

V. Alternatives

V. Alternatives

1. Introduction

The identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process under CEQA. Public Resources Code (PRC) Section 21002 states, in part, that the environmental review process is intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives which will avoid or substantially lessen such significant effects. If specific economic, social, or other conditions make infeasible such alternatives, individual projects may be approved in spite of one or more significant effects. In addition, PRC Section 21002.1(a) states, in part, that the purpose of an environmental impact report is to identify the significant effects on the environment of a project, identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.

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

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

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

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

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

2. Overview of Selected Alternatives

As indicated above, the intent of the Alternatives analysis is to avoid or substantially lessen any of the significant effects of a project. Based on the analysis in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with regard to historic resources, NO_x emissions during operation, on-site construction noise, off-site construction noise, on-site construction vibration (pursuant to the threshold for human annoyance), and off-site construction vibration (pursuant to the threshold for human annoyance). Implementation of the Project would also result in significant cumulative impacts that cannot be feasibly mitigated with regard to NO_x emissions during operation, on-site construction noise, off-site construction noise, on-site construction vibration (pursuant to the threshold for human annoyance), and off-site construction vibration (pursuant to the threshold for human annoyance), as well as concurrent construction and operational NO_x emissions. Accordingly, the six Alternatives to the Project summarized below have been selected for evaluation. These alternatives have been selected for evaluation based on the significant environmental impacts of the Project, the objectives established for the Project (listed in Section II, Project Description, of this Draft EIR), the feasibility of the Alternatives considered, public input received during the scoping period, the existing zoning designation on the Project Site, and CEQA’s requirement to consider a reasonable range of alternatives. A summary of the proposed alternatives is provided in Table V-1 on page V-3.

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

Table V-1
Net New Floor Area Under the Project and Alternatives^a

Use	Project	Alter- native 1	Alter- native 2	Alternative 3	Alternative 4	Alternative 5	Alternative 6
Retail/ Restaurant	103,400 sf ^b	— ^b	— ^b	5,000 ^b	61,787 sf ^b	45,792 sf ^b	102,150 sf ^b
Residential	1,523,528 sf 1,527 du	— —	— —	331,446 sf 358 du	932,757sf 885 du	749,295 sf 751 du	753,286 sf 755 du
Office	580,374 sf ^c	—	709 sf	709 sf	336,617 sf ^c	488,320 sf ^c	580,374 sf ^c
Industrial/ Warehouse	(49,111) sf	—	—	(49,111) sf	(49,111) sf	(49,111) sf	(49,111) sf
Indoor Visual Media Studio	—	—	—	—	—	—	485,484 sf
Total	2,158,191 sf	0 sf	709 sf	288,044 sf	1,282,050 sf	1,234,296 sf	1,872,183 sf

du = dwelling units

sf = square feet

() = negative number—existing to be removed

^a Square footage of floor area as defined by LAMC Section 12.03.

^b The existing Lankershim Depot contains 1,725 square feet of retail/restaurant uses to be retained under the Project and all the alternatives. Because this square footage would neither be added nor removed under the Project and the alternatives (e.g., part of the existing condition to remain), it is not identified in this table.

^c This includes 87,300 square feet of floor area, which could be created through the conversion of portions of four levels of parking structure on Block 8 to office uses.

Source: Eyestone Environmental, 2022.

- Alternative 2: No Project/Development Alternative—Alternative 2 assumes that the Project would not be approved and no new development would occur within the Project Site or Off-site Metro Parking Areas, with the exception of the development of the Consolidated Transit Center (including the movement of the Lankershim Depot) on Block 0 West which was previously approved by Metro.¹
- Alternative 3: Development in Accordance with Existing Zoning Alternative—Alternative 3 assumes that the Project Site would be developed in accordance with the existing C4-2D (Commercial, Height District 2), C4-2D-CA (Commercial,

¹ On April 23, 2020, using its self-permitting authority, the Metro Board of Directors approved improvements to the G (Orange) Line Terminus located within Block 0 West including additional discharge, boarding, and layover bays for the G (Orange) Line and future bus rapid transit services; new bays for local/regional buses; electric bus charging facilities; and an expanded portal to the subsurface B (Red) Line station. The improvements were found to be statutorily exempt from CEQA under PRC Section 21080, Subdivisions (b)(10) and (b)(11) and CEQA Guidelines Section 15275, Subdivision (a), which state that CEQA does not apply to the institution or increase of passenger or commuter service on rail lines or high-occupancy vehicle lanes already in use, including the modernization of existing stations and parking facilities. This action was undertaken by Metro to provide the flexibility to move forward independently with these improvements in the event the Project does not proceed.

Height District 2, Commercial and Artcraft District), C2-2D-CA (Commercial, Height District 2, Commercial and Artcraft District), CM-1VL (Commercial Manufacturing, Height District 1VL), and PF-1VL (Public Facilities, Height District 1VL) zoning of the Project Site.

- **Alternative 4: Reduced Density Alternative**—Alternative 4 would develop the same mix of uses as the Project on the same blocks, but all development would be reduced by 42 percent, which is the percentage reduction required to avoid the Project's significant unavoidable operational air quality (e.g., regional NO_x) impact.
- **Alternative 5: Historic Preservation Alternative**—Alternative 5 would not include development of the previously approved Consolidated Transit Center (including the relocation of the Lankershim Depot) on Block 0 West, thereby avoiding the significant unavoidable historical resources impact of the Project. As a result, local buses would remain on the east side of Lankershim Boulevard, and Blocks 4, 5, and 6 would not be developed to maintain existing Metro parking and the local bus plaza. The remainder of the Project Site would be developed with the same mix of uses as the Project.
- **Alternative 6: Alternative Land Use Mix Alternative**—Alternative 6 would develop indoor visual media studio space on Blocks 2 and 3, as permitted by current zoning. The remainder of the Project Site would be developed with the same mix of uses as the Project.

Each of these alternatives is described in the sections that follow. In addition, CEQA Guidelines Section 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible, and such alternatives are also discussed below.

3. Alternatives Considered and Rejected as Infeasible

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

- **Alternative Project Site:** Metro already owns the Project Site and has authorized the Applicant to act on its behalf regarding development of the Project Site. The Project Site is located in the heart of North Hollywood which is

characterized by a mix of uses including residential, commercial, office, and industrial uses. These uses make the Project Site particularly suitable for development of a mixed-use development that provides new residential units, office space, and retail/restaurant uses that serve the community and promote walkability. The Project Site is also well-served by transit, including the on-site Metro North Hollywood Station. Furthermore, Metro cannot reasonably acquire, control, or access an alternative site in a timely fashion that would result in implementation of a project with similar uses and square footage, nor would Metro acquire a property solely for the purpose of a real estate development. Given its urban location, if an alternative site in North Hollywood that could accommodate the Project could be found, it would be expected to result in significant and unavoidable impacts associated with construction noise and vibration, similar to the proposed Project on the Project Site. Additionally, considering the mix of uses in North Hollywood, which include sensitive uses, it is possible that development of the Project at an alternative site could potentially be closer to sensitive uses and thus may produce other environmental impacts that would otherwise not occur at the current Project Site or result in greater environmental impacts when compared with the Project. An alternative site also has the potential to displace existing people or housing given the makeup of North Hollywood, which would not occur under the Project. Therefore, an alternative site is not considered feasible, as Metro does not own another suitable site that would achieve the underlying purpose and objectives of the Project, and an alternative site would not likely avoid many of the Project's significant impacts. Thus, this alternative was rejected from further consideration.

- **Alternatives to Eliminate Significant Noise and Vibration Impacts During Construction:** As discussed in Section IV.G, Noise, of this Draft EIR, the Project would result in short-term significant unavoidable on-site construction noise (Project-level and cumulative), off-site construction noise (Project-level and cumulative), and on- and off-site construction vibration pursuant to the threshold for human annoyance (Project-level and cumulative). The following approaches were considered to substantially reduce or avoid these impacts:
 - Approach (a)—Above-Grade Parking: An approach where all parking is provided above rather than below grade, thus avoiding much of the excavation and hauling activity required under the Project was reviewed and rejected as infeasible for the following reasons:
 - Although the on-site construction activities would be reduced during site grading due to less excavation, the on-site construction noise levels would be similar to the Project, as the number of pieces of construction equipment and type of construction mix would be similar on a peak day (i.e., with maximum number of pieces of construction equipment for the various construction phases), which is used for the evaluation of impacts. As such, noise impacts from on-site construction activities would be significant, similar to the Project.

- 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 for building foundations and the hauling activities on a peak day would likely be similar to the Project. In addition, in order to reduce noise by 3 dBA on a peak hauling day, the number of daily haul truck trips would need to be reduced by 50 percent, which would not occur under this alternative.
- Construction equipment utilized under this approach would be similar to the Project (e.g., drill rig and large bulldozer/excavator), which would generate similar vibration levels. Therefore, 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 (i.e., the amount of construction on any given day would be the same as the Project due to the similar equipment utilized). In addition, off-site construction vibration impacts (human annoyance) due to heavy trucks traveling by sensitive receptors, would also continue to be significant because, hauling would still be required, peak hauling trips would still be similar to that of the Project, and the haul routes would be the same.
- 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 reviewed and rejected as infeasible for the following reasons:
 - Construction noise levels are dependent on the type and number of pieces of construction equipment operating simultaneously (on-site equipment or off-site construction trucks). It is anticipated the daily 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 pieces of construction equipment or construction traffic (haul and delivery trucks) trips would be required to reduce the construction-related noise levels by 3 dBA (just perceptible). For example, a reduction from 23 pieces to 12 pieces of construction equipment (an approximate 48-percent reduction) for the Block 1 grading phase would reduce the noise level at receptor location R1 from 74.5 dBA to 71.6 dBA (a 2.9-dBA reduction).³ However, the estimated noise level with approximately 48-percent reduction in the on-site construction

² California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, September 2013, Section 2.2.1.1.

³ Refer to Appendix V.1, *Alternatives Noise Calculations*, of this Draft EIR.

equipment would still exceed the 5-dBA significance criteria. Similarly, a 50-percent reduction in construction truck trips for Block 1 mat foundation pour phase (from 100 truck trips per hour to 50 truck trips per hour) would reduce the construction truck related noise level from 72.3 dBA to 69.3 dBA along Cumpston Street (a 3 dB reduction). However, the Project plus ambient noise levels due to construction would still exceed the 5 dBA significance criteria. To achieve sufficient reduction to avoid the significant on-site or off-site construction noise impacts would require an approximate 80-percent reduction in the number of construction equipment operated simultaneously (i.e., from 23 pieces to five pieces of construction equipment for the Block 1 grading phase construction or reduction from 100 truck trips to 20 truck trips per hour for the Block 1 mat foundation pour phase), which would not feasibly allow for construction of the Project because such a reduction in the amount of construction equipment operated simultaneously or peak haul trips would not be sufficient to serve the Project. Therefore, the construction noise levels under this approach would be less than the Project (depending on the amount of reduction) but would still exceed the significance threshold. In addition, this approach would be inefficient and would increase the number of days that sensitive receptors would be impacted by construction activities. As such, the on-site construction noise impacts under this approach would be less but 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 extended construction duration approach would utilize similar construction equipment to the Project (e.g., drill rig and large bulldozer) as the site grading/excavation phase). Since similar construction equipment would be used, vibration levels would be similar to the Project. In addition, because the haul routes would be the same, 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 construction activities and development is moved closer to the center of the Project Site, thus pulling back the proposed development and associated construction activities from the off-site sensitive receptors, was reviewed and rejected as infeasible for the following reasons:
 - This approach would not accomplish the Project's and City's planning objective to redevelop the area around the Metro North Hollywood Station with a high-density, mixed-use development, which is transit and pedestrian oriented. Specifically, a centrally located project would not be oriented around the existing Metro transit portal).

- Construction noise levels can be reduced by providing additional distance between the receptor and the construction equipment. Noise levels from construction equipment would attenuate approximately 6 dBA per doubling of distance. The construction noise levels associated with the building phases for the proposed development placed closer to the center of the site would be lower than the Project. However, the noise level reduction, depending on the setback from the property line, would be limited due to the size of the Project Site and the line of sight to adjacent noise sensitive receptors. In addition, noise levels during the site demolition, site preparation and grading would be similar to the Project, as construction activities for these phases would be similar on peak days. As such, the on-site construction noise impacts under this approach would remain significant similar to the Project. Furthermore, moving the development more central to the Project Site would result in taller buildings in order to provide the level of development proposed by the Project, necessitating additional off-road equipment (e.g., additional mobile cranes) resulting in an increase in construction pollutant emissions and increasing the severity of significant concurrent construction and operation air quality impacts.
- Because the haul routes would remain the same, the off-site construction vibration impacts (human annoyance), due to heavy trucks traveling by sensitive receptors, would be significant similar to the Project.
- 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 and rejected as infeasible for the following reasons:
 - As discussed above, construction noise levels can be reduced with a smaller number of on-site construction equipment pieces and with increased distance 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 (sensitive receptors bordering the majority of the Project Site with a direct line of sight) 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. Furthermore, peak activity days, which are used for evaluating noise impacts, would remain unchanged.
 - 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 pieces that would still be required near the perimeter of the Project Site. In addition, because the haul routes would remain the same, off-site

construction vibration impacts (human annoyance), due to heavy trucks traveling by sensitive receptors, would be significant similar to the Project.

As indicated above, none of the above approaches would substantially reduce or avoid the significant construction-related noise and vibration (human annoyance) impacts of the Project. Furthermore, Approaches (a) through (d) would not achieve the Project's underlying purpose and objectives to the same extent as the Project⁴; Approach (b) would extend the construction period, meaning impacts would affect sensitive receptors for a longer period of time, making this approach infeasible; Approaches (a) and (d) would provide less housing and fewer jobs near transit, which would be inconsistent with City land use objectives and requirements for the Project Site; and in addition to meeting the Project's underlying objective to a lesser extent than the Project, Approach (c) would not allow for the development of the public plazas which would serve as open space for the community. Therefore, an alternative that includes one or more of these approaches has been rejected from further consideration in this Draft EIR.

4. Alternatives Analysis Format

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the project objectives, identified in Section II, Project Description, of this Draft EIR, would be substantially attained by the alternative.⁵ The evaluation of each of the alternatives follows the process described below:

- a. The net environmental impacts of the alternative are determined for each environmental issue area analyzed in Section IV, Environmental Impact Analysis, of this Draft EIR, assuming that the alternative would implement the same project design features and mitigation measures identified in Section IV, Environmental Impact Analysis, of this Draft EIR, as applicable.
- b. Post-mitigation significant and non-significant environmental impacts of the alternative and the Project are compared for each environmental issue area as follows:

⁴ *The underlying purpose of the Project referred to here is to redevelop the area around the Metro North Hollywood Station with a high-density, mixed-use development, which is transit and pedestrian oriented and provides housing and jobs in the North Hollywood Valley Village Community Plan Area.*

⁵ *State of California, CEQA Guidelines Section 15126.6 (c).*

- Less: Where the net impact of the alternative would be clearly less adverse or more beneficial than the impact of the Project, the comparative impact is said to be “less.”
 - Greater: Where the net impact of the alternative would clearly be more adverse or less beneficial than the Project, the comparative impact is said to be “greater.”
 - Similar: Where the impact of the alternative and Project would be roughly equivalent, the comparative impact is said to be “similar.”
- c. The comparative analysis of the impacts is followed by a general discussion of whether the underlying purpose and basic project objectives are feasibly and substantially attained by the alternative.

A summary matrix that compares the impacts associated with the Project with the impacts of each of the analyzed alternatives is provided below in Table V-2 on page V-11.

As evaluated in the Initial Study prepared for the Project included in Appendix A of this Draft EIR, and Section VI, Other CEQA Considerations, of this Draft EIR, the Project would not result in significant impacts related to aesthetics; air quality (odors); agriculture and forestry resources; biological resources; cultural resources (human remains); hazards and hazardous materials (airport hazards); hydrology/water quality; geology and soils; land use (division of an established community); mineral resources; noise (airport related noise); population and housing (displacement of people or housing); utilities and service systems (stormwater, telecommunications facilities, and solid waste); and wildfires. Therefore, no further analysis of these topics in this EIR is required or provided.

Table V-2
Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project

Impact Area	Project	Alternative 1: No Project/ No Build	Alternative 2: No Project/ Development Alternative	Alternative 3: Development in Accordance with Existing Zoning Alternative	Alternative 4: Reduced Density Alternative	Alternative 5: Historic Preservation Alternative	Alternative 6: Alternative Use Alternative
A. AIR QUALITY							
<i>Construction</i>							
<i>Regional and Localized Emissions</i>	Less Than Significant with Mitigation ⁶	Less (No Impact)	Less (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation ⁶)	Similar (Less Than Significant with Mitigation ⁶)	Similar (Less Than Significant with Mitigation ⁶)
<i>Toxic Air Contaminants</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than significant)	Less (Less Than significant)
<i>Operation</i>							
<i>Regional and Localized Emissions</i>	Significant Unavoidable ⁷	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Significant Unavoidable ⁷)
<i>Toxic Air Contaminants</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)

⁶ Concurrent construction and operational NOx impacts would be significant and unavoidable.

⁷ Both significant unavoidable Project-level and cumulative regional NOx impacts.

