Air Quality

(1) Regional Emissions

(a) Construction

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

Under Alternative 2, construction activities would be generally the same as those of the Project given that the similar site plan, including two towers, a podium structure, the same number of subterranean parking levels, and the same overall amount of floor area (i.e., 1,269,150 square feet). Furthermore, the peak day construction activities and duration of construction activities of Alternative 2 would be generally be the same as the Project, such that intensity of construction-related regional air and fugitive dust emissions from site preparation and construction activities would be the same. Thus, as the construction-related regional emissions of the Project would be less than significant (with mitigation incorporated), so too would the construction-related regional construction emissions of Alternative 2. The regional air quality impacts associated with construction of Alternative 2 would be the same as the Project.

(b) Operation

The operational regional emissions associated with the consumption of electricity and natural gas would be similar between Alternative 2 and the Project. However, as provided in Appendix N, VMT Calculator Output for Alternatives, of this Draft EIR, Alternative 2 would result in a total of 6,738 daily vehicle trips and 55,850 daily VMT, as compared to the Project's 5,410 daily vehicle trips and 40,033 daily VMT.¹¹ Alternative 2 would thus result in greater operational air emissions than the Project, which is the primary contributor to regional operational emissions. Furthermore, unlike the Project, the operational regional emissions under Alternative 2 would exceed SCAQMD's regional significance thresholds for NOx. Therefore, the operational regional air pollutant emissions of Alternative 2 would be significant and unavoidable and greater than the less than significant impacts of the Project.

(2) Localized Emissions

(a) Construction

On-site construction activities associated with Alternative 2 would be located at similar distances from sensitive receptors as the Project, and the maximum day, extent and duration of construction activities would generally be the same as the Project. As such, localized regional air emissions and fugitive dust emissions from site preparation and construction activities would be the same. Therefore, as with the Project, localized construction emissions impacts under Alternative 2 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

As previously discussed, the development proposed under Alternative 2 would be generally the same as the Project, with just a different land use mix. Hence, operational localized emissions associated with on-site stationary sources (e.g., HVAC systems, etc.) would be similar between the two projects. Also, as with the Project, Alternative 2 would not introduce any major new sources of air pollution within the Project Site. However, localized operational impacts are determined primarily by peak-hour intersection traffic volumes. As provided in Appendix N of this Draft EIR, Alternative 2 would generate 641 vehicle trips during the A.M. peak hour and 808 vehicle trips during the P.M. peak hour, which would be greater than the Project's 398 A.M. peak-hour trips and 585 P.M. peak-hour trips. As such, localized operational vehicular emissions under Alternative 2 would be greater than those of the Project. At buildout of the Project, the highest average daily trips

¹¹ Gibson Transportation Consulting, Inc., *Transportation Assessment for the Alternatives to the Angels Landing Project*, May 2020. See Appendix J.1 of this Draft EIR.

at an intersection in the Project vicinity would be approximately 104,310 trips. The 2003 AQMP estimated that localized CO concentrations would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day. Although Alternative 2 would result in an increase in peak-hour trips, this increase is unlikely to result in 400,000 vehicle trips per day at nearby intersections.

In addition, with the development of the same floor area as the Project, area and stationary sources would also generate similar on-site operational air emissions compared to the Project. Also, as with the Project, Alternative 2 would not introduce any major new sources of air pollution within the Project Site. Because the localized impacts analysis from on-site operational activities and the localized CO hotspot analysis associated with off-site operational activities for the Project did not result in any significant impacts, localized impacts under Alternative 2 would be less than significant but greater than the less than significant impacts of the Project.

(3) Toxic Air Contaminants

(a) Construction

As with the Project, construction of Alternative 2 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. Construction TAC emissions generated by Alternative 2 would be similar to those of the Project since grading and excavation activities would be similar between the two projects. Thus, impacts due to construction-related TAC emissions and the corresponding individual cancer risk under Alternative 2 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

As set forth in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential TACs associated with Project operations would include diesel particulate matter from delivery trucks. Neither project would include land uses that generate substantial TAC emissions. However, under Alternative 2, the number of truck deliveries and associated DPM emissions would be expected to be greater than under the Project because: (1) the number of daily vehicle trips would be greater (e.g., 6,364 under Alternative 2 versus 5,410 under the Project);¹² and (2) the proportion of commercial to residential uses would be greater such that the number of daily truck deliveries to the Project Site would likely be

¹² Gibson Transportation Consulting, Inc., *Transportation Assessment for the Alternatives to the Angels Landing Project*, May 2020. See Appendix J.1 of this Draft EIR.

greater. However, like the Project, Alternative 2 would not include uses which would generate a large number of truck trips such as warehousing operations or cold storage facilities. Also, as with the Project, the land uses proposed under Alternative 2 are not considered land uses that generate substantial TAC emissions. Therefore, the operational TACs impacts of Alternative 2 would be less than significant but greater than the less than significant impacts of the Project.

b. Cultural Resources

(1) Historical Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, there are no historical resources on the Project Site, and no historical resources would be demolished, destroyed, relocated or altered under the Project. Also, while the Project would include vibration-generating grading and construction activities on the Project Site, this vibration would not be sufficient to result in material damage to the off-site historical resources in the vicinity. Because the amount of excavation, grading, and other construction activities would generally be the same between the Project and Alternative 2 and would occur the same distance from off-site historical resources, vibration associated with on-site construction activities under Alternative 2 would similarly not damage off-site historical resources in the vicinity.

With regard to indirect impacts on adjacent historical resources, similar to the Project, Alternative 2 would introduce new high-rise mixed-use development at the Project Site. However, Alternative 2 would not demolish existing buildings and would include the same site plan, same two towers, same podium structure, same number of subterranean parking levels, and same overall amount of floor area (e.g., 1,269,150 square feet) on the same site as the Project. Hence, as with the Project, Alternative 2 would not materially impair the context of the adjacent historical resources (e.g., would not demolish or alter the physical characteristics that convey the significance of the historical resources that justify their inclusion in or eligibility for inclusion in the national, state or local registers or historic district programs pursuant to CEQA).

Based on the above, Alternative 2 would result in less than significant impacts to historical resources, which would be similar to the less than significant impacts of the Project.

(2) Archaeological Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, no archaeological resources have been documented on-site, although multiple archaeological resource finds have been documented within a 0.5-mile radius of the Project Site. As

further discussed in Section IV.B, the history of Native American and historic-era Europeans occupation of the Los Angeles area makes the potential for the presence of buried archaeological resources a possibility at the Project Site. The Project would include excavation and grading activities that could potentially unearth archaeological resources, if present.¹³ Because Alternative 2 would include roughly the same site plan and levels of subterranean parking as the Project at the same location, it would include similar excavation and grading activities as the Project on the same site and would, thus, have a similar potential for unearthing archaeological resources, if present. Furthermore, the City applies its standard archaeological resources condition of approval to projects that disturb soil to address the inadvertent discovery of archaeological resources during grading activities. As such, Alternative 2 would result in a similar less than significant impact as the Project.

(3) Human Remains

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, no human remains have been documented on-site or at the adjacent properties, although a prehistoric burial has been documented 0.5 mile northeast of the Project Site and the history of occupation of the Los Angeles area makes the potential for unearthing human remains a possibility at the Project Site. The Project would include excavation and grading activities that could potentially unearth human remains, if present. Because Alternative 2 would include roughly the same site plan and levels of subterranean parking as the Project at the same location, it would include similar excavation and grading activities as the Project and would have a similar potential for unearthing human remains, if present. As such, Alternative 2 would result in similar less than significant impacts to human remains (with adherence to applicable regulations) as the Project.

c. Energy

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

(a) Construction

Similar to the Project, construction activities associated with Alternative 2 would consume electricity to supply and convey water for dust control, power construction site

¹³ *Given the undeveloped nature of the Project Site, the extended duration of surrounding past historical-era activity, and the presence of sensitive prehistoric resources within a 0.5-mile radius, the Project Site is considered to have a moderate potential for supporting the presence of unanticipated historical-era and prehistoric archaeological resources. As such, while unlikely, it is still possible that unanticipated archaeological deposits or features are present below the ground surface at the Project Site. As Project excavations would extend down to as much as 70 feet below the ground surface, Project excavations could potentially disturb archaeological resources if such resources are present.*

lighting and power other construction equipment, and require diesel and other fuels for construction vehicles, but like the Project, would not consume natural gas. However, as with the Project, this energy use would occur in accordance with applicable energy conservation requirements (e.g., Title 24, CARB anti-idling regulations, In-Use Off-Road Diesel-Fueled Fleet regulations, etc.) such that this energy use would not occur in a wasteful, inefficient, or unnecessary manner. In addition, because Alternative 2 would include the same site plan, number of subterranean levels, buildings, and overall floor area (e.g., 1,269,150 square feet) as the Project, the level of construction activities and associated energy use would be similar. Therefore, the construction-related energy impacts of Alternative 2 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 2 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels. Electricity consumption rates are generally higher for office uses than for hotel and residential uses, while natural gas consumption rates are generally higher for residential uses and lower for hotel and office uses. Hence, because Alternative 2 would develop office uses in place of the hotel and residential uses proposed in Tower B under the Project, the operational electricity consumption would be greater and natural gas consumption would be lower under Alternative 2 than under the Project. Also, as provided in Appendix N of this Draft EIR, Alternative 2 would result in a total of 6,364 daily vehicle trips and 49,908 daily VMT as compared to 5,410 daily trips and 40,033 daily VMT under the Project.¹⁴ As such, the operational consumption of petroleum-based fuels would be greater under Alternative 2. However, like the Project, Alternative 2 would: (1) represent a high-density mixed-use infill project within a TPA and HQTa adjacent to an existing Metro portal which would maximize transit and other alternative modes of transportation, minimize vehicle miles traveled, and result in associated reductions in motor vehicle-related fuel use; (2) be designed to further reduce vehicular trips to the Project Site through various TDM strategies (e.g., bicycle infrastructure) as set forth in Section IV.J, Transportation; (3) implement PDFs to reduce energy usage (e.g., GHG-PDF-1, design per LEED Silver certification requirements, GHG-PDF-2, provision of electric vehicle charging stations, and GHG-PDF-3, prohibition on natural gas-fueled fireplaces); and (4) comply with the applicable energy conservation requirements of Title 24, the Los Angeles Green Building Code, and CALGreen. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels during operation of Alternative 2 would not be wasteful, inefficient, or unnecessary, and impacts would be less than significant. The degree of the impacts would

¹⁴ Gibson Transportation Consulting, Inc., *Transportation Assessment for the Alternatives to the Angels Landing Project*, May 2020. See Appendix J.1 of this Draft EIR.

be similar between the two projects as neither would use energy in a wasteful, inefficient, or unnecessary manner.

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

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

With regard to transportation related energy usage, Alternative 2, like the Project, would: (1) comply with goals of the SCAG's 2016 RTP/SCS which incorporate VMT targets established by SB 375; (2) develop mixed uses adjacent to a Metro portal within a TPA, HQTa and major job centers which would serve to reduce per capita VMT and associated transportation fuel usage; (3) comply with CAFE fuel economy standards; and (4) comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction.

Based on the above, Alternative 2, like the Project, would not conflict with plans for renewable energy or energy efficiency. The impacts of Alternative 2 would thus be less than significant, and similar to the less than significant impacts of the Project.

d. Geology and Soils (Paleontological Resources)

As discussed in Section IV.D, Geology and Soils (Paleontological Resources), of this Draft EIR, no paleontological resources have been documented on-site or at the adjacent properties, and the uppermost layers of soil and the overlying younger Quaternary Alluvium deposits at the Project Site are unlikely to yield significant vertebrate fossils. However, deeper excavations into the sedimentary layers and San Fernando Formation bedrock underlying the Project Site have the potential to encounter significant vertebrate fossil remains. As Alternative 2 would include roughly the same site plan and number of subterranean parking levels as the Project, it would result in the same depth of excavations and spatial extent of grading as the Project and thus would have a similar potential to impact paleontological resources as the Project. Furthermore, like the Project, Alternative 2 would implement Mitigation Measures GEO-MM-1 through GEO-MM-4 which require construction worker paleontological resources sensitivity training, paleontological

monitoring by qualified paleontological monitor, and the proper collection and treatment of any paleontological resources discovered during construction which would mitigate any impacts. Therefore, the paleontological resources impacts of Alternative 2, like the Project, would be less than significant (with mitigation incorporated), with the level of the impacts similar between the two projects.

e. Greenhouse Gas Emissions

(1) GHG Emissions

Both the Project and Alternative 2 would include new development that would generate GHG emissions associated with both construction (the operation of construction equipment, construction truck and construction worker traffic, etc.) and operation (lighting, HVAC systems, heating, automobile and truck traffic, etc.). Like the Project, Alternative 2 would: (1) represent high-density mixed-use development on an urban infill site adjacent to transit and located within a TPA and HQTa which would reduce daily vehicle trips and per capita VMT;¹⁵ (2) be designed to comply with the requirements of Title 24, the CALGreen Code, and the Los Angeles Green Building Code; and (3) incorporate PDFs to reduce GHG emissions (e.g., GHG-PDF-1, design per LEED Silver certification requirements, GHG-PDF-2, provision of electric vehicle charging stations, and GHG-PDF-3, prohibition on natural gas-fueled fireplaces). Nonetheless, while both projects would generate similar GHG emissions during construction owing to the same site plan, levels of subterranean parking, amount of new floor area (e.g., 1,269,150 square feet), etc., Alternative 2 would: (1) consume more electricity but less natural gas during operation owing to the development of office uses rather than hotel and residential uses in Tower B; and (2) consume more petroleum-based fuels during operation due to greater daily vehicle trips (6,364 versus 5,410) and daily VMT (49,908 versus 40,033) under this alternative.¹⁶ As the primary source of GHG emissions from both projects would be from vehicle travel during operation, therefore, overall, Alternative 2 would generate greater GHG emissions than the Project. Therefore, while neither project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, the less than significant impacts of Alternative 2 would be greater than the less than significant impacts of the Project.

¹⁵ Gibson Transportation Consulting, Inc., *Transportation Assessment for the Alternatives to the Angels Landing Project*, May 2020. See Appendix J.1 of this Draft EIR.

¹⁶ Gibson Transportation Consulting, Inc., *Transportation Assessment for the Alternatives to the Angels Landing Project*, May 2020. See Appendix J.1 of this Draft EIR.

(2) Conflict with GHG Reduction Plans/Policies/Regulations

As indicated above, Alternative 2, like the Project, would: (1) represent high-density mixed-use development on an urban infill site within a TPA and HQTa; (2) reduce per capita VMT; (3) comply with Title 24, the CALGreen Code, and the Los Angeles Green Building Code; and (4) incorporate PDFs to reduce GHG emissions (e.g., GHG-PDF-1, design per LEED Silver certification requirements, GHG-PDF-2, provision of electric vehicle charging stations, and GHG-PDF-3, prohibition on natural gas-fueled fireplaces). Therefore, Alternative 2, like the Project, would not conflict with applicable GHG reduction plans, policies and regulations. Alternative 2 would result in less than significant impacts associated with GHG plans and policies, which would be similar to the less than significant impacts of the project.

f. Land Use and Planning

As previously described, Alternative 2 would develop office uses in Tower B and hotel, residential, and commercial uses in Tower A. Alternative 2 would include the development of 459,492 gross square feet of office space in Tower B instead of the residential and hotel uses proposed in the Project. To provide the needed floorplates for office uses, Tower B would have a slightly larger footprint and be slightly shorter in height. Tower A and the balance of the site plan would remain the same as proposed with the Project, except that: (1) there would be less code-required open space (e.g., 35,025 sf instead of 56,881 sf) because Alternative 2 would have less residential units; and (2) there would be 400 vehicle parking spaces for Tower B and 275 vehicle parking spaces for Tower A for a total of 675 vehicle parking spaces on the Project Site. This compares to the 750 vehicle parking spaces proposed with the Project. The overall square feet of floor area (1,269,150) and FAR (13:1) would be the same as the Project.

As with the Project, the uses proposed under Alternative 2 would be consistent with the type, height, density and intensity of development permitted by the existing land use designation (Regional Center Commercial) and zoning (C2-4D) of the Project Site. Both projects would also comply with applicable zoning requirements (for example, parking, open space, setback, and right-of-way dedication requirements). Like the Project, Alternative 2 would also include high-density mixed-use development on an urban infill site adjacent to the Metro portal and within a TPA and HQTa and would offer a mix of uses within one site, thereby reducing the need for residents to travel off-site to meet their retail needs and reducing vehicle trips, VMT, traffic congestion, and air emissions. Both projects would also provide public benefits, including but not limited to affordable housing, publicly accessible open space, frontage improvements, and pedestrian connections between Bunker Hill and the Historic Core and between the Metro portal, California Plaza, and Angels Flight. Lastly, because the difference between the two projects would be in the land use mix only (not in the types of land uses or the overall amount of floor area), and

because both projects are permitted at the Project Site without the need for a General Plan Amendment or Zone Change, Alternative 2, like the Project, has been accounted for and would not conflict with the applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect, including those set forth in the Los Angeles General Plan Framework Element, Housing Element, Central City Community Plan, Draft Downtown Community Plan,¹⁷ Bunker Hill Specific Plan, LAMC, and SCAG's 2016–2040 RTP/SCS.¹⁸ Therefore, Alternative 2 would result in less than significant land use and planning impacts that are similar to the less than significant impacts of the Project.

g. Noise

(1) Noise

(a) Construction

The amount of peak day and overall construction activity, the duration of construction, and the amount of overall construction activities and construction traffic would generally be the same between Alternative 2 and the Project. This is because: (1) Alternative 2 would include roughly the same site plan and number of subterranean parking levels as the Project, and thus roughly the same amount of excavation and grading activity; (2) both projects would include the development of 1,269,150 square feet of floor area; (3) both projects would be developed on the same site, with roughly the same building footprints,¹⁹ and within the same distances to off-site sensitive receptors; (4) both projects would include the development of mat foundations requiring nighttime concrete pours; (5) given that both projects would include high-rise mixed-use development, it is anticipated that they would require the same mix of construction equipment; (6) both projects would implement the same construction-related project noise design features, including NOI-PDF-1 (using construction equipment equipped with state-of-the-art noise

¹⁷ *Analysis of the Draft Downtown Community Plan provided for informational purposes only (not yet adopted).*

¹⁸ *On September 1, 2020, SCAG's Regional Council adopted an updated RTP/SCS known as the 2020–2045 RTP/SCS or Connect SoCal. As with the 2016–2020 RTP/SCS, the purpose of the 2020–2045 RTP/SCS is to meet the mobility needs of the six-county SCAG region over the subject planning period through a roadmap identifying sensible ways to expand transportation options, improve air quality and bolster Southern California long-term economic viability. On October 30, 2020, the California Air Resources Board (CARB) accepted SCAG's determination that the SCS would meet the applicable state greenhouse gas emissions targets. The goals and policies of the 2020–2045 RTP/SCS are similar to, and consistent with, those of the 2016–2040 RTP/SCS. Hence, like the Project, Alternative 2 would also be consistent with the 2020–2045 RTP/SCS.*

¹⁹ *The Tower B footprint would be slightly larger under Alternative 2. However, the amount of overall excavation and grading, and peak day construction activities, would be roughly the same between the two projects.*

shielding and muffling devices) and NOI-PDF-3 (prohibition on the use of impact driven pile systems); and (7) both projects would implement Mitigation Measure NOI-MM-1 (temporary impermeably sound barrier at specified locations during the construction period). Thus, like the Project, Alternative 2 would result in significant unavoidable on-site construction noise (both project-level and cumulative), less than significant off-site construction traffic noise (project level), and significant unavoidable off-site construction traffic noise (cumulative), with the degree of these impacts similar between the two projects.

(b) Operation

As discussed in Section IV.G, Noise, of this Draft EIR, sources of operational noise under the Project would include: (1) on-site stationary noise sources, including mechanical equipment, activities within the proposed outdoor spaces, parking areas, loading dock and trash collection areas; and (2) off-site mobile source (e.g., traffic) noise sources. Alternative 2 would introduce noise from similar on-site and off-site noise sources as the Project. The proposed parking, loading dock and trash collection areas for Alternative 2 would also be located in enclosed areas, similar to the Project, such that parking, loading dock and trash collection area noise under Alternative 2 would be minimal similar to the Project. The Project and Alternative 2 would also both be mixed-use projects, albeit with different mixes of land uses, and would have similar outdoor open space hours, similar outdoor operating hours and frequency of outdoor special events, and similar mechanical equipment (e.g., HVAC systems, etc.). Furthermore, Alternative 2 would implement the same operations-related regulatory compliance measures and PDFs as the Project, including NOI-PDF-2 (acoustically screening mechanical equipment), NOI-PDF-3 (acoustically screening loading docks), NOI-PDF-5 (limiting noise from outdoor amplified sound systems to specific maximum levels); and NOI-PDF-6 (6-foot-high noise attenuation features around the proposed Level 5 Terrace). Hence, Alternative 2 would result in less than significant operational on-site noise impacts that would be similar to the less than significant impacts of the Project.