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

Impact Area	Project	Alternative 1: No Project/ No Build	Alternative 2: No Project/ Development Alternative	Alternative 3: Development in Accordance with Existing Zoning Alternative	Alternative 4: Reduced Density Alternative	Alternative 5: Historic Preservation Alternative	Alternative 6: Alternative Use Alternative
B. CULTURAL RESOURCES							
<i>Historic Resources</i>	Significant Unavoidable	Less (No Impact)	Less (Significant Unavoidable)	Similar (Significant Unavoidable)	Similar (Significant Unavoidable)	Less (Less Than Significant)	Similar (Significant Unavoidable)
<i>Archaeological Resources</i>	Less Than Significant w/Mitigation	Less (No Impact)	Less (Less Than Significant w/Mitigation)	Less (Less Than Significant w/Mitigation)	Less (Less Than Significant w/Mitigation)	Less (Less Than Significant w/Mitigation)	Greater (Less Than Significant w/Mitigation)
C. ENERGY							
<i>Wasteful Consumption of Energy</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Conflict with Energy Plans</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
D. GEOLOGY AND SOILS							
<i>Geologic Hazards</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Paleontological Resources</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)

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

Impact Area	Project	Alternative 1: No Project/ No Build	Alternative 2: No Project/ Development Alternative	Alternative 3: Development in Accordance with Existing Zoning Alternative	Alternative 4: Reduced Density Alternative	Alternative 5: Historic Preservation Alternative	Alternative 6: Alternative Use Alternative
E. GREENHOUSE GAS EMISSIONS							
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
F. HAZARDS AND HAZARDOUS MATERIALS							
<i>Construction</i>	Less Than Significant w/Mitigation	Less (No Impact)	Less (Less Than Significant w/Mitigation)	Less (Less Than Significant w/Mitigation)	Less (Less Than Significant w/Mitigation)	Less (Less Than Significant w/Mitigation)	Greater (Less Than Significant w/Mitigation)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)
G. LAND USE							
<i>Conflict with Land Use Plans</i>	Less Than Significant	Less (No Impact)	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)

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

Impact Area	Project	Alternative 1: No Project/ No Build	Alternative 2: No Project/ Development Alternative	Alternative 3: Development in Accordance with Existing Zoning Alternative	Alternative 4: Reduced Density Alternative	Alternative 5: Historic Preservation Alternative	Alternative 6: Alternative Use Alternative
H. NOISE							
<i>Construction</i>							
<i>On-Site Noise</i>	Significant Unavoidable ⁸	Less (No Impact)	Less (Significant Unavoidable ⁵)	Less (Significant Unavoidable ⁵)	Similar (Significant Unavoidable ⁵)	Less (Significant Unavoidable ⁵)	Similar (Significant Unavoidable ⁵)
<i>Off-Site Noise</i>	Significant Unavoidable ⁹	Less (No Impact)	Less (Significant Unavoidable ⁶)	Less (Significant Unavoidable ⁶)	Less (Significant Unavoidable ⁶)	Less (Significant Unavoidable ⁶)	Less (Significant Unavoidable ⁶)
<i>On-Site Vibration</i>	Significant Unavoidable ¹⁰	Less (No Impact)	Less (Significant Unavoidable ⁷)	Less (Significant Unavoidable ⁷)	Similar (Significant Unavoidable ⁷)	Less (Significant Unavoidable ⁷)	Similar (Significant Unavoidable ⁷)
<i>Off-Site Vibration</i>	Significant Unavoidable ¹¹	Less (No Impact)	Less (Significant Unavoidable ⁸)	Less (Significant Unavoidable ⁸)	Less (Significant Unavoidable ⁸)	Less (Significant Unavoidable ⁸)	Less (Significant Unavoidable ⁸)

⁸ Both significant unavoidable Project-level and cumulative impacts.

⁹ Both significant unavoidable Project-level and cumulative impacts.

¹⁰ Both significant unavoidable Project-level and cumulative impacts.

¹¹ Both significant unavoidable Project-level and cumulative impacts.

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

Impact Area	Project	Alternative 1: No Project/ No Build	Alternative 2: No Project/ Development Alternative	Alternative 3: Development in Accordance with Existing Zoning Alternative	Alternative 4: Reduced Density Alternative	Alternative 5: Historic Preservation Alternative	Alternative 6: Alternative Use Alternative
<i>Operation</i>							
<i>On-Site Noise</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Off-Site Noise</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
I. POPULATION AND HOUSING							
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
J. PUBLIC SERVICES							
<i>Fire Protection</i>							
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)

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

Impact Area	Project	Alternative 1: No Project/ No Build	Alternative 2: No Project/ Development Alternative	Alternative 3: Development in Accordance with Existing Zoning Alternative	Alternative 4: Reduced Density Alternative	Alternative 5: Historic Preservation Alternative	Alternative 6: Alternative Use Alternative
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Police Protection</i>							
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Schools</i>							
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Parks and Recreation</i>							
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)

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

Impact Area	Project	Alternative 1: No Project/ No Build	Alternative 2: No Project/ Development Alternative	Alternative 3: Development in Accordance with Existing Zoning Alternative	Alternative 4: Reduced Density Alternative	Alternative 5: Historic Preservation Alternative	Alternative 6: Alternative Use Alternative
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Libraries</i>							
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
K. TRANSPORTATION							
<i>Conflict with Plans</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	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)	Greater (Less Than Significant)	Greater (Less Than Significant)	Less (Less Than Significant)
<i>Geometric Design Features</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	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)	Similar (Less Than Significant)	Similar (Less Than Significant)

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

Impact Area	Project	Alternative 1: No Project/ No Build	Alternative 2: No Project/ Development Alternative	Alternative 3: Development in Accordance with Existing Zoning Alternative	Alternative 4: Reduced Density Alternative	Alternative 5: Historic Preservation Alternative	Alternative 6: Alternative Use Alternative
L. TRIBAL CULTURAL RESOURCES							
<i>Tribal Cultural Resources</i>	Less Than Significant w/Mitigation	Less (No Impact)	Less (Less Than Significant w/Mitigation)	Less (Less Than Significant w/Mitigation)	Less (Less Than Significant w/Mitigation)	Less (Less Than Significant w/Mitigation)	Greater (Less Than Significant w/Mitigation)
M. UTILITIES AND SERVICE SYSTEMS							
<i>Water Supply and Infrastructure</i>							
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Wastewater</i>							
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)

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

Impact Area	Project	Alternative 1: No Project/ No Build	Alternative 2: No Project/ Development Alternative	Alternative 3: Development in Accordance with Existing Zoning Alternative	Alternative 4: Reduced Density Alternative	Alternative 5: Historic Preservation Alternative	Alternative 6: Alternative Use Alternative
<i>Energy Infrastructure</i>							
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Source: Eyestone Environmental, 2022.</i>							

5. Project Objectives

California Environmental Quality Act (CEQA) Guidelines Section 15124(b) states that the project description shall contain “a statement of the objectives sought by the proposed project.” CEQA Guidelines Section 15124(b) further states that “the statement of objectives should include the underlying purpose of the project.” The underlying purpose of the Project is to redevelop the area around the Metro North Hollywood Station with a high-density, mixed-use development, which is transit and pedestrian oriented and provides housing and jobs in the North Hollywood Valley Village Community Plan Area. The Project’s specific objectives are as follows:

- The orderly development of residential uses, commercial uses, office uses, and transit uses, as a unified site in furtherance of Metro’s commitment to creating transit-oriented communities that offer compact, bikeable, and walkable communities centered around public transit.
- Facilitate an urban in-fill development with a mix of residential, commercial, and office land uses at a density and scale to enable the Project Site to function as a regional center and support transit use.
- Provide housing in furtherance of the goals of the City’s Housing Element, City’s Regional Housing Needs Assessment, and which serves the surrounding area and citywide market, by providing housing in a range of unit types, affordability levels, and sizes adjacent to public transit.
- Provide community benefits such as new community-serving retail uses, enhanced streetscapes, and publicly accessible open space amenities for the community.
- Promote local and regional mobility objectives and reduce VMT by providing a mix of higher density housing and commercial uses that are in close proximity to public transportation, including numerous bus lines as well as rail transit, which are supported by recreational amenities, commercial services, and enhancements to bicycle and pedestrian amenities.
- Promote fiscal benefits, economic development, and job creation by generating jobs during the construction and operation of the Project and generating tax revenue for the City and ground lease revenues to Metro to supports its mission to improve mobility in Los Angeles County.
- Promote resource and energy conservation through incorporating sustainable and green building design and construction above Title 24 (CALGreen) code requirements.
- Promote and enhance transit ridership by consolidating and revitalizing the Metro transit center to accommodate current local and municipal buses as well as the

G (Orange) Line terminus and to provide enhancements to the North Hollywood Metro Station, including an improved terminal and security office, Metro employee break room, other support structures, new Metro portal structures on the West and East sides of Lankershim, and the retention of the historic Lankershim Depot.

- Support Metro's regional planning efforts such as the Metro Vision 2028 Strategic Plan by improving pedestrian, bicycle, and transit facilities in North Hollywood.
- Improve Metro infrastructure in furtherance of Metro's commitment to convert to an all-electric fleet by 2040.

V. Alternatives

A. Alternative 1: No Project/No Build

1. Description of the Alternative

In accordance with the CEQA Guidelines, the No Project Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. CEQA Guidelines Section 15126.6l(3)(B) states in part that, “in certain instances, the No Project Alternative means ‘no build’ wherein the existing environmental setting is maintained.” Accordingly, for purposes of this analysis, Alternative 1, the No Project/No Build Alternative, assumes that the Project would not be approved and no new development would occur within the Project Site and Off-Site Metro Parking Areas. Thus, the physical conditions of the Project Site and Off-Site Metro Parking Areas would generally remain as they are today. The Project Site and Off-Site Metro Parking Areas would continue to be occupied by industrial/warehouse buildings, the historic Lankershim Depot, and Metro facilities. No new construction would occur.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

Alternative 1 would not alter the existing uses or require any construction activities on the Project Site. Therefore, no construction-related air quality impacts associated with regional and localized emissions would occur. Impacts would be less than the Project’s significant and unavoidable impacts associated with concurrent construction and operation.

(b) Toxic Air Contaminants

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

(2) Operation

(a) Regional and Localized Air Quality Impacts

Alternative 1 would not result in new development or increased operations that could generate additional operational emissions related to vehicular traffic or the consumption of electricity beyond what is currently generated by the existing uses on the Project Site. Therefore, no operational air quality impacts associated with regional and localized emissions would occur. As a result, Alternative 1 would avoid the Project's project-level and cumulative operational NO_x emissions impacts, as well as its concurrent construction and operational impacts. Thus, no operational impacts associated with regional and localized emissions would occur, which is less than the significant and unavoidable impacts of the Project.

(b) Toxic Air Contaminants

Alternative 1 would not result in new development or increase the intensity of the existing uses on the Project Site. Therefore, no new increase in mobile source emissions and their associated TACs would occur. No operational impact associated with TACs would occur, and such impact would be less than the Project's less-than-significant impact.

b. Cultural Resources

(1) Historical Resources

The Lankershim Depot on the Project Site is listed in the California Register and is therefore considered a historic resource under CEQA. However, no demolition, grading, or other earthwork activities that could potentially affect this historical resource would occur under Alternative 1. Therefore, no impact on historical resources would occur, and the impact would be less than the Project's significant and unavoidable impact.

(2) Archaeological Resources

No construction or earthwork would occur under Alternative 1. Therefore, no impact with respect to archaeological resources would occur and impacts would be less than the Project, which are less than significant with mitigation.

c. Energy

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

Construction activities would not occur under Alternative 1. Therefore, Alternative 1 would not generate a short-term demand for energy during construction, and construction-related impacts to energy would not occur. As such, the impact would be less than the Project's less-than-significant impact.

Alternative 1 would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the long-term energy demand on the Project Site and no impact would occur. As such, the impact would be less than the Project's less-than-significant impacts.

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

Alternative 1 would not alter the existing land uses or site operations on the Project Site. However, unlike the Project, Alternative 1 would not include new buildings meeting updated energy efficiency targets such as the applicable 2019 CalGreen requirements and the Los Angeles Green Building Code. Specifically, the Project Site would continue to operate with seven buildings constructed prior to 1989.¹² Nevertheless, no impact would occur, and impacts would be less than the less than significant impacts of the Project.

d. Geology and Soils

(1) Geologic Hazards

No construction or earthwork would occur under Alternative 1. Therefore, no impact with respect to geologic hazards would occur and impacts would be less than the Project, which are less than significant.

(2) Paleontological Resources

No construction or earthwork would occur under Alternative 1. Therefore, no impact with respect to paleontological resources would occur and impacts would be less than the Project, which are less than significant.

¹² On December 21, 2020, a fire destroyed the existing building on Block 7. Nevertheless, because it was present at the time the NOP was published on July 7, 2020, it is considered part of the existing conditions.

e. Greenhouse Gas Emissions

Alternative 1 would not include the development of any new uses on the Project Site. Therefore, no new greenhouse gas (GHG) emissions would be generated and no new impact associated with global climate change would occur. As such, impacts associated with GHG emissions during construction and operation would be less than the Project's less-than-significant impact.

f. Hazards and Hazardous Materials

(1) Construction

Construction activities would not occur under Alternative 1. Therefore, Alternative 1 would not result in the use, handling, storage, or disposal of hazardous materials and no impact would occur. As such, the impact would be less than the Project's less-than-significant with mitigation impact.

(2) Operation

Alternative 1 would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase use, handling, storage, or disposal of hazardous materials and no impact would occur. As such, the impact would be less than the Project's less-than-significant impact.

g. Land Use

Under Alternative 1, there would be no changes to the physical or operational characteristics of the existing on-site uses. No land use approvals or permits would be required. Therefore, Alternative 1 would not result in any inconsistency with existing land use plans and policies that govern the Project Site, including those that were adopted for the purpose of avoiding or mitigating an environmental effect. No impact associated with conflicts with land use regulations and plans would occur, and the impact would be less than the Project's less-than-significant impact.

h. Noise

(1) Construction

Construction activities would not occur on the Project Site under Alternative 1. Therefore, no construction-related noise or vibration would be generated on-site or off-site. As such, Alternative 1 would avoid the Project's significant and unavoidable impacts with respect to on-site construction noise, off-site construction noise, on-site construction

vibration (pursuant to the threshold for human annoyance), and off-site vibration (pursuant to the threshold for human annoyance). Alternative 1 would also avoid the Project's cumulative impacts with respect to on-site construction noise, off-site construction noise, on-site construction vibration (pursuant to the threshold for human annoyance), and off-site construction vibration (pursuant to the threshold for human annoyance). No impacts associated with construction noise and vibration would occur, and the impacts would be less than the Project's significant and unavoidable impacts.

(2) Operation

Alternative 1 would not develop new uses on the Project Site, and no changes to existing site operations would occur. Therefore, no new stationary or mobile noise sources would be introduced to the Project Site or the Project Site vicinity. No impact would occur, and the impact would be less than Project's less than significant impact.

i. Population and Housing

No development would occur under Alternative 1. Therefore, there would be no potential to introduce a new planned or unplanned residential population on the Project Site. No impacts with respect to population and housing would occur under Alternative 1, and impacts would be less than the less than significant impacts of the Project.

j. Public Services

(1) Fire Protection

No development would occur under Alternative 1. Therefore, Alternative 1 would not necessitate the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service. No impacts with respect to fire protection would occur under Alternative 1, and impacts would be less than the less than significant impacts of the Project.

(2) Police Protection

No development would occur under Alternative 1. Therefore, Alternative 1 would not necessitate the addition of a new police station or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service. No impacts with respect to police protection would occur under Alternative 1, and impacts would be less than the less than significant impacts of the Project.

(3) Schools

No development would occur under Alternative 1. Therefore, there would be no increase in the population of school-aged children in the attendance boundaries of the schools within the Los Angeles Unified School District (LAUSD) that serve the Project Site such that the addition of new school facilities or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service. No impacts would occur, and impacts would be less than the less than significant impacts of the Project.

(4) Parks and Recreation

No development would occur under Alternative 1. Therefore, there would be no increase in demand for parks and recreational facilities in the Project Site vicinity such that the addition of new parks and recreational facilities or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service. No impacts would occur, and impacts would be less than the less than significant impacts of the Project.

(5) Libraries

No development would occur under Alternative 1. Therefore, Alternative 1 would not increase the library service population such that the addition of new library facilities or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service. No impacts to library services would occur under Alternative 1, and impacts would be less than the Project's less than significant impact.

k. Transportation

Since the No Project/No Build Alternative would not develop new or additional land uses on the Project Site, Alternative 1 would not generate any additional vehicle trips or alter existing access or circulation within the Project Site during operation. Therefore, no impacts related to Transportation would occur, and the impacts would be less than the Project's less-than-significant impacts.

l. Tribal Cultural Resources

Grading and other earthwork activities would not occur under Alternative 1. Therefore, there would be no potential for Alternative 1 to uncover subsurface tribal cultural resources. As such, no impact on tribal cultural resources would occur, and the impact would be less than the Project's impacts which are less than significant with mitigation.

m. Utilities and Service Systems

(1) Water Supply and Infrastructure

Alternative 1 would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the long-term water demand on the Project Site. No impact on water supply and water infrastructure would occur, and the impact would be less than the Project's less-than-significant impact.

(2) Wastewater

Alternative 1 would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the wastewater flow from the Project Site. No impact on wastewater would occur, and the impact would be less than the Project's less-than-significant impact.

(3) Energy Infrastructure

Alternative 1 would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the long-term energy demand on the Project Site and no new or upgraded infrastructure would be required. No impact related to energy infrastructure would occur, and the impact would be less than the Project's less-than-significant impact.

3. Comparison of Impacts

As evaluated above, Alternative 1 would avoid the Project's significant and unavoidable impacts associated with historic resources, NO_x emissions during operation, on-site construction noise, off-site construction noise, on-site construction vibration (pursuant to the threshold for human annoyance), and off-site construction vibration (pursuant to the threshold for human annoyance). Alternative 1 would also avoid the Project's significant cumulative impacts that cannot be feasibly mitigated with regard to NO_x emissions during operation, on-site construction noise, off-site construction noise, on-site construction vibration (pursuant to the threshold for human annoyance), and off-site construction vibration (pursuant to the threshold for human annoyance), as well as concurrent construction and operational NO_x emissions. All other environmental impacts would also be less than the Project.

4. Relationship of the Alternative to Project Objectives

Under Alternative 1, the existing uses would remain on the Project Site and no new development would occur. As such, Alternative 1 would not meet the Project's underlying purpose or any of its objectives. Specifically, Alternative 1 would not meet the underlying purpose of the Project to redevelop the area around the Metro North Hollywood Station with a high-density, mixed-use development, which is transit and pedestrian oriented and provides housing and jobs in the North Hollywood Valley Village Community Plan Area, nor would it meet any of the following objectives:

- The orderly development of residential uses, commercial uses, office uses, and transit uses, as a unified site in furtherance of Metro's commitment to creating transit-oriented communities that offer compact, bikeable, and walkable communities centered around public transit.
- Facilitate an urban in-fill development with a mix of residential, commercial, and office land uses at a density and scale to enable the Project Site to function as a regional center and support transit use.
- Provide housing in furtherance of the goals of the City's Housing Element, City's Regional Housing Needs Assessment, and which serves the surrounding area and citywide market, by providing housing in a range of unit types, affordability levels, and sizes adjacent to public transit.
- Promote local and regional mobility objectives and reduce VMT by providing a mix of higher density housing and commercial uses that are in close proximity to public transportation, including numerous bus lines as well as rail transit, which are supported by recreational amenities, commercial services, and enhancements to bicycle and pedestrian amenities.
- Promote fiscal benefits, economic development, and job creation by generating jobs during the construction and operation of the Project and generating tax revenue for the City and ground lease revenues to Metro to supports its mission to improve mobility in Los Angeles County.
- Provide community benefits such as new community-serving retail uses, enhanced streetscapes, and publicly accessible open space amenities for the community.
- Promote resource and energy conservation through incorporating sustainable and green building design and construction above Title 24 (CALGreen) code requirements.