Alternative 2 would result 6,364 daily vehicle trips, versus the Project's 5,410 daily vehicle trips, and would generate more peak-hour vehicle trips than the Project,²⁰ such that off-site mobile source noise would be greater under Alternative 2 than under the Project. Typically, a doubling of traffic volume would result in an increase of 3 dBA in traffic noise levels. Since Alternative 2 would only result in a maximum increase of approximately 18 percent in daily vehicle trips, the total traffic volumes in the study area would not be doubled by trips generated under Alternative 2. As presented in Section IV.G, the Project-related traffic would result in a maximum noise level increase of 0.4 dBA CNEL. Due to the

²⁰ Gibson Transportation Consulting, Inc., *Transportation Assessment for the Alternatives to the Angels Landing Project*, May 2020. See Appendix J.1 of this Draft EIR.

approximately 18 percent increase in daily vehicle trips the, noise level associated with the off-site traffic under Alternative 2 would be increased (less than approximately 0.1 dBA CNEL higher), as compared to the Project but would remain below the 3-dBA CNEL significance threshold. Therefore, operational off-site noise impacts under Alternative 2 would be greater than the Project but would remain less than significant as for the Project.

Cumulative off-site operational traffic noise would be significant and unavoidable under the Project. Because Alternative 2 would generate more operational traffic than the Project (e.g., 6,364 daily vehicle trips versus 5,410 under the Project), cumulative operational traffic noise would also be significant and unavoidable under Alternative 2 (e.g., cumulative noise levels would increase by 3.3 dBA under Alternative 2 and by 3.2 dBA under the Project, both of which would be above the 3 dBA threshold).²¹ The degree of the impact would be greater under Alternative 2 owing to higher traffic generation, and thus greater (+0.1 dBA)²² cumulative operational traffic noise, under this alternative.

(2) Vibration

(a) Construction

Both Alternative 2 and the Project would generate on-site vibration from the use of heavy-duty excavation, grading and construction equipment and off-site vibration along the proposed construction haul route from construction trucks. While the Project and Alternative 2 would include different land use mixes in Tower B (Tower A would be the same), they would include: (1) roughly the same site plan on the same site; (2) development of the same amount of new floor area (1,269,150 square feet); (3) the same number of subterranean parking levels, and roughly the same spatial extent and depth of excavations and grading; (4) the same mat foundations with nighttime concrete pours; (5) roughly the same amount of construction traffic; and (6) utilize the same construction haul route. As discussed previously, both projects would also have roughly the peak day and overall amount construction activity, and roughly the same duration of construction. Thus, as with the project, Alternative 2 would result in less than significant on- and off-site construction vibration impacts in terms of building damage, significant unavoidable on- and off-site construction vibration impacts in terms of human annoyance, and significant unavoidable cumulative off-site construction vibration impacts in terms of human annoyance. The degree of these impacts would be similar between the two projects for the reasons stated above.

²¹ AES Acoustics, August 28, 2020.

²² AES Acoustics, August 28, 2020.

(b) Operation

As described in Section IV.G, Noise, of this Draft EIR, sources of vibration related to operation of the Project would include mechanical equipment, on-site vehicle circulation, and off-site delivery trucks. These same sources of operational vibration would occur under Alternative 2. As with the Project, building mechanical equipment installed as part of Alternative 2 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units mounted at the roof level that would include vibration-attenuation mounts to reduce vibration transmission, such that associated vibration would not be perceptible at the off-site sensitive receptors. Similarly, as with the Project, the vast majority of on-site vehicular circulation would occur within the proposed on-site subterranean parking structure, while all on-site truck traffic would occur within the fully enclosed loading dock portion of the podium structure, such that associated vibration would not exceed vibration-related building damage and human annoyance thresholds at the nearest buildings and sensitive uses, respectively, under Alternative 2 or the Project. Hence, as with the Project, on-site operational vibration impacts (both building damage and human annoyance) would be less than significant under Alternative, with the degree of the impact similar between Alternative 2 and the Project.

Regarding off-site operational vibration, as indicated in Section IV.G, Project operational traffic would not result in vibration in exceedance of applicable vibration-related building damage or human annoyance thresholds. Alternative 2 would result 6,364 daily vehicle trips, versus the Project's 5,410 daily vehicle trips, and would generate more peak-hour vehicle trips than the Project.²³ While the daily vehicle trips would be increased under Alternative 2, the vibration levels would be expected to be similar to those of the Project, as vibration impacts are evaluated based on the maximum (peak) vibration levels generated by an individual vehicle. As such, off-site operational vibration impacts (both building damage and human annoyance) would be less than significant, with the degree of the impact similar under Alternative 2 when compared with the Project.

While project-level operational traffic noise would be less than significant under both the Project and Alternative 2, cumulative operational traffic noise would be significant and unavoidable under the Project. Because Alternative 2 would generate more operational traffic than the Project (e.g., 6,364 daily vehicle trips versus 5,410 under the Project), cumulative operational traffic noise would also be significant and unavoidable under Alternative 3. The degree of the impact would be greater under Alternative 2 owing to

²³ Gibson Transportation Consulting, Inc., *Transportation Assessment for the Alternatives to the Angels Landing Project*, May 2020. See Appendix J.1 of this Draft EIR.

higher traffic generation, and thus greater (+0.1 dBA)²⁴ cumulative operational traffic noise, under this alternative.

h. Population and Housing

(1) Construction

As discussed in Section IV.H, Population and Housing, of this Draft EIR, the Project Site is vacant except for the Metro portal located in the southeastern portion of the Project Site. Furthermore, both the Project and Alternative 2 would retain the existing on-site Metro portal. Therefore, as with the Project, construction of Alternative 2 would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere, and no impact would occur.

As discussed in Section IV.H, Population and Housing, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by a particular development. Many construction workers are highly specialized (e.g., crane operators, steel workers, masons), and move from job site to job site as dictated by the demand for their skills while keeping their site of residence. Therefore, as with the Project, construction activities associated with Alternative 2 would not induce substantial unplanned population growth in the area and the impact would be less than significant. The degree of the impact would be similar between the Alternative 2 and the Project owing to the development of roughly the same site plan and buildings, development of the same amount of new floor area (1,269,150 square feet), and roughly the same overall amount and duration of construction, which together would result in a similar numbers of construction workers.

(2) Operation

As previously discussed, Alternative 2 would include the same amount of new floor area (e.g., 1,269,150 square feet) as the Project, but would include the development of 459,492 square feet of office use in Tower B in place of the 192 residential units and 239,872 square feet of hotel uses proposed in Tower B under the Project. As indicated in Table V-2 on page V-6, this would result in a total of 240 residential units under Alternative 2, which would generate an estimated 578 residents, versus 432 residential units under the Project which would generate an estimated 1,042 residents. As discussed in Section IV.J, Population and Housing, of this Draft EIR, the new residents generated by the Project would be within, and thus would be consistent with, the SCAG RTP/SCS growth forecasts,

²⁴ AES Acoustics, August 28, 2020.

and would constitute a small percentage of projected City and regional growth. Additionally, the new residential units proposed by the Project would represent a small percentage of the housing growth in the SCAG region and in the City. Alternative 2, like the Project, would be consistent with the existing zoning of the Project Site, which serves as the basis for City and SCAG RTP/SCS growth forecasts. Therefore, like the Project, Alternative 2 would not directly induce substantial unplanned population growth in the area.

With regard to indirect population impacts, both the Project and Alternative 2 would generate employees. Specifically, as indicated in Table V-2 on page V-6, Alternative 2 and the Project would generate an estimated 2,211 and 535 employees, respectively. While Alternative 2 would generate more employees than the Project, the majority of these employment opportunities, like for the Project, would likely be filled by persons already residing in or commuting to the area. This is because the Project Site is located in Downtown Los Angeles, one of the largest metropolitan areas in the nation with a large prospective employee pool and within close proximity to transit (including the on-site Metro portal). Similarly, any indirect demand for housing associated with the proposed new businesses under both projects would likely be fulfilled by vacancies in the surrounding housing market and from other new units in the vicinity of the Project Site, including the proposed housing units. Furthermore, both the Project and Alternative 2 would be consistent with the existing Community Plan land use designation and zoning of the Project Site such that the proposed land uses and associated populations have been accounted for in City and SCAG population forecasts. Lastly, while Alternative 2 would generate more employees than the Project, it would also generate less residents owing to the fewer number of residential units under this alternative, so that the overall (resident + employee populations) population associated with the two projects would somewhat balance out. As such, Alternative 2, like the Project, would not indirectly induce substantial unplanned population growth in the area due to development.

With regard to indirect population impacts associated with infrastructure, the Project Site represents an urban infill site within the highly developed Downtown area which already has fully developed roadway and utility infrastructure systems. Furthermore, as with the Project, the circulation and utility infrastructure improvements under Alternative 2 would be limited to those required to serve the Project from the adjacent streets and the utility infrastructure in those adjacent streets. The extension of roadways and utility infrastructure systems would not be required to serve either project. Therefore, like the Project, Alternative 2 would not indirectly induce substantial unplanned population growth in the area due to infrastructure improvements.

Based on the above, Alternative 2, like the Project, would result in less than significant operational population and housing impacts. The degree of these impacts would be similar between the two projects owing to the fact that both projects would be consistent with zoning and thus with City and SCAG growth projections.

i. Public Services

(1) Fire Protection

(a) Construction

As previously described, the types and overall amount of construction activities required for Alternative 2 would be similar to that of the Project, owing to roughly the same site plan, same amount of proposed new floor area, same spatial and depth of excavations and grading, etc. Like the Project, construction activities under Alternative 2 would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous waste (e.g., OSHA, LAFD requirements, etc.). Construction under both projects would also occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, similar to the Project, compliance with regulatory requirements under Alternative 2 would effectively reduce the potential for construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Additionally, while construction activities would primarily be contained within the boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by temporary lane closures, roadway/access improvements, and the construction of utility line connections under both projects. Similar to the Project, it is also likely that Alternative 2 would require construction fences that would encroach into the public right-of-way (e.g., sidewalks and roadways) adjacent to the Project Site on 4th Street, Hill Street, and Olive Street. However, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period under both projects, and emergency access would not be impeded. In addition, as with the Project, a Construction Management Plan (TR-PDF-1) would be implemented during construction of Alternative 2 to ensure that adequate and safe emergency access remains available within and near the Project Site during construction activities.

As indicated in Section IV.I.1, Public Services—Fire Protection, of this Draft EIR, Project construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. The same would be true for Alternative 2. However, with the implementation of TR-PDF-1, the majority of construction-related traffic, including hauling activities and construction worker trips would occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts and the slowing of emergency response times under both projects. Per TR-PDF-1, both projects would also employ temporary traffic controls such as flag persons to control traffic movement during temporary traffic flow disruptions, and construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as

necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Therefore, as with the Project, construction-related traffic under Alternative 2 would not substantially slow emergency response times or interfere with emergency access.

Based on the above, construction of Alternative 2, like the Project, would not require new or physically altered fire protection facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. As such, impacts under both projects would be less than significant, with the degree of the impacts similar between the two projects.

(b) Operation

Similar to the Project, Alternative 2 would generate new residential and employee populations on the Project Site that would contribute to an increase in demand for LAFD fire protection and emergency medical services. Specifically, as indicated in Table V-2 on page V-6, Alternative 2 would generate an estimated 578 residents and 2,211 employees, for a total service population of 2,789, versus the Project would generate an estimated 1,042 residents and 535 employees, for a total service population of 1,577 persons. Due to the greater service population under Alternative 2, this alternative would generate a greater demand for LAFD fire protection and emergency medical services than the Project. However, similar to the Project, Alternative 2 would: (1) implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, emergency access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. (including providing a rooftop emergency helicopter landing facility or other option acceptable to LAFD); (2) include automatic fire sprinklers in the proposed buildings; and (3) not include barriers that could impede emergency vehicle access.

Furthermore, as with the Project, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for Alternative 2 given the same building type, size, height, location and the same fire flow infrastructure, and because Alternative 2 would have the same fire flow requirements as the Project (e.g., would fall within LAFD Industrial and Commercial category which has a required fire flow of 6,000 gpm to 9,000 gpm from four to six fire hydrants flowing simultaneously with a minimum residual water pressure of 20 pounds psi).

Lastly, the LAFD has determined fire protection (based on the response distance from existing fire stations criteria) is adequate to serve the Project, and because Alternative 2 would be developed on the same site, fire protection would thus also be adequate to service Alternative 2.

Based on the above, like the Project, Alternative 2 would not require new or physically altered fire protection facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. Hence, like the Project, Alternative 2 would result in less than significant impacts. The degree of these impacts would be greater under Alternative 2 owing to the greater service demand under this alternative.

(2) Police Protection

(a) Construction

As with the Project, Alternative 2 would include construction activities and generate construction traffic that would create a demand for LAPD police protection services, potentially obstruct emergency access, and potentially slow emergency response times during the construction period. However, as with the Project, Alternative 2 would implement PDFs (e.g., POL-PDF-1 that provides for security lighting, fencing and regular security patrols of the construction sites, and TR-PDF-1, that provides for implementation of a Construction Management Plan) that would minimize the demand for LAPD police protection services, ensure the provision of adequate emergency access, and minimize construction traffic-related delays in emergency response during the construction period. Also, emergency vehicles have the ability to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic as permitted by CVC Section 21806. Furthermore, the construction of the Project and Alternative 2 would not indirectly generate a demand for LAPD police protection services because, as discussed previously, construction workers and their families would not be expected to move to the area as a result of the proposed development and because construction jobs would be temporary. Therefore, like the Project, Alternative 2 would not require new or physically altered police protection facilities that would cause substantial adverse physical impacts during construction, and impacts would be less than significant. Because Alternative 2 would include the same amount of development and likely the same amount and duration of construction activities as the Project, the degree of these impacts would be similar to the Project.

(b) Operation

As indicated in Section IV.I.2, Public Services—Police Protection, of this Draft EIR, LAPD considers the residential population within their service area to evaluate service capacity. As indicated in Table V-2 on page V-6, the Project would include 432 residential units which would generate an estimated 1,042 residents, versus Alternative 2 which would include 240 residential units which would generate an estimated 578 residents. While the residents of both Alternative 2 and the Project would create a demand for service from LAPD's Central Community Police Station, both projects would implement POL-PDF-2 that provides 24-hour/seven-day-a-week security, as well as regulatory requirements that would

include lighting of buildings and walkways to provide pedestrian orientation and secure pedestrian routes, security lighting of parking areas, and building entrances/exits, open spaces and walkways that would be open and in view of surrounding sites. Also, both Alternative 2 and the Project would generate tax revenues that could be applied toward the provision of new police facilities and related staffing within the Central Area. In addition, the officer-to-resident ratio for the Central Area would decrease from approximately 9.25 officers per 1,000 residents to approximately 9.02 officers per 1,000 residents under the Project and to approximately 9.12 officers per 1,000 residents under Alternative 2, which would still be substantially higher than the Citywide ratio of 2.5 officers per 1,000 residents.²⁵ Lastly, as discussed in Section IV.I.2, in conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board of Trustees of the California State University* ruling, the City is obligated to provide adequate public safety services, including police protection services, and the need for additional public safety services is not an environmental impact that CEQA requires a project proponent to mitigate.

With regard to impacts on police emergency response times, both the Project and Alternative 2 would generate operational traffic in the vicinity of the Project Site which could have the potential to increase LAPD emergency response times. Alternative 2 would generate more operational traffic than the Project (e.g., 6,364 daily vehicle trips versus 5,410 under the Project),²⁶ and thus would have a slightly greater potential to slow emergency response times. However, Alternative 2, like the Project, would not close existing streets or include barriers that could impede emergency access. Also, in accordance with CVC Section 21806, drivers of police emergency vehicles have the ability to avoid traffic by using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Lastly, the Project Site under both projects is located only 1.1 miles from LAPD's Central Community Police Station. Like the Project, operation of Alternative 2 would not cause a substantial increase in LAPD emergency response times due to traffic congestion.

Based on the above, Alternative 2, like the project, would not result in the need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service, and impacts would be less than significant. The degree of these impacts would be less under Alternative 2 because

²⁵ Calculations based on 370 existing sworn officers, and an existing residential service population of 40,000, within LAPD's Central Area. For Alternative 2, the 9.12 officers per 1,000 resident estimate was calculated using the following formula: $370 / ((40,000 + 578) / 1,000) = 9.12$.

²⁶ Gibson Transportation Consulting, Inc., *Transportation Assessment for the Alternatives to the Angels Landing Project*, May 2020. See Appendix J.1 of this Draft EIR.

Alternative 2 would generate less residential population (e.g., less service population) than the Project.

(3) Schools

(a) Construction

Similar to the Project, Alternative 2 would generate temporary construction jobs during the construction period. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project or Alternative 2. Therefore, as with the Project, the construction employment generated by Alternative 2 would not result in a notable increase in the resident population, an increase in demand for schools in the vicinity of the Project Site, or the need for new or physically altered school facilities, the construction of which would cause significant environmental impacts. Impacts under both projects would be less than significant, with the degree of these impacts similar between the two projects owing to roughly the same amount of construction activities and associated number of construction workers.

(b) Operation

As with the Project, Alternative 2 would include new development that would contribute to an increased demand for schools. Specifically, Alternative 2 would include 240 residential units, versus 432 residential units under the Project. Because Alternative 2 would include fewer residential units than the Project, which is the primary driver of the demand for schools, it would generate less demand for schools than the Project. At the same time, the number of students that could be indirectly generated by employee households would be greater under Alternative 2 than under the Project owing to the development of office in instead of residential uses in Tower B under Alternative 2. Regardless, pursuant to Senate Bill 50, the Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits for either project, and per Government Code Section 65995, the payment of these fees is considered mitigation of the impacts of new development on schools. Therefore, both Alternative 2 and the Project would result in less than significant impacts. Because Alternative 2 would generate less demand for schools than the Project, as residential units rather than commercial uses are the primary generator of school demand, the degree of these impacts would be less under Alternative 2.

j. Transportation

Alternative 2 would be developed on the same site as the Project and thus would be subject to the same transportation-related plans and requirements as the Project (e.g., the

City's Mobility Plan 2035, Plan for a Healthy Los Angeles, Central City Community Plan, Draft Downtown Community Plan,²⁷ Bunker Hill Specific Plan, LAMC, Vision Zero, Citywide Design Guidelines, and SCAG RTP/SCS). Like the Project, Alternative 2 would represent a high density (13:1 FAR) mixed-use development on an urban infill site within a TPA and HQTAs, adjacent to a Metro portal, and within close proximity of multiple bus transit routes, which would be consistent with applicable plans calling for high-density development in close proximity to transit so as to maximize the use of alternative transportation modes and reduce traffic, VMT and air emissions. Like the Project, Alternative 2 would also reduce per capita VMT in accordance with the applicable transportation plans. Specifically, Alternative 2 would result in a household VMT per capita of 3.6 and a work/employee VMT per capita of 6.3, and the Project would result in a household VMT per capita of 3.9 and a work/employee VMT per capita of 7.3. As such like the Project, Alternative 2 would generate VMT impacts that would be less than the City's household VMT per capita threshold of 6.0 and work-employee VMT per capita threshold of 7.6.²⁸ Also, Alternative 2 would include roughly the same site plan as the Project, including the same vehicular, pedestrian, and bicycle access and parking, and would follow the same City roadway, driveway, site distance, parking, and other transportation-related requirements as the Project. Lastly, Alternative 2 would implement the same transportation-related PDFs as the Project (e.g., TR-PDF-2 that provides TDM measures, and TR-PDF-3 that includes measures to ensure the safety of pedestrians) as the Project. As with the Project, Alternative 2 would also be consistent with other applicable transportation-related goals, objectives and policies, including but not limited to the following:

- Provide safe access for all users regardless of mode of choice, encourage multi-modal transportation alternatives and access, and reduce per capita VMT consistent with the Mobility Plan.
- Prioritize safety and access through improved pedestrian passages and connectivity to transit and would encourage healthy living by promoting bicycling and walking consistent with the Plan for a Healthy Los Angeles.
- Expand housing opportunities near accessible transit, encourage a mix of land uses to create an active destination, provide traditional and non-traditional sources of open space, support high levels of transit use, and provide employment opportunities consistent with the Central City Community Plan.

²⁷ *Analysis of the Draft Downtown Community Plan provided for informational purposes only (not yet adopted).*

²⁸ *Gibson Transportation Consulting, Inc., Transportation Assessment for the Alternatives to the Angels Landing Project, May 2020. See Appendix J.1 of this Draft EIR.*

- Provide a mixed-use infill development in proximity to transit, would reinforce the Downtown workforce, and would grow and support the area's residential base consistent with the Draft Downtown Community Plan.²⁹
- Create a 24-hour Downtown environment at the Project Site, expand housing opportunities and commercial retail space, provide employment opportunities, provide connections between public open spaces and pedestrian pathways, and create a transit-friendly environment through active ground floor uses and pedestrian-oriented design consistent with the Bunker Hill Specific Plan.
- Comply with LAMC street dedication, TDM and vehicle and bicycle parking requirements.
- Separate pedestrian, bicycle, and automobile traffic, and would not preclude future City safety improvements consistent with Vision Zero.
- Include accessible sidewalks, pedestrian amenities, vehicular access driveways, and other transportation improvements consistent with the Citywide Design Guidelines.
- Be consistent with the growth projections and VMT reduction policies of SCAG's RTP/SCS.

Therefore, as with the Project, Alternative 2 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant. The degree of these impacts would be similar between Alternative 2 and the Project as both projects would be consistent with applicable transportation programs, plans, ordinances and policies.