- Promote and enhance transit ridership by consolidating and revitalizing the Metro transit center to accommodate current local and municipal buses as well as the G (Orange) Line terminus and to provide enhancements to the North Hollywood Metro Station, including an improved terminal and security office, Metro employee break room, other support structures, new Metro portal structures on the West and East sides of Lankershim, and the retention of the historic Lankershim Depot.
- Support Metro's regional planning efforts such as the Metro Vision 2028 Strategic Plan by improving pedestrian, bicycle, and transit facilities in North Hollywood.
- Improve Metro infrastructure in furtherance of Metro's commitment to convert to an all-electric fleet by 2040.

V. Alternatives

B. Alternative 2: No Project/Development Alternative

1. Description of the Alternative

In accordance with the CEQA Guidelines, the No Project/Development Alternative for a development project on an identifiable property consists of the circumstance under which a proposed project does not proceed. CEQA Guidelines Section 15126.6l(3)(B) states that “in certain instances, the No Project Alternative means ‘no build’ wherein the existing environmental setting is maintained.” In addition, CEQA Guidelines Section 15126.6(e)(3)(C) states that “the lead agency should proceed to analyze the impacts of the no project alternative by projecting 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.” Accordingly, for purposes of this analysis, Alternative 2, the No Project/Development Alternative, assumes that the Project would not be approved and no new development would occur within the Project Site or Off-Site Metro Parking Areas, with the exception of the development of the Consolidated Transit Center (including the movement of the Lankershim Depot) on Block 0 West which was previously approved by Metro, and 709 square feet of office uses on the Project Site which would be used as a security office and employee breakroom.¹³ Thus, the physical conditions of the Project Site would generally remain as they are today. Under Alternative 2, the Project Site would continue to be developed with existing industrial/warehouse buildings and the Lankershim Depot, together totaling 25,145 square feet along with surface parking;¹⁴ the West Lot would continue to be developed with an existing industrial/warehouse building totaling 25,691 square feet and surface parking; and the East Lot

¹³ On April 23, 2020, using its self-permitting authority, the Metro Board of Directors approved improvements to the G (Orange) Line Terminus located within Block 0 West including additional discharge, boarding, and layover bays for the G (Orange) Line and future bus rapid transit services; new bays for local/regional buses; electric bus charging facilities; and an expanded portal to the subsurface B (Red) Line station. The improvements were found to be statutorily exempt from CEQA under PRC Section 21080, Subdivisions (b)(10) and (b)(11) and CEQA Guidelines Section 15275, Subdivision (a), which state that CEQA does not apply to the institution or increase of passenger or commuter service on rail lines or high-occupancy vehicle lanes already in use, including the modernization of existing stations and parking facilities. This action was undertaken by Metro to provide the flexibility to move forward independently with these improvements in the event the Project does not proceed.

¹⁴ On December 21, 2020, a fire destroyed the existing building on Block 7. Nevertheless, because it was present at the time the NOP was published on July 7, 2020, it is considered part of the existing conditions.

would continue to be developed with an existing surface parking. New construction would occur only on Block 0 West associated with construction of the previously-approved Consolidated Transit Center, which would consist of additional discharge, boarding, and layover bays for the G (Orange) Line and future bus rapid transit services; new bays for local/regional buses; electric bus charging facilities; and an expanded portal to the subsurface B (Red) Line station. Local bus traffic would move from the east to west side of Lankershim Boulevard following completion. Similar to the Project, the Consolidated Transit Center would include one vehicular access point off Tujunga Boulevard. Also similar to the Project, this would include relocation of the Lankershim Depot within Block 0 West to accommodate the expanded station portal. No development beyond the previously approved Consolidated Transit Center would occur.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

While construction activities would occur within Block 0 West under Alternative 2, this construction would be substantially less than the Project. Specifically, as described above, new construction would occur only on Block 0 West associated with construction of the previously-approved Consolidated Transit Center, which would consist of additional discharge, boarding, and layover bays for the G (Orange) Line and future bus rapid transit services; new bays for local/regional buses; electric bus charging facilities; and an expanded portal to the subsurface B (Red) Line station, as well as the 709 square feet of office uses. Peak daily construction activities for Block 0 West would be similar to the Project under Alternative 2. As shown in Appendix C-3.1 (CalEEMod Construction-Regional output, page 50), peak daily construction emissions for solely Block 0 West would result in construction emissions less than SCAQMD regional and localized significance thresholds. As a result, Alternative 2 would avoid the Project's significant and unavoidable concurrent construction and operational NO_x impacts. Therefore, construction-related air quality impacts associated with regional and localized emissions would be less than significant without mitigation measures and less than the Project's significant and unavoidable impacts.

(b) Toxic Air Contaminants

While construction activities would occur within Block 0 West under Alternative 2, this construction would be substantially less than the Project. As a result, diesel particulate emissions during construction that could generate substantial TACs would be reduced

when compared to the Project. TAC impacts would be less than significant and less than the less than significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Similar to the Project, Alternative 2 is anticipated result in an approximately 38-percent increase of bus operations at the Project Site. These transit operations would serve to reduce reliance on passenger vehicles and related pollutant emissions. Metro's engine repower program replaces mid-life bus engines with near-zero emissions engines that yield substantial reductions (90 percent) in NO_x compared to standard CNG engines currently installed on older buses. This effort is an important interim solution for reducing emissions until 2030, when Metro plans on electrifying their entire bus further reducing regional and localized pollutant emissions.¹⁵ As with the Project, the reduction in pollutant emissions associated with the increase of bus operations was conservatively not quantified. Additional operational emissions related to vehicular traffic beyond what is contemplated for Block 0 West under the Project and what is currently generated by the existing uses on the Project Site would be minimal as the increase in trips would primarily be related to clean bus operations. As a result, Alternative 2 would avoid the Project's project-level and cumulative operational NO_x emissions impacts. Thus, operational impacts associated with regional and localized emissions under Alternative 2 would be less than significant and less than the significant and unavoidable impacts of the Project.

(b) Toxic Air Contaminants

Alternative 2 would result in additional transit operations at the Project Site. However, similar to the Project the increase in bus transit trips would be from clean buses (i.e., no diesel buses) and pollutant emissions and their associated TACs over existing conditions would be minimal. Impacts associated with operational TAC emissions would be less than significant under Alternative 2 and less than the less than significant impacts of the Project.

¹⁵ Metro, *Metro's first electric buses debuted on the Metro G Line (Orange) in July 2020*. <https://sustainability.reporting.metro.net/emissions-and-pollution-control>, accessed November 1, 2021.

b. Cultural Resources

(1) Historical Resources

The Lankershim Depot on the Project Site is listed in the California Register and is therefore considered a historic resource under CEQA. Similar to the Project, Alternative 2 would include the relocation of the Lankershim Depot within Block 0 West. Therefore, like the Project, Alternative 2 would result in a significant and unavoidable impact associated with a loss of association with the intersection of Lankershim and Chandler Boulevards. However, Alternative 2 would implement mitigation measures similar to CUL-MM-1 through CUL-MM-3 to reduce impacts to the Lankershim Depot to the extent feasible. Additionally, Alternative 2 would require earthwork activity associated with the expanded portal to the B (Red) Line station. Therefore, there is a potential for direct impacts to the Lankershim Depot due to vibration and construction activities nearby. Construction activities on Block 0 West could cause damage to the building's foundation and/or the building itself. Alternative 2 would implement a mitigation measure similar to NOI-MM-2 to reduce such vibration impacts to a less than significant level. Because Alternative 2 would not include development on Block 8, the Project's less-than-significant-with-mitigation impact with respect to building damage associated with construction vibration at the Security Trust and Savings Bank would be eliminated. Overall, impacts would be less than the Project, but remain significant and unavoidable.

(2) Archaeological Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, SCCIC records indicate that three archaeological resources have been previously recorded within the Project Site consisting of two historic-era sites and one prehistoric isolate. Alternative 2 would require earthwork activity associated with the expanded portal to the B (Red) Line station. Therefore, like the Project, Alternative 2 has the potential to uncover previously unidentified archeological resources. However, this potential would be less than the Project due to the reduction in construction activity. Nevertheless, Alternative 2 would also comply with the same regulatory requirements and implement similar mitigation measures as the Project in the event that archaeological resources are uncovered during site grading activities. As such, due to the reduced excavation, the potential to uncover previously unidentified archaeological resources would be less than the less-than-significant-with-mitigation impacts of the Project.

c. Energy

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

While construction activities would occur within Block 0 West, this construction would be the same as under the Project for this block and substantially less than the overall development in all nine blocks (Blocks 0-8) under the Project. Therefore, the short-term demand for energy during construction would be reduced when compared to the Project. As with the Project, electric equipment under Alternative 2 would be powered off when not in use to avoid unnecessary energy consumption. In addition, although Title 24 requirements typically apply to energy usage for buildings, long-term construction lighting (longer than 120 days) providing illumination for the Project Site and staging areas would also comply with applicable Title 24 requirements which includes limits on the wattage allowed per specific area, which result in the conservation of energy.¹⁶ As such, the demand for electricity during construction under Alternative 2 would not cause wasteful, inefficient, and unnecessary use of energy. Impacts would be less than significant and less than the less than significant impacts of the Project.

Alternative 2 would not alter the existing land uses but would result in minor changes to site operations (e.g., additional discharge, boarding, and layover bays for the G (Orange) Line and future bus rapid transit services; new bays for local/regional buses; electric bus charging facilities; and an expanded portal to the subsurface B (Red) Line station) within Block 0 West of the Project Site and similar to the Project, specifically an increase in bus operations. Therefore, Alternative 2 could increase the long-term energy demand on the Project Site, though to a lesser extent than the Project. Furthermore, as noted in the Utility Report included as Appendix G of this Draft EIR, the Los Angeles Department of Water and Power (LADWP) has confirmed that the electrical infrastructure in the Project area has adequate capacity to serve the Project; thus, adequate capacity would also be available to serve Alternative 2. Impacts would be less than significant and less than the Project's less than significant impact.

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

Except for on Block 0 West, Alternative 2 would not alter the existing land uses or site operations on the Project Site. However, unlike the Project, Alternative 2 would not include new buildings meeting updated energy efficiency targets such as the applicable 2019 CalGreen requirements and the Los Angeles Green Building Code, nor would it exceed Title 24 energy efficiency requirements by 10 percent like the Project. Specifically,

¹⁶ *California Building Energy Efficiency Standards, Title 24, Part 6, Sections 110.9, 130.0, and 130.2.*

the Project Site would continue to operate with seven buildings constructed prior to 1989.¹⁷ Impacts with respect to conflicts with plans for renewable energy or energy efficiency would be less than significant, and similar to the less than significant impacts of the Project.

d. Geology and Soils

(1) Geologic Hazards

The Project Site is located within the seismically active region of Southern California. Thus, as with the Project, under Alternative 2, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, liquefaction, seismically induced settlement, and subsidence, would be similar to those under the Project since such impacts are a function of the Project Site's underlying geologic conditions rather than the type of land uses or amount of development proposed. As with the Project, Alternative 2 would be subject to all applicable regulations, including the applicable provisions in the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the California Building Code, the City's General Plan Safety Element, and the Los Angeles Building Code. Lastly, similar to the Project, Alternative 2 would not include uses such as mining operations, deep excavation into the earth, or boring of large areas creating unstable seismic conditions or stresses in the earth's crust. Overall, given the similar construction methods, building types, and amount of grading and excavation, impacts related to geology and soils would be less than significant, similar to the Project.

(2) Paleontological Resources

As discussed in Section IV.D, Geology and Soils, of this Draft EIR, a records search conducted for the Project Site indicates there are no previously encountered fossil vertebrate localities located within the Project Site. Therefore, like the Project, Alternative 2 would not impact listed paleontological resources. Alternative 2 would require earthwork activity associated with the expanded portal to the B (Red) Line station. Therefore, like the Project, Alternative 2 has the potential to uncover previously unidentified paleontological resources. However, this potential would be less than the Project due to the reduction in construction activity. Nevertheless, Alternative 2 would also comply with the same regulatory requirements in the event that paleontological resources are uncovered during site grading activities. As such, due to the reduced excavation, the potential to uncover previously unidentified paleontological resources would be less than the less than significant impacts of the Project.

¹⁷ On December 21, 2020, a fire destroyed the existing building on Block 7. Nevertheless, because it was present at the time the NOP was published on July 7, 2020, it is considered part of the existing conditions.

e. Greenhouse Gas Emissions

(1) Construction

While construction activities would occur within Block 0 West under Alternative 2 and similar to the Project for this block, this construction would be substantially less than the overall Project. Specifically, as described above, new construction would occur only on Block 0 West associated with construction of the previously-approved Consolidated Transit Center, which would consist of additional discharge, boarding, and layover bays for the G (Orange) Line and future bus rapid transit services; new bays for local/regional buses; electric bus charging facilities; and an expanded portal to the subsurface B (Red) Line station, as well as the 709 square foot office use which would be used as an employee breakroom. As a result, GHG emissions over the construction duration would be less than the Project.

(2) Operation

Alternative 2 would result in additional transit operations at the Project Site, specifically an estimated 38-percent increase in bus traffic. These transit operations would serve to reduce reliance on passenger vehicles and related GHG emissions. Metro's engine repower program replaces mid-life bus engines with near-zero emissions engines that yield substantial reductions (90 percent) in GHG emissions compared to standard CNG engines currently installed on older buses. This effort is an important interim solution for reducing emissions until 2030, when Metro plans on electrifying their entire bus further reducing regional and localized pollutant emissions.¹⁸ As with the Project, the reduction in GHG associated with the reduction in VMT resulting from the increase of bus operations was conservatively not quantified. Greenhouse gas (GHG) emissions related to vehicular traffic and the consumption of electricity under Alternative 2 is similar for Block 0 West under the Project would be minimal as the increase in trips would primarily be related to clean bus operations. As such, impacts associated with GHG emissions under Alternative 2 would be less than significant and less than the less than significant impacts of the Project.

¹⁸ Metro, *Metro's first electric buses debuted on the Metro G Line (Orange) in July 2020*, <https://sustainability.reporting.metro.net/emissions-and-pollution-control>, accessed November 1, 2021.

f. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, during construction of Alternative 2, hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, would be used and, therefore, would require proper handling and management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases and, subsequently, the exposure of the public to hazardous materials. However, all potentially hazardous materials would be used, stored, and disposed in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use.

With respect to existing conditions, like the Project, Alternative 2 would have the potential to encounter contaminated soils and soil gas during construction, although such potential would be reduced due to the reduced amount of excavation. Additionally, as discussed in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, the Project Site is identified in numerous databases compiled pursuant to Government Code Section 65962.5. These listings collectively constitute a recognized environmental condition (REC). Accordingly, like the Project, Alternative 2 would implement mitigation measures similar to HAZ-MM-1 through HAZ-MM-4 to reduce impacts associated with contaminated soil and soil gas to a less than significant level. Because the existing buildings on the Project Site and Off-Site Metro Parking Areas would not be removed, Alternative 2 would not have the potential to encounter methane, asbestos containing materials (ACM), lead based paint (LBP), or polychlorinated biphenyl (PCB). Overall, similar to the Project, impacts would be less than significant with mitigation, but less than the Project because of reduced construction and demolition activity, including reduced excavation.

(2) Operation

Operation of Alternative 2 would use limited quantities of potentially hazardous materials typical of those used in transit uses, including fuels, cleaning agents, paints, pesticides, and other materials used for landscaping. All hazardous materials on the Project Site would be acquired, handled, used, stored, and disposed of in accordance with all applicable federal, state and local requirements. Similar to the Project, Alternative 2 would not include the use of ACMs, LBP, or PCBs. Additionally, like the Project, Alternative 2's driveway and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency access. Overall, impacts would be less than significant and less than the less than significant impacts of the Project as a result of less development.

g. Land Use

Under Alternative 2, there would be no changes to the physical or operational characteristics of the existing on-site uses. No land use approvals or permits would be required. Therefore, Alternative 2 would not result in any inconsistencies with existing land use plans and policies that govern the Project Site, including those that were adopted for the purpose of avoiding or mitigating an environmental effect. No impacts associated with conflicts with land use regulations and plans would occur, and impacts would be less than the less than significant impacts of the Project.

h. Noise

(1) Construction

While construction activities would occur within Block 0 West under Alternative 2, this construction would be substantially less than the Project. Specifically, as described above, new construction would occur only on Block 0 West associated with construction of the previously-approved Consolidated Transit Center, which would consist of additional discharge, boarding, and layover bays for the G (Orange) Line and future bus rapid transit services; new bays for local/regional buses; electric bus charging facilities; and an expanded portal to the subsurface B (Red) Line station, as well as the 709 square feet of office uses. However, the peak daily construction activities associated with Block 0 West, which serves as the basis of the construction noise analysis, under Alternative 2 would be similar to the Project (i.e., similar construction equipment mix). Therefore, on-site construction noise and vibration impacts at receptor locations R5, R7, and R11 would be similar to the Project (see Table IV.H-27 of Section IV.H of this Draft EIR), which remain significant and unavoidable after mitigation. In addition, vibration levels associated with on-site construction activities at Block 0 West 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. Therefore, due to its proximity to Block 0 West, on-site construction vibration impacts at receptor location R7 would be similar to the Project, which would result in significant vibration impacts with respect to human annoyance (see Table IV.H-30 of Section IV.H of this Draft EIR). Off-site construction noise from haul trucks would be substantially less than Project and the impacts from off-site construction from Block 0 West construction would be less than significant. However, off-site vibration levels generated by construction trucks would be similar to the Project, as vibration levels are based on the peak vibration levels generated by the individual truck. Therefore, off-site construction vibration impacts with respect to human annoyance would also be significant and unavoidable, similar to the Project. Cumulative on-site noise and vibration, as well as off-site noise and vibration, would also remain significant and unavoidable under Alternative 2, similar to the Project. However, because Alternative 2 would include substantially less development and thus generate less

construction-related noise and vibration impacts than the Project, on- and off-site construction noise and vibration impacts would be reduced under this alternative.