Both Alternative 2 and the Project would reduce per capita VMT as summarized above. Therefore, impacts with respect to conflicts with CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant under both Projects. Although Alternative 2 would result in greater daily VMT than the Project (e.g., 49,908 versus 40,033 under the Project, the degree of these impacts would be less under Alternative 2 owing to the generation of lower household and work-employee VMT per capita under this alternative.³⁰

²⁹ *Analysis of the Draft Downtown Community Plan is provided for informational purposes only (not adopted plan).*

³⁰ *Gibson Transportation Consulting, Inc., Transportation Assessment for the Alternatives to the Angels Landing Project, May 2020. See Appendix J.1 of this Draft EIR.*

Regarding traffic hazards, Alternative 2 would have roughly the same site plan, including the same access plan, as the Project. Specifically, as with the Project, Alternative 2 would: (1) include new driveways along Olive Street and 4th Street; (2) include off-street, on-site subterranean parking; (3) maintain the designated driveway and roadway width requirements identified in the Mobility Plan; (4) not preclude future roadway improvements proposed in the Mobility Plan; (5) separate pedestrian and vehicular traffic; (6) not result in inadequate vehicle queuing at the Project driveways or applicable freeway on- and off-ramps; and (6) provide all heavy truck maneuvering associated with the proposed loading dock within the Project Site. Furthermore, neither project would be developed along streets identified in the City's High Injury Network, and both projects would implement the same applicable PDFs (e.g., TR-PDF-1 that provides a Construction Management Plan, and TR-PDF-3 that includes measures to ensure the safety of pedestrians such as maintaining adequate sight distance at Project driveways). Lastly, neither project would generate traffic involving farm equipment or other incompatible use. Therefore, similar to the Project, Alternative 2 would not substantially increase hazards due to a geometric design feature or incompatible use, and impacts would be less than significant. The degree of the impact would be similar between Alternative 2 and the Project.

Regarding emergency access, both the Project and Alternative 2 would primarily contain construction activities on-site and would implement TR-PDF-1 (Construction Management Plan) which would ensure adequate emergency access during construction. Also, like the Project, Alternative 2 would not close any existing streets, would provide for emergency access into the Project Site on three sides (e.g., via Olive, Hill and 4th Streets), would include driveways and internal circulation designed to meet all applicable City Building Code and Fire Code requirements regarding emergency access, and would not include the installation of barriers that could impede emergency vehicle access. Lastly, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, Alternative 2 would result in less than significant emergency access impacts that would be similar to the less than significant impacts of the Project.

k. Tribal Cultural Resources

As indicated in Section IV.K, Tribal Cultural Resources, of this Draft EIR, no pre-historic archaeological sites or other resources documented to be related to past Native American activity have been previously recorded within the Project Site according to the SLF and SCCIC records searches. Also, while several archaeological resources have been recorded within the 0.5-mile records search radius of the Project Site, including a prehistoric burial (P-19-120015), AB 52 consultation initiated by the City has not resulted in the identification of a tribal cultural resource within the Project Site. In addition, the Project

Site has been previously graded and developed such that the native subsurface soils with the potential to support the presence of cultural deposits have likely been disturbed. Furthermore, based on the archaeologist's review of applicable documentation and a pedestrian survey, there is no record or evidence of tribal cultural resources on the Project Site or in its immediate vicinity. Based on this information, the City, in its discretion and supported by substantial evidence, finds that the Project Site does not contain any resources determined by the City to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. Furthermore, should tribal cultural resources be inadvertently discovered during Project excavation and grading activities, the City's standard condition of approval for tribal cultural resources would be implemented to address such resources. Accordingly, the analysis in Section IV.K. concludes that Project impacts on tribal cultural resources would be less than significant. Because Alternative 2 would be developed on the same site as the Project, would include roughly the same spatial extent and depth of excavation and grading, and would be subject to the same standard condition of approval for tribal cultural resources, it too would result in less than significant impacts. Because the potential to encounter any buried tribal cultural resources would be the same between the Alternative 2 and the Project, the degree of these impacts would be similar.

I. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 2 would generate a short-term demand for water associated with dust control, excavation/export, soil compaction, cleaning of construction equipment, cleaning, etc. This demand would be similar to that during construction of the Project as both projects would include: roughly the same site plan; the same buildings, new floor area, and number of subterranean parking levels; similar amounts of excavation and grading; and generally, the same amount of construction activity and duration of construction. As evaluated in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of construction. Since Alternative 2 would include a similar amount of development and construction activity as the Project, the temporary and intermittent demand for water during construction of Alternative 2 would similarly be met by the City's available water supplies.

With regard to water infrastructure, neither project would require new or upgraded water mains, and the design and installation of new water service connections and the required on-site water distribution system under both projects would be constructed in accordance with applicable City standards. These connections and on-site water

distribution system would primarily involve on-site trenching to place the lines below the surface and minor off-site trenching to connect to the existing public water mains or existing meter lateral locations. The environmental effects of the on-site trenching are already subsumed in the environmental impact analysis of the other applicable environmental issues (e.g., air quality, cultural resources, noise, etc.), while the environmental effects of the off-site trenching would be minor and would be mitigated with implementation of TR-PDF-1 (Construction Management Plan). Also, the mitigation measures and standard Conditions of Approval identified in the analyses for the other applicable environmental issues would also apply to the on- and off-site trenching under both projects. Therefore, like the Project, Alternative 2 would not result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environment impacts.

Based on the above, Alternative 2 would result in less than significant water supply and infrastructure impacts during construction, which would be similar to the less than significant impacts of the Project.³¹

(b) Operation

During operation, Alternative 2, like the Project, would generate a demand for water from LADWP. The WSA prepared by LADWP for the Project, included as Appendix M of this Draft EIR, concludes that City water supplies are adequate to serve the Project during normal, single dry, and multiple dry years for the next 20 years and beyond. The base water demand (e.g., water demand before the implementation of required and proposed water conservation features/measures) for Alternative 2 would be approximately 20,842 gpd less than under the Project.³² Therefore, City water supplies would also be adequate to serve Alternative 2. Furthermore, both projects would comply with applicable water conservation requirements, and with the additional water conservation measures outlined in WAT-PDF-1. Lastly, both projects would be consistent with the existing zoning of the Project Site such that both projects are accounted for in the City's future water demand forecasts. Therefore, like the Project adequate water supplies would be available to serve Alternative 2.

³¹ *Alternative 2 would create a demand for approximately 4 percent less domestic water than the Project during operation. However, it is not anticipated that this decrease would result in a substantive difference in the sizing of the required on-site water infrastructure or the connections of this infrastructure to the off-site water mains as water infrastructure sizing is based on fire flow requirements, which would be the same between the two projects, rather than on domestic water demand.*

³² *Calculated by subtracting the base water demand associated with the hotel and residential units proposed in Tower B under the Project (e.g., 47,181 gpd + 28,800 gpd = 75,981 gpd) from the base water demand associated with the office uses proposed in Tower B under Alternative 2 (e.g., 55,139 gpd). The water use rates used in these calculations are from the 2012 City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table.*

With regard to water infrastructure, as indicated in the Utility Report included as Appendix L of this Draft EIR, the IFFAR and SAR prepared by LADWP for the Project indicate that adequate water infrastructure and associated capacity is available to provide the domestic water and fire flow required to serve the Project. Because Alternative 2 would result in lower domestic water demand than the Project (although fire flow demand would be the same as discussed previously under Fire Protection), adequate water infrastructure would also be available to serve Alternative 2. Furthermore, like the Project, Alternative 2 would incorporate fire sprinkler suppression systems in the proposed buildings which would reduce or eliminate the public hydrant demand, and per the Utility Report, adequate capacity is available in the water mains that would serve the Project to power the sprinkler systems. Lastly, both projects would comply with applicable water conservation requirements, and with the additional water conservation measures outlined in WAT-PDF-1, which would minimize the impacts on the local water mains.

Based on the above, Alternative 2 would result in less than significant operational water supply impacts that would be less than the less than significant impacts of the Project.

(2) Wastewater

(a) Construction

As with the Project, temporary facilities, such as portable toilet and hand wash areas, would be provided by the construction contractor under Alternative 2, with any sewage generated from these facilities collected and hauled off-site rather than discharged to the local sewer system. Thus, as with the Project, wastewater generation from construction activities under Alternative 2 would not cause a measurable increase in wastewater flows requiring conveyance by the local public sewer system.

With regard to the environmental effects associated with the construction of required wastewater infrastructure, Alternative 2, like the Project, would require the construction of new on-site wastewater conveyance infrastructure to serve the proposed buildings as well as connections to the existing 15-inch sewer line in Hill Street. However, construction of this infrastructure would be limited to on site trenching, and to both minor off-site trenching and minor connection work along the Project Site's Hills Street frontage, under both projects. The environmental effects of the on-site trenching are already subsumed in the environmental impact analysis of the other applicable environmental issues (e.g., air quality, cultural resources, noise, etc.), while the environmental impacts associated with the off-site trenching would be minor and would be mitigated with implementation of TR-PDF-1 (Construction Management Plan). Also, the mitigation measures and standard Conditions of Approval identified in the analyses for the other applicable environmental issues would also apply to the on-and off-site trenching under both projects. No upgrades to the existing

off-site sewer mains or greater wastewater conveyance system would be required. Furthermore, impacts associated with the installation of the wastewater infrastructure would be short-term and temporary and would cease upon completion of the installation.

Based on the above, Alternative 2 would result in less than significant wastewater infrastructure impacts during construction that would be similar to the less than significant impacts of the Project.³³

(b) Operation

During operation, Alternative 2, like the Project, would generate wastewater requiring conveyance and treatment. Operational wastewater generation under Alternative 2 would be approximately 20,842 gpd less than under the Project.³⁴ Like the Project, sewer service for Alternative 2 would be provided utilizing a new on-site sewer system and connections to the existing 15-inch sewer main in Hill Street. Given that the wastewater flows generated by Alternative 2 would be less than the estimated wastewater flows of the Project, and given that the Utility Report included as Appendix L of this EIR (including the WWSI prepared by LASAN and included as an appendix to that report) determined that adequate capacity exists in the existing adjacent sewer mains to serve the Project, adequate sewer capacity would also be available to serve Alternative 2. Hence, like the Project, Alternative 2 would not require or result in the relocation or construction of new or expanded waster facilities, the construction or relocation of which could cause significant environmental effects, during operation. Impacts would be less than significant under both projects. The degree of these impacts would be less under Alternative 2 owing to less wastewater generation under this alternative and less of a demand for wastewater conveyance and treatment capacity.

(3) Energy Infrastructure

(a) Construction

The Project and Alternative 2 would consume electricity and fossil fuels during construction (natural gas is typically not used during construction). The energy consumed

³³ *Operation of Alternative 2 would create approximately 4 percent less wastewater than the Project. However, it is not anticipated that this decrease in wastewater generation would result in a substantive difference in the sizing of the on-site wastewater infrastructure or the connections of this infrastructure to the off-site sewer mains required under the Project.*

³⁴ *Calculated by subtracting the wastewater generation associated with the hotel and residential units proposed in Tower B under the Project (e.g., 47,181 gpd + 28,800 gpd = 75,981 gpd) from the wastewater generation associated with the office uses proposed in Tower B under Alternative 2 (e.g., 55,139 gpd). The wastewater generation rates used in these calculations are from the 2012 City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table.*

by Alternative 2 during construction would be similar to that of the Project given that the site plan, levels of subterranean parking, buildings, and new floor area (1,269,150 square feet), and thus the amount and duration of construction activities, would be the roughly the same between the two projects. As indicated in Section IV.L.3, Utilities and Service Systems—Energy Infrastructure, energy supplies and infrastructure in the vicinity are adequate to meet the construction needs of the Project. Hence, energy supplies and infrastructure would also be adequate to meet the construction needs of Alternative 2.

With regard to the environmental effects associated with the construction of energy infrastructure, Alternative 2, like the Project, would be provided with the electricity and natural gas required for operation by the existing electricity and natural gas lines in the adjacent streets via new on-site electricity and natural gas systems and connections to these existing lines. This would require on-site and some off-site trenching, as well as installation of the on-site electricity and natural gas infrastructure and connections. However, the environmental effects of the on-site trenching are already subsumed in the environmental impact analysis of the other applicable environmental issues (e.g., air quality, cultural resources, noise, etc.), while the environmental effects associated with the off-site trenching would be minor and would be mitigated with implementation of TR-PDF-1 (Construction Management Plan). Also, the mitigation measures and standard Conditions of Approval identified in the analyses for the other applicable environmental issues would also apply to the on- and off-site trenching under both projects. No upgrades to the existing off-site electricity or natural gas mains would be required. Also, impacts associated with the installation of the electricity and natural gas infrastructure would be short-term and temporary and would cease upon completion of the installation.

Based on the above, Alternative 2, like the Project, would not require or result in the relocation or construction of new or expanded energy facilities, the construction or relocation of which could cause significant environmental effects, during construction. Impacts would be less than significant under both projects. The degree of these impacts would be similar between the two projects.

(b) Operation

During operation, Alternative 2, like the Project, would generate an increased consumption of electricity, natural gas and fossil fuels. Operational energy consumption under Alternative 2 would be greater in terms of electricity and less in terms of natural gas than the Project as office uses typically consume more electricity than residential and hotel uses but less natural gas. Also, Alternative 2 would consume more fossil fuels than the Project during operation owing to the greater operational traffic generation under this alternative. As provided in Section IV.L.3, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR, adequate capacity exists in both the local electrical and natural gas lines to serve the Project. Also, while Alternative 2 would result in the greater

consumption of electricity and fossil fuels than the Project during operation, the incremental difference in the rate of consumption between Alternative 2 and the Project would represent an inconsequential percentage of the region's electricity and natural gas supply capacity. Therefore, Alternative 2 would result in less than significant operational energy infrastructure impacts that would be similar to the less than significant impacts of the Project.

3. Comparison of Impacts

As evaluated above, Alternative 2 would not avoid or substantially reduce the Project's significant unavoidable impacts (specifically, Project and cumulative construction-related noise and vibration, and off-site cumulative operations-related traffic noise) because: (1) the amount, intensity and duration of construction activities would generally be the same between the two projects; and (2) operational traffic generation would be greater under this alternative. In fact, Alternative 2 would result in slightly greater cumulative operational traffic noise (e.g., + 0.1 dBA) than the Project owing to higher traffic generation. Furthermore, as indicated in Table V-3 on page V-16, Alternative 2 would result in less impacts than the Project related to operational impacts to police protection, schools, transportation (VMT), water supply/infrastructure, and wastewater (owing to fewer residential units under this alternative), and greater impacts than the Project with regard to operational air quality and TACs, GHG emissions, operational off-site noise and vibration, and operational fire protection (owing primarily to higher operational traffic generation and service demand with the office uses under Alternative 2). In addition, Alternative 2 would result in significant and unavoidable regional air quality impacts during operation due to the increase in traffic. This impact would not occur under the Project. Impacts for the remaining environmental topics would be similar to those of the Project. Overall, Alternative 2 would be more impactful than the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 2 would meet the underlying purpose of the Project which is to redevelop the site by providing a high-density, mixed-use, transit- and pedestrian-oriented development that includes a mix of housing types (including affordable units) integrated with hotel, retail, restaurant and open space uses to transform the vacant site into a marquee destination and functional linkage between the Historic Core and Bunker Hill areas of downtown. However, Alternative 2 would not meet this underlying purpose as effectively as the Project because it would: (1) develop fewer residential units, including fewer affordable units; and (2) develop fewer hotel rooms reducing the marquee destination utility of the Project.

Furthermore, Alternative 2 would be less effective than the Project in meeting the following Project objectives due to the development of fewer residential units and hotel rooms:

- Maximize density and floor area ratio on the site with a high level of intensity to create a high-energy urban experience with an interrelated mix of land uses that function to transform the site into an iconic development.³⁵
- Create a mix of interactive land uses with expanded for-sale and for-rent housing opportunities blended together with commercial uses to enhance the 24 hour downtown experience and provide an infill development that enlivens adjacent streets and integrated public spaces.
- Develop a high-quality mixed-use project that provides residential dwelling units that contribute to the City's housing supply, while integrating hotel uses capable of enhancing the experience in Bunker Hill and contributing to the supply of downtown hotel rooms for convention and tourist activities.

Alternative 2 would meet the following objectives to the same extent as the Project because the site plan would remain substantially the same as the Project, and thus offer similar pedestrian- and transit-oriented design with open space amenities and accessible linkages:

- Provide attractive and ample publicly accessible open spaces that incorporate community amenities and integrate the Angels Flight funicular into the experience of the site.
- Establish and maintain active and accessible linkages between the residential, office, and cultural amenities on Bunker Hill and in the Historic Core area to enhance the interconnectivity of these communities.
- Integrate the existing Metro portal as a component of open space and plaza design to enhance the pedestrian and transit user experience at the site.
- Construct an economically feasible project that expands the economic base of the City and provides employment opportunities and new sources of tax revenue for the City by providing construction and permanent jobs, attracting commercial

³⁵ While Alternative 2 would maintain the 13:1 FAR (density) as the Project, it would not utilize all the residential unit and hotel density permitted at the Project Site.

tenants and hotel operators, and increasing hotel patrons that collectively increase City tax revenues directly and indirectly.³⁶

- Utilize public investment in public transit by redeveloping an urban infill location with on-site mass transit capabilities to further smart growth land use planning practices and align with policies related to the reduction of greenhouse gas emissions and vehicle miles travelled.

³⁶ *Alternative 2 would include the development of fewer hotel rooms than the Project and thus would not be as effective as the Project in meeting the hotel-related portion of this objective. On the other hand, Alternative 2 would include office development that would generate more overall permanent jobs at the Project Site than the Project and thus would be more effective than the Project in meeting the employment opportunities portion of this objective. To provide a conservative analysis, this objective is included in this same extent list rather than in the preceding less effective list.*

V. Alternatives

C. Alternative 3: Reduced-Density Alternative

1. Description of the Alternative

Alternative 3, the Reduced Density Alternative, would include the same types of uses proposed by the Project while reducing the amount of total new residential units and hotel, retail, restaurant and indoor amenity floor area by 25 percent. Specifically, as indicated in Table V-1 on page V-4, Alternative 3 would include 324 residential units (e.g., 135 condominiums and 189 apartments), 352,588 square feet of hotel uses (e.g., 386 hotel rooms and a mix of restaurant, ballroom, meeting room, amenity and back of house/hallway/lobby space), and 54,068 square feet of general commercial uses (e.g., 22,850 square feet of retail and 31,218 square feet of restaurant), for a total of 951,863 square feet of floor area. Alternative 3 would also include 38,750 square feet of open space, 400 vehicle parking spaces (yet the 70 foot depth of excavation on the Project Site would remain the same as the proposed Project), and an overall FAR of approximately 10:1. As with the Project, these uses would be developed in two towers above a podium structure with three subterranean parking levels, except that the towers would be approximately 25 percent shorter (e.g., Tower A would be 47 floors [661 feet], while Tower B would be 32 floors [390 feet]). Similar to the Project, the Metro portal in the southeastern portion of the Project Site would be retained under this alternative. The site plan under this alternative would be similar to that of the proposed Project.

2. Environmental Impacts

a. Air Quality

(1) Regional Emissions

(a) Construction

As with the Project, construction of Alternative 3 has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. Under Alternative 3, construction activities would be reduced in comparison to the Project due to the reduction in uses and associated square footage. However, the intensity of air

emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, regional impacts on these days would be similar to those of the Project. Therefore, the construction-related regional emissions under Alternative 3 would be less than significant (with mitigation incorporated) and similar to the less than significant impacts (with mitigation incorporated) of the Project.

(b) Operation

As previously discussed, the development proposed under Alternative 3 would be reduced by approximately 25 percent compared to the Project. As such, the number of new daily operational vehicle trips generated by Alternative 3 would be less than the number of new daily trips generated by the Project. Specifically, as provided in Appendix N of this Draft EIR, Alternative 3 would result in a total of 4,035 daily vehicle trips and 29,838 daily vehicle miles traveled (VMT), as compared to the Project's 5,410 daily vehicle trips and 40,033 daily VMT.³⁷ Also, Alternative 3 would include 25 percent less floor area than the Project. Because operational regional air pollutant emissions associated with Alternative 3 would be generated by vehicle trips and VMT, which are the largest contributors to operational air pollutant emissions, and to a lesser extent by the consumption of electricity and natural gas, the operational regional emissions of Alternative 3 would be less than those of the Project. Furthermore, the operational regional emissions under both projects would be below the SCAQMD's regional significance thresholds. Therefore, the operational regional air pollutant emissions of Alternative 3 would be less than significant and less than the less than significant impacts of the Project.

(2) Localized Emissions

(a) Construction

On-site construction activities associated with Alternative 3 would be located at similar distances from sensitive receptors as the Project. Although this alternative would result in approximately 25 percent less floor area as compared to the Project, overall construction activities and associated localized emissions from construction of Alternative 3 would be similar to the Project. The intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, localized impacts on these days would be similar to those of the Project. Therefore, as with the Project, localized construction impacts under Alternative 3 would be less than significant and less than the less than the significant impacts of the Project.

³⁷ Gibson Transportation Consulting, Inc., *Transportation Assessment for the Alternatives to the Angels Landing Project*, May 2020. See Appendix J.1 of this Draft EIR.

(b) Operation

Localized operational impacts are determined primarily by peak-hour intersection traffic volumes. As provided in Appendix N of this Draft EIR, Alternative 3 would generate 297 vehicle trips during the A.M. peak hour and 433 trips during the P.M. peak hour, which would be less than the Project's 398 A.M. peak-hour trips and 585 P.M. peak-hour trips. As such, total operational vehicular emissions under Alternative 3 would be less than those of the Project. In addition, with the development of less floor area than the Project, area and stationary sources would also generate less on-site operational air emissions compared to the Project. Also, as with the Project, Alternative 3 would not introduce any major new sources of air pollution within the Project Site. Because the localized impacts analysis from on-site operational activities and the localized CO hotspot analysis associated with off-site operational activities for the Project did not result in any significant impacts, localized impacts under Alternative 3 would also be less than significant and less than the less than significant impacts of the Project.

(3) Toxic Air Contaminants

(a) Construction

As with the Project, construction of Alternative 3 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. Overall construction TAC emissions generated by Alternative 3 would be similar to those of the Project since grading and excavation activities would be similar between the two projects owing to the same site plan and number of subterranean parking levels. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 3 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

As set forth in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential TACs associated with Project operations would include diesel particulate matter from delivery trucks. Under Alternative 3, the overall increase in the number of deliveries and associated DPM emissions would be reduced compared to the Project due to the reduction in floor area for all of the proposed uses. Also, as with the Project, the land uses proposed under Alternative 3 are not considered land uses that generate substantial TAC emissions. Therefore, the operational TACs impacts of Alternative 3 would be less than significant and less than the less than significant impacts of the Project.

b. Cultural Resources

(1) Historical Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, there are no historical resources on the Project Site, and no historical resources would be demolished, destroyed, relocated or altered under the Project. Also, similar to the Project, Alternative 3 would include vibration-generating grading and construction activities. However, this vibration would not be sufficient to result in material damage to the historical resources under the Project, and because the amount of excavation and grading would be similar between the two projects (owing to the same site plan and number of subterranean parking levels), excavation and grading activities under Alternative 3 would similarly not result in damage to the adjacent historical resources. Hence, as with the Project, Alternative 3 would not directly impact historical resources.

With regard to indirect impacts on adjacent historical resources, similar to the Project Alternative 3 would introduce new high-rise mixed-use development at the Project Site. The Project would not materially impair the context of the adjacent historical resources (e.g., would not demolish or alter the physical characteristics that convey the significance of the historical resources that justify their inclusion in or eligibility for inclusion in the national, state or local registers or historic district programs pursuant to CEQA). Because alternative 3 would include less floor area and lower towers than the Project, but otherwise the same site plan as architecture, it too would not materially impair the context of the adjacent historical resources.

Based on the above, Alternative 3 would result in less than significant impacts to historical resources which would be similar to the less than significant impacts of the Project.

(2) Archaeological Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, no archaeological resources have been documented on-site, although archaeological resource finds have been documented within a 0.5-mile radius of the Project Site. The Project would include excavation and grading activities that could potentially unearth archaeological resources, if present. Because Alternative 3 would include the same site plan and levels of subterranean parking as the Project at the same location, it would include similar excavation and grading activities as the Project and would have a similar potential for unearthing archaeological resources, if present. Furthermore, the City applies its standard archaeological resources condition of approval to projects that disturb soil to address the inadvertent discovery of archaeological resources during grading activities. As such,

Alternative 3 would result in a similar less than significant impact to archaeological resources as the Project.

(3) Human Remains

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, no human remains have been documented on-site or at the adjacent properties, although a prehistoric burial has been documented 0.5 mile northeast of the Project Site and the history of occupation of the Los Angeles area makes the potential for unearthing human remains a possibility at the Project Site. The Project would include excavation and grading activities that could potentially unearth human remains, if present. Because Alternative 3 would include the same site plan and levels of subterranean parking as the Project at the same location, it would include similar excavation and grading activities as the Project and would have a similar potential for unearthing archaeological resources, if present. As such, Alternative 3 would result in a similar less than significant impact to human remains (with adherence to applicable regulations) as the Project.

c. Energy

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

(a) Construction

Similar to the Project, construction activities associated with Alternative 3 would consume electricity to supply and convey water for dust control, power construction site lighting and power other construction equipment, and require diesel and other fuels for construction vehicles, but like the Project, would not consume natural gas. However, as with the Project, this energy use during construction would occur in accordance with applicable energy conservation requirements (e.g., Title 24, CARB anti-idling regulations, In-Use Off-Road Diesel-Fueled Fleet regulations, etc.) such that energy use during construction would not occur in a wasteful, inefficient, or unnecessary manner. In addition, because Alternative 3 would include the development of 25 percent less floor area than the Project, less overall construction activities and associated energy use would occur. Therefore, the construction-related energy impacts of Alternative 3 would be less than significant and less than the less than significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 3 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels. As previously discussed, Alternative 3 would result in a reduction of the uses proposed by the Project as well as a reduction in the number of daily vehicle trips. Specifically, as provided in

Appendix N of this Draft EIR, Alternative 3 would result in a total of 4,035 daily vehicle trips and 29,838 daily VMT as compared to 5,410 daily vehicle trips and 40,033 daily VMT under the Project.³⁸ As such, the consumption of electricity, natural gas, and petroleum-based fuels would be reduced under Alternative 3. In addition, the Project would represent a high-density mixed-use infill project within a TPA and HQTa adjacent to an existing Metro portal, which would together maximize transit and other alternative modes of transportation, minimize vehicle miles traveled, and result in associated reductions in motor vehicle-related fuel use. Furthermore, the Project would be designed to further reduce vehicular trips to the Project Site through various TDM strategies (e.g., bicycle infrastructure) as set forth in Section IV.J, Transportation. Lastly, similar to the Project, Alternative 3 would implement PDFs to reduce energy usage (e.g., GHG-PDF-1, design per LEED Silver certification requirements, GHG-PDF-2, provision of electric vehicle charging stations, and GHG-PDF-3, prohibition on natural gas-fueled fireplaces), and would comply with the applicable energy conservation requirements of Title 24, the Los Angeles Green Building Code, and CALGreen. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 3 would not be wasteful, inefficient, or unnecessary. The impacts of alternative 3 would be less than significant and less than the less than significant impacts of the Project owing to the reduced energy use under this alternative.

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

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

With regard to transportation related energy usage, Alternative 3 would also comply with goals of the SCAG's 2016 RTP/SCS which incorporate VMT targets established by SB 375. As with the Project, the uses proposed under Alternative 3 and their adjacency to a Metro portal and proximity to major job centers and public transportation would serve to reduce per capita VMT and associated transportation fuel usage within the region. In

³⁸ Gibson Transportation Consulting, Inc., *Transportation Assessment for the Alternatives to the Angels Landing Project*, May 2020. See Appendix J.1 of this Draft EIR.

addition, vehicle trips generated during Project operations would comply with CAFE fuel economy standards. In addition, as with the Project, Alternative 3 would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction.

Based on the above, Alternative 3, like the Project, would not conflict with plans for renewable energy or energy efficiency. The impacts of Alternative 3 would thus be less than significant, and similar to the less than significant impacts of the Project.

d. Geology and Soils (Paleontological Resources)

As discussed in Section IV.D, Geology and Soils (Paleontological Resources), of this Draft EIR, no paleontological resources have been documented on-site or at the adjacent properties, and the uppermost layers of soil and the overlying younger Quaternary Alluvium deposits at the Project Site are unlikely to yield significant vertebrate fossils. However, deeper excavations into the sedimentary layers and San Fernando Formation bedrock underlying the Project Site have the potential to encounter significant vertebrate fossil remains. As Alternative 3 would include the same site plan and number of subterranean parking levels as the Project, it would result in the same depth of excavations and spatial extent of grading as the Project and thus would have a similar potential to impact paleontological resources as the Project. Furthermore, like the Project, Alternative 3 would implement Mitigation Measures GEO-MM-1 through GEO-MM-4 which require construction worker paleontological resources sensitivity training, paleontological monitoring by qualified paleontological monitor, and the proper collection and treatment of any paleontological resources discovered during construction, which would mitigate any impacts. Therefore, the paleontological resources impacts of Alternative 3, like the Project, would be less than significant (with mitigation incorporated), with the level of the impacts similar between the two projects.

e. Greenhouse Gas Emissions

(1) GHG Emissions

As discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, GHG emissions from a development project are determined in large part by energy consumption and the number of daily trips generated and associated VMT resulting from the proposed land uses. The Project would represent high-density mixed-use development on an urban infill site adjacent to transit within a TPA and HQTa which would take advantage of alternative modes of traffic and reduce per capita VMT. Furthermore, the Project would be designed to comply with the requirements of Title 24, the CALGreen Code, and the Los Angeles Green Building Code, and would incorporate PDFs to reduce GHG emissions (e.g., GHG-PDF--1, design per LEED Silver certification requirements, GHG-PDF-2,

provision of electric vehicle charging stations, and GHG-PDF-3, prohibition on natural gas–fueled fireplaces). Therefore, the Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Alternative 3 would also represent high-density mixed-use development on an urban infill site within a TPA and HQTa, would reduce per capita VMT, would comply with applicable GHG reduction requirements, and would implement the same GHG-reducing design features as the Project. However, Alternative 3 would include 25 percent less floor area than the Project, and would generate less energy usage, vehicle trips, and VMT, such that GHG emissions would be less under Alternative 3. Therefore, while neither project would generate GHG emissions that may have a significant impact on environment, the less than significant impacts of Alternative 3 would be less than the less than significant impacts of the Project.

(2) Conflict with GHG Reduction Plans/Policies/Regulations

As indicated above, the Project would represent high-density mixed-use development on an urban infill site within a TPA and HQTa, reduce per capita VMT, comply with Title 24, the CALGreen Code, and the Los Angeles Green Building Code, and incorporate PDFs to reduce GHG emissions (e.g., GHG-PDF-1, design per LEED Silver certification requirements, GHG-PDF-2, provision of electric vehicle charging stations, and GHG-PDF-3, prohibition on natural gas–fueled fireplaces). Therefore, as concluded in Section IV.E, the Project would not conflict with applicable GHG reduction plans, policies and regulations. Alternative 3 would also represent high-density mixed-use development on an urban infill site within a TPA and HQTa, reduce per capita VMT, comply with applicable GHG reduction requirements, and incorporate the same GHG-reducing design features as the Project. Therefore, Alternative 3 would also not conflict with applicable GHG reduction plans, policies and regulations, and impacts would be less than significant. As Alternative 3 and the Project would both comply with applicable GHG reduction plans, policies and regulations, the level of the impacts would be similar between the two projects.

f. Land Use and Planning

As previously described, Alternative 3 would include a high-density mixed-use development similar to the Project, but would reduce the amount of total floor area by approximately 25 percent. Specifically, Alternative 3 would develop: 108 fewer dwelling units; 129 fewer hotel rooms; 25 percent less hotel ballrooms, meeting rooms, amenities, and back of house/hallways/lobbies; 7,616 square feet less retail space; 10,407 square feet less restaurant space; 350 fewer parking spaces, and 18,131 less open space than the Project. As with the Project, the uses proposed by Alternative 3 would also not conflict with the surrounding mix of urban uses. In addition, like the Project, this alternative would include high-density mixed-use development on an urban infill site adjacent to the Metro portal and within a TPA and HQTa and would offer a mix of uses within one site, thereby

reducing the need for residents to travel off-site to meet their retail needs and reducing vehicle trips, VMT, traffic congestion, and air emissions. Thus, as with the Project, Alternative 3 would not conflict with the applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect, including those set forth in the Los Angeles General Plan Framework Element, Housing Element, Central City Community Plan, Bunker Hill Specific Plan, LAMC, and SCAG's 2016–2040 RTP/SCS.³⁹ Therefore, Alternative 3 would result in less than significant land use and planning impacts that are similar to the less than significant impacts of the Project.

g. Noise

(1) Noise

(a) Construction

The amount of construction activity and the duration of construction under Alternative 3 would be reduced from that of the Project, owing to the approximately 25 percent less floor being under this alternative. Construction noise levels can be reduced with a smaller number of on-site construction equipment pieces and with a buffer zone between the sensitive receptors and the construction equipment. However, due to the close proximity of the sensitive receptors (i.e., directly across from the Project Site) and a constrained Project Site that does not have the space to create a meaningful buffer zone, it would not be practical to mitigate the on-site construction noise impacts of the Project through a feasible alternative, especially at the upper levels of the adjacent apartment buildings. In addition, the maximum or peak day of construction activity, which serves as the basis of the construction noise analysis, would be similar between the two projects. This is because: (1) Alternative 3 would include the same site plan and number of subterranean parking levels as the Project, and thus roughly the same amount of excavation and grading activity; (2) both projects would be developed on the same site, with the same building footprints, and within the same distances to off-site sensitive receptors; (3) both projects would include the development of mat foundations requiring nighttime concrete pours; (4) given that both projects would include high-rise mixed-use development, it is anticipated that they would require the same mix of construction equipment; (5) both projects would implement the same construction-related project noise

³⁹ On September 1, 2020, SCAG's Regional Council adopted an updated RTP/SCS known as the 2020–2045 RTP/SCS or Connect SoCal. As with the 2016–2020 RTP/SCS, the purpose of the 2020–2045 RTP/SCS is to meet the mobility needs of the six-county SCAG region over the subject planning period through a roadmap identifying sensible ways to expand transportation options, improve air quality and bolster Southern California long-term economic viability. The 2020–2045 RTP/SCS has yet to be adopted by the California Air Resources Board (CARB). The goals and policies of the 2020–2045 RTP/SCS are similar to, and consistent with, those of the 2016–2040 RTP/SCS. Hence, like the Project, Alternative 3 would also be consistent with the 2020–2045 RTP/SCS.

design features, including NOI-PDF-1 (using construction equipment equipped with state-of-the-art noise shielding and muffling devices) and NOI-PDF-3 (prohibition on the use of impact driven pile systems); and (6) both projects would implement Mitigation Measure NOI-MM-1 (temporary impermeable sound barrier at specified locations during the construction period). Thus, like the Project, Alternative 3 would result in significant unavoidable on-site construction noise (both project-level and cumulative), less than significant off-site construction traffic noise (project-level), and significant unavoidable off-site construction traffic noise (cumulative). As impacts are based on peak construction days, impacts would be similar to those of the Project.

Similar to the Project, the on-site construction vibration impacts (human annoyance) of Alternative 3 would be significant. This is because the vibration impact analysis is based on the peak vibration level generated by individual construction equipment pieces that would still be required near the perimeter of the Project Site. In addition, off-site construction vibration impacts (human annoyance), due to heavy trucks traveling by sensitive receptors, would be significant similar to the Project.

(b) Operation

As discussed in Section IV.G, Noise, of this Draft EIR, sources of operational noise under the Project would include: (1) on-site stationary noise sources, including mechanical equipment, activities within the proposed outdoor spaces, parking areas, loading dock and trash collection areas; and (2) off-site mobile source (e.g., traffic) noise sources. Alternative 3 would introduce noise from similar on-site and off-site noise sources as the Project. The proposed parking, loading dock and trash collection areas for Alternative 3 would also be located in enclosed areas, similar to the Project, such that parking, loading dock and trash collection area noise under Alternative 3 would be minimal, similar to the Project. The Project and Alternative 3 would also have the same types of land uses, and similar operating hours and frequency of special events. Lastly, Alternative 3 would implement the same operations-related PDFs as the Project, including NOI-PDF-2 (acoustically screening mechanical equipment), NOI-PDF-3 (acoustically screening loading docks), NOI-PDF-5 (limiting noise from outdoor amplified sound systems to specific maximum levels); and NOI-PDF-6 (6-foot-high noise attenuation features around the proposed Level 5 Terrace). However, it is anticipated that with the 25-percent reduction in floor area under Alternative 3, the noise levels from on-site mechanical equipment and outdoor spaces would be reduced. In addition, Alternative 3 would result in 4,035 daily vehicle trips, versus 5,410 daily vehicle trips under the Project,⁴⁰ such that off-site mobile source noise under this alternative would also be reduced. Therefore, both projects would

⁴⁰ Gibson Transportation Consulting, Inc., *Transportation Assessment for the Alternatives to the Angels Landing Project*, May 2020. See Appendix J.1 of this Draft EIR.

result in less than significant operational on- and off-site project-level noise impacts (including composite noise), and less than significant cumulative operation on-site noise impacts, with the degree of these impacts less under Alternative 3.

With regard to cumulative operational off-site traffic noise, this noise would be significant and unavoidable under the Project. While Alternative 3 would generate less operational traffic than the Project (e.g., 4,035 daily vehicle trips versus 5,410 under the Project), cumulative operational traffic noise would still be significant and unavoidable under Alternative 3 (e.g., noise levels would increase by 3.1 dBA under Alternative 3 and by 3.2 dBA under the Project, both of which would be above the 3 dBA threshold).⁴¹ The degree of the impact would be less under Alternative 3 owing to less traffic generation, and thus less (0.1 dBA)⁴² cumulative operational traffic noise, under this alternative.

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 3 would be similar to the Project, although the amount and duration of construction activities would be reduced. As with the Project, construction of Alternative 3 would generate vibration from the use of heavy-duty construction equipment as well as from off-site truck trips. While the overall amount of construction would be reduced, on- and off-site construction activities and the associated construction vibration levels would be expected to be similar to those of the Project, as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment. As such, peak vibration levels generated by the construction equipment under Alternative 3 would be similar to those of the Project. Thus, as with the project, Alternative 3 would result in less than significant construction-related vibration impacts (both on- and off-site) in terms of damage to structures, significant unavoidable construction-related vibration impacts (both on- and off-site) in terms of human annoyance, and significant unavoidable cumulative construction-related off-site vibration impacts in terms of human annoyance. This is even with the implementation of NOI-PDF-4 (prohibition on the use of impact driven pile systems) under both projects. Thus, peak construction day impacts associated with vibration under Alternative 3 would be similar to the Project.

⁴¹ AES Acoustics, August 28, 2020.

⁴² AES Acoustics, August 28, 2020.

(b) Operation

As described in Section IV.I, Noise, of this Draft EIR, sources of vibration related to operation of the Project would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under Alternative 3. As with the Project, vehicular-induced vibration from Alternative 3, including vehicle circulation, would generate perceptible vibration levels at off-site sensitive uses, while vehicle circulation within the subterranean parking area would not generate perceptible vibration levels at off-site sensitive uses. In addition, like the Project, building mechanical equipment installed as part of Alternative 3 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration transmission such that the vibration would not be perceptible at the off-site sensitive receptors. Because Alternative 3 would include 25 percent less floor area than the Project and would generate 4,035 daily vehicle trips as compared to the Project's 5,410 daily trips,⁴³ operational off-site vibration would be less under Alternative 3 than under the Project. Therefore, as with the Project, Alternative 3 would result in less than significant operational vibration impacts (both in terms of building damage and human annoyance), with the degree of these impacts less under Alternative 3.

h. Population and Housing

(1) Construction

As discussed in Section IV.H, Population and Housing, of this Draft EIR, the Project Site is vacant except for the Metro portal located in the southeastern portion of the Project Site. Furthermore, both the Project and Alternative 3 would retain the existing on-site Metro portal. Therefore, as with the Project, construction of Alternative 3 would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere, and the no impact would occur.

As discussed in Section IV.H, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by a particular development. Many construction workers are highly specialized (e.g., crane operators, steel workers, masons), and move from job site to job site as dictated by the demand for their skills while keeping their site of residence. Therefore, as with the Project, construction activities associated with Alternative

⁴³ Gibson Transportation Consulting, Inc., *Transportation Assessment for the Alternatives to the Angels Landing Project*, May 2020. See Appendix J.1 of this Draft EIR.

3 would not induce substantial unplanned population growth in the area, and the impact would be less than significant. Because the number of construction workers under Alternative 3 would be less than under the Project, owing to the 25-percent reduction in floor area, the degree of this impact would be less under Alternative 3.

(2) Operation

As previously discussed, Alternative 3 would reduce the total floor area compared to the Project by 25 percent. This would include reducing the 432 residential units proposed under the project to 324 units. As indicated in Table V-2 on page V-6, these 324 units would generate a new residential population of 781 (compared to the Project's 1,042 residents). As discussed in Section IV.J, Population and Housing, of this Draft EIR, the new residents generated by the Project would be within and, thus, consistent with, SCAG growth forecasts, constituting a small percentage of projected City and regional growth. Additionally, the new residential units proposed by the Project would represent a small percentage of the housing growth in the SCAG region and in the City. Thus, as with the Project, the residents and new residential units generated by Alternative 3 would not directly induce substantial unplanned population growth in the area.

With regard to indirect population impacts associated with the proposed development, the proposed hotel retail and restaurant uses under both the Project and Alternative 3 would generate employment opportunities. Specifically, as indicated in Table V-2 on page V-6, Alternative 3 would generate an estimate 400 employees during operation compared to the Project's estimated 535 employees. Similar to the Project, the majority of these new employment opportunities under Alternative 3 would likely be filled by persons already residing in the area as the Project Site. This is because the Project Site is located in Downtown Los Angeles, one of the largest metropolitan areas in the nation with a large prospective employee pool. Similarly, any indirect demand for housing associated with the proposed new businesses under both projects would likely be fulfilled by vacancies in the surrounding housing market and from other new units in the vicinity of the Project Site, not to mention by the proposed housing units. Lastly, both the Project and Alternative 3 would be consistent with the existing Community Plan land use designation and zoning of the Project Site such that the proposed land uses have been accounted for in City and SCAG population forecasts. As such, like the Project, Alternative 3 would not indirectly induce substantial unplanned population growth in the area due to development.