(2) Operation

Like the Project, Alternative 2 would result in additional transit operations at the Project Site, specifically an anticipated 38-percent increase in bus traffic, over existing conditions.¹⁹ The 38-percent increase in the bus traffic would be similar to the Project, which would result in a 1.4 dBA noise increase over existing conditions at receptor location R7.²⁰ Similar to the Project, the estimated noise level due to the transit center under Alternative 2 at receptor location R7 (closest to the transit center) would be 60.1 dBA L_{eq} , which would be below the significance threshold. The composite noise level when added to ambient noise (63.0 dBA L_{eq}) would be 64.8 dBA L_{eq} , which would also be below the 5-dBA significance threshold. In addition, the increase in mobile noise and vibration over existing conditions would be minimal. Impacts associated with operational on-site noise, off-site noise, and vibration would be less than significant under Alternative 2 and less than the less than significant impacts of the Project.

i. Population and Housing

(1) Construction

As discussed in Section IV.I, Population and Housing, of this Draft EIR, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by a particular development. Many construction workers are highly specialized (e.g., crane operators, steel workers, masons), and move from job site to job site as dictated by the demand for their skills. Additionally, as the overall amount of construction in Alternative 2 would be less than the Project, fewer construction workers would be needed. Therefore, population impacts related to household growth in the City of Los Angeles or the SCAG Region as a result of construction worker relocation under Alternative 2 would be less than significant and less than the less than significant impacts of the Project.

(2) Operation

While Alternative 2 would result in an anticipated 38-percent increase transit operations at the Project Site similar to the Project, no additional employees are anticipated

¹⁹ Kimley Horn, 2021, based on projected bus traffic data provided by Metro.

²⁰ Noise increase equal to $10 \cdot \log(1.38) = 1.4$ dBA.

because these bus lines already exist and no residential uses are proposed. Therefore, there would be no potential to introduce a new unplanned residential population on the Project Site. No impacts with respect to unplanned population and housing growth would occur under Alternative 2, and impacts would be less than the less than significant impacts of the Project.

j. Public Services

(1) Fire Protection

Alternative 2 would include the development of the Consolidated Transit Center and 709 square feet of office uses on the Project Site. Therefore, Alternative 2 would increase the on-site service population, though to a much lesser extent than that Project, which would include 3,717 residents and 2,882 net new employees. Therefore, Alternative 2 would not necessitate the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service. Impacts would be less than significant and less than the less than significant impacts of the Project.

(2) Police Protection

Alternative 2 would include the development of the Consolidated Transit Center and 709 square feet of office uses on the Project Site. Therefore, Alternative 2 would increase the on-site service population, though to a much lesser extent than that Project, which would include 3,717 residents and 2,882 net new employees. Therefore, Alternative 2 would not necessitate the addition of a new police station or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service. No impacts to police protection services would occur under Alternative 2, and impacts would be less when compared to the less than significant impacts of the Project.

(3) Schools

Alternative 2 would include the development of the Consolidated Transit Center and 709 square feet of office uses on the Project Site. Therefore, Alternative 2 would increase the on-site service population, though to a much lesser extent than that Project, which would include 3,717 residents and 2,882 net new employees. Additionally, no residential uses are proposed. Therefore, the potential to increase the population of school-aged children in the attendance boundaries of the schools within LAUSD that serve the Project Site such that the addition of new school facilities or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service would be reduced compared to the Project. Accordingly, impacts would be less than significant and less than the less than significant impacts of the Project.

(4) Parks and Recreation

Alternative 2 would include the development of the Consolidated Transit Center and 709 square feet of office uses on the Project Site. Therefore, Alternative 2 would increase the on-site service population, though to a much lesser extent than that Project, which would include 3,717 residents and 2,882 net new employees. Additionally, no residential uses are proposed. Therefore, the potential demand for parks and recreational facilities in the Project Site vicinity such that the addition of new parks and recreational facilities or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service would be reduced compared to the Project. Impacts would be less than significant and less than the less than significant impacts of the Project.

(5) Libraries

Alternative 2 does not include residential uses. Therefore, Alternative 2 would not increase the library service population such that the addition of new library facilities or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service. No impacts to library services would occur under Alternative 2, and impacts would be less than the Project's less than significant impact on libraries.

k. Transportation

Although Alternative 2 would include the development of the Consolidated Transit Center and 709 square feet of office uses, Alternative 2 would not generate any additional vehicle trips during operation because transit does not generate trips in and of itself and the 709 square feet of office uses is intended to serve as security office and an employee breakroom for Metro drivers and staff. The increase in transit operations would result in additional bus traffic, but any impact on the surrounding roadway network would be minimal. Therefore, impacts with respect to potential conflicts with programs, plans, ordinances, or policies addressing the circulation system and vehicle miles traveled (VMT) would be less than significant and less than the less than significant impacts of the Project.

As with the Project, Alternative 2 would not introduce hazardous geometric design features and all driveways would be designed to Los Angeles Department of Transportation (LADOT) standards. Impacts would be less than significant and similar to the less than significant impacts of the Project.

Lastly, similar to the Project, Alternative 2 would not interfere with emergency access (for example, it would implement a Construction Traffic Management Plan during construction to ensure emergency access during the construction period, would minimize closure of existing public streets, and would provide emergency access in accordance with

applicable requirements). The impacts of Alternative 2 would be less than significant and similar to the less than significant impacts of the Project.

I. Tribal Cultural Resources

Alternative 2 would require earthwork activity associated with the expanded portal to the B (Red) Line station. Therefore, like the Project, Alternative 2 has the potential to uncover previously unidentified tribal cultural resources. However, this potential would be less than the Project due to the reduction in construction activity. Nevertheless, Alternative 2 would implement a similar mitigation measure in the event that tribal cultural resources are uncovered during site grading activities. As such, due to the reduced excavation, the potential to uncover previously unidentified tribal cultural resources would be less than the Project, but remain less than significant with mitigation.

m. Utilities and Service Systems

(1) Water Supply and Infrastructure

Alternative 2 would include the development of the Consolidated Transit Center and 709 square feet of office uses on the Project Site. Therefore, Alternative 2 would increase the long-term water demand on the Project Site, though to a much lesser extent than that Project, which includes 2,207,302 square feet of new development and has an approved Water Supply Assessment (WSA). Impacts to water supply and water infrastructure would be less than significant, and less than the less than significant impacts of the Project.

(2) Wastewater

Alternative 2 would include the development of the Consolidated Transit Center and 709 square feet of office uses on the Project Site. Therefore, Alternative 2 would increase the wastewater flow on the Project Site, though to a much lesser extent than the Project. Impacts related to wastewater conveyance or treatment would be less than significant, and be less than the less than significant impacts of the Project.

(3) Energy Infrastructure

Alternative 2 would include minor upgrades to existing on-site infrastructure to accommodate the new bus charging facilities. However, the consumption of electricity under Alternative 2 would be less than the Project because of the reduced amount of construction, and the corresponding impact on energy infrastructure would be less than the Project. Therefore, impacts to energy infrastructure under Alternative 2 would be less than significant and less than the less than significant impacts of the Project.

3. Comparison of Impacts

As evaluated above and shown in Table V-2 on page V-11, Alternative 2 would avoid the Project's significant unavoidable concurrent construction/operational and operational air quality (NOx) impacts. However, similar to the Project, Alternative 2 would result in significant unavoidable impacts with respect to historic resources, on- and off-site construction noise, and on- and off-site construction vibration (human annoyance). Like the Project, Alternative 2 would also result in significant cumulative impacts that cannot feasibly mitigated with regard to on- and off-site construction noise, and on- and off-site construction vibration (human annoyance). The balance of the impacts would be similar under Alternative 2 or would be less owing to substantially reduced development under this alternative. Overall, Alternative 2 would be less impactful than the Project.

4. Relationship of the Alternative to Project Objectives

Under Alternative 2, the existing uses would remain on the Project Site, but Metro would proceed with development of the Consolidated Transit Center on Block 0 West as approved on April 23, 2020. As such, Alternative 2 would not meet the underlying purpose of the Project to redevelop the area around the Metro North Hollywood Station with a high-density, mixed-use development, which is transit and pedestrian oriented and provides housing and jobs in the North Hollywood Valley Village Community Plan Area or many of the Project objectives. Furthermore, Alternative 2 would not meet the following Project objectives:

- The orderly development of residential uses, commercial uses, office uses, and transit uses, as a unified site in furtherance of Metro's commitment to creating transit-oriented communities that offer compact, bikeable, and walkable communities centered around public transit.
- Facilitate an urban in-fill development with a mix of residential, commercial, and office land uses at a density and scale to enable the Project Site to function as a regional center and support transit use.
- Provide housing in furtherance of the goals of the City's Housing Element, City's Regional Housing Needs Assessment, and which serves the surrounding area and citywide market, by providing housing in a range of unit types, affordability levels, and sizes adjacent to public transit.
- Provide community benefits such as new community-serving retail uses, enhanced streetscapes, and publicly accessible open space amenities for the community.

- Promote local and regional mobility objectives and reduce VMT by providing a mix of higher density housing and commercial uses that are in close proximity to public transportation, including numerous bus lines as well as rail transit, which are supported by recreational amenities, commercial services, and enhancements to bicycle and pedestrian amenities.
- Promote fiscal benefits, economic development, and job creation by generating jobs during the construction and operation of the project and generating tax revenue for the City and ground lease revenues to Metro to support its mission to improve mobility in Los Angeles County.
- Promote resource and energy conservation through incorporating sustainable and green building design and construction above Title 24 (CALGreen) code requirements.

With limited development, there would not be enough space to accommodate the proposed Metro Bike Hubs. Therefore, Alternative 2 would only partially meet the following objective:

- Support Metro's regional planning efforts such as the Metro Vision 2028 Strategic Plan by improving pedestrian, bicycle, and transit facilities in North Hollywood.

With the development of the Consolidated Transit Center, Alternative 2 would fully meet the following Project objectives:

- Promote and enhance transit ridership by consolidating and revitalizing the Metro transit center to accommodate current local and municipal buses as well as the G (Orange) Line terminus and to provide enhancements to the North Hollywood Metro Station, including an improved terminal and security office, Metro employee break room, other support structures, new Metro portal structures on the West and East sides of Lankershim, and the retention of the historic Lankershim Depot.
- Improve Metro infrastructure in furtherance of Metro's commitment to convert to an all-electric fleet by 2040.

V. Alternatives

C. Alternative 3: Development in Accordance with Existing Zoning Alternative

1. Description of the Alternative

Under this Alternative, the Project Site would be developed in accordance with the existing C4-2D (Commercial, Height District 2), C4-2D-CA (Commercial, Height District 2, Commercial and Artcraft District), C2-2D-CA (Commercial, Height District 2, Commercial and Artcraft District), CM-1VL (Commercial Manufacturing, Height District 1VL), and PF-1VL (Public Facilities, Height District 1VL) zoning of the Project Site. Specifically, Alternative 3 would develop the previously approved Consolidated Transit Center on Block 0 West, including 709 square feet of office uses which would be used as a security office and employee breakroom. Block 8, which is currently an empty lot, would be developed with 358 residential units, 90 of which would be Low Income units (25 percent of total density) and 36 of which would be live/work units in accordance with the Commercial and Artcraft District overlay (10 percent of total density), compared to 1,216 market rate units and 311 affordable units with the Project.²¹ Under this Alternative, the Lankershim Depot would also be retained as a restaurant use but would be relocated within Block 0 West under the previously approved Consolidated Transit Center similar to the Project. Blocks 1 through 5/6 would remain as surface parking lots and Block 7 would continue with industrial/warehouse uses.²² Because Metro's existing parking would not be removed, the Off-Site Metro Parking Areas would not be redeveloped under this Alternative. The proposed residential uses would be located within a seven-story, 85-foot tall building within Block 8, compared to multiple buildings ranging from one-story and 36 feet to 28 stories and 325 feet under the Project. Overall, Alternative 3 would provide 288,044 net square feet of new development (including 358 residential units and 5,000 square feet of retail) versus 2,158,191 net square feet (including 1,527 residential units) under the Project.

²¹ Due to the proximity of Block 8 to the North Hollywood Metro Station, residential development on that site would qualify for a Tier 4 project under the City's Transit Oriented Communities Program. As a Tier 4 project, it would qualify for an 80-percent density bonus by providing 25 percent of the total units as Low Income. The base density for Block 8 is approximately 199 units, which would amount to 358 units with an 80-percent density bonus.

²² On December 21, 2020, a fire destroyed the existing building on Block 7. Nevertheless, because it was present at the time the NOP was published on July 7, 2020, it is considered part of the existing conditions.

Alternative 3 would provide: 38,950 square feet of open space, compared to 211,280 square feet of open space under the Project; 395 vehicle parking spaces within one subterranean level, compared to 3,313 vehicle parking spaces within subterranean and above ground parking areas under the Project; and a total of 215 bicycle parking spaces with 20 short-term spaces and 168 long-term spaces compared to 1,158 bicycle parking spaces consisting of 970 long-term and 188 short-term spaces under the Project.

Vehicular access to the subterranean parking on Block 8 would be provided from Weddington Street and Bakman Avenue, similar to the Project. Bus access to the Consolidated Transit Center on Block 0 West would be provided from Tujunga Avenue, similar to the Project. Pedestrian access to the residential uses on Block 8 would be provided from Lankershim Boulevard and Chandler Boulevard, and pedestrian access to the Consolidated Transit Center would be provided from Chandler Boulevard, Tujunga Avenue, and Lankershim Boulevard.

As noted above, Alternative 3 would develop only one building compared to multiple buildings under the Project; however, the building design would be similar to the residential buildings proposed under the Project. Alternative 3 would also implement similar lighting, vehicular and pedestrian access, setbacks, and sustainability features in Blocks 0 West and 8 as those proposed for the Project. Proposed signage would conform to the Los Angeles Municipal Code (LAMC). Alternative 3 would require fewer discretionary approvals than the Project because no zone change or general plan amendment would be required. Alternative 3 would, however, apply for Transit Oriented Communities (TOC) approval. The extent and duration of construction activities would be substantially less under Alternative 3 than under the Project owing to lack of new development on multiple Blocks and substantially less overall development under this alternative.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

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 and haul trucks traveling to and from the Project Site. 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 3, the overall amount of construction would be reduced in comparison to the Project because of lack of new development on the majority of the Project Site and the Off-Site Metro Parking Areas, and substantially less overall net new development and soil export, under this alternative (e.g., 288,044 square feet under Alternative 3 versus 2,158,191 square feet under the Project). Furthermore, the intensity of air emissions and fugitive dust from site preparation and construction activities on days with maximum construction activities would be less under Alternative 3. This is because Alternative 3 would have the potential to develop a maximum of only two blocks simultaneously (e.g., Blocks 0 West and 8), while the Project would have the potential to develop more than two blocks simultaneously as it proposes developing all the Project Site blocks and Off-Site Metro Parking Areas. Peak daily construction activities for Block 0 West and Block 8 would be similar to the Project under Alternative 3. As shown in Appendix C-3.1 (CalEEMod Construction-Regional output, pages 50 and 55), peak daily construction emissions for Block 0 and Block 8 would result in construction emissions less than SCAQMD regional and localized significance thresholds. Therefore, regional and localized air emissions during construction with implementation of Project mitigation measures would be less than significant and less than the Project.

(b) Toxic Air Contaminants

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 would represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less than significant impacts with regard to TAC emissions. Overall construction emissions generated by Alternative 3 would be less than those of the Project because Alternative 3 would include substantially less development and less overall construction activity. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 3 would be less than significant and less than the less than significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Similar to the Project as discussed in Section IV.A, Air Quality, of this Draft EIR, operational regional air pollutant emissions under Alternative 3 would be generated by vehicle trips to the Project Site and the consumption of electricity and natural gas. As discussed under Transportation below, development of Alternative 3 would result in 1,355 post-TDM daily vehicle trips compared to 12,425 with the Project, and a

corresponding 90-percent reduction in total daily VMT compared to the Project (9,854 total daily vehicle miles traveled [VMT] compared to 103,775 total daily VMT).²³ As vehicular emissions depend on the number of trips, vehicular sources would result in a smaller increase in air emissions compared to the Project. In addition, because the overall square footage would be substantially reduced when compared to the Project, the demand for electricity and natural gas would be less than the Project. Furthermore, with the reduction in residential units, use of consumer products would have a proportional reduction in VOC emissions. Lastly, Alternative 3 would not require concurrent construction and operation. As shown in Table IV.A-8 of this Draft EIR, the Project results in 82 pounds per day of regional operational NO_x emissions of which 66 pounds of the total Project emissions are from mobile sources. Since VMT under this alternative would be reduced by 90 percent in comparison to the Project, mobile source emissions would be reduced to approximately 7 pounds per day. Not accounting for any reduction associated with the reduction in square footage, NO_x emissions under Alternative 3 would be reduced to 23 pounds and below the SCAQMD regional operational significance threshold of 55 pounds per day. As such, Alternative 3 would avoid the significant and unavoidable impact under the Project related to concurrent construction and operation. Therefore, impacts associated with regional operational emissions under Alternative 3 would be less than significant and less than the significant unavoidable impacts of the Project.

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 3 would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, localized impacts from on-site emission sources associated with Alternative 3 would also be less than significant. Such impacts would be less than those of the Project due to the overall decrease in net new building square footage. Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. As discussed above, Alternative 3 would result in a substantial decrease in daily vehicle trips when compared to the Project, which would correspond to a decrease in peak-hour trips. Therefore, impacts would be less than significant and less than the Project's less than significant impacts.

(b) Toxic Air Contaminants

As discussed in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include diesel particulate matter from delivery trucks. As this alternative would be smaller in size, the number of delivery trucks would also be reduced in comparison to the Project. Additionally, the types of uses proposed with both the Project and Alternative 3 are not considered land uses that generate substantial TAC emissions. Typical sources of acutely and chronically hazardous

²³ From the VMT Calculator runs for the alternatives included as Appendix V.2 of this Draft EIR.