With regard to indirect population impacts associated with infrastructure, the Project Site represents an urban infill site within the highly developed Downtown area which already has fully developed roadway and utility infrastructure systems. Furthermore, as with the Project, the circulation and utility infrastructure improvements under Alternative 3 would be limited to those required to serve the Project from the adjacent streets and the utility infrastructure in those adjacent streets. The extension of roadways and utility

infrastructure systems would not be required to serve either project. Therefore, like the Project, Alternative 3 would not indirectly induce substantial unplanned population growth in the area due to infrastructure improvements.

Based on the above, Alternative 3, like the Project, would result in less than significant operational population and housing impacts. The degree of these impacts would be less under Alternative 3 owing to less floor area and associated resident and employee populations under this alternative.

i. Public Services

(1) Fire Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 3 would be similar to that of the Project, although the overall amount of construction activities and duration of construction would be reduced owing to the reduction in development. Like the Project, construction activities under Alternative 3 would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous waste (e.g., OSHA, LAFD requirements, etc.). Construction under both projects would also occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, similar to the Project, compliance with regulatory requirements under Alternative 3 would effectively reduce the potential for construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Additionally, while construction activities would primarily be contained within the boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by temporary lane closures, roadway/access improvements, and the construction of utility line connections. Similar to the Project, it is likely that Alternative 3 would require construction fences that would encroach into the public right-of-way (e.g., sidewalks and roadways) adjacent to the Project Site on 4th Street, Hill Street, and Olive Street. However, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period and emergency access would not be impeded. In addition, as with the Project, a Construction Management Plan (TR-PDF-1) would be implemented during construction of Alternative 3 to ensure that adequate and safe access remains available within and near the Project Site during construction activities.

As indicated in Section IV.I.1, Public Services—Fire Protection, of this Draft EIR, Project construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. The same would be true for Alternative 3. However, with the implementation of TR-PDF-1, the majority of construction-related traffic, including hauling activities and construction worker trips under both projects, would occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts and the slowing of emergency response times. Per TR-PDF-1, both projects would also employ temporary traffic controls such as flag persons to control traffic movement during temporary traffic flow disruptions, and construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Therefore, as with the Project, construction-related traffic under Alternative 3 would not substantially slow emergency response times or interfere with emergency access.

Based on the above, Alternative 3, like the Project, would not require new or physically altered fire protection facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. As such, impacts under both projects would be less than significant, with the degree of the impact less under Alternative 3.

(b) Operation

Similar to the Project, Alternative 3 would generate a new residential population, as well as a new visitor and employee population on the Project Site, that would contribute to an increase in demand for LAFD fire protection and emergency medical services. Specifically, as indicated in Table V-2 on page V-6, Alternative 3 would generate an estimated 781 residents and 400 employees for a total service population of 1,181 persons, versus the Project which would generate an estimated 1,042 residents and 535 employees for a total service population of 1,577. However, due to the reduction in total new floor area and uses, Alternative 3 would generate a smaller service population than the Project and thus a lower demand for LAFD fire protection and emergency medical services. In addition, similar to the Project, Alternative 3: (1) would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, emergency access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. (including providing a rooftop emergency helicopter landing facility or other option acceptable to LAFD); (2) would include automatic fire sprinklers in the proposed buildings; and (3) would not include barriers that could impede emergency vehicle access. Furthermore, as with the Project, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for Alternative 3 given its reduced size compared to the Project. Lastly, the LAFD has determined fire

protection (based on the response distance from existing fire stations criteria) are adequate to serve the Project, and because LAFD demand would be lower under Alternative 3, existing LAFD fire protection services would also be adequate to serve Alternative 3. Therefore, similar to the Project, Alternative 3 would not require new or physically altered fire protection facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. As such, impacts under both projects would be less than significant, with the degree of the impact less under Alternative 3.

(2) Police Protection

(a) Construction

As with the Project, Alternative 3 would include construction activities and would generate construction traffic that would create a demand for LAPD police protection services, potentially obstruct emergency access, and potentially slow emergency response times during the construction period. However, as with the Project, Alternative 3 would implement PDFs (e.g., POL-PDF-1, security lighting, fencing and regular security patrols of the construction sites, and TR-PDF-1, Construction Management Plan) that would minimize the demand for LAPD police protection services, ensure the provision of adequate emergency access, and minimize construction traffic-related delays in emergency response during the construction period. Also, emergency vehicles have the ability to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic as permitted by CVC Section 21806. Furthermore, the construction of the Project and Alternative 3 would not indirectly generate a demand for LAPD police protection services because, as discussed previously, construction workers and their families would not be expected to move to the area as a result of the proposed development and because construction jobs would be temporary. Therefore, like the Project, Alternative 3 would not require new or physically altered police protection facilities that would cause substantial adverse physical impacts during construction, and impacts would be less than significant. Because Alternative 3 would include less development than the Project, and less overall construction activities and a shorter construction period, the degree of the impacts would be less under Alternative 3.

(b) Operation

As indicated in Section IV.2, Public Services—Police Protection, of this Draft EIR, LAPD considers the residential population within their service area to evaluate service capacity. As indicated in Table V-2 on page V-6, the Project would include 432 residential units which would generate an estimate 1,042 residents, versus Alternative 3 which would include 324 residential units which would generate an estimated 781 residents). While the residents of both projects would create a demand for service from LAPD's Central Community Police Station, both projects would implement POL-PDF-2 which includes

24-hour/seven-day-a-week security, as well as regulatory requirements that include security lighting, and designing building entrances/exits, open spaces and walkways to be open and in view of surrounding sites. Also, both projects would generate tax revenues that could be applied toward the provision of new police facilities and related staffing within the Central Area. In addition, the officer-to-resident ratio for the Central Area would decrease from approximately 9.25 officers per 1,000 residents to approximately 9.02 officers per 1,000 residents under the Project (with slightly less of a decrease under Alternative 3 owing to the reduced number of residents and associated service population under this alternative), which would still be substantially higher than the Citywide ratio of 2.5 officers per 1,000 residents. Lastly, as discussed in Section IV.I.2, in conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board of Trustees of the California State University* ruling, the City is obligated to provide adequate public safety services, including police protection services, and the need for additional public safety services is not an environmental impact that CEQA requires a project proponent to mitigate.

With regard to impacts on police emergency response times, both the Project and Alternative 3 would generate operational traffic in the vicinity of the Project Site which could have the potential to increase LAPD emergency response times. However, neither project would close existing streets or include barriers that could impede emergency access. Also, in accordance with CVC Section 21806, drivers of police emergency vehicles have the ability to avoid traffic by using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Accordingly, like with the Project, operation of Alternative 3 would not cause a substantial increase in LAPD emergency response times due to traffic congestion.

Based on the above, , as with operation of the Project, Alternative 3 would not result in the need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service, and impacts would be less than significant. The degree of these impacts would be less under Alternative 3 owing to the reduced amount of development and residents under this alternative.

(3) Schools

(a) Construction

Similar to the Project, Alternative 3 would generate temporary construction jobs during the construction period. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project or Alternative 3. Therefore, the

construction employment generated by the Project and Alternative 3 would not result in a notable increase in the resident population, an increase in demand for schools in the vicinity of the Project Site, or the need for new or physically altered school facilities, the construction of which would cause significant environmental impacts. Impacts under both projects would thus be less than significant, with the degree of these impacts less under Alternative 3 owing to less development and fewer construction jobs under this alternative.

(b) Operation

As with the Project, Alternative 3 would include new development that would contribute to an increased demand for schools. Because Alternative 3 would include 25 percent less floor area than the Project, including 324 residential units versus the Project's 432 residential units, Alternative 3 would generate less of a demand for schools than the Project. Regardless, pursuant to Senate Bill 50, the Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits for either project, and per Government Code Section 65995, the payment of these fees is considered mitigation of the impacts of new development on schools. Therefore, both projects would result in less than significant impacts on schools. Because Alternative 3 would generate less demand for schools than the Project, the degree of these impacts would be less under Alternative 3.

j. Transportation

Alternative 3 would be developed on the same site as the Project and thus be subject to the same transportation-related plans and requirements as the Project (e.g., the City's Mobility Plan 2035, Plan for a Healthy Los Angeles, Central City Community Plan, Bunker Hill Specific Plan, LAMC, Vision Zero, Citywide Design Guidelines, and SCAG RTP/SCS). Both project would represent high density mixed-use development on an urban infill site within a TPA and HQT, adjacent to a Metro portal, and within close proximity of multiple bus transit routes, which would be consistent with applicable plans calling for high-density development in close proximity to transit so as maximize the use of alternative transportation modes and reduce traffic, VMT and air emissions. Both projects would also reduce per capita VMT in accordance with the applicable transportation plans (e.g., both projects would result in a household VMT of 3.9 per capita and a work-employee VMT of 7.3 per capita, which would be below the City's thresholds of 6.0 VMT per capita for household and 7.6 VMT per capita for works-employees).⁴⁴ Also, Alternative 3 would include the same site plan as the Project, including the same vehicular, pedestrian, and bicycle access and parking, and would follow the same City roadway, driveway, site

⁴⁴ Gibson Transportation Consulting, Inc., *Transportation Assessment for the Alternatives to the Angels Landing Project*, May 2020. See Appendix J.1 of this Draft EIR.

distance, parking, and other transportation-related requirements as the Project. Lastly, Alternative 3 would implement the same transportation-related PDFs as the Project (e.g., TR-PDF-1, Construction Management Plan, TR-PDF-2, TDM measures, and TR-PDF-3, measures to ensure the safety of pedestrians). As with the Project, Alternative 3 would also be consistent with other applicable transportation-related goals, objectives and policies, including but not limited to the following:

- Provide safe access for all users regardless of mode of choice, encourage multi-modal transportation alternatives and access, and reduce per capita VMT consistent with the Mobility Plan.
- Prioritize safety and access through improved pedestrian passages and connectivity to transit and would encourage healthy living by promoting bicycling and walking consistent with the Plan for a Healthy Los Angeles.
- Expand housing opportunities near accessible transit, encourage a mix of land uses to create an active destination, provide traditional and non-traditional sources of open space, support high levels of transit use, and provide employment opportunities consistent with the Central City Community Plan.
- Provide a mixed-use infill development in proximity to transit, would reinforce the Downtown workforce, and would grow and support the area's residential base consistent with the Draft Downtown Community Plan.
- Create a 24-hour Downtown environment at the Project Site, expand housing opportunities and commercial retail space, provide employment opportunities, provide connections between public open spaces and pedestrian pathways, and create a transit-friendly environment through active ground floor uses and pedestrian-oriented design consistent with the Bunker Hill Specific Plan.
- Comply with LAMC street dedication, TDM and vehicle and bicycle parking requirements.
- Separate pedestrian, bicycle, and automobile traffic, and would not preclude future City safety improvements consistent with Vision Zero.
- Include accessible sidewalks, pedestrian amenities, vehicular access driveways, and other transportation improvements consistent with the Citywide Design Guidelines.
- Be consistent with the growth projections and VMT reduction policies of SCAG's RTP/SCS.

Therefore, as with the Project, Alternative 3 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant. The degree of the

impacts would be similar between Alternative 3 and the Project as both projects would be consistent with applicable transportation programs, plans, ordinances and policies.

Both Alternative 3 and the Project would reduce per capita VMT (e.g., both projects would result in a household VMT per capita of 3.9 and a worker/employee VMT per capita of 7.3, as compared to the City's thresholds of 6.0 and 7.6, respectively).⁴⁵ Therefore, impacts with respect to conflicts with CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant under both projects. The degree of these impacts would be less under Alternative 3 owing to the generation of lower daily VMT under this alternative (e.g., 29,838 VMT under Alternative 3 versus 40,033 VMT under the Project).⁴⁶

Regarding traffic hazards, alternative 3 would have the same site plan, including the same access plan, as the Project. Specifically, as with the Project, Alternative 3 would: (1) include new driveways along Olive Street and 4th Street; (2) include off-street, on-site subterranean parking; (3) maintain the designated driveway and roadway width requirements identified in the Mobility Plan; (4) not preclude future roadway improvements proposed in the Mobility Plan; (5) separate pedestrian and vehicular traffic; (6) not result in inadequate vehicle queuing at the Project driveways or applicable freeway on- and off-ramps; and (6) provide all heavy truck maneuvering associated with the proposed loading dock within the Project Site. Furthermore, neither project would be developed along streets identified in the City's High Injury Network, and both projects would implement the same applicable PDFs (e.g., TR-PDF-1, Construction Management Plan, TR-PDF-3, measures to ensure the safety of pedestrians such as maintaining adequate sight distance at Project driveways). Lastly, neither project would generate traffic involving farm equipment or other incompatible use. Therefore, similar to the Project, Alternative 3 would not substantially increase hazards due to a geometric design feature or incompatible use, and impacts would be less than significant. The degree of the impact would be similar between the two projects.

Regarding emergency access, both the Project and Alternative 3 would primarily contain construction activities on-site and would implement TR-PDF-1 (Construction Management Plan), which would ensure adequate emergency access during construction. Also, like the Project, Alternative 3 would not close any existing streets, would provide for emergency access into the Project Site on three sides (e.g., via Olive, Hill and 4th Streets), would include driveways and internal circulation designed to meet all applicable City Building Code and Fire Code requirements regarding emergency access, and would not

⁴⁵ Gibson Transportation Consulting, Inc., *Transportation Assessment for the Alternatives to the Angels Landing Project*, May 2020. See Appendix J.1 of this Draft EIR.

⁴⁶ Gibson Transportation Consulting, Inc., *Transportation Assessment for the Alternatives to the Angels Landing Project*, May 2020. See Appendix J.1 of this Draft EIR.

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

k. Tribal Cultural Resources

As indicated in Section IV.K, Tribal Cultural Resources, of this Draft EIR, no pre-historic archaeological sites or other resources documented to be related to past Native American activity have been previously recorded within the Project Site according to the SLF and SCCIC records searches. Also, while several archaeological resources have been recorded within the 0.5-mile records search radius of the Project Site, AB 52 consultation initiated by the City has not resulted in the identification of a tribal cultural resource within the Project Site. In addition, the Project Site has been previously graded and developed such that the native subsurface soils with the potential to support the presence of cultural deposits have likely been disturbed. Furthermore, based on the archaeologist's review of applicable documentation and a pedestrian survey, there is no record or evidence of tribal cultural resources on the Project Site or in its immediate vicinity. Based on this information, the City, in its discretion and supported by substantial evidence, finds that the Project Site does not contain any resources determined by the City to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. Furthermore, should tribal cultural resources be inadvertently discovered during Project excavation and grading activities, the City's standard condition of approval for tribal cultural resources would be implemented to address such resources. Accordingly, the analysis in Section IV.K concludes that Project impacts on tribal cultural resources would be less than significant. Because Alternative 3 would be developed on the same site as the Project, would include a similar spatial extent and depth of excavation and grading, and would be subject to the City's standard condition of approval for tribal cultural resources, it too would result in less than significant impacts. Because the potential to encounter any buried tribal cultural resources would be the same between the two projects, the degree of these impacts would be similar.

I. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 3 would generate a short-term demand for water associated with dust control, excavation/export, soil compaction, cleaning of construction equipment, cleaning, etc.) This demand would be

less than that generated during construction of the Project due to the reduction in construction activities and duration (grading and excavation activities would be the same between the two projects, but less construction activities would occur thereafter under Alternative 3). As evaluated in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of construction. Since Alternative 3 would result in less construction activities and a lower overall demand for water during construction than the Project, the temporary and intermittent demand for water during Alternative 3 construction would also be met by the City's available water supplies.

With regard to water infrastructure, neither project would require new or upgraded water mains, and the design and installation of new water service connections and the required on-site water distribution system under both projects would be constructed in accordance with applicable City standards. These connections and on-site water distribution system would primarily involve on-site trenching to place the lines below the surface and minor off-site trenching to connect to the existing public water mains or existing meter lateral locations. The environmental effects of the on-site trenching are already subsumed in the environmental impact analysis of the other applicable environmental issues (e.g., air quality, cultural resources, noise, etc.), while the environmental effects associated with the off-site trenching would be minor and would be mitigated with implementation of TR-PDF-1 (Construction Management Plan). Also, the mitigation measures and standard Conditions of Approval identified in the analyses for the other applicable environmental issues which would also apply to the off-site trenching. Therefore, both the Project and Alternative 3 would not result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environment impacts.

Based on the above, Alternative 3 would result in less than significant water supply and infrastructure impacts during construction. These impacts would be less than the less than significant impacts of the Project owing to lower construction-related water demand and potentially a reduced need to construct new water infrastructure under Alternative 3.

(b) Operation

During operation, Alternative 3, like the Project, would generate a demand for water from LADWP. The WSA prepared by LADWP for the Project, included as Appendix M of this Draft EIR, concludes that City water supplies are adequate to serve the Project during normal, single dry, and multiple dry years for the next 20 years and beyond. Because Alternative 3 would include 25 percent less floor area than the Project, but otherwise include the same land use mix as the Project, this alternative would generate less operational water demand than the Project. Therefore, City water supplies would also be

adequate to serve Alternative 3. Furthermore, both projects would comply with applicable water conservation requirements, and with the additional water conservation measures outlined in WAT-PDF-1. Lastly, both projects would be consistent with the existing zoning of the Project Site such that both projects are accounted for in the City's future water demand forecasts. Therefore, like for the Project, adequate water supplies would be available to serve Alternative 3.

With regard to water infrastructure, as indicated in the Utility Report included as Appendix L of this Draft EIR, the IFFAR and SAR prepared by LADWP for the Project indicate that adequate water infrastructure and associated capacity is available to provide the domestic water and fire flow required to serve the Project. Because Alternative 3 would result in lower domestic water demand than the Project (although fire flow demand would be the same), adequate water infrastructure would also be available to serve Alternative 3. Furthermore, like the Project, Alternative 3 would incorporate fire sprinkler suppression systems in the proposed buildings which would reduce or eliminate the public hydrant demand, and per the Utility Report, adequate capacity is available in the water mains that would serve the Project to power the sprinkler systems. Lastly, both projects would comply with applicable water conservation requirements, and with the additional water conservation measures outlined in WAT-PDF-1, which would minimize the impacts on the local water mains.

Based on the above, Alternative 3 would result in less than significant operational water supply impacts that would be less than the less than significant impacts of the Project.

(2) Wastewater

(a) Construction

As with the Project, temporary facilities, such as portable toilet and hand wash areas, would be provided by the construction contractor under Alternative 3, with any sewage generated from these facilities collected and hauled off-site rather than discharged to the local sewer system. Thus, as with the Project, wastewater generation from construction activities under Alternative 3 would not cause a measurable increase in wastewater flows requiring conveyance by the local public sewer system.

With regard to the environmental effects associated with the construction of required wastewater infrastructure, Alternative 3, like the Project, would require the construction of new on-site wastewater conveyance infrastructure to serve the proposed buildings as well as connections to the existing 15-inch sewer line in Hill Street under both projects. However, construction of this infrastructure would be limited to on site trenching, and to both minor off-site trenching and minor connection work along the Project Site's Hills Street

frontage. The environmental effects of the on-site trenching are already subsumed in the environmental impact analysis of the other applicable environmental issues (e.g., air quality, cultural resources, noise, etc.), while the environmental impacts associated with the off-site trenching would be minor and would be mitigated with implementation of TR-PDF-1 (Construction Management Plan). Also, the mitigation measures and standard Conditions of Approval identified in the analyses for the other applicable environmental issues would also apply to the on- and off-site trenching under both projects. No upgrades to the existing off-site sewer mains or greater wastewater conveyance system would be required. Also, impacts associated with the installation of the wastewater infrastructure would be short-term and temporary and would cease upon completion of the installation.

Based on the above, Alternative 3, like the Project, would not require or result in the relocation or construction of new or expanded waster facilities, the construction or relocation of which could cause significant environmental effects, during construction. Impacts would be less than significant under both projects. The degree of these impacts would be slightly less under Alternative 3 owing to less development under this alternative and the likely need for smaller and/or fewer on-site sewer lines and connections to the off-site sewers.

(b) Operation

As with the Project, operation of the Alternative 3 would generate greater wastewater flows relative to existing conditions. However, based on the reduction in total floor area, wastewater generation under Alternative 3 would be less than the Project's estimated wastewater flow. As provided in Section IV.L.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the Project-generated wastewater could be accommodated by the existing capacity of the HWRP. Therefore, the capacity of the HWRP would also be sufficient to accommodate the wastewater flow from Alternative 3 without the need to expand the plant.

Like the Project, sewer service for Alternative 3 would be provided utilizing a new on-site sewer system and connections to the existing 15-inch sewer main in Hill Street. Given that the wastewater flows generated by Alternative 3 would be less than the estimated wastewater flows of the Project, owing to the 25-percent reduction in floor area, and given that the Utility Report included as Appendix L of this EIR (including the WWSI prepared by LASAN and included as an appendix to that report) determined that adequate capacity exists in the existing adjacent sewer mains to serve the Project, adequate sewer capacity would also be available to serve Alternative 3.

Based on the above, Alternative 3, like the Project, would not require or result in the relocation or construction of new or expanded waster facilities, the construction or relocation of which could cause significant environmental effects, during operation.

Impacts would be less than significant under both projects. The degree of these impacts would be less under Alternative 3 owing to less development under this alternative and less of a demand for wastewater conveyance and treatment capacity.

(3) Energy Infrastructure

(a) Construction

The Project and Alternative 3 would consume electricity and fossil fuels during construction (natural gas is typically not used during construction). The energy consumed by Alternative 3 during construction would be reduced compared to that of the Project due to the 25-percent reduction in floor area and the associated reduction in the overall amount and duration of construction activities. As indicated in Section IV.L.3, Utilities and Service Systems—Energy Infrastructure, energy supplies and infrastructure in the vicinity are adequate to meet the construction needs of the Project. Hence, energy supplies and infrastructure would also be adequate to meet the construction needs of Alternative 3.