TACs include industrial manufacturing processes, which are not proposed by the Project or Alternative 3. Similar to the Project, Alternative 3 would not release substantial amounts of TACs and would be consistent with California Air Resources Board (CARB) and South Coast Air Quality Management District (SCAQMD) guidelines regarding TAC sources in proximity to existing sensitive land uses. Thus, as with the Project, potential TAC impacts under 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, the Lankershim Depot within the Block 0 West portion of the Project Site is listed in the California Register and is therefore considered a historic resource under CEQA. Similar to the Project, Alternative 3 would include the relocation of the Lankershim Depot within Block 0 West and excavation and grading activity associated with the expanded portal to the B (Red) Line station in close proximity to the relocated Depot. Like the Project, Alternative 3 would also include development of Block 8, which is located immediately adjacent to the Security Trust and Savings Bank located at 5301 Lankershim Boulevard which is eligible for listing in the National Register and listed in the California Register. Mitigation Measures CUL-MM-1 through CUL-MM-3 and NOI-MM-2, which would be implemented under the Project, would also be implemented under Alternative 3. As with the Project, these mitigation measures would reduce the potential construction-related vibration impacts on the Depot and Security Trust and Savings Bank to less than significant levels. However, as with the Project, the impacts to the historical context of the Lankershim Depot associated with its relocation would remain significant and unavoidable under Alternative 3, because the relationship to the intersection of Lankershim and Chandler Boulevards would be lost. Given that the relocation of the Depot and development adjacent to the Security Trust and Savings Bank are proposed under both Alternative 3 and the Project, the impacts would be similar to those of the Project.

(2) Archaeological Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, SCCIC records indicate that three archaeological resources have been previously recorded within the Project Site consisting of two historic-era sites and one prehistoric isolate. Alternative 3 would include substantially less development than the Project, both spatially (e.g., would include development on only two of the blocks proposed for development under the Project and Off-Site Metro Parking Areas) and in terms of net new floor area (including fewer subterranean parking levels). Therefore, the potential for Alternative 3 to uncover subsurface archaeological resources would be reduced when compared to that of the

Project. Furthermore, Alternative 3 would comply with the same regulatory requirements and would implement the same mitigation measures (i.e., Mitigation Measures CUL-MM-4 through CUL-MM-6) as the Project. Therefore, like the Project, impacts to archeological resources under Alternative 3 would be less than significant after mitigation, and less compared to the Project.

c. Energy

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

Similar to the Project, as discussed in Section IV.C, Energy, of this Draft EIR, construction activities associated with Alternative 3 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be reduced compared to the Project due to the reduction in the spatial extent, overall amount and duration of construction. Furthermore, as with the Project, construction activities under Alternative 3 would comply with all applicable requirements relating to energy use. Therefore, like the Project, short-term energy use during construction of Alternative 3 would not occur in a wasteful, inefficient or and manner, and would be less than significant similar to the less than significant impacts of the Project.

As with the Project, operation of Alternative 3 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels compared to existing conditions. However, Alternative 3 would result in less operational energy demand than the Project owing to substantially less development under this alternative. In terms of petroleum-based fuel usage, the number of daily trips generated by this alternative would be lower in comparison to the Project due to the reduction in square footage. Furthermore, LADWP has confirmed that the electrical infrastructure in the Project area has adequate capacity to serve the Project; thus, adequate capacity would also be available to serve Alternative 3. Lastly, the consumption of electricity, natural gas, and petroleum-based fuels under this alternative would not be wasteful, inefficient, or unnecessary because the development would represent urban infill within an urbanized area in close proximity to transit which would contribute to an energy efficient land use pattern consistent with SCAG's 2020–2045 RTP/SCS growth forecast in Transit Priority Areas (TPAs), because operation of the proposed uses would comply with applicable energy efficiency standards, and because some older buildings would be replaced with new buildings developed to the latest energy efficiency standards. Therefore, like the Project, long-term energy use during operation of Alternative 3 would not occur in a wasteful, inefficient, or unnecessary manner, and would be less than significant similar to the less than significant impacts of the Project.

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

Alternative 3 would result in less operational energy demand than the Project owing to substantially less net new floor area under this alternative. Like the Project, the consumption of electricity, natural gas, and petroleum-based fuels under this alternative would not be wasteful, inefficient, or unnecessary because the development would represent urban infill within an urbanized area in close proximity to transit which would contribute to an energy efficient land use pattern consistent with SCAG's 2020–2045 RTP/SCS growth forecast in TPAs, and because operation of the proposed uses would comply with applicable energy efficiency standards. Therefore, like the Project, Alternative 3 would not conflict with plans for renewable energy or energy efficiency and would result in less than significant impacts similar to the less than significant impacts of the Project.

d. Geology and Soils

(1) Geologic Hazards

Under Alternative 3, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, and site stability would be similar to those under the Project discussed in Section IV.D, Geology and Soils, of this Draft EIR. This is because such impacts are a function of the Project Site's underlying geologic conditions rather than the types or amounts of land uses proposed. Alternative 3 would be developed within the same location as the Project and would comply with the same regulatory requirements as the Project to ensure that the soils underlying the Project Site can adequately support the proposed development. As with the Project, Alternative 3 would be designed and constructed to conform to the current seismic design provisions of the California Building Code and the Los Angeles Building Code. Alternative 3 would also comply with the same regulatory requirements as the Project, which require the preparation of a final design-level geotechnical engineering report to identify and minimize seismic risks. Lastly, similar to the Project, Alternative 3 would not include uses such as mining operations, deep excavation into the earth, or boring of large areas creating unstable seismic conditions or stresses in the earth's crust. Therefore, as with the Project, Alternative 3 would not cause or accelerate geologic conditions which could result in substantial damage to proposed structures or infrastructure or expose people to substantial risk of injury. Impacts related to geology and soils under Alternative 3 would be less than significant, and similar to the less than significant impacts of the Project.

(2) Paleontological Resources

As discussed in Section IV.D, Geology and Soils, of this Draft EIR, a records search conducted for the Project Site indicates there are no previously encountered fossil vertebrate localities located within the Project Site. Therefore, like the Project, Alternative 3

would not impact listed paleontological resources. Alternative 3 would include development of two Blocks compared to nine with the Project and would not develop the Off-Site Metro Parking Areas, thereby resulting in less grading and excavation. Therefore, the potential for Alternative 3 to uncover subsurface paleontological resources would be reduced when compared to that of the Project. Also, Alternative 3 would comply with the same regulatory requirements and implement the same standard City condition of approval for paleontological resources as the Project in the event paleontological resources are uncovered during site grading activities. Therefore, impacts to paleontological resources under Alternative 3 would be less than significant and less than the less than significant impacts of the Project.

e. Greenhouse Gas Emissions

(1) Construction

Under Alternative 3, the overall amount of construction would be reduced in comparison to the Project because of lack of new development on the majority of the Project Site and the Off-Site Metro Parking Areas, and substantially less overall net new development, under this alternative (i.e., 288,044 square feet under Alternative 2 versus 2,158,191 square feet under the Project). The mix of equipment and emissions factors would be the same under Alternative 3, but overall equipment requirements would be less under this alternative. As a result, GHG emissions over the construction duration under Alternative 3 would be less than the Project.

(2) Operation

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 the number of daily trips generated and energy consumption from proposed land uses. As discussed above, Alternative 3 would include substantially less development, consume less energy, and generate fewer daily vehicle trips than the Project. Thus, the amount of GHG emissions generated by Alternative 3 would be less than the Project. As with the Project, Alternative 3 would incorporate Project Design Features GHG-PDF-1 and GHG-PDF-2 (e.g., sustainability features, etc.) to reduce GHG emissions and would be designed to comply with the City's Green Building Ordinance, as applicable. Furthermore, as with the Project, Alternative 3 would represent infill development within an urban area in close proximity to transit, and thus would contribute to an energy efficient land use pattern which would support the goals of the RTP/SCS intended to reduce GHG emissions. Therefore, with compliance with the City's Green Building Ordinance, it is anticipated that Alternative 3, like the Project, would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans. Thus, impacts related to GHG

emissions under Alternative 3 would be less than significant, and less than the less than significant impacts of the Project.

f. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, would be used and, therefore, would require proper handling and management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases and, subsequently, the exposure of the public to hazardous materials. However, as discussed for the proposed Project in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, all potentially hazardous materials under Alternative 3 would be used, stored, and disposed in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use.

With respect to existing conditions, like the Project, Alternative 3 would have the potential to encounter contaminated soils and soil gas during construction. Additionally, as discussed in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, the Project Site is identified in multiple databases compiled pursuant to Government Code Section 65962.5. These listings collectively constitute a REC. However: (1) such potential would be reduced as compared to that of the Project owing to the reduced amount of development (both in terms of square footage and development area) and thus excavation activities under this alternative; and (2) any contaminated soils and/or soil gas found would be treated and disposed of in accordance with applicable regulations and HAZ-MM-1 to reduce potential impacts to less than significant levels.²⁴ Furthermore, while Alternative 3, like the Project, would include the removal of some existing buildings that could potentially contain ACM, LBP, and/or PCB: (1) fewer existing buildings would be removed under this alternative which would reduce the potential for exposure to these materials; and (2) like the Project, the identification and removal of such materials would occur in accordance with applicable regulations which would mitigate any impacts. Lastly, because the West Lot would not be developed, Alternative 3 would not include construction within a methane buffer zone. Overall, similar to the Project, the impacts under Alternative 3 would be less than significant with mitigation, although such impacts would be less due to the reduction in development.

²⁴ *Mitigation Measures HAZ-MM-2 and HAZ-MM-3 apply to the West Lot (e.g., one of the two Off-Site Metro Parking Areas), which would not be developed under this Alternative.*

(2) Operation

Operation of Alternative 3 would use limited quantities of potentially hazardous materials typical of those used in transit and residential uses, including fuels, cleaning agents, paints, pesticides, and other materials used for landscaping. Like under the Project as discussed in Section IV.F, Hazards and Hazardous Materials, all hazardous materials on the Project Site under Alternative 3 would be acquired, handled, used, stored, and disposed of in accordance with all applicable federal, state and local requirements. Similar to the Project, Alternative 3 would also not include the use of ACMs, LBP, or PCBs. Additionally, like the Project, Alternative 3's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency access. Overall, impacts would be less than significant and less than the less than significant impacts of the Project as a result of less development.

g. Land Use

Alternative 3 would include development of the Consolidated Transit Center on Block 0 West and development of residential and retail uses on Block 8 in accordance with the existing General Plan Land use designation and zoning of that block. The remaining land uses on the balance of the Blocks and Off-Site Metro Parking Areas would remain unchanged. Therefore, unlike under the Project as discussed in Section IV.G, Land Use, of this Draft EIR, development under Alternative 3 would not require a General Plan Amendment and Vesting Zone change to change the land use designation and zoning of the Project Site. Alternative 3 would, however, apply for Transit Oriented Communities (TOC) approval. Furthermore, as with the Project, all permits and approvals required to facilitate development would be obtained under Alternative 3 in compliance with City requirements. Also, like the Project, with approval of its requested entitlements, Alternative 3 would comply with City development requirements, including but not limited to those related to parking, open space, lighting, landscaping, driveway, access, street frontages and building design. Lastly, like the Project, Alternative 3 would provide affordable housing, would be consistent with applicable regional and City growth projections, and would represent infill development within an urban area in close proximity to transit, which would contribute to reductions in air emissions and VMT and provide for an efficient land use pattern. Therefore, Alternative 3 would not result in any conflicts with existing land use plans and policies that govern the Project Site, including those that were adopted for the purpose of avoiding or mitigating an environmental effect, and like the Project, the impact would be less than significant, similar to the Project.

h. Noise

(1) Construction

Like the Project, Alternative 3 would include on- and off-site (e.g., traffic) construction activities that would generate noise and vibration, including along the proposed construction haul route. Alternative 3 would implement Project Design Features similar to NOI-PDF-1 and NOI-PDF-2, as outlined in Section IV.H, Noise, of this Draft EIR, to minimize this noise and vibration at existing sensitive receptors. Construction activities would only occur within Blocks 0 West and 8 under Alternative 3, which is substantially less than the Project. Specifically, Alternative 3 would not include the development proposed on Blocks 1 through 7 and the Off-Site Metro Parking Areas under the Project which are located in close proximity to sensitive receptors north of Cumpston Street, south of Chandler Boulevard, and immediately east and west of the Project Site. However, the peak daily construction activities, which serves as the basis of the construction noise analysis, under Alternative 3 would be similar to the Project (i.e., similar construction equipment mix) for Block 0 West and Block 8. Therefore, due to their proximity to Block 0 West and Block 8, on-site construction noise impacts at receptor locations R5, R7, R9, R10, and R11 under Alternative 3 would be similar to the Project (see Table IV.H-27 of this Draft EIR), which would remain significant and unavoidable after mitigation (despite that the West Lot, which is located immediately north of receptor location R7, would not be redeveloped under this alternative).

In addition, vibration levels associated with on-site construction activities at Block 0 West and Block 8 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. Therefore, due to its proximity to Block 0 West and Block 8, on-site construction vibration impacts at receptor locations R7 (near Block 0 West) and R9 (near Block 8) would be similar to the Project, which would result in significant vibration impacts with respect to human annoyance (see Table IV.H-30 of Section IV.H of this Draft EIR). In addition, off-site vibration levels generated by construction trucks would be similar to the Project, as vibration levels are based on the peak vibration levels generated by the individual truck. Cumulative on-site noise and vibration, as well as off-site noise and vibration, would also remain significant and unavoidable under Alternative 3, similar to the Project.

Conventional mitigation measures, such as providing temporary noise barrier walls to reduce the off-site construction truck traffic noise impacts, would not be feasible as the barriers would obstruct the access and visibility to the properties along the anticipated truck route. In addition, there are no technologically feasible mitigation measures to reduce the potential vibration human annoyance impacts. Therefore, as with the Project, the off-site construction noise and vibration impacts under Alternative 3 would be significant and

unavoidable. However, because Alternative 3 would include substantially less development and thus generate less construction-related noise and vibration impacts than the Project, including in proximity to adjacent sensitive uses, on- and off-site construction noise and vibration impacts would be less under this alternative compared to the Project.

Regarding construction vibration as it relates to building damage, as discussed in Section IV.B, Cultural Resources, of the Draft EIR, there is one historic structure (Lankershim Depot) located on the Project Site and six historic structures located in the close vicinity (i.e., Security Trust and Savings Bank, Angelino Valley Mortuary, United States Post Office, Fire Station #60, Air Raid Siren #210, and El Portal Theater). Like the Project, Alternative 3 would result less than significant construction vibration impacts at the majority of these historic structures, and impacts at the Lankershim Depot and the Security Trust and Savings Bank would be less than significant with implementation of Mitigation measure NOI-MM-2. The construction vibration levels would be lower at the Angelino Valley Mortuary but would be similar at other historic structures. The impacts would be less under Alternative 3 compared to the Project owing to less construction activity and associated vibration under this alternative.

(2) Operation

Like the Project as discussed in Section IV.H, Noise, of this Draft EIR, Alternative 3 would generate on-site operational noise associated with increased on-site activities, and off-site operational noise associated with project traffic. Like the Project, Alternative 3 would also implement Project Design Features similar to NOI-PDF-3 through NOI-PDF-5, as outlined in Section IV.H, Noise, of this Draft EIR, to minimize operational noise.²⁵ However, because Alternative 3 would include substantially less net new floor area than the Project, and would not include new development in Blocks 1 through 7 or the Off-Site Metro Parking Areas, Alternative 3 would generate less operational on- and off-site noise than the Project, including in proximity to the sensitive uses north of Cumpston Street, south of Chandler Boulevard, and immediately east of the Project Site. Therefore, Alternative 3 would result in less than significant on- and off-site operational noise that would be less than the less than significant on- and off-site operational noise of the Project.

Like the Project, Alternative 3 would generate on-site operational vibration associated with vehicle circulation, delivery trucks, and building mechanical equipment. However, because Alternative 3 would include substantially less net new floor area than the Project and would not include new development in Blocks 1 through 7 or the Off-Site Metro Parking Areas, Alternative 3 would generate less operational vibration than the

²⁵ Project Design Feature NOI-PDF-6 applies to NoHo Square within Block 5/6 which would not be developed under this alternative.

Project. Therefore, Alternative 3 would result in less than significant operational vibration that would be less than the less than significant operational vibration of the Project.

i. Population and Housing

(1) Construction

As discussed in Section IV.I, Population and Housing, of this Draft EIR, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by a particular development. Many construction workers are highly specialized (e.g., crane operators, steel workers, masons), and move from job site to job site as dictated by the demand for their skills. Additionally, as the overall amount of construction under Alternative 3 would be substantially less than the Project, fewer construction workers would be needed under Alternative 3. Therefore, population impacts related to substantial unplanned household growth in the City of Los Angeles or the SCAG Region as a result of construction worker relocation under Alternative 3 would be less than significant and less than the less than significant impacts of the Project.

(2) Operation

Alternative 3 would include transit improvements within Block 0 West and the development of 358 residential units and 5,000 square feet of retail uses in Block 8. This development would directly generate an estimated 807 residents and 10 employees, as compared to the Project which would generate an estimated 3,717 residents and 2,882 net new employees.²⁶ Because Alternative 3 would directly generate fewer residents and employees than the Project, and because the Project's residents and employees would represent only a small fraction of the growth projected within the SCAG region and City between 2020 and 2037 (the buildout year of the Project) and thus would be within applicable growth projections, Alternative 3, like the Project, would not directly induce substantial unplanned population growth.

Regarding indirect unplanned population growth, like the Project, Alternative 3 could potentially indirectly generate jobs in the surrounding community to serve Alternative 3 residents that could generate some small demand for housing. However, this potential would be lower under Alternative 3 owing to the substantially reduced amount of development under this alternative. Furthermore, like the Project, these employment positions would include a range of permanent and part-time positions that may be filled, in

²⁶ From the VMT Calculator runs for the alternatives included as Appendix V.2 of this Draft EIR.

part, by persons already residing in the vicinity of the workplace and who generally do not relocate their households due to such employment opportunities, and other persons who would commute to the Project Site from other communities in and outside of the City. Also similar to the Project, any indirect housing demand created by Alternative 3 would be fulfilled by a combination of the proposed new dwelling units, vacancies in the surrounding housing market, and from other new units in the vicinity of the Project Site. Additionally, similar to the Project, all circulation improvements planned for Alternative 3 are intended to improve circulation flows and safety throughout the Project Site and vicinity, and utility and other infrastructure improvements planned for Alternative 3 are intended to connect the proposed uses to the existing main infrastructure system and would not require upgrades to the main system. Lastly, although the consolidated transit center would result in increased bus traffic, because these bus routes already exist and are intended to accommodate planned growth, this would not result in unplanned population growth. As such, like the Project, Alternative 3 would not indirectly induce substantial unplanned population growth associated with potential employment opportunities that may be generated by the proposed development.

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

j. Public Services

(1) Fire Protection

(a) Construction

As discussed in Section IV.J.1, Public Services—Fire Protection, of this Draft EIR, construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings, and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. However, as with the Project, construction of Alternative 3 would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, as with the Project, compliance with regulatory requirements would reduce the potential for construction activities under Alternative 3 to expose people to the risk of fire or explosion.

Like the Project, construction activities under Alternative 3 could potentially slow LAFD emergency response times and interfere with emergency access during the construction period through temporary lane closures, etc. While Alternative 3 would include less development than the Project, and generate less overall construction activities and construction traffic, peak day construction activities, and construction traffic would be

similar to the Project. Furthermore, both Alternative 3 and the Project would implement the required Construction Traffic Management Plan (similar to Project Design Feature TR-PDF-1) that would ensure continued provision of emergency access during construction. Lastly, emergency vehicles normally have a variety of options for dealing with traffic pursuant to California Vehicle Code (CVC) Section 21806, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, like the Project, construction of Alternative 3 would not result in the need for new or altered government facilities (i.e., fire stations). Impacts under Alternative 3 would be less than significant and less than the less than significant impacts of the Project owing to less development.

(b) Operation

As discussed in Section IV.J.1, Public Services—Fire Protection, of this Draft EIR, the Project Site would continue to be served by Fire Station No. 60, the “first-in” station, as well as Fire Station Nos. 86, 102, 89, and 78. Alternative 3 would result in substantially less net new development than the Project, thus resulting in a smaller service population and lower net increase in demand for fire protection and emergency medical services than the Project. Specifically, Alternative 3 would directly generate an estimated 807 residents and 10 employees, as compared to the Project which would generate an estimated 3,717 residents and 2,882 net new employees.²⁷ In addition, similar to the Project, Alternative 3 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Lastly, because of the substantially reduced amount of net new development under this alternative, operational traffic and the potential for impacts to emergency response times would be reduced compared to those of the Project.

As with the Project, domestic and fire water service to the Project Site under Alternative 3 would continue to be supplied by LADWP. As discussed in Section IV.J.1, the Fire Flow Availability Report (IFFAR) and Service Advisory Request (SAR) indicate that adequate hydrant pressure and flow is currently available at the Project Site to serve the Project. As the amount of net new development under Alternative 3 would be substantially less under the Project, and as Alternative 3 would not include land uses that require higher fire flows than those of the Project, existing fire flows would also be adequate to serve Alternative 3. Like the Project, Alternative 3 would also incorporate fire sprinkler suppression systems in its buildings as required by code.

²⁷ From the VMT Calculator runs for the alternatives included as Appendix V.2 of this Draft EIR.

Based on the above, operation of Alternative 3 would not require the addition of a new or expanded fire station in order to maintain service. Therefore, like the Project, operation of Alternative 3 would not result in the need for new or altered government facilities (i.e., fire stations) the construction of which could cause significant environmental impacts. Impacts under Alternative 3 would be less than significant and less than the less than significant impacts of the Project.

(2) Police Protection

(a) Construction

Similar to the Project, construction of Alternative 3 could create a small demand for police services during the construction period. However, as with the Project, Alternative 3 would incorporate a Project Design Feature similar to POL-PDF-1 into its design to implement temporary security measures, including security fencing, lighting, and locked entry to secure the Project Site during construction which would reduce demand for police protection services. Similar to the Project, the implementation of this project design feature, would reduce the potential for theft and vandalism during construction under this alternative.

Like under the Project, construction activities under Alternative 3 could potentially slow LAPD emergency response times and interfere with emergency access during the construction period through temporary lane closures, etc. While Alternative 3 would include less development than the Project, and generate less overall construction activities and construction traffic, peak daily construction activities, and construction traffic would be similar to the Project. Furthermore, Alternative 3, like the Project, would implement the required Construction Traffic Management Plan (similar to Project Design Feature TR-PDF-1) that would ensure continued provision of emergency access during construction. Lastly, emergency vehicles normally have a variety of options for dealing with traffic pursuant to CVC Section 21806, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, like the Project, construction of Alternative 3 would not result in the need for new or altered government facilities (i.e., police stations) the construction of which could cause significant environmental impacts. Impacts under Alternative 3 would be less than significant and less than the less than significant impacts of the Project.

(b) Operation

As discussed in Section IV.J.2, Public Services—Police Protection, of this Draft EIR, the Project Site would continue to be served by North Hollywood Community Police Station. The same would be true under Alternative 3. Alternative 3 would result in substantially less net new development than the Project, thus resulting in a smaller service population, a lower net decrease in the existing officer-to-resident population ratio, and

lower net increase in demand for police protection service, than the Project. Specifically, Alternative 3 would directly generate an estimated 807 residents and 10 employees, as compared to the Project which would generate an estimated 3,717 residents and 2,882 net new employees.²⁸ Furthermore, similar to the Project, Alternative 3 would implement Project Design Features similar to POL-PDF-2 through POL-PDF-4 which require: a standard set of security measures (e.g., closed circuit cameras, etc.) be incorporated into the proposed buildings; sufficient lighting and design of buildings, walkways, plazas, parking, etc., to ensure visibility/security; provision to the LAPD of Project diagrams showing Project access routes, etc. to facilitate police response; and implementation of a Safety and Security Plan in accordance with Metro's Guide for Development at the North Hollywood Station. These project design features would help reduce the increase in demand for police services under both Alternative 3 and the Project. Lastly, because of the substantially reduced amount of net new development under this alternative, operational traffic and the potential for impacts to emergency response times would be reduced compared to those of the Project. Based on the above, operation of Alternative 3, like the Project, would not result in the need for new or altered government facilities (i.e., police stations) the construction of which could cause significant environmental impacts. Impacts under Alternative 3 would be less than significant and less than the less than significant impacts of the Project.

(3) Schools

(a) Construction

Similar to the Project, Alternative 3 would generate part-time and full-time jobs associated with construction 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, which require construction workers to commute to job sites that change many times in the course of a year, construction workers are not likely to relocate their households as a consequence of the construction job opportunities under either project. Therefore, like the Project, the construction employment generated by Alternative 3 would not result in a notable increase in the resident population or a corresponding demand for schools in the vicinity of the Project Site. Impacts on school facilities during construction under Alternative 3 would be less than significant and similar to the Project's less than significant impacts.

²⁸ From the VMT Calculator runs for the alternatives included as Appendix V.2 of this Draft EIR.

(b) Operation

Like the Project, Alternative 3 would include new development that would create a demand for LAUSD school facilities (e.g., Lankershim Elementary, Walter Reed Middle School, North Hollywood Senior High, and East Valley Senior High). However, the demand for LAUSD facilities under Alternative 3 would be substantially less than under the Project owing to substantially less net new floor area under this alternative, including substantially fewer residential units (e.g., 358 under this alternative versus 1,527 under the Project). Furthermore, like the Project, the Applicant under Alternative 3 would be required to pay the applicable (e.g., LAUSD) Senate Bill (SB) 50 development fees for schools, which per Government Code Section 65995, is considered by the State to represent full mitigation of the impact of new development on schools. Therefore, while some of the above schools currently have seating shortages which would be exacerbated by the Project, and while the same would be true for Alternative 3, the operational impacts of Alternative 3 on schools would be less than significant and less than the less than significant impacts of the Project.

(4) Parks and Recreation

(a) Construction

Construction of Alternative 3, like the Project, would result in a temporary increase in the number of construction workers at the Project Site. As described above, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, the likelihood that construction workers would relocate their households as a consequence of working on Alternative 3 is low. Also, while there would be some potential for construction workers to spend their lunch breaks at parks and recreational facilities, any resulting increase in use would be temporary and negligible. Therefore, like the Project, the construction workers associated with Alternative 3 would not result in a notable increase in the residential population of the Project area, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site. Also, while construction activities under Alternative 3 would have the potential to result in access restrictions to City parks and recreational facilities in the vicinity, such as the North Hollywood Park, implementation of the Construction Traffic Management Plan set similar to that set forth in TR-PDF-1 would ensure that access is maintained. Hence, similar to the Project, construction of Alternative 3 would not generate a demand for park or recreational facilities that would require the provision of new or physically altered government facilities the construction of which could cause significant environmental impacts. Impacts under Alternative 3 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

Residents are considered the primary users of parks and recreation facilities. Like the Project, Alternative 3 would include the development of new residential uses that would create a demand for Los Angeles Department of Recreation and Parks (RAP) parks and recreational facilities. However, this demand would be substantially lower than under the Project owing to substantially less net new floor area under Alternative 3 (including 358 residential units versus 1,527 under the Project). Furthermore, like the Project, Alternative 3 would meet City open space requirements through the provision of residential balconies, pools, landscaped park spaces, and outdoor seating areas so that, like the Project, it is anticipated that Alternative 3 residents would generally utilize on-site open space to meet their recreational needs. However, this alternative would not provide the central open space areas of the Project, thereby offering fewer on-site options for recreation. Additionally, like the Project, the Applicant under Alternative 3 would be required to pay Quimby fees to the City that could be used to add or improve park facilities in the vicinity of the Project Site. Lastly, while non-residential uses can generate a small indirect demand for parks and recreational facilities, the new non-residential floor area under Alternative 3 would be only 5,709 square feet (versus 683,774 square feet under the Project). Therefore, Alternative 3 operation would not generate a demand for park or recreational facilities that would result in the physical deterioration of an existing facility or require the provision of new or physically altered government facilities, the construction of which could cause significant environmental impacts. Impacts would be less than significant and less than the less than significant impacts of the Project.

(5) Libraries

(a) Construction

Similar to the Project, Alternative 3 would result in a temporary increase of construction workers on the Project Site. However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities. Therefore, construction employment generated by Alternative 3, which would be less than the Project, would not result in a notable increase in the resident population or a corresponding demand for library services in the vicinity of the Project Site, and would not result in the need for new or altered library facilities, the construction of which could cause significant environmental impacts. As such, impacts to library facilities during construction of Alternative 3 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

As described in Section IV.J.5, Libraries, of this Draft EIR, the Project Site is located within the service area of the North Hollywood–Amelia M. Earhart Regional Library and the Valley Plaza Branch Library. Like the Project, operation of Alternative 3 would increase the demand for service from these Los Angeles Public Library (LAPL) libraries. While both of these libraries are currently below the building size recommendations set forth in the 2007 Branch Facilities Plan for their existing service populations, the service populations of both libraries are below the service population level at which a new Branch Library is recommended (e.g., 90,000 people). Because Alternative 3 would generate an estimated residential population of 807²⁹ as compared to the Project's 3,717 residents, the Valley Plaza Branch Library, which would have a service population in 2037 (e.g., the Project buildout year) of 88,555³⁰ persons, would not reach LAPL's recommended level to provide an additional library under future with Alternative 3 conditions unlike under the Project. Furthermore, like the Project, Alternative 3 would generate tax revenues for the City's General Fund which would help offset the increases in library demand. For these reasons, like the Project, Alternative 3 would not result in the need for new or altered library facilities, the construction of which could cause significant environmental impacts. Impacts would be less than significant and less than the less than significant impacts of the Project.

k. Transportation

Similar to the Project, Alternative 3 would generally support applicable transportation plans (Mobility Plan 2035, Plan for a Health Los Angeles, Vision Zero, etc.) and multimodal transportation options. Like the Project, Alternative 3 would enhance the user experience by integrating multi-modal transportation options, and new sidewalks, street trees, pedestrian lighting, and bicycle parking in accordance with the LAMC. Like the Project, Alternative 3 would also include certain transportation demand management (TDM) program elements (e.g., reduced parking supply, promotions/marketing, traffic calming improvements, etc.). Like the Project, Alternative 3 would also represent urban infill development in close proximity to transit which would encourage alternative transportation use. Therefore, Alternative 3 would not conflict with a program, plan, ordinance, or policy addressing the circulation system and impacts would be less than significant, similar to the Project.

With respect to VMT, with TDM measures included, Alternative 3 would result in an average household VMT per capita of 5.2, versus the Project which would result in an

²⁹ From the VMT Calculator runs for the alternatives included as Appendix V.2 of this Draft EIR.

³⁰ Written communication from Los Angeles Public Library, August 6, 2020. See Appendix Q of this Draft EIR.

average household VMT per capita of 4.5.^{31,32} VMT for employees was not calculated in accordance with LADOT guidelines because the proposed retail space is less than 50,000 square feet,³³ compared to an average VMT per employee of 8.7 with the Project. These are compared to the South Valley Area Planning Commission (APC) thresholds of 9.4 household VMT per capita and 11.6 VMT per employee. Impacts would be less than the less than significant impacts of the Project.

As with the Project, Alternative 3 would not introduce hazardous geometric design features and all driveways would be designed to LADOT standards. Impacts would be less than significant and similar to the less than significant impacts of the Project.

Lastly, similar to the Project, Alternative 3 would not interfere with emergency access (for example, would implement a Construction Traffic Management Plan during construction to ensure emergency access during the construction period, would not close any existing public streets, and would provide emergency access in accordance with applicable requirements). The impacts of Alternative 3 would be less than significant and similar to the less than significant impacts of the Project.

I. Tribal Cultural Resources

Alternative 3 would include grading and earthwork on Blocks 0 West and 8, versus the Project which would require grading and earthwork throughout the Project Site and Off-Site Metro Parking Areas. Therefore, like the Project, Alternative 3 would have the potential to uncover previously unidentified tribal cultural resources, although such potential would be reduced as a result of less grading and development. Nevertheless, Alternative 3 would implement the same mitigation measure as the Project in the event that tribal cultural resources are uncovered during grading and excavation activities (i.e., Mitigation Measure TCR-MM-1). Therefore, Alternative 3 would result in less than significant impacts to tribal cultural resources which would be less than the less than significant impacts of the Project due to the reduction in development.

³¹ From the VMT Calculator runs for the alternatives included as Appendix V.2 of this Draft EIR.

³² Per the VMT Calculator runs for the alternatives, Alternative 3 would generate 1,355 daily vehicle trips and 9,854 VMT under post-TDM conditions, versus the Project's 12,425 daily vehicle trips and 103,775 VMT under post-TDM conditions.

³³ LADOT, *Transportation Assessment Guidelines*, Section 2.2.2, July 2020.

m. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities for Alternative 3 would result in a temporary demand for water for dust control, cleaning of equipment, excavation/export, removal and re-compaction, and other short-term related activities. These activities would occur incrementally throughout construction of Alternative 3. The amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed (the average is identified as 1,000 to 2,000 gpd per block in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR). However, given the temporary nature of construction activities, water use during construction of Alternative 3 would be short-term and intermittent. As with the Project, water for construction activities of Alternative 3 would be conveyed using the existing water infrastructure at the Project Site, and no infrastructure upgrades would be needed to provide water during construction. As such, construction activities would not require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental impacts. Construction-related impacts to water supply and infrastructure under Alternative 3 would be less than significant and less than the less than significant impacts of the Project owing to the substantially reduced amount of net new floor area and associated construction activities and water use under this alternative.

(b) Operation

Like the Project, Alternative 3 would result in an increase in long-term water demand. As discussed in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, a WSA was prepared by LADWP for the Project, as required by SB 610, which concludes that sufficient water supplies would be available to serve the Project. Because Alternative 3 would include substantially less net new development than the Project (e.g., 288,044 square feet [including 358 residential units], versus 2,158,191 square feet [including 1,527 residential units] under the Project), Alternative 3 would generate substantially less operational water demand than the Project. Furthermore, in addition to complying with applicable water conservation requirements, both Alternative 3 and the Project would incorporate the additional water conservation measures set forth in Project Design Feature WAT-PDF-1.³⁴ Therefore, as with the Project, LADWP would have sufficient water supplies available to serve Alternative 3 during

³⁴ Alternative 3 would implement only those water conservation measures identified in WAT-PDF-1 for Blocks 0 and 8 because only those blocks would be developed under Alternative 3.

normal, dry, and multiple dry years.

Regarding water infrastructure, as indicated in Section IV.M.1, conservative analysis for both fire suppression and domestic water flows has been completed by LADWP for the Project as summarized in the Utility Report included as Appendix G of this Draft EIR. Specifically, see Exhibits 1 and 2 of the Utility Report for the results of the IFFAR and SAR, respectively, which demonstrate that adequate water infrastructure capacity exists (e.g., the existing water mains in Lankershim Boulevard, Cumpston Street, Fair Avenue, North and South Chandler Boulevard, and Bakman Avenue, and the existing fire hydrants) to serve the Project.³⁵ Because Alternative 3 would include substantially less net new development than the Project and generate a substantially lower operational water demand, adequate water infrastructure capacity also exists to serve Alternative 3. Therefore, like the Project, Alternative 3 operation would not require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects.

Based on the above, the operational impacts of Alternative 2 would be less than significant and less than the less than significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, existing sewer laterals would be capped, temporary facilities (e.g., portable toilet, hand wash areas, etc.) would be provided, and sewage from these facilities would be collected and hauled off-site, during construction of Alternative 3. Therefore, like the Project, Alternative 3 would not cause a measurable increase in wastewater flows and/or require or result in the relocation or construction of new or expanded wastewater conveyance and treatment facilities during construction. The impact of Alternative 3 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

As discussed in Section IV.K.2, Utilities and Service Systems—Wastewater, of the Draft EIR, wastewater generated by the Project would be conveyed by the Los Angeles Department of Sanitation's (LASAN) existing wastewater conveyance system to the Hyperion Water Reclamation Plan (HWRP) for treatment. The same would occur under

³⁵ KPFF Consulting Engineers, *District NoHo Utility Technical Report: Water, Wastewater, and Energy*, April 2021.

Alternative 3. Because the existing sewer lines and the HWRP have adequate capacity to serve the Project, and Alternative 3 would include substantially less net new development (e.g., 288,044 square feet [including 358 residential units], versus 2,158,191 square feet [including 1,527 residential units] under the Project) and generate substantially less operational wastewater than the Project, the capacities of the sewer system and HWRP serving the Project Site would also be adequate to serve Alternative 3. Furthermore, both Alternative 3 and the Project would comply with applicable City wastewater infrastructure design and wastewater reduction requirements, and both would implement Project Design Feature WAT-PDF-1 requiring water conservation measures above applicable requirements which would also reduce wastewater generation. Lastly, additional detailed sewer gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permits during the standard required permitting process under both Alternative 3 and the Project. Therefore, like the Project, operation of Alternative 3 would not either: (1) require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects; or (2) result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has inadequate capacity to serve the Project's projected demand in addition to the provider's existing commitments. The impacts of Alternative 3 would be less than significant and less than the less than significant impacts of the Project.