With regard to the environmental effects associated with the construction of required energy infrastructure, Alternative 3, like the Project, would be provided with the electricity and natural gas required for operation by the existing electricity and natural gas lines in the adjacent streets via new on-site electricity and natural gas systems and connections to these lines. This would require on-site and some off-site trenching, as well as installation of the on-site electricity and natural gas infrastructure and of the connections. However, the environmental effects of the on-site trenching are already subsumed in the environmental impact analysis of the other applicable environmental issues (e.g., air quality, cultural resources, noise, etc.), while the environmental effects associated with the off-site trenching would be minor and would be mitigated with implementation of TR-PDF-1 (Construction Management Plan) and the mitigation measures and standard Conditions of Approval identified in the analyses for the other applicable environmental issues which would also apply to the off-site trenching. No upgrades to the existing off-site electricity or natural gas mains would be required. Also, impacts associated with the installation of the electricity and natural gas infrastructure would be short-term and temporary and would cease upon completion of the installation.

Based on the above, Alternative 3, like the Project, would not require or result in the relocation or construction of new or expanded energy facilities, the construction or relocation of which could cause significant environmental effects, during construction. Impacts would be less than significant under both projects. The degree of these impacts would be less under Alternative 3 owing to less development under this alternative and thus less of a demand for energy conveyance capacity.

(b) Operation

As with the Project, operation of Alternative 3 would generate an increased consumption of electricity, natural gas and fossil fuels. However, based on the reduction in total new floor area and uses, the total energy consumption of Alternative 3 would be less than the total energy consumption of the Project. In addition, because the existing electrical transmission lines and natural gas mains serving the Project Site would have sufficient capacity to serve the Project, so too would they have sufficient capacity to serve Alternative 3. Both the Project and Alternative 3 would not require the relocation or construction of new or expanded energy facilities. As the operational energy impacts of the Project would be less than significant, so too would the operational energy impacts of Alternative 3, with the degree of the impacts less under Alternative 3.

3. Comparison of Impacts

As evaluated above, Alternative 3 would not avoid or substantially reduce the Project's significant unavoidable impacts (specifically, Project and cumulative construction-related noise and vibration, and cumulative off-site operations-related traffic noise). As indicated in Table V-3 on page V-16 and described above, Alternative 3 would result in reduced impacts associated with operational air quality and TACs, historical resources, energy, GHG emissions, transportation, public service demand, utility demand, operational noise and vibration, population and housing, fire and police protection, schools, water supply/infrastructure, wastewater and energy. Impacts associated with the remaining environmental topics would be similar to the Project and Alternative 3 would not result in any increases in impacts when compared with the Project. Overall, Alternative 3 would be less impactful than the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 3 would partially meet the underlying purpose of the Project which is to redevelop the site by providing a high-density, mixed-use, transit- and pedestrian-oriented development that includes a mix of housing types (including affordable units) integrated with hotel, retail, restaurant and open space uses to transform the vacant site into a marquee destination and functional linkage between the Historic Core and Bunker Hill areas of downtown. However, Alternative 3 would be less effective than the Project in meeting this underlying purpose because it would include lower density development and fewer residential units and hotel rooms, and thus: (1) would not be as transit-oriented as the Project; (2) would not be as much of a marquee destination as the Project; and (3) would provide fewer affordable housing units.

Furthermore, Alternative 3 would be less effective than the Project in meeting the following Project objectives due to the development of lower density and fewer residential units and hotel rooms:

- Maximize density and floor area ratio on the site with a high level of intensity to create a high-energy urban experience with an interrelated mix of land uses that function to transform the site into an iconic development.
- Create a mix of interactive land uses with expanded for-sale and for-rent housing opportunities blended together with commercial uses to enhance the 24-hour downtown experience and provide an infill development that enlivens adjacent streets and integrated public spaces.
- Develop a high-quality mixed-use project that provides residential dwelling units that contribute to the City's housing supply, while integrating hotel uses capable of enhancing the experience in Bunker Hill and contributing to the supply of downtown hotel rooms for convention and tourist activities.
- Construct an economically feasible project that expands the economic base of the City and provides employment opportunities and new sources of tax revenue for the City by providing construction and permanent jobs, attracting commercial tenants and hotel operators, and increasing hotel patrons that collectively increase City tax revenues directly and indirectly.
- Utilize public investment in public transit by redeveloping an urban infill location with on-site mass transit capabilities to further smart growth land use planning practices and align with policies related to the reduction of greenhouse gas emissions and vehicle miles travelled.

Alternative 3 would meet the following objectives to the same extent as the Project because the site plan would remain substantially the same as the Project, and thus offer similar pedestrian- and transit-oriented design with open space amenities and accessible linkages:

- Provide attractive and ample publicly accessible open spaces that incorporate community amenities and integrate the Angels Flight funicular into the experience of the site.
- Establish and maintain active and accessible linkages between the residential, office, and cultural amenities on Bunker Hill and in the Historic Core area to enhance the interconnectivity of these communities.
- Integrate the existing Metro portal as a component of open space and plaza design to enhance the pedestrian and transit user experience at the site.

V. Alternatives

D. Alternative 4: Residential Alternative

1. Description of the Alternative

Similar to the Project, Alternative 4 would be consistent with the uses permitted at the Project Site by the Framework Plan, Central City Community Plan, Bunker Hills Specific Plan, and the Zoning Code. However, the mix of uses would vary from the Project. Specifically, Alternative 4 would include the development of residential and commercial (retail and restaurant) uses in Towers A and B instead of the hotel uses proposed under the Project. As detailed in Table V-1 on page V-4, Alternative 4 would develop 577 residential units in Tower A and Tower B (as opposed to 432 residential units and hotel uses under the Project), with a mix of general commercial (e.g., retail and restaurant) and residential amenity uses in the podium (e.g., no hotel uses). There would be 12,094 additional square feet of open space to satisfy Code, and like the Project, Alternative 4 would include 750 subterranean vehicle parking spaces (with the same 70-foot depth). Also like the Project, Alternative 4 would retain the existing Metro portal in the southeastern portion of the Project Site. The 1,269,150 sf of floor area, FAR of approximately 13:1, tower heights, and site plan under Alternative 4 would be the same as under the Project.

2. Environmental Impacts

a. Air Quality

(1) Regional Emissions

(a) Construction

As with the Project, construction of Alternative 4 has the potential to generate construction-related regional air emissions through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from excavation and grading activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Under Alternative 4, construction activities would be generally the same as those of the Project given that the same site plan, same two towers, same podium structure, same

number of subterranean parking levels, and same overall amount of floor area (e.g., 1,269,150 square feet). Furthermore, the maximum day of construction activity and duration of construction activities of Alternative 4 would be generally be the same as the Project, such that intensity of construction-related regional air and fugitive dust emissions from site preparation and construction activities would be the same. Thus, as the construction-related regional emissions of the Project would be less than significant (with mitigation incorporated), so too would the construction-related regional construction emissions of Alternative 4. The degree of the impacts would be similar between the Alternative 4 and the Project.

(b) Operation

As previously discussed, the development proposed under Alternative 4 would be generally the same as the Project, with just a different land use mix. Hence, operational regional emissions associated with the consumption of electricity and natural gas would be similar between the two Projects. However, as provided in Appendix N of this Draft EIR, Alternative 4 would result in a total of 3,971 daily vehicle trips and 27,903 daily VMT, as compared to the Project's 5,410 daily vehicle trips and 40,033 daily VMT.⁴⁷ Alternative 4 would result in less traffic-related operational air emissions than the Project which is the primary contributor to regional operational emissions. Thus, like the Project, regional operational emissions under Alternative 4 would be below SCAQMD's regional significance thresholds. As such, the operational regional air pollutant emissions of Alternative 4 would be less than the less than significant and less than the less than significant impacts of the Project.

(2) Localized Emissions

(a) Construction

On-site construction activities associated with Alternative 4 would be located at similar distances from sensitive receptors as the Project, and the maximum day, extent and duration of construction activities would generally be the same between the two projects. As such, localized regional air emissions and fugitive dust emissions from site preparation and construction activities would be the same. Therefore, as with the Project, localized construction emissions impacts under Alternative 4 would be less than significant and similar to the less than significant impacts of the Project.

⁴⁷ Gibson Transportation Consulting, Inc., *Transportation Assessment for the Alternatives to the Angels Landing Project*, May 2020. See Appendix J.1 of this Draft EIR.

(b) Operation

Localized operational impacts are determined primarily by peak-hour intersection traffic volumes. As provided in Appendix N of this Draft EIR, Alternative 4 would generate 247 vehicle trips during the A.M. peak hour and 392 trips during the P.M. peak hour, which would be less than the Project's 398 A.M. peak-hour trips and 585 P.M. peak-hour trips. As such, total operational vehicular emissions under Alternative 4 would be less than those of the Project. In addition, with the development of less floor area than the Project, area and stationary sources would also generate less on-site operational air emissions compared to the Project. Also, as with the Project, Alternative 4 would not introduce any major new sources of air pollution within the Project Site. Because the localized impacts analysis from on-site operational activities and the localized CO hotspot analysis associated with off-site operational activities for the Project did not result in any significant impacts, localized impacts under Alternative 4 would be less than significant and less than the less than significant impacts of the Project.

(3) Toxic Air Contaminants

(a) Construction

As with the Project, construction of Alternative 4 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. Construction TAC emissions generated by Alternative 4 would be similar to those of the Project since grading and excavation activities would be similar between the two projects owing to the same site plan and number of subterranean parking levels. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 4 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

As set forth in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential TACs associated with Project operations would include diesel particulate matter from delivery trucks. Under Alternative 4, the overall increase in the number of deliveries and associated DPM emissions would be expected to be reduced compared to the Project because: (1) the number of overall daily vehicle trips would be less (e.g., 3,971 under Alternative 4 versus 5,410 under the Project;⁴⁸ and (2) Alternative 4 would include more residential and no hotel uses when compared with the Project, and thus would be expected to result in less daily commercial delivery truck traffic. Also, as with the Project, the land

⁴⁸ Gibson Transportation Consulting, Inc., *Transportation Assessment for the Alternatives to the Angels Landing Project*, May 2020. See Appendix J.1 of this Draft EIR.

uses proposed under Alternative 4 are not considered land uses that generate substantial TAC emissions. Therefore, the operational TACs impacts of Alternative 4 would be less than significant and less than the less than significant impacts of the Project.

b. Cultural Resources

(1) Historical Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, there are no historical resources on the Project Site, and no historical resources would be demolished, destroyed, relocated or altered under the Project. Also, similar to the Project, Alternative 4 would include vibration-generating grading and construction activities. However, this vibration would not be sufficient to result in material damage to adjacent historical resources under the Project, and because the amount of excavation and grading would be similar between the two projects (owing to the same site plan and number of subterranean parking levels and thus similar amounts of excavation and grading), excavation and grading activities under Alternative 4 would similarly not result in damage to the adjacent historical resources.

With regard to indirect impacts on adjacent historical resources, similar to the Project Alternative 4 would introduce new high-rise mixed-use development at the Project Site. However, Alternative 4 would not demolish existing buildings and would include the same site plan, same two towers, same podium structure, same number of subterranean parking levels, and same overall amount of floor area (e.g., 1,269,150 square feet) on the same site as the Project. Hence, as with the Project, Alternative 4 would not materially impair the context of the adjacent historical resources (e.g., would not demolish or alter the physical characteristics that convey the significance of the historical resources that justify their inclusion in or eligibility for inclusion in the national, state or local registers or historic district programs pursuant to CEQA).

Based on the above, Alternative 4 would result in less than significant impacts to historical resources which would be similar to the less than significant impacts of the Project.

(2) Archaeological Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, no archaeological resources have been documented on-site, although multiple archaeological resource finds have been documented within a 0.5-mile radius of the Project Site. The Project would include excavation and grading activities that could potentially unearth archaeological resources, if present. Because Alternative 4 would include the same site plan and levels of subterranean parking as the Project at the same location, it would

include similar excavation and grading activities as the Project and would have a similar potential for unearthing archaeological resources, if present. Furthermore, the City applies its standard archaeological resources condition of approval to projects that disturb soil to address the inadvertent discovery of archaeological resources during grading activities. As such, Alternative 4 would result in a similar less than significant impact as the Project.

(3) Human Remains

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, no human remains have been documented on-site or at the adjacent properties, although a prehistoric burial has been documented 0.5 mile northeast of the Project Site. The Project would include excavation and grading activities that could potentially unearth human remains, if present. Because Alternative 4 would include the same site plan and levels of subterranean parking as the Project at the same location, it would include similar excavation and grading activities as the Project and would have a similar potential for unearthing archaeological resources, if present. As such, Alternative 4 would result in a similar less than significant impacts to human remains (with adherence to applicable regulations) as the Project.

c. Energy

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

(a) Construction

Similar to the Project, construction activities associated with Alternative 4 would consume electricity to supply and convey water for dust control, power construction site lighting and power other construction equipment, and require diesel and other fuels for construction vehicles, but like the Project, would not consume natural gas. However, as with the Project, this energy use during construction would occur in accordance with applicable energy conservation requirements (e.g., Title 24, CARB anti-idling regulations, In-Use Off-Road Diesel-Fueled Fleet regulations, etc.) such that energy use during construction would not occur in a wasteful, inefficient, or unnecessary manner. In addition, because Alternative 4 would include the same site plan, number of subterranean levels, buildings, and overall floor area (e.g., 1,269,150 square feet) as the Project, the level of construction activities and associated energy use would be similar. Therefore, the construction-related energy impacts of Alternative 4 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 4 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels. The electricity and natural gas consumption rates for residential uses are lower than for hotel uses such that Alternative 4 would result in less operations-related consumption of electricity and natural gas than the Project. Also, as provided in Appendix N of this Draft EIR, Alternative 4 would result in a total of 3,971 daily vehicle trips and 27,903 daily VMT as compared to 5,410 daily trips and 40,033 daily VMT under the Project;⁴⁹ as such, the consumption of petroleum-based fuels would also be reduced under Alternative 4. In addition, like the Project, Alternative 4 would: (1) represent a high-density mixed-use infill project within a TPA and HQTa adjacent to an existing Metro portal which would maximize transit and other alternative modes of transportation, minimize vehicle miles traveled, and result in associated reductions in motor vehicle-related fuel use; (2) be designed to further reduce vehicular trips to the Project Site through various TDM strategies (e.g., bicycle infrastructure) as set forth in Section IV.J, Transportation; (3) implement PDFs to reduce energy usage (e.g., GHG-PDF-1, design per LEED Silver certification requirements, GHG-PDF-2, provision of electric vehicle charging stations, and GHG-PDF-3, prohibition on natural gas-fueled fireplaces); and (4) comply with the applicable energy conservation requirements of Title 24, the Los Angeles Green Building Code, and CALGreen. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels during operation of Alternative 4 would not be wasteful, inefficient, or unnecessary, and impacts would be less than significant. The degree of the impacts would be similar between the two projects because, while Alternative 4 would generate lower energy demand than the Project, neither project would use energy in a wasteful, inefficient, or unnecessary manner.

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

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

⁴⁹ *Gibson Transportation Consulting, Inc., Transportation Assessment for the Alternatives to the Angels Landing Project, May 2020. See Appendix J.1 of this Draft EIR.*

With regard to transportation related energy usage, Alternative 4, like the Project, would: (1) comply with goals of the SCAG's 2016 RTP/SCS which incorporate VMT targets established by SB 375; (2) develop mixed uses adjacent to a Metro portal within a TPA, HQTa and major job centers which would serve to reduce per capita VMT and associated transportation fuel usage; (3) would comply with CAFE fuel economy standards; and (4) comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction.

Based on the above, Alternative 4, like the Project, would not conflict with plans for renewable energy or energy efficiency. The impacts of Alternative 4 would thus be less than significant, and similar to the less than significant impacts of the Project.

d. Geology and Soils (Paleontological Resources)

As discussed in Section IV.D, Geology and Soils (Paleontological Resources), of this Draft EIR, no paleontological resources have been documented on-site or at the adjacent properties, and although the uppermost layers of soil and the overlying younger Quaternary Alluvium deposits at the Project Site are unlikely to yield significant vertebrate fossils. However, deeper excavations into the sedimentary layers and San Fernando Formation bedrock underlying the Project Site have the potential to encounter significant vertebrate fossil remains. As Alternative 4 would include the same site plan and number of subterranean parking levels as the Project, it would result in the same depth of excavations and spatial extent of grading as the Project and thus would have a similar potential to impact paleontological resources as the Project. Furthermore, like the Project, Alternative 4 would implement Mitigation Measures GEO-MM-1 through GEO-MM-4 which require construction worker paleontological resources sensitivity training, paleontological monitoring by qualified paleontological monitor, and the proper collection and treatment of any paleontological resources discovered during construction which would mitigate any impacts. Therefore, the paleontological resources impacts of Alternative 4, like the Project, would be less than significant (with mitigation incorporated), with the level of the impacts similar between the two projects.

e. Greenhouse Gas Emissions

(1) GHG Emissions

Both the Project and Alternative 4 would include new development that would generate GHG emissions associated with both construction (the operation of construction equipment, truck and construction worker traffic, etc.) and operation (lighting, HVAC systems, heating, automobile and truck traffic, etc.). However, like the Project, Alternative 4 would: (1) represent high-density mixed-use development on an urban infill site adjacent to transit within a TPA and HQTa which would reduce daily vehicle trips and per capita VMT;

(2) be designed to comply with the requirements of Title 24, the CALGreen Code, and the Los Angeles Green Building Code; and (3) incorporate PDFs to reduce GHG emissions (e.g., GHG-PDF-1, design per LEED Silver certification requirements, GHG-PDF-2, provision of electric vehicle charging stations, and GHG-PDF-3, prohibition on natural gas–fueled fireplaces). Still, while both projects would generate similar GHG emissions during construction owing to the same site plan, levels of subterranean parking, amount of new floor area (e.g., 1,269,150 square feet), etc., Alternative 4 would: (1) result in less operational electricity and natural gas usage than the Project owing to the greater portion of residential to hotel uses under this alternative (e.g., hotel rooms have higher energy demand factors per square foot than do residential uses); and (2) would consume less petroleum-based fuels during operation due to the lower daily vehicle trips and daily VMT. Therefore, while neither project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, the less than significant impacts of Alternative 4 would be less than the less than significant impacts of the Project.

(2) Conflict with GHG Reduction Plans/Policies/Regulations

As indicated above, Alternative 4, like the Project, would: (1) represent high-density mixed-use development on an urban infill site within a TPA and HQT; (2) reduce per capita VMT; (3) comply with Title 24, the CALGreen Code, and the Los Angeles Green Building Code; and (4) incorporate PDFs to reduce GHG emissions (e.g., GHG-PDF-1, design per LEED Silver certification requirements, GHG-PDF-2, provision of electric vehicle charging stations, and GHG-PDF-3, prohibition on natural gas–fueled fireplaces). Therefore, Alternative 4, like the Project, would not conflict with applicable GHG reduction plans, policies and regulations. Alternative 4 would result in less than significant impacts which would be similar to the less than significant impacts of the project.

f. Land Use and Planning

As previously described, Alternative 4 would develop 577 residential units in Towers A and B, with a mix of general commercial and residential amenity uses in the podium. Rather than developing 470,117 square feet of hotel uses among the uses proposed in the towers as proposed under the Project, Alternative 4 would instead develop 145 additional residential units. All other aspects of Alternative 4 would be the same as the Project (e.g., same site plan, number of subterranean parking levels [3], number of parking spaces [750], overall square feet of floor area [1,269,150], FAR [13:1], etc.), except that 12,094 square feet of additional open space would be provided to satisfy Code requirements associated with the proposed additional residential units.

As with the Project, the uses proposed under Alternative 4 would be consistent with the type, height, density and intensity of development permitted by the existing land use designation (Regional Center Commercial) and zoning (C2-4D) of the Project Site. Both

projects would also comply with applicable zoning requirements (for example, parking, open space, setback, and right-of-way dedication requirements). Like the Project, Alternative 4 would also include high-density mixed-use development on an urban infill site adjacent to the Metro portal and within a TPA and HQTa and would offer a mix of uses within one site, thereby reducing the need for residents to travel off-site to meet their retail needs and reducing vehicle trips, VMT, traffic congestion, and air emissions. Both projects would also provide public benefits, including but not limited to affordable housing, publicly accessible open space, frontage improvements, and pedestrian connections between Bunker Hill and the Historic Core and between the Metro portal, California Plaza, and Angels Flight. Lastly, because the only difference between the two projects would be in the land use mix, Alternative 4, like the Project, would not conflict with the applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect, including those set forth in the Los Angeles General Plan Framework Element, Housing Element, Central City Community Plan, Bunker Hill Specific Plan, LAMC, and SCAG's 2016–2040 RTP/SCS. Therefore, Alternative 4 would result in less than significant land use and planning impacts that are similar to the less than significant impacts of the Project.

g. Noise

(1) Noise

(a) Construction

The amount of peak day and overall construction activity, as well as the duration of construction, would be generally the same between Alternative 4 and the Project. This is because: (1) Alternative 4 would include the same site plan and number of subterranean parking levels as the Project, and thus roughly the same amount of excavation and grading activity; (2) both projects would include the development of 1,269,150 square feet of floor area; (3) both projects would be developed on the same site, with the same building footprints, and within the same distances to off-site sensitive receptors; (4) both projects would include the development of mat foundations requiring nighttime concrete pours; (5) given that both projects would include high-rise mixed-use development, it is anticipated that they would require the same mix of construction equipment; (6) both projects would implement the same construction-related project noise design features, including NOI-PDF-1 (using construction equipment equipped with state-of-the-art noise shielding and muffling devices) and NOI-PDF-3 (prohibition on the use of impact driven pile systems); and (7) both projects would implement Mitigation Measure NOI-MM-1 (temporary impermeable sound barrier at specified locations during the construction period). Thus, like the Project, Alternative 4 would result in significant unavoidable on-site construction noise (both project-level and cumulative), less than significant off-site construction traffic noise (project-level), and significant unavoidable off-site construction noise (cumulative), with the degree of these impacts similar between the two projects.