(3) Energy Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 3 would consume minor quantities of electricity (construction activities do not typically involve the consumption of natural gas). The energy consumed during construction of Alternative 3 would be less than under the Project owing to the substantial reduction in net new development and associated construction activities and the duration of construction under this alternative. Furthermore, because the Project Site is an urban infill site that is already served by energy infrastructure, it is anticipated that, like the Project, Alternative 3 would not require the construction of extensive off-site energy infrastructure improvements. Lastly, like the Project, Alternative 3 would be required to coordinate energy infrastructure improvements with LADWP and SoCalGas, and to develop on-site energy infrastructure and connections to the existing off-site energy infrastructure in accordance with applicable requirements. Hence, like the Project, construction activities under Alternative 3 would not result in an increase in energy demand that exceeds available distribution infrastructure capabilities that would require the construction of new or expanded energy facilities, the construction of which could cause significant environmental effects. Therefore, impacts on energy infrastructure associated with short-term construction activities under Alternative 3 would be less than significant and less than the less than significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 3 would generate an increased consumption of electricity and natural gas relative to existing conditions which would be minimal when compared to total energy flows in the local infrastructure. However, Alternative 3 operation would result in less electricity and natural gas demand than the Project, owing to substantially less net new development (e.g., 288,044 square feet [including 358 residential units], versus 2,158,191 square feet [including 1,527 residential units] under the Project) under this alternative. Hence, Alternative 3 would result in reduced operational impacts on energy infrastructure when compared to the Project. Also, as discussed in the Utility Report, LADWP and SoCalGas have confirmed that the existing energy infrastructure in the area is sufficient to serve the Project. Because Alternative 3 would result in less operational energy demand than the Project, the existing energy infrastructure in the area would also be adequate to serve Alternative 3. Therefore, as with the Project, Alternative 3 operation would not result in an increase in energy demand that exceeds available distribution infrastructure capabilities that would require the construction of new or expanded energy facilities, the construction of which could cause significant environmental effects. Impacts on energy infrastructure under Alternative 3 would be less than significant and less than the less than significant impacts of the Project.

3. Comparison of Impacts

As evaluated above and shown in Table V-2 on page V-11, Alternative 3 would avoid the Project's significant unavoidable concurrent construction/operational and operational air quality (NO_x) impacts. However, similar to the Project, Alternative 3 would result in significant unavoidable impacts with respect to historic resources, on- and off-site construction noise, and on- and off-site construction vibration (human annoyance). Like the Project, Alternative 3 would also result in significant cumulative impacts that cannot feasibly mitigated with regard to on- and off-site construction noise, and on- and off-site construction vibration (human annoyance). The balance of the impacts under Alternative 3 would be similar to the Project or less owing to less development under this alternative. Overall, impacts under Alternative 3 would be reduced when compared to the Project.

4. Relationship of the Alternative to Project Objectives

Under Alternative 3, the existing uses would remain on the Project Site and Off-Site Metro Parking Areas with the exception of the development of the Consolidated Transit Center on Block 0 West and development of 358 residential units and 5,000 square feet of retail uses in Block 8. As such, Alternative 3 would not meet the underlying purpose of the Project which is to redevelop the area around the Metro North Hollywood Station with a

high-density, mixed-use development which is transit and pedestrian oriented and provides housing and jobs in the North Hollywood Valley Village Community Plan Area.

With the development of residential and retail uses in Block 8, Alternative 3 would partially meet the below Project objectives or meet them to a lesser extent. Alternative 3 would not fully meet these objectives since the majority of the Project Site blocks and Off-Site Metro Parking Areas would not be redeveloped under this alternative, no public open space plazas would be provided, and the number of new residential units would be less than under the Project.

- The orderly development of residential uses, commercial uses, office uses, and transit uses, as a unified site in furtherance of Metro's commitment to creating transit-oriented communities that offer compact, bikeable, and walkable communities centered around public transit.
- Facilitate an urban in-fill development with a mix of residential, commercial, and office land uses at a density and scale to enable the Project Site to function as a regional center and support transit use.
- Provide housing in furtherance of the goals of the City's Housing Element, City's Regional Housing Needs Assessment, and which serves the surrounding area and citywide market, by providing housing in a range of unit types, affordability levels, and sizes adjacent to public transit.
- Provide community benefits such as new community-serving retail uses, enhanced streetscapes, and publicly accessible open space amenities for the community.
- Promote fiscal benefits, economic development, and job creation by generating jobs during the construction and operation of the project and generating tax revenue for the City and ground lease revenues to Metro to supports its mission to improve mobility in Los Angeles County.
- Promote local and regional mobility objectives and reduce VMT by providing a mix of higher density housing and commercial uses that are in close proximity to public transportation, including numerous bus lines as well as rail transit, which are supported by recreational amenities, commercial services, and enhancements to bicycle and pedestrian amenities.

With the development of the Consolidated Transit Center, Alternative 3 would meet the following Project objectives:

- Promote and enhance transit ridership by consolidating and revitalizing the Metro transit center to accommodate current local and municipal buses as well as the G (Orange) Line terminus and to provide enhancements to the North Hollywood

Metro Station, including an improved terminal and security office, Metro employee break room, other support structures, new Metro portal structures on the West and East sides of Lankershim, and the retention of the historic Lankershim Depot.

- Support Metro's regional planning efforts such as the Metro Vision 2028 Strategic Plan by improving pedestrian, bicycle, and transit facilities in North Hollywood.
- Improve Metro infrastructure in furtherance of Metro's commitment to convert to an all-electric fleet by 2040.

Alternative 3 would also meet the following Project objective related to sustainable building design:

- Promote resource and energy conservation through incorporating sustainable and green building design and construction above Title 24 (CALGreen) code requirements.

V. Alternatives

D. Alternative 4: Reduced Density Alternative

1. Description of the Alternative

Alternative 4 would develop the same mix of uses as the Project on the same blocks, but all development would be reduced by 42 percent, which is the percentage reduction required to avoid the Project's significant unavoidable operational air quality (e.g., regional NO_x) impact. Specifically, under Alternative 4, 61,787 square feet of retail/restaurant uses (44,000 square feet of which would be restaurant uses), 885 residential units (including 708 market rate and 177 affordable units or 20 percent of total density), 336,617 square feet of office uses, and the Consolidated Transit Center, would be developed. All development would occur within the same footprint as the Project, and the heights of the proposed buildings would be reduced by 42 percent compared to those under the Project (e.g., ranging from one-story and 36 feet to 16 stories and 155 feet under Alternative 4, compared to one-story and 36 feet to 28 stories and 325 feet under the Project). In all, 1,282,050 square feet of net new floor area (including 885 residential units) would be developed under Alternative 4, as compared to 2,158,191 square feet (including 1,527 residential units) under the Project. Alternative 4 also would include Off-Site Metro Parking Areas located at the southwest corner of N. Chandler Boulevard and Tujunga Avenue and on the north side of Chandler Boulevard between Fair Avenue and Vineland Avenue.

Based on a 42-percent reduction of the requirements of the Specific Plan proposed as part of the Project, Alternative 4 would provide: 2,124 vehicle parking spaces, compared to 3,313 vehicle parking spaces under the Project; and a total of 838 bicycle parking spaces with 126 short-term spaces and 712 long-term spaces, compared to 1,158 bicycle parking spaces consisting of 188 short-term and 970 long-term spaces under the Project. Like the Project, up to 274 Metro parking spaces would also be provided on the Project Site. Fewer subterranean and above-grade parking levels would be provided under Alternative 4 than under the proposed Project as a result of the reduced development under this alternative. With the overall reduction in development, the central open space areas would not be provided. A total of 96,191 square feet of open space would be provided in accordance with the LAMC compared to 211,280 square feet under the Project.

Vehicular, bus, and pedestrian access under Alternative 4 would be similar to that under the Project. The design of the buildings under Alternative 4 would be similar to that of the Project, as would the signage, lighting, vehicular and pedestrian access, setbacks, sustainability features, and discretionary approvals. Construction activities would also generally be similar to those of the Project but would require less excavation due to the reduced number of subterranean parking levels and would be shorter in overall duration due to the reduced amount of development, under this alternative.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

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

Under Alternative 4, the overall amount and duration of construction would be reduced in comparison to the Project because of the 42-percent reduction in net new floor area and soil export under this alternative (e.g., 1,282,050 square feet under Alternative 4 versus 2,158,191 square feet under the Project). Also, the depth of excavation would be less owing to the reduced number of subterranean parking under this alternative. However, the same Project Site Blocks and Off-Site Metro Parking Areas would be developed under this alternative such that the area of grading would be similar to that of the Project, as would the peak day of construction activities. Because the construction emissions analysis/modeling is based on the peak day of construction activities in accordance with SCAQMD and City requirements, like the Project, the construction-related regional and localized air quality impacts of Alternative 4 with implementation of Project mitigation measures would be less than significant and similar to the less than significant air quality impacts of the Project.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 4 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation

activities. These activities would represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less than significant construction impacts with regard to TAC emissions. Overall construction emissions generated by Alternative 4 would be less than those of the Project because Alternative 4 would include 42 percent less net new floor area and less overall construction activity (although roughly the same peak day construction activity). With the reduction in excavation and export for subterranean parking, Alternative 4 would also require a corresponding reduction in diesel haul trucks. Thus, impacts due to construction-related TAC emissions and the corresponding individual cancer risk under Alternative 4 would be less than significant and less than the less than significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Similar to the Project as discussed in Section IV.A, Air Quality, of this Draft EIR, operational regional air pollutant emissions under Alternative 4 would be generated by Project energy (natural gas usage, HVAC, etc.) and mobile (e.g., traffic) sources by the associated consumption of natural gas and petroleum-based fuels. As discussed under Transportation below, development of Alternative 4 would result in 7,887 post-TDM daily vehicle trips compared to 12,425 with the Project, and a corresponding 36-percent reduction in total daily VMT compared to the Project (66,285 total daily VMT compared to 103,775 total daily VMT). As vehicular emissions depend on the number of trips, mobile sources would result in a smaller increase in air emissions compared to the Project. In addition, because the overall square footage would be reduced by 42 percent when compared to the Project, the demand for natural gas would be less than the Project. Furthermore, with the reduction in residential units, use of consumer products would have a proportional reduction in VOC emissions. As shown in Table IV.A-8 of this Draft EIR, the Project results in 82 pounds per day of regional operational NO_x emissions of which 66 pounds of the total Project emissions are from mobile sources. Since VMT under this alternative would be reduced by 36 percent in comparison to the Project, mobile source emissions would be reduced to approximately 42 pounds per day. The 42-percent reduction in square footage would reduce energy and area source NO_x emissions from 13 pounds per day under the Project to 8 pounds per day under Alternative 4. As with the Project, Alternative 4 would still include 3 pounds per day of NO_x emissions from stationary sources. Thus, total regional operational emissions under Alternative 4 would be reduced to 53 pounds per day and less than the SCAQMD regional operational significance threshold of 55 pounds per day of NO_x. Therefore, operational regional impacts related to NO_x would be less than significant under Alternative 4 and less than the significant unavoidable impacts of the Project.

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 4 would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, localized impacts from on-site stationary sources under Alternative 4 would also be less than significant. Such impacts would be less than those of the Project due to the 42-percent reduction in net new floor area under this alternative. Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. As discussed above, Alternative 4 would result in a significant decrease in daily vehicle trips, which would correspond to a decrease in peak-hour trips. Therefore, operational localized air quality impacts under Alternative 4 would be less than significant and less than the Project's less than significant impacts.

As with the Project, portions of the Project Site under Alternative 4 would be completed and occupied while construction of the later Project components would be ongoing. The intensity of this interim year air quality impact would remain similar under Alternative 4 since the intensity of construction (i.e., the pace at which construction occurs) and amount of completed and occupied Project components could be similar (i.e., the 42-percent reduction in net new floor area reflects total at buildout). Therefore, concurrent construction and operational regional air quality impacts under Alternative 4 would be similar to the significant unavoidable impacts of the Project.

(b) Toxic Air Contaminants

As discussed in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include diesel particulate matter from delivery trucks. As Alternative 4 would include 42 percent less net new floor area than the Project, the number of delivery trucks would also be reduced in comparison to the Project. Additionally, the types of uses proposed with both the Project and Alternative 4 are not considered land uses that generate substantial TAC emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities).³⁶ Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not proposed by the Project or Alternative 4. Similar to the Project, Alternative 4 would not release substantial amounts of TACs and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Thus, as with the Project, potential TAC impacts under Alternative 4 would be less than significant, and less than the less than significant impacts of the Project.

³⁶ CARB, *Air Quality and Land Use Handbook, a Community Health Perspective*, April 2005.

b. Cultural Resources

(1) Historical Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, the Lankershim Depot within the Block 0 West portion of the Project Site is listed in the California Register and is therefore considered a historic resource under CEQA. Similar to the Project, Alternative 4 would include the relocation of the Lankershim Depot within Block 0 West and excavation and grading activity associated with the expanded portal to the B (Red) Line station in close proximity to the relocated Lankershim Depot. Like the Project, Alternative 4 would also include development of Block 8 which is located immediately adjacent to the Security Trust and Savings Bank located at 5301 Lankershim Boulevard which is eligible for listing in the National Register and listed in the California Register. Mitigation Measures CUL-MM-1 through CUL-MM-3 and NOI-MM-2, which would be implemented under the Project, would also be implemented under Alternative 4. As with the Project, these mitigation measures would reduce the potential construction-related vibration impacts on the Lankershim Depot and Security Trust and Savings Bank to less than significant levels. However, like for the Project, the impacts to the historical context of the Lankershim Depot resulting from its relocation would remain significant and unavoidable under Alternative 4 because the relationship to the intersection of Lankershim and Chandler Boulevards would be lost. Given that relocation of the Lankershim Depot and development adjacent to the Security Trust and Savings Bank are proposed under both Alternative 4 and the Project, the impacts under this alternative would be similar to the Project.

(2) Archaeological Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, SCCIC records indicate that three archaeological resources have been previously recorded within the Project Site consisting of two historic-era sites and one prehistoric isolate. While Alternative 4 would include 42 percent less net new floor area than the Project, it would include development within the same footprint as the Project (including on the same Project Site Blocks and Off-Site Metro Parking Areas). However, because Alternative 4 would include 42 percent less development than the Project, fewer subterranean parking levels would be required under this alternative, resulting in reduced depths of excavations and a reduction in the potential to uncover subsurface archaeological resources. Furthermore, Alternative 4 would comply with the same regulatory requirements and would implement the same mitigation measures for archaeological resources (i.e., Mitigation Measures CUL-MM-4 through CUL-MM-6) as the Project. Therefore, like the Project, impacts to archaeological resources under Alternative 4 would be less than significant after mitigation and less than the Project.

c. Energy

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

Similar to the Project as discussed in Section IV.C, Energy, of this Draft EIR, construction activities associated with Alternative 4 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be reduced compared to the Project due to the 42-percent reduction in the overall amount of construction and associated reduction in the duration of construction under this alternative. Furthermore, as with the Project, construction activities under Alternative 4 would comply with all applicable requirements relating to energy use. Therefore, like the Project, short-term energy use during construction of Alternative 4 would not occur in a wasteful, inefficient or and manner, and would be less than significant similar to the less than significant impacts of the Project.

As with the Project, operation of Alternative 4 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels compared to existing conditions. However, Alternative 4 would result in less operational energy demand than the Project due to the 42-percent reduction in development. In terms of petroleum-based fuel usage, the number of daily trips generated by this alternative would be lower in comparison to the Project due to the lower net new floor area under this alternative. Furthermore, LADWP has confirmed that the electrical infrastructure in the Project area has adequate capacity to serve the Project; thus, adequate capacity would also be available to serve Alternative 4. Lastly, like the Project, the consumption of electricity, natural gas, and petroleum-based fuels under this alternative would not be wasteful, inefficient, or unnecessary because the development would represent urban infill within an urbanized area in close proximity to transit which would contribute to an energy efficient land use pattern consistent with SCAG's 2020–2045 RTP/SCS growth forecast in Transit Priority Areas (TPAs), because operation of the proposed uses would comply with applicable energy efficiency standards, and because some older buildings would be replaced with new buildings developed to the latest energy efficiency standards. Therefore, like the Project, long-term energy use during operation of Alternative 4 would not occur in a wasteful, inefficient or and manner, and would be less than significant similar to the less than significant impacts of the Project.

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

Alternative 4 would result in less operational energy demand than the Project owing to 42 percent less net new floor area under this alternative. Also, like the Project, Alternative 4 would replace 49,111 square feet of existing uses with new buildings meeting

updated energy efficiency standards (e.g., Title 24 energy efficiency standards, 2019 CalGreen requirements, Los Angeles Green Building Code requirements, etc.). In addition, like the Project, the consumption of electricity, natural gas, and petroleum-based fuels under this alternative would not be wasteful, inefficient, or unnecessary because the development would represent urban infill within an urbanized area in close proximity to transit which would contribute to an energy efficient land use pattern consistent with SCAG's 2020–2045 RTP/SCS growth forecast in TPAs, and because operation of the proposed uses would comply with applicable energy efficiency standards. Therefore, like the Project, Alternative 4 would not conflict with plans for renewable energy or energy efficiency and would result in less than significant impacts similar to the less than significant impacts of the Project.

d. Geology and Soils

(1) Geologic Hazards

Under Alternative 4, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, and site stability would be similar to those under the Project discussed in Section IV.D, Geology and Soils, of this Draft EIR. This is because such impacts are a function of the Project Site's underlying geologic conditions rather than the types or amounts of land uses proposed. Alternative 4 would be developed within the same location as the Project and would comply with the same regulatory requirements as the Project to ensure that the soils underlying the Project Site can adequately support the proposed development. As with the Project, Alternative 4 would be designed and constructed to conform to the current seismic design provisions of the California Building Code and the Los Angeles Building Code. Alternative 4 would also comply with the same regulatory requirements as the Project, which require the preparation of a final design-level geotechnical engineering report to identify and minimize seismic risks. Lastly, similar to the Project, Alternative 4 would not include uses such as mining operations, deep excavation into the earth, or boring of large areas creating unstable seismic conditions or stresses in the earth's crust. Therefore, as with the Project, Alternative 4 would not cause or accelerate geologic conditions which could result in substantial damage to proposed structures or infrastructure or expose people to substantial risk of injury. The impacts of Alternative 4 would be less than significant and similar to the less than significant impacts of the Project.

(2) Paleontological Resources

As discussed in Section IV.D, Geology and Soils, of this Draft EIR, a records search conducted for the Project Site indicates there are no previously encountered fossil vertebrate localities located within the Project Site. Therefore, like the Project, Alternative 4 would not impact listed paleontological resources. While Alternative 4 would result in soil

disturbance and excavation activities within the same footprint as the Project (i.e., on the same Blocks and Off-Site Metro Parking Areas), the depth of the excavations would be less owing to the 42-percent reduction in net new floor area under this alternative and the associated reduction in the number of subterranean parking levels required. Therefore, the potential for Alternative 4 to uncover subsurface paleontological resources would be reduced when compared to that of the Project. Also, Alternative 4 would comply with the same regulatory requirements and implement the same standard City condition of approval for paleontological resources as the Project in the event paleontological resources are uncovered during site grading activities. Therefore, impacts to paleontological resources under Alternative 4 would be less than significant and less than the less than significant impacts of the Project.

e. Greenhouse Gas Emissions

(1) Construction

Under Alternative 4, the overall amount and duration of construction would be reduced in comparison to the Project because of the 42-percent reduction in net new floor area under this alternative. The mix of equipment and emissions factors would be the same under Alternative 4, but overall equipment usage would be less under this alternative. As a result, GHG emissions over the construction duration under Alternative 4 would be less than significant and less than the Project.

(2) Operation

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 the number of daily trips generated and energy consumption from proposed land uses. As discussed above, Alternative 4 would include 42 percent less development, consume less energy, and generate fewer vehicle trips than the Project. Thus, the GHG emissions generated by Alternative 4 would be less than the Project. Also, as with the Project, Alternative 4 would incorporate project design features (e.g., sustainability features, etc.) to reduce GHG emissions and would be designed to comply with the City's Green Building Ordinance, as applicable. Furthermore, as with the Project, Alternative 4 would represent infill development within an urban area in close proximity to transit, and thus would contribute to an energy efficient land use pattern which would support the goals of the RTP/SCS intended to reduce GHG emissions. Therefore, with compliance with the City's Green Building Ordinance and the implementation of the same project design features as the Project (e.g., similar to GHG-PDF-1 and GHG-PDF-2 it is anticipated that Alternative 4, like the Project, would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans. Thus, impacts related to GHG

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

f. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, would be used during construction of Alternative 4 and, therefore, would require proper handling and management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases and, subsequently, the exposure of the public to hazardous materials. However, similar to the Project as discussed in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, all potentially hazardous materials under Alternative 4 would be used, stored, and disposed in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use.

With respect to existing conditions, like the Project, Alternative 4 would have the potential to encounter contaminated soils and soil gas during construction. Additionally, as discussed in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, the Project Site is identified in multiple databases compiled pursuant to Government Code Section 65962.5. These listings collectively constitute a REC. However: (1) such potential would be reduced as compared to the Project owing to the reduced amount of development, associated with the reduced need for subterranean parking, and shallower excavation depths under this alternative; and (2) any contaminated soils and/or soil gas found would be treated and disposed of in accordance with applicable regulations and HAZ-MM-1 through HAZ-MM-4 to reduce potential impacts to less than significant levels. Furthermore, while Alternative 4, like the Project, would include the removal of the same existing buildings, some of which could potentially contain ACM, LBP, and/or PCB, like the Project, the identification and removal of such materials would occur in accordance with applicable regulations which would mitigate any impacts. Overall, similar to the Project, the impacts under Alternative 4 would be less than significant with mitigation, although such impacts would be less due to the reduction in development.

(2) Operation

Operation of Alternative 4 would use limited quantities of potentially hazardous materials typical of those used in transit, residential, retail/restaurant and office uses, including fuels, batteries, cleaning agents, paints, pesticides, and other materials used for landscaping. Like under the Project as discussed in Section IV.F, Hazards and Hazardous Materials, all hazardous materials on the Project Site under Alternative 4 would be

acquired, handled, used, stored, and disposed of in accordance with all applicable federal, state and local requirements. Similar to the Project, Alternative 4 would also not include the use of ACMs, LBP, or PCBs. Additionally, like the Project, Alternative 4's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency access and also like the Project, Alternative 4 would not physically interfere with an adopted emergency response plan or evacuation plan. Overall, impacts would be less than significant and less than the less than significant impacts of the Project as a result of less development.

g. Land Use

Alternative 4 would develop the same uses as the Project, but at a 42-percent reduction in density. Like the Project, Alternative 4 would require: a Specific Plan to regulate development within the Project Site; a General Plan Amendment to Regional Center; an amendment to the North Hollywood-Valley Village Community Plan to create a Regional Center land use designation; a Vesting Zone Change and Height District change for the entire site; create a Sign District; and other land use entitlements/approvals. Furthermore, as with the Project, all other permits and approvals required to facilitate development would be obtained under Alternative 4 in compliance with City requirements, and all new development would comply with applicable City development requirements, including but not limited to those related to parking, open space, lighting, landscaping, driveway, access, street frontages and building design. Lastly, like the Project, Alternative 4 would provide affordable housing, would be consistent with applicable regional and City growth projections, and would represent infill development within an urban area in close proximity to transit which would support local and regional planning efforts to reduce air emissions and VMT and provide for an efficient land use pattern. Therefore, like the Project, Alternative 4 would not result in any conflicts with existing land use plans and policies that govern the Project Site, including those that were adopted for the purpose of avoiding or mitigating an environmental effect. The impacts of Alternative 4 would be less than significant, and similar to the less than significant impacts of the Project.

h. Noise

(1) Construction

Alternative 4 would be developed within the proximity of the same existing sensitive receptors (e.g., a mix of residential, school, park, and recording studio uses located north of Cumpston Street, south of Chandler Boulevard, immediately east and west of the Project Site, etc.) as the Project. Although the amount of construction activity and duration under Alternative 4 would be reduced as compared to the Project, the construction noise analysis is based on the maximum or peak day of construction activity. Therefore, the maximum

daily construction noise level under Alternative 4 would be similar to the Project. Alternative 4 would also include the same construction haul route in proximity to existing sensitive receptors. Additionally, like the Project Alternative 4 would implement Project Design Features similar to NOI-PDF-1 and NOI-PDF-2 to minimize construction noise and vibration at existing sensitive receptors. Lastly, like the Project, Alternative 4 would implement construction noise barriers required by Mitigation Measure NOI-MM-1. However, as under the Project, conventional mitigation measures, such as providing temporary noise barrier walls, to reduce the noise associated with the upper levels of on-site construction and off-site construction truck traffic noise would not be feasible under Alternative 4 as the barriers would not be able to be tall enough and/or would obstruct the access and visibility to the properties along the anticipated truck route. As such, like the Project, because peak activity days under Alternative 4 would be similar to the Project, construction activities at each of the Project Site blocks and Off-Site Metro Parking Areas under Alternative 4 would result in significant and unavoidable Project-level and cumulative on- and off-site construction noise and vibration (human annoyance) impacts at multiple off-site sensitive receptors. Although Alternative 4 would include the construction of 42 percent less net new floor area than the Project, construction noise and vibration impacts would be similar to the Project, as impacts are based on peak constructions days.

Regarding construction vibration as it relates to building damage, as discussed in Section IV.B, Cultural Resources, of the Draft EIR, there is one historic structure (Lankershim Depot) located on the Project Site and six historic structures located in the close vicinity (i.e., Security Trust and Savings Bank, Angelino Valley Mortuary, United States Post Office, Fire Station #60, Air Raid Siren #210, and El Portal Theater). Like the Project, Alternative 4 would result less than significant construction vibration impacts at the majority of these historic structures, and impacts at the Lankershim Depot and the Security Trust and Savings Bank would be less than significant with implementation of Mitigation measure NOI-MM-2. The impacts under Alternative 4 would be similar to the Project, as impacts are based on peak construction days.

(2) Operation

Like the Project, Alternative 4 would generate on-site operational noise and vibration associated with increased on-site activities, and off-site operational noise and vibration associated with project traffic. Additionally, like the Project, Alternative 4 would implement Project Design Features similar to NOI-PDF-3 through NOI-PDF-6 to minimize operational noise at existing sensitive receptors. Because the Project would result in less than significant on- and off-site operational noise and vibration impacts, and because Alternative 4 would include 42 percent less net new development than the Project and thus generate less on- and off-site operational noise and vibration, but otherwise include development at the same locations and uses as the Project, the operational noise and vibration impacts of

Alternative 4 would similarly be less than significant. These impacts would be less under Alternative 4 owing to less operational noise and vibration under this alternative.

i. Population and Housing

(1) Construction

As discussed in Section IV.I, Population and Housing, of this Draft EIR, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by a particular development. Many construction workers are highly specialized (e.g., crane operators, steel workers, masons), and move from job site to job site as dictated by the demand for their skills. Additionally, as the overall amount of construction under Alternative 4 would be substantially less than the Project, fewer construction workers would be needed under Alternative 4. Therefore, population impacts related to substantial unplanned household growth in the City of Los Angeles or the SCAG Region as a result of construction worker relocation under Alternative 4 would be less than significant and less than the less than significant impacts of the Project.

(2) Operation

Alternative 4 would include the development of 885 residential units, 336,617 square feet of office uses, and 61,787 square feet of retail/restaurant uses. Alternative 4 would directly generate an estimated 2,151 residents and 1,558 employees, as compared to the Project which would generate an estimated 3,717 residents and 2,882 employees.³⁷ Because Alternative 4 would directly generate fewer residents and employees than the Project, and because the Project's residents and employees would represent only a small fraction of the growth projected within the SCAG region and City between 2020 and 2037 (the buildout year of the Project) and thus would be within applicable growth projections, Alternative 4, like the Project, would not directly induce substantial unplanned population growth.

Regarding indirect unplanned population growth, like the Project, Alternative 4 would generate jobs that could potentially attract people to the area and generate a demand for housing. However, similar to the Project, these employment positions would include a range of permanent and part-time positions that may be filled, in part, by persons already residing in the vicinity of the workplace and who generally do not relocate their households due to such employment opportunities, and other persons who would commute to the

³⁷ From the VMT Calculator runs for the alternatives included as Appendix V.2 of this Draft EIR.

Project Site from other communities in and outside of the City. Also similar to the Project, indirect housing demand created by Alternative 4 would be fulfilled by a combination of the proposed new dwelling units, vacancies in the surrounding housing market, and from other new units in the vicinity of the Project Site. Additionally, similar to the Project, all circulation improvements planned for Alternative 4 are intended to improve circulation flows and safety throughout the Project Site and vicinity, and utility and other infrastructure improvements planned for Alternative 4 are intended to connect the proposed uses to the existing main infrastructure system and would not require upgrades to the main system. As such, like the Project, Alternative 4 would not indirectly induce substantial population growth associated with potential employment opportunities that may be generated by the proposed development.

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

j. Public Services

(1) Fire Protection

(a) Construction

As discussed in Section IV.J.1, Public Services—Fire Protection, of this Draft EIR, construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings, and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. However, as with the Project, construction of Alternative 4 would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, as with the Project, compliance with regulatory requirements would reduce the potential for construction activities under Alternative 4 to expose people to the risk of fire or explosion related to hazardous materials. However, this risk would be reduced under Alternative 4 as a result of less construction.

Similar to the Project, construction activities under Alternative 4 could potentially slow LAFD emergency response times and interfere with emergency access during the construction period through temporary lane closures, etc. While Alternative 4 would include 42 percent less development than the Project, and generate less overall construction activities and construction traffic, peak day construction activities, and construction traffic would be similar to the Project. However: (1) any impacts on LAFD emergency response times would be temporary under both Alternative 4 and the Project; (2) both Alternative 4 and the Project would implement the required Construction Traffic Management Plan (similar to Project Design Feature TR-PDF-1) that would ensure

continued provision of emergency access during construction; (3) construction traffic under both Alternative 4 and the Project would avoid peak commute hours to the degree possible; and (4) emergency vehicles normally have a variety of options for dealing with traffic pursuant to CVC Section 21806, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, like the Project, construction activities under Alternative 4 would not result in the need for new or altered government facilities (i.e. fire stations) the construction of which could cause significant environmental impacts. Impacts under Alternative 4 would be less than significant and less than the less than significant impacts of the Project.

(b) Operation

As discussed in Section IV.J.1, Public Services—Fire Protection, of this Draft EIR, the Project Site would continue to be served by Fire Station No. 60, the “first-in” station, as well as Fire Station Nos. 86, 102, 89, and 78. Alternative 4 would result in 42 percent less net new development than the Project, thus resulting in a smaller service population and lower net increase in demand for fire protection and emergency medical services than the Project. Specifically, Alternative 4 would directly generate an estimated 2,151 residents and 1,558 employees, as compared to the Project which would generate an estimated 3,717 residents and 2,882 employees.³⁸ In addition, similar to the Project, Alternative 4 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Lastly, because of the reduced amount of net new development under this alternative, operational traffic and the potential for impacts to emergency response times would be reduced compared to those of the Project.

As with the Project, domestic and fire water service to the Project Site under Alternative 4 would continue to be supplied by LADWP. As discussed in Section IV.J.1, the IFFAR and SAR indicate that adequate hydrant pressure and flow is currently available at the Project Site to serve the Project. As the amount of net new development under Alternative 4 would be less under the Project, and as Alternative 4 would include the same land uses as the Project, existing fire flows would also be adequate to serve Alternative 4. Like the Project, Alternative 4 would also incorporate fire sprinkler suppression systems in its buildings.

Based on the above, operation of Alternative 4 would not require the addition of a new or expanded fire station the construction of which could cause significant environmental impacts. Therefore, like the Project, operation of Alternative 4 would not

³⁸ From the VMT Calculator runs for the alternatives included as Appendix V.2 of this Draft EIR.

result in the need for new or altered government facilities (i.e., fire stations). Impacts under Alternative 4 would be less than significant and less than the less than significant impacts of the Project.

(2) Police Protection

(a) Construction

Similar to the Project, construction of Alternative 4 could create a small demand for police services during the construction period. However, as with the Project, Alternative 4 would incorporate a Project Design Feature similar to POL-PDF-1 to implement temporary security measures, including security fencing, lighting, and locked entry to secure the Project Site during construction which would reduce demand for police protection services. Similar to the Project, the implementation of this project design feature would reduce the potential for theft and vandalism during construction under this alternative. However, this potential would be reduced under Alternative 4 as a result of less construction.

Like under the Project, construction activities under Alternative 4 could potentially slow LAPD emergency response times and interfere with emergency access during the construction period through temporary lane closures, etc. While peak daily and peak-hour construction traffic would be similar under Alternative 4 to that of the Project, overall construction traffic would be less under Alternative 4 owing to less development and overall construction activities under this alternative. Furthermore, both Alternative 4 and the Project would implement the required Construction Traffic Management Plan (similar to Project Design Feature TR-PDF-1) that would ensure continued provision of emergency access during construction. Lastly, emergency vehicles normally have a variety of options for dealing with traffic pursuant to CVC Section 21806, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, like the Project, construction of Alternative 4 would not result in the need for new or altered government facilities (i.e., police stations) the construction of which could cause significant environmental impacts. Impacts under Alternative 4 would be less than significant and less than the less than significant impacts of the Project.

(b) Operation

As discussed in Section IV.J.2, Public Services—Police Protection, of this Draft EIR, the Project Site would continue to be served by North Hollywood Community Police Station. The same would be true under Alternative 4. Alternative 4 would result in 42 percent less net new development than the Project, thus resulting in a smaller service population, a lower net decrease in the existing officer-to-resident population ratio, and lower net increases in the demand for police protection service, than the Project. Specifically, Alternative 4 would directly generate an estimated 2,151 residents and 1,558 employees, as compared to the Project which would generate an estimated

3,717 residents and 2,882 employees.³⁹ Furthermore, similar to the Project, Alternative 4 would implement Project Design Features similar to POL-PDF-2 through POL-PDF-4 which require: a standard set of security measures (e.g., closed circuit cameras, etc.) be incorporated into the proposed buildings; sufficient lighting and design of buildings, walkways, plazas, parking, etc., to ensure visibility/security; provision to the LAPD of Project diagrams showing Project access routes, etc. to facilitate police response; and implementation of a Safety and Security Plan in accordance with Metro's Guide for Development at the North Hollywood Station. These project design features would help reduce the increase in demand for police services under both Alternative 4 and the Project. Lastly, because of the reduced amount of net new development under this alternative, operational traffic and the potential for impacts to emergency response times would be reduced compared to those of the Project. Based on the above, operation of Alternative 4, like the Project, would not result in the need for new or altered government facilities (i.e., police stations) the construction of which could cause significant environmental impacts. Impacts under Alternative 4 would be less than significant and less than the less than significant impacts of the Project.

(3) Schools

(a) Construction

Similar to the Project, Alternative 4 would generate part-time and full-time jobs associated with construction 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, which require construction workers to commute to job sites that change many times in the course of a year, construction workers are not likely to relocate their households as a consequence of the construction job opportunities under either project. Therefore, like the Project, the construction employment generated by Alternative 4 would not result in a notable increase in the resident population or a corresponding demand for schools in the vicinity of the Project Site. Impacts on school facilities during construction under Alternative 4 would be less than significant and similar to the Project's less than significant impacts.

(b) Operation

Like the Project, Alternative 4 would include new development that would create a demand for LAUSD school facilities (e.g., Lankershim Elementary, Walter Reed Middle School, North Hollywood Senior High, and East Valley Senior High). However, the demand for LAUSD facilities under Alternative 4 would be less than under the Project owing to

³⁹ From the VMT Calculator runs for the alternatives included as Appendix V.2 of this Draft EIR.

42-percent reduction in net new floor area under this alternative, including 42 percent fewer residential units and associated residents and students. Furthermore, like the Project, the Applicant under Alternative 4 would be required to pay the applicable (e.g., LAUSD) SB 50 development fees for schools, which per Government Code Section 65995, is considered by the State to represent full mitigation of the impact of new development on schools. Therefore, while some of the above schools currently have seating shortages which would be exacerbated by the Project, and while the same would be true for Alternative 4, the operational impacts of Alternative 4 on schools would be less than significant and less than the less than significant impacts of the Project.

(4) Parks and Recreation

(a) Construction

Construction of Alternative 4, like the Project, would result in a temporary increase in the number of construction workers at the Project Site. As described above, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, the likelihood that construction workers would relocate their households as a consequence of working on Alternative 4 is low. Also, while there would be some potential for construction workers to spend their lunch breaks at parks and recreational facilities, any resulting increase in use would be temporary and negligible. Therefore