(b) Operation

As discussed in Section IV.G, Noise, of this Draft EIR, sources of operational noise under the Project would include: (1) on-site stationary noise sources, including mechanical equipment, activities within the proposed outdoor spaces, parking areas, loading dock and trash collection areas; and (2) off-site mobile source (e.g., traffic) noise sources. Alternative 4 would introduce noise from similar on-site and off-site noise sources as the Project. The proposed parking, loading dock and trash collection areas for Alternative 4 would also be located in enclosed areas, similar to the Project, such that parking, loading dock and trash collection area noise under Alternative 4 would be minimal similar to the Project. The Project and Alternative 4 would also both be mixed-use projects, albeit with different mixes of land uses, and would have similar outdoor open space hours, similar outdoor operating hours and frequency of outdoor special events, and similar mechanical equipment (e.g., HVAC systems, etc.). Lastly, Alternative 4 would implement the same operations-related PDFs as the Project, including NOI-PDF-2 (acoustically screening mechanical equipment), NOI-PDF-3 (acoustically screening loading docks), NOI-PDF-5 (limiting noise from outdoor amplified sound systems to specific maximum levels), and NOI-PDF-6 (6-foot-high noise attenuation features around the proposed Level 5 Terrace). However, Alternative 4 would result 3,971 daily vehicle trips, versus the Project's 5,410 daily vehicle trips,⁵⁰ such that off-site mobile source noise under this alternative would be reduced. Therefore, both projects would result in less than significant project-level operational on- and off-site noise impacts (including composite noise), and less than significant cumulative operational off-site traffic noise impacts, with the degree of these impacts less under Alternative 4.

With regard to cumulative operational off-site traffic noise, this noise would be significant and unavoidable under the Project. While Alternative 4 would generate less operational traffic than the Project, cumulative operational traffic noise would still be significant and unavoidable under Alternative 4 (e.g., noise levels would increase by 3.1 dBA under Alternative 4 and by 3.2 dBA under the Project, both of which would be above the 3 dBA threshold).⁵¹ The degree of the impact would be less under Alternative 4 owing to less traffic generation, and thus less (0.1 dBA)⁵² cumulative operational traffic noise, under this alternative.

⁵⁰ Gibson Transportation Consulting, Inc., *Transportation Assessment for the Alternatives to the Angels Landing Project*, May 2020. See Appendix J.1 of this Draft EIR.

⁵¹ AES Acoustics, August 28, 2020.

⁵² AES Acoustics, August 28, 2020.

(2) Vibration

(a) Construction

Both projects would generate on-site vibration from the use of heavy-duty excavation, grading and construction equipment and off-site vibration along the proposed construction haul route from construction trucks, even with the implementation of NOI-PDF-4 (prohibition on the use of impact driven pile systems) under both projects. While the Project and Alternative 4 would include different land use mixes, they would include the same site plan on the same site, develop the same amount of new floor area (1,269,150 square feet), include the same number of subterranean parking levels, require the same mat foundations with nighttime concrete pours, and would utilize the same construction haul route. As discussed previously, both projects would also have the peak day and overall amount construction activity, and roughly the same duration of construction. Thus, as with the project, Alternative 4 would result in less than significant on- and off-site vibration impacts in terms of building damage, and significant unavoidable on- and off-site vibration impacts in terms of human annoyance. The degree of these impacts would be similar between the two projects as both projects would include the same site plan and number of subterranean parking levels thus requiring similar amounts of excavation and grading, and generally the same maximum day construction activities.

(b) Operation

As described in Section IV.G, Noise, of this Draft EIR, sources of vibration related to operation of the Project would include mechanical equipment, on-site vehicle circulation, and off-site delivery trucks. These same sources of operational vibration would occur under Alternative 4. As with the Project, building mechanical equipment installed as part of Alternative 4 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units mounted at the roof level that would include vibration-attenuation mounts to reduce vibration transmission, such that associated vibration would not be perceptible at the off-site sensitive receptors. Similarly, as with the Project, the vast majority of on-site vehicular circulation would occur within the proposed on-site subterranean parking structure, while all on-site truck traffic would occur within the fully enclosed loading dock portion of the podium structure, such that associated vibration would not exceed vibration-related building damage and human annoyance thresholds at the nearest buildings and sensitive uses, respectively, under either project. Lastly, as indicated in Section IV.G, Project traffic would not result in vibration in exceedance of applicable vibration-related building damage or human annoyance thresholds. Because Alternative 4 would generate less operational traffic than the Project (e.g., 3,971 versus 5,410 trips per

day),⁵³ it too would not exceed these thresholds. Therefore, Alternative 4 would generate less than significant operational vibration impacts that are less than the less than significant impacts of the Project.

h. Population and Housing

(1) Construction

As discussed in Section IV.H, Population and Housing, of this Draft EIR, the Project Site is vacant except for the Metro portal located in the southeastern portion of the Project Site. Furthermore, both the Project and Alternative 4 would retain the existing on-site Metro portal. Therefore, as with the Project, construction of Alternative 4 would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere, and the no impact would occur.

As discussed in Section IV.H, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by a particular development. Many construction workers are highly specialized (e.g., crane operators, steel workers, masons), and move from job site to job site as dictated by the demand for their skills while keeping their site of residence. Therefore, as with the Project, construction activities associated with Alternative 4 would not induce substantial unplanned population growth in the area and the impact would be less than significant. The degree of the impact would be similar between the two projects owing to development of the same site plan, buildings, new floor area, and duration of construction which would result in similar number of construction workers.

(2) Operation

As previously discussed, Alternative 4 would include the same amount of new floor area (e.g., 1,269,150 square feet) as the Project, but would include the development of 145 residential units in place of the 470,117 square feet of hotel uses proposed under the Project. As indicated in Table V-2 on page V-6, this would result in 577 residential units and an estimated 1,391 residents under Alternative 4, versus 432 residential units and 1,042 residents under the Project. As discussed in Section IV.J, Population and Housing, of this Draft EIR, the new residents generated by the Project would be within, and thus would be consistent with, the SCAG RTP/SCS growth forecasts, and would constitute a small percentage of projected City and regional growth. Additionally, the new residential

⁵³ Gibson Transportation Consulting, Inc., *Transportation Assessment for the Alternatives to the Angels Landing Project*, May 2020. See Appendix J.1 of this Draft EIR.

units proposed by the Project would represent a small percentage of the housing growth in the SCAG region and in the City. While Alternative 4 would result in more residential units and residents than the Project, this alternative would still be consistent with the existing zoning of the Project Site which serves as the basis for City and SCAG RTP/SCS growth forecasts. Furthermore, given that the City's resident population is expected to increase from 4,036,475 to 4,227,450 persons between 2019 and 2026 (the buildout year of the Project) as indicated in Table IV.H-1 in Section IV.H, Population and Housing, of this Draft EIR, the 1,391 new residents that would be generated by Alternative 4 would be well within City growth projections. Therefore, like the Project, Alternative 4 would not directly induce substantial unplanned population growth in the area.

With regard to indirect population impacts associated with the proposed development, specifically the proposed retail and restaurant uses under both the Project and Alternative 4 would generate employment opportunities. Specifically, as indicated in Table V-2 on page V-6, Alternative 4 would generate an estimated 228 employees during operation versus the Project's estimated 535 employees. Similar to the Project, the majority of these new employment opportunities under Alternative 4 would likely be filled by persons already residing in the area as the Project Site. This is because the Project Site is located in Downtown Los Angeles, one of the largest metropolitan areas in the nation with a large prospective employee pool. Similarly, any indirect demand for housing associated with the proposed new businesses under both projects would likely be fulfilled by vacancies in the surrounding housing market and from other new units in the vicinity of the Project Site, not to mention by the proposed housing units. Lastly, both the Project and Alternative 4 would be consistent with the existing Community Plan land use designation and zoning of the Project Site such that the proposed land uses have been accounted for in City and SCAG population forecasts. As such, like the Project, Alternative 4 would not indirectly induce substantial unplanned population growth in the area due to development.

With regard to indirect population impacts associated with infrastructure, the Project Site represents an urban infill site within the highly developed Downtown area which already has fully developed roadway and utility infrastructure systems. Furthermore, as with the Project, the circulation and utility infrastructure improvements under Alternative 4 would be limited to those required to serve the Project from the adjacent streets and the utility infrastructure in those adjacent streets. The extension of roadways and utility infrastructure systems would not be required to serve either project. Therefore, like the Project, Alternative 4 would not indirectly induce substantial unplanned population growth in the area due to infrastructure improvements.

Based on the above, Alternative 4, like the Project, would result in less than significant operational population and housing impacts. The degree of these impacts would be greater under Alternative 4 due to the increased residential population.

i. Public Services

(1) Fire Protection

(a) Construction

As previously described, the types and overall amount of construction activities required for Alternative 4 would be similar to that of the Project, owing to the same site plan, same amount of proposed new floor area, etc. Like the Project, construction activities under Alternative 4 would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous waste (e.g., OSHA, LAFD requirements, etc.). Construction under both projects would also occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, similar to the Project, compliance with regulatory requirements under Alternative 4 would effectively reduce the potential for construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Additionally, while construction activities would primarily be contained within the boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by temporary lane closures, roadway/access improvements, and the construction of utility line connections. Similar to the Project, it is likely that Alternative 4 would require construction fences that would encroach into the public right-of-way (e.g., sidewalks and roadways) adjacent to the Project Site on 4th Street, Hill Street, and Olive Street. However, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period and emergency access would not be impeded. In addition, as with the Project, a Construction Management Plan (TR-PDF-1) would be implemented during construction of Alternative 4 to ensure that adequate and safe access remains available within and near the Project Site during construction activities.

As indicated in Section IV.I.1, Public Services—Fire Protection, of this Draft EIR, Project construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. The same would be true for Alternative 4. However, with the implementation of TR-PDF-1, the majority of construction-related traffic, including hauling activities and construction worker trips under both projects, would occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts and the slowing of emergency response times. Per TR-PDF-1, both projects would also employ temporary traffic controls such as flag persons to control traffic movement during temporary traffic flow disruptions, and construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as

necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Therefore, as with the Project, construction-related traffic under Alternative 4 would not substantially slow emergency response times or interfere with emergency access.

Based on the above, Alternative 4, like the Project, would not require new or physically altered fire protection facilities, the construction of which would cause significant environmental impacts, on order to maintain acceptable service ratios, response times, or other performance objectives. As such, impacts under both projects would be less than significant, with the degree of the impacts similar between the two projects.

(b) Operation

Similar to the Project, Alternative 4 would generate a new residential population, as well as a new visitor and employee population on the Project Site that would contribute to an increase in demand for LAFD fire protection and emergency medical services. Specifically, As indicated in Table V-2 on page V-6, Alternative 4 would generate an estimated 1,391 residents and 228 employees, for a total service population of 1,619, versus the Project would generate an estimated 1,042 residents and 535 employees, for a total service population of 1,577 persons. Due to the slightly greater service population under Alternative 4, this alternative would generate a slightly greater demand for LAFD fire protection and emergency medical services than the Project. However, similar to the Project, Alternative 4 would: (1) implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, emergency access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. (including providing a rooftop emergency helicopter landing facility or other option acceptable to LAFD); (2) include automatic fire sprinklers in the proposed buildings; and (3) not include barriers that could impede emergency vehicle access. Furthermore, as with the Project, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for Alternative 4 given the same type, size, height, location, and fire flow infrastructure as the Project. Lastly, the LAFD has determined fire protection (based on the response distance from existing fire stations criteria) is adequate to serve the Project, and because Alternative 4 would be developed on the same site, fire protection would thus also be adequate to service Alternative 4. Therefore, neither project would require new or physically altered fire protection facilities, the construction of which would cause significant environmental impacts, on order to maintain acceptable service ratios, response times, or other performance objectives. Based on the above, Alternative 4 would result in less than significant impacts which are slightly greater than the less than significant impacts of the Project.

(2) Police Protection

(a) Construction

As with the Project, Alternative 4 would include construction activities and generate construction traffic that would create a demand for LAPD police protection services, potentially obstruct emergency access, and potentially slow emergency response times during the construction period. However, as with the Project, Alternative 4 would implement PDFs (e.g., POL-PDF-1, security lighting, fencing and regular security patrols of the construction sites, and TR-PDF-1, Construction Management Plan) that would minimize the demand for LAPD police protection services, ensure the provision of adequate emergency access, and minimize construction traffic-related delays in emergency response during the construction period. Also, emergency vehicles have the ability to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic as permitted by CVC Section 21806. Furthermore, the construction of the Project and Alternative 4 would not indirectly generate a demand for LAPD police protection services because, as discussed previously, construction workers and their families would not be expected to move to the area as a result of the proposed development and because construction jobs would be temporary. Therefore, like the Project, Alternative 4 would not require new or physically altered police protection facilities that would cause substantial adverse physical impacts during construction, and impacts would be less than significant. Because Alternative 4 would include the same amount of development as the Project, would likely include the same amount of construction activities and same duration of construction, these impacts would be similar between the two projects.

(b) Operation

As indicated in Section IV.2, Public Services—Police Protection, of this Draft EIR, LAPD considers the residential population within their service area to evaluate service capacity. As indicated in Table V-2 on page V-6, the Project would include 432 residential units which would generate an estimate 1,042 residents, versus Alternative 4 which would include 577 residential units which would generate an estimated 1,391 residents. While the residents of both projects would create a demand for service from LAPD's Central Community Police Station, both projects would implement PDF POL-PDF-2, 24-hour/seven-day-a-week security plan and would include regulatory requirements including security lighting (for buildings/walkways and the parking structure, respectively), and design of building entrances/exits, open spaces and walkways to be open and in view of surrounding sites. Also, both projects would generate tax revenues that could be applied toward the provision of new police facilities and related staffing within the Central Area. In addition, the officer-to-resident ratio for the Central Area would decrease from approximately 9.25 officers per 1,000 residents to approximately 9.02 officers per 1,000 residents under the Project or to approximately 8.94 officers per 1,000 residents under Alternative 4, which would still be substantially higher than the Citywide ratio of

2.5 officers per 1,000 residents.⁵⁴ Lastly, as discussed in Section IV.I.2, in conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board of Trustees of the California State University* ruling, the City is obligated to provide adequate public safety services, including police protection services, and the need for additional public safety services is not an environmental impact that CEQA requires a project proponent to mitigate.

With regard to impacts on police emergency response times, both the Project and Alternative would generate operational traffic in the vicinity of the Project Site which could have the potential to increase LAPD emergency response times. However, Alternative 4 would generate less operational traffic than the Project (e.g., 3,971 daily vehicle trips versus 5,410 under the Project),⁵⁵ and thus would have less of a potential than the Project to slow emergency response times. Also, neither project would close existing streets or include barriers that could impede emergency access. Also, in accordance with CVC Section 21806, drivers of police emergency vehicles have the ability to avoid traffic by using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Accordingly, like with the Project, operation of Alternative 4 would not cause a substantial increase in LAPD emergency response times due to traffic congestion.

Based on the above, Alternative 4, like the project, would not result in the need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service, and impacts would be less than significant. The degree of these impacts would be greater under Alternative 4 as it would generate more service demand (e.g., a higher residential or service population) than the Project.

(3) Schools

(a) Construction

Similar to the Project, Alternative 4 would generate temporary construction jobs during the construction period. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project or Alternative 4. Therefore, as with

⁵⁴ Calculations based on 370 existing sworn officers, and an existing residential service population of 40,000, within LAPD's Central Area. For Alternative 4, the 8.94 officers per 1,000 resident estimate was calculated using the following formula: $370 / ((40,000 + 1,391) / 1,000) = 8.94$.

⁵⁵ Gibson Transportation Consulting, Inc., *Transportation Assessment for the Alternatives to the Angels Landing Project*, May 2020. See Appendix J.1 of this Draft EIR.

the Project, the construction employment generated by Alternative 4 would not result in a notable increase in the resident population, an increase in demand for schools in the vicinity of the Project Site, or the need for new or physically altered school facilities, the construction of which would cause significant environmental impacts. Impacts under both projects would be less than significant, with the degree of these impacts similar between the two projects owing to roughly the same amount of construction activities and associated number of construction workers.

(b) Operation

As with the Project, Alternative 4 would include new development that would contribute to an increased demand for schools. Specifically, Alternative 4 would include 577 residential units, versus 432 residential units under the Project. Because Alternative 4 would include more residential units than the Project, which is the primary driver of the demand for schools, it would generate a greater demand for schools. At the same time, the number of students that could be indirectly generated by employee households would be less under Alternative 4 owing to the development of residential rather than hotel uses, and thus fewer new employees, under this alternative. Regardless, pursuant to Senate Bill 50, the Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits for either project, and per Government Code Section 65995, the payment of these fees is considered mitigation of the impacts of new development on schools. Therefore, both projects would result in less than significant impacts. Because Alternative 4 would generate a greater demand for schools than the Project, the degree of these impacts would be greater under Alternative 4.

j. Transportation

Alternative 4 would be developed on the same site as the Project and thus be subject to the same transportation-related plans and requirements as the Project (e.g., the City's Mobility Plan 2035, Plan for a Healthy Los Angeles, Central City Community Plan, Bunker Hill Specific Plan, LAMC, Vision Zero, Citywide Design Guidelines, and SCAG RTP/SCS). Both projects would represent high density (13:1 FAR) mixed-use development on an urban infill site within a TPA and HQT, adjacent to a Metro portal, and within close proximity of multiple bus transit routes, which would be consistent with applicable plans calling for high-density development in close proximity to transit so as maximize the use of alternative transportation modes and reduce traffic, VMT and air emissions. Both projects would also reduce per capita VMT in accordance with the applicable transportation plans (e.g., both projects would result in a household VMT of 3.9 per capita, with a work-employee VMT of 7.3 per capita for the Project and 7.1 for Alternative 4, which would be below the City's thresholds of 6.0 VMT per capita for household and 7.6 VMT per capita for

works-employees),⁵⁶ Also, Alternative 4 would include the same site plan as the Project, including the same vehicular, pedestrian, and bicycle access and parking, and would follow the same City roadway, driveway, site distance, parking, and other transportation-related requirements as the Project. Lastly, Alternative 4 would implement the same transportation-related PDFs as the Project (e.g., TR-PDF-1, Construction Management Plan, TR-PDF-2, TDM measures, and TR-PDF-3, measures to ensure the safety of pedestrians). As with the Project, Alternative 4 would also be consistent with other applicable transportation-related goals, objectives and policies, including but not limited to the following:

- Provide safe access for all users regardless of mode of choice, encourage multi-modal transportation alternatives and access, and reduce per capita VMT consistent with the Mobility Plan.
- Prioritize safety and access through improved pedestrian passages and connectivity to transit and would encourage healthy living by promoting bicycling and walking consistent with the Plan for a Healthy Los Angeles.
- Expand housing opportunities near accessible transit, encourage a mix of land uses to create an active destination, provide traditional and non-traditional sources of open space, support high levels of transit use, and provide employment opportunities consistent with the Central City Community Plan.
- Provide a mixed-use infill development in proximity to transit, would reinforce the Downtown workforce, and would grow and support the area's residential base consistent with the Draft Downtown Community Plan.
- Create a 24-hour Downtown environment at the Project Site, expand housing opportunities and commercial retail space, provide employment opportunities, provide connections between public open spaces and pedestrian pathways, and create a transit-friendly environment through active ground floor uses and pedestrian-oriented design consistent with the Bunker Hill Specific Plan.
- Comply with LAMC street dedication, TDM and vehicle and bicycle parking requirements.
- Separate pedestrian, bicycle, and automobile traffic, and would not preclude future City safety improvements consistent with Vision Zero.

⁵⁶ Gibson Transportation Consulting, Inc., *Transportation Assessment for the Alternatives to the Angels Landing Project*, May 2020. See Appendix J.1 of this Draft EIR.

- Include accessible sidewalks, pedestrian amenities, vehicular access driveways, and other transportation improvements consistent with the Citywide Design Guidelines.
- Be consistent with the growth projections and VMT reduction policies of SCAG's RTP/SCS.

Therefore, as with the Project, Alternative 4 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant. The degree of the impacts would be similar between Alternative 4 and the Project as both projects would be consistent with applicable transportation programs, plans, ordinances and policies.

Both Alternative 4 and the Project would reduce per capita VMT (e.g., both projects would result in a household VMT per capita of 3.9, with a worker/employee VMT per capita of 7.3 for the Project and 7.1 for Alternative 4, as compared to the City's thresholds of 6.0 and 7.6, respectively).⁵⁷ Therefore, impacts with respect to conflicts with CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant under both projects. The degree of these impacts would be less under Alternative 4 owing to the generation of lower daily VMT under this alternative (e.g., 27,903 VMT under Alternative 4 versus 40,033 VMT under the Project).⁵⁸

Regarding traffic hazards, alternative 4 would have the same site plan, including the same access plan, as the Project. Specifically, as with the Project, Alternative 4 would: (1) include new driveways along Olive Street and 4th Street; (2) include off-street, on-site subterranean parking; (3) maintain the designated driveway and roadway width requirements identified in the Mobility Plan; (4) not preclude future roadway improvements proposed in the Mobility Plan; (5) separate pedestrian and vehicular traffic; (6) not result in inadequate vehicle queuing at the Project driveways or applicable freeway on- and off-ramps; and (6) provide all heavy truck maneuvering associated with the proposed loading dock within the Project Site. Furthermore, neither project would be developed along streets identified in the City's High Injury Network, and both projects would implement the same applicable PDFs (e.g., TR-PDF-1, Construction Management Plan, and TR-PDF-3, measures to ensure the safety of pedestrians such as maintaining adequate sight distance at Project driveways). Lastly, neither project would generate traffic involving farm equipment or other incompatible use. Therefore, similar to the Project,

⁵⁷ Gibson Transportation Consulting, Inc., *Transportation Assessment for the Alternatives to the Angels Landing Project*, May 2020. See Appendix J.1 of this Draft EIR.

⁵⁸ Gibson Transportation Consulting, Inc., *Transportation Assessment for the Alternatives to the Angels Landing Project*, May 2020. See Appendix J.1 of this Draft EIR.

Alternative 4 would not substantially increase hazards due to a geometric design feature or incompatible use, and impacts would be less than significant. The degree of the impact would be similar between the two projects.

Regarding emergency access, both the Project and Alternative 4 would primarily contain construction activities on-site and would implement TR-PDF-1 (Construction Management Plan) which would ensure adequate emergency access during construction. Also, like the Project, Alternative 4 would not close any existing streets, would provide for emergency access into the Project Site on three sides (e.g., via Olive, Hill and 4th Streets), would include driveways and internal circulation designed to meet all applicable City Building Code and Fire Code requirements regarding emergency access, and would not include the installation of barriers that could impede emergency vehicle access. Lastly, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, Alternative 4 would result in less than significant emergency access impacts that would be similar to the less than significant impacts of the Project.

k. Tribal Cultural Resources

As indicated in Section IV.K, Tribal Cultural Resources, of this Draft EIR, no pre-historic archaeological sites or other resources documented to be related to past Native American activity have been previously recorded within the Project Site according to the SLF and SCCIC records searches. Also, AB 52 consultation initiated by the City has not resulted in the identification of a tribal cultural resource within the Project Site. In addition, the Project Site has been previously graded and developed such that the native subsurface soils with the potential to support the presence of cultural deposits have likely been disturbed. Furthermore, based on the archaeologist's review of applicable documentation and a pedestrian survey, there is no record or evidence of tribal cultural resources on the Project Site or in its immediate vicinity. Based on this information, the City, in its discretion and supported by substantial evidence, finds that the Project Site does not contain any resources determined by the City to be significant pursuant to criteria set forth in subdivision(c) of PRC Section 5024.1. Furthermore, should tribal cultural resources be inadvertently discovered during Project excavation and grading activities, the City's standard condition of approval for tribal cultural resources would be implemented to address such resources. Accordingly, the analysis in Section IV.K, Tribal Cultural Resources, concludes that Project impacts on tribal cultural resources would be less than significant. Because Alternative 4 would be developed on the same site as the Project, would include the same spatial extent and depth of excavation and grading, and would be subject to the same standard condition of approval for tribal cultural resources, it too would result in less than significant impacts. Because the potential to encounter any buried tribal

cultural resources would be the same between the two projects, the degree of these impacts would be similar.

I. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 4 would generate a short-term demand for water associated with dust control, excavation/export, soil compaction, cleaning of construction equipment, cleaning, etc.) This demand would be similar to that during construction of the Project as both projects would include the same site plan, levels of subterranean parking, new building floor area, etc., and thus a similar amount of excavation, grading, overall construction activity, and duration of construction. As evaluated in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of construction. Since Alternative 4 would include a similar amount of construction activity as the Project, and for roughly the same duration, the temporary and intermittent demand for water during construction of Alternative 4 would similarly be met by the City's available water supplies.

With regard to water infrastructure, neither project would require new or upgraded water mains, and the design and installation of new water service connections and the required on-site water distribution system under both projects would be constructed in accordance with applicable City standards. These connections and on-site water distribution system would primarily involve on-site trenching to place the lines below the surface and minor off-site trenching to connect to the existing public water mains or existing meter lateral locations. The environmental effects of the on-site trenching are already subsumed in the environmental impact analysis of the other applicable environmental issues (e.g., air quality, cultural resources, noise, etc.), while the environmental effects of the off-site trenching would be minor and would be mitigated with implementation of TR-PDF-1 (Construction Management Plan). Also, the mitigation measures and standard Conditions of Approval identified in the analyses for the other applicable environmental issues would also apply to the on- and off-site trenching under both projects. Therefore, neither project would result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environment impacts.

Based on the above, Alternative 4 would result in less than significant water supply and infrastructure impacts during construction that would be similar to the less than significant impacts of the Project.⁵⁹

(b) Operation

During operation, Alternative 4, like the Project, would generate a demand for water from LADWP. The WSA prepared by LADWP for the Project, included as Appendix M of this Draft EIR, concludes that City water supplies are adequate to serve the Project during normal, single dry, and multiple dry years for the next 20 years and beyond. The base water demand (e.g., water demand before the implementation of required and proposed water conservation features/measures) for Alternative 4 would be approximately 14,543 gpd less than under the Project.⁶⁰ Therefore, City water supplies would also be adequate to serve Alternative 4. Furthermore, both projects would comply with applicable water conservation requirements, and with the additional water conservation measures outlined in WAT-PDF-1. Lastly, both projects would be consistent with the existing zoning of the Project Site such that both projects are accounted for in the City's future water demand forecasts. Therefore, adequate water supplies would be available to serve both projects.

With regard to water infrastructure, as indicated in the Utility Report included as Appendix L of this Draft EIR, the IFFAR and SAR prepared by LADWP for the Project indicate that adequate water infrastructure and associated capacity is available to provide the domestic water and fire flow required to serve the Project. Because Alternative 4 would result in lower domestic water demand than the Project (although fire flow demand would be the same), adequate water infrastructure would also be available to serve Alternative 4. Furthermore, like the Project, Alternative 4 would incorporate fire sprinkler suppression systems in the proposed buildings which would reduce or eliminate the public hydrant demand, and per the Utility Report, adequate capacity is available in the water mains that would serve the Project to power the sprinkler systems. Lastly, both projects would comply with applicable water conservation requirements, and with the additional

⁵⁹ *Alternative 4 would create a demand for approximately 3 percent less domestic water than the Project during operation. However, it is not anticipated that this decrease would result in a substantive difference in the sizing of the required on-site water infrastructure or the connections of this infrastructure to the off-site water mains as water infrastructure sizing is based on fire flow requirements, which would be the same between the two projects, rather than on domestic water demand.*

⁶⁰ *Calculated by subtracting the water demand associated with the hotel uses under the Project (e.g., 36,293 gpd per Table IV.L.1-4 in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR) by the water demand associated with the 145 residential units that would be developed under Alternative 4 instead of the hotel uses (21,750 gpd based on the water demand factor identified for 2-bedroom residential units in Table IV.L.1-4 of 150 gpd/unit).*

water conservation measures outlined in WAT-PDF-1, which would minimize the impacts on the local water mains.

Based on the above, Alternative 4 would result in less than significant operational water supply impacts that would be less than the less than significant impacts of the Project.

(2) Wastewater

(a) Construction

As with the Project, temporary facilities, such as portable toilet and hand wash areas, would be provided by the construction contractor under Alternative 4, with any sewage generated from these facilities collected and hauled off-site rather than discharged to the local sewer system. Thus, as with the Project, wastewater generation from construction activities under Alternative 4 would not cause a measurable increase in wastewater flows requiring conveyance by the local public sewer system.

With regard to the environmental effects associated with the construction of required wastewater infrastructure, Alternative 4, like the Project, would require the construction of new on-site wastewater conveyance infrastructure to serve the proposed buildings as well as connections to the existing 15-inch sewer line in Hill Street. However, construction of this infrastructure would be limited to on site trenching, and to both minor off-site trenching and minor connection work along the Project Site's Hills Street frontage, under both projects. The environmental effects of the on-site trenching are already subsumed in the environmental impact analysis of the other applicable environmental issues (e.g., air quality, cultural resources, noise, etc.), while the environmental impacts associated with the off-site trenching would be minor and would be mitigated with implementation of TR-PDF-1 (Construction Management Plan). Also, the mitigation measures and standard Conditions of Approval identified in the analyses for the other applicable environmental issues would also apply to the on- and off-site trenching under both projects. No upgrades to the existing off-site sewer mains or greater wastewater conveyance system would be required. Furthermore, impacts associated with the installation of the wastewater infrastructure would be short-term and temporary and would cease upon completion of the installation.

Based on the above, Alternative 4 would result in less than significant wastewater infrastructure impacts during construction which would be similar to the less than significant impacts of the Project.⁶¹

⁶¹ *Operation of Alternative 4 would create slightly (approximately 12 percent less) wastewater than the Project. However, it is not anticipated that this decrease in wastewater generation would result in a* (Footnote continued on next page)

(b) Operation

During operation, Alternative 4, like the Project, would generate wastewater requiring conveyance and treatment. Operational wastewater generation under Alternative 4 would be approximately 14,543 gpd less than under the Project.⁶² As provided in Section IV.L.2, Utilities and Service Systems—Wastewater, of this Draft EIR, adequate capacity exists in both the local public sewer lines and the HWRP to serve the Project. Therefore, adequate capacity also exists in this infrastructure to serve Alternative 4.

Like the Project, sewer service for Alternative 4 would be provided utilizing a new on-site sewer system and connections to the existing 15-inch sewer main in Hill Street. Given that the wastewater flows generated by Alternative 4 would be less than the estimated wastewater flows of the Project, and given that the Utility Report included as Appendix L of this EIR (including the WWSI prepared by LASAN and included as an appendix to that report) determined that adequate capacity exists in the existing adjacent sewer mains to serve the Project, adequate sewer capacity would also be available to serve Alternative 4.

Based on the above, Alternative 4, like the Project, would not require or result in the relocation or construction of new or expanded waster facilities, the construction or relocation of which could cause significant environmental effects, during operation. Impacts would be less than significant under both projects. The degree of these impacts would be slightly less under Alternative 4 owing to less wastewater generation under this alternative and less of a demand for wastewater conveyance and treatment capacity.

(3) Energy Infrastructure

(a) Construction

The Project and Alternative 4 would consume electricity and fossil fuels during construction (natural gas is typically not used during construction). The energy consumed by Alternative 4 during construction would be similar to that of the Project given that the site plan, levels of subterranean parking, buildings, and new floor area (1,269,150 square feet), and thus the amount and duration of construction activities, would be the roughly the same between the two projects. As indicated in Section IV.L.3, Utilities and Service Systems—Energy Infrastructure, energy supplies and infrastructure in the vicinity are adequate to

substantive difference in the sizing of the on-site wastewater infrastructure or the connections of this infrastructure to the off-site sewer mains required under the Project.

⁶² See water calculations for Alternative 4 under Water Supply and Infrastructure above which are the same for wastewater.

meet the construction needs of the Project. Hence, energy supplies and infrastructure would also be adequate to meet the construction needs of Alternative 4.

With regard to the environmental effects associated with the construction of energy infrastructure, Alternative 4, like the Project, would be provided with the electricity and natural gas required for operation by the existing electricity and natural gas lines in the adjacent streets via new on-site electricity and natural gas systems and connections to these lines. This would require on-site and some off-site trenching, as well as installation of the on-site electricity and natural gas infrastructure and of the connections. However, the environmental effects of the on-site trenching are already subsumed in the environmental impact analysis of the other applicable environmental issues (e.g., air quality, cultural resources, noise, etc.), while the environmental effects associated with the off-site trenching would be minor and would be mitigated with implementation of TR-PDF-1 (Construction Management Plan). Also, the mitigation measures and standard Conditions of Approval identified in the analyses for the other applicable environmental issues would also apply to the on- and off-site trenching under both projects. No upgrades to the existing off-site electricity or natural gas mains would be required. Also, impacts associated with the installation of the electricity and natural gas infrastructure would be short-term and temporary and would cease upon completion of the installation.

Based on the above, Alternative 4, like the Project, would not require or result in the relocation or construction of new or expanded energy facilities, the construction or relocation of which could cause significant environmental effects, during construction. Impacts would be less than significant under both projects. The degree of these impacts would be slightly less under Alternative 4 owing to slightly lower energy demand under this alternative (see operation discussion below) and thus less of a demand for energy conveyance capacity.

(b) Operation

During operation, Alternative 4, like the Project, would generate an increased consumption of electricity, natural gas and fossil fuels. Operational energy consumption under Alternative 4 would be less than under the Project owing to the fact that that high-demand energy uses (e.g., the hotel restaurants and back of house uses like commercial laundering facilities, etc.) would not be developed under Alternative 4. As provided in Section IV.L.3, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR, adequate capacity exists in both the local electrical and natural gas lines to serve the Project. Therefore, adequate capacity also exists in this infrastructure to serve Alternative 4. Neither project would require the relocation or construction of new or expanded energy facilities. Therefore, Alternative 4 would result in less than significant impacts on energy infrastructure that would be less than the less than significant impacts of the Project.

3. Comparison of Impacts

As evaluated above, Alternative 4 would not avoid or substantially reduce the Project's significant unavoidable noise and vibration impacts (specifically, Project and cumulative construction-related noise and vibration) because peak day construction activities would generally be the same between the two projects, as would the amount, intensity and duration of overall construction activities. As evaluated above, Alternative 4 would also not avoid the Project's significant unavoidable off-site cumulative operations-related traffic noise impacts. Still, as indicated in Table V-3 on page V-16, Alternative 4 would have less impacts than the Project for operational air quality and TACs, GHG emissions, operational off-site noise and vibration, cumulative operational traffic noise, operational transportation (VMT), and operational water supply/infrastructure (owing primarily to the lower operational trip generation and water demand under this alternative), and greater impacts than the Project for operational fire protection, schools, and police protection, wastewater, and energy infrastructure (owing to the greater number of residential units under this alternative). Overall, Alternative 4 would be less impactful than the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 4 would not meet the underlying purpose of the Project, which is to redevelop the site by providing a high-density, mixed-use, transit- and pedestrian-oriented development that includes a mix of housing types (including affordable units) integrated with hotel, retail, restaurant and open space uses to transform the vacant site into a marquee destination and functional linkage between the Historic Core and Bunker Hill areas of downtown. This is because Alternative 4 would not include hotel uses that would be integrated with other uses, and the commercial component would be limited to the 72,091 square feet of general commercial use.

Furthermore, Alternative 4 would be less effective than the Project in meeting the following Project objectives due to the lack of hotel development:

- Maximize density and floor area ratio on the site with a high level of intensity to create a high-energy urban experience with an interrelated mix of land uses that function to transform the site into an iconic development.
- Create a mix of interactive land uses with expanded for-sale and for-rent housing opportunities blended together with commercial uses to enhance the 24-hour downtown experience and provide an infill development that enlivens adjacent streets and integrated public spaces.

- Develop a high-quality mixed-use project that provides residential dwelling units that contribute to the City's housing supply, while integrating hotel uses capable of enhancing the experience in Bunker Hill and contributing to the supply of downtown hotel rooms for convention and tourist activities.
- Construct an economically feasible project that expands the economic base of the City and provides employment opportunities and new sources of tax revenue for the City by providing construction and permanent jobs, attracting commercial tenants and hotel operators, and increasing hotel patrons that collectively increase City tax revenues directly and indirectly.

Alternative 4 would meet the following Project Objectives, in part because the site plan would remain substantially the same as the Project, and thus offer similar pedestrian- and transit-oriented design with open space amenities and accessible linkages:

- Provide attractive and ample publicly accessible open spaces that incorporate community amenities and integrate the Angels Flight funicular into the experience of the site.
- Establish and maintain active and accessible linkages between the residential, office, and cultural amenities on Bunker Hill and in the Historic Core area to enhance the interconnectivity of these communities.
- Integrate the existing Metro portal as a component of open space and plaza design to enhance the pedestrian and transit user experience at the site.
- Utilize public investment in public transit by redeveloping an urban infill location with on-site mass transit capabilities to further smart growth land use planning practices and align with policies related to the reduction of greenhouse gas emissions and vehicle miles travelled.

V. Alternatives

E. Environmentally Superior Alternative

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

With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible alternatives evaluated in this section includes Alternative 1 (No Project/No Build Alternative), Alternative 2 (Commercial Office Alternative), Alternative 3 (Reduced Density Alternative), and Alternative 4 (Residential Alternative). Table V-3 on page V-16, provides a comparative summary of the environmental impacts anticipated under each alternative with the environmental impacts associated with the Project. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to “avoid or substantially lessen one or more of the significant effects” of the Project.

Based on the analyses in Section IV, Environmental Impact Analysis, of this Draft EIR, the Project would result in significant unavoidable construction noise and vibration impacts (specifically, on-site construction noise, both on- and off-site construction vibration [human annoyance], and cumulative off-site operational traffic noise). Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project/No Build Alternative, would avoid these significant unavoidable impacts of the Project. Also, as indicated in Table V-3, Alternative 1 would result in less impacts than the Project for all of the environmental issues evaluated in this Draft EIR (as opposed to Alternatives 2 through 4 which would result in less impacts than the Project for fewer of the environmental issues, and also opposed to Alternatives 2 and 4 which would actually result in greater impacts than the Project for some of the environmental issues). As such, Alternative 1 would be less impactful than both the Project and the other alternatives.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives, as summarized in Table V-3, indicates that Alternative 3, the Reduced Density Alternative, would be less impactful than both the Project and the other

alternatives (e.g., Alternatives 2 and 4). While Alternative 3, like Alternatives 2 and 4, would not avoid or substantially reduce the significant unavoidable impacts of the Project, it would result in less impacts than the Project for the following environmental topics: operational air quality and TACs; historical resources; energy; GHG emissions; operational noise and vibration; population and housing; public services (police, fire, schools); transportation (VMT); and utilities (water supply/infrastructure, wastewater, energy infrastructure). In addition, Alternative 3 would not result in greater impacts than the Project for any of the other environmental issues. Thus, Alternative 3 is identified as the Environmentally Superior Alternative.

While Alternative 3 would be the Environmentally Superior Alternative, it is noted that this alternative would only partially meet the underlying purpose of the Project which is to redevelop the site by providing a high-density, mixed-use, transit- and pedestrian-oriented development that includes a mix of housing types (including affordable units) integrated with hotel, retail, restaurant and open space uses to transform the vacant site into a marquee destination and functional linkage between the Historic Core and Bunker Hill areas of downtown. Alternative 3 would only partially meet this underlying purpose because it would include lower density than the Project and thus be less transit-oriented and less of a marquee destination than the Project.

Furthermore, Alternative 3 would meet the following Project objectives to the same extent as the Project because the site plan would remain substantially the same as the Project, and thus offer similar pedestrian- and transit-oriented design with open space amenities and accessible linkages:

- Provide attractive and ample publicly accessible open spaces that incorporate community amenities and integrate the Angels Flight funicular into the experience of the site.
- Establish and maintain active and accessible linkages between the residential, office, and cultural amenities on Bunker Hill and in the Historic Core area to enhance the interconnectivity of these communities.
- Integrate the existing Metro portal as a component of open space and plaza design to enhance the pedestrian and transit user experience at the site.

However, Alternative 3 would be less effective than the Project in meeting the following Project objectives due to the development of lower density and fewer residential units and hotel rooms:

- Maximize density and floor area ratio on the site with a high level of intensity to create a high-energy urban experience with an interrelated mix of land uses that function to transform the site into an iconic development.

- Create a mix of interactive land uses with expanded for-sale and for-rent housing opportunities blended together with commercial uses to enhance the 24-hour downtown experience and provide an infill development that enlivens adjacent streets and integrated public spaces.
- Develop a high-quality mixed-use project that provides residential dwelling units that contribute to the City's housing supply, while integrating hotel uses capable of enhancing the experience in Bunker Hill and contributing to the supply of downtown hotel rooms for convention and tourist activities.
- Construct an economically feasible project that expands the economic base of the City and provides employment opportunities and new sources of tax revenue for the City by providing construction and permanent jobs, attracting commercial tenants and hotel operators, and increasing hotel patrons that collectively increase City tax revenues directly and indirectly.
- Utilize public investment in public transit by redeveloping an urban infill location with on-site mass transit capabilities to further smart growth land use planning practices and align with policies related to the reduction of greenhouse gas emissions and vehicle miles travelled.

Lastly, while Alternative 3, like the Project, would be consistent with City and regional land use plans, Alternative 3 would be less effective than the Project in achieving the City's land use objectives for the Project Site. For example, Alternative 3 (10:1 FAR) would not include the density (13:1) permitted at the Project Site by the existing zoning and planned for the site by the Bunker Hill Specific Plan, nor would it provide as much transit-oriented development or as many affordable housing units as the Project. Also, because of the above, Alternative 3 would not be as effective as the Project in helping the City achieve its smart growth objectives and reducing VMT and associated air emissions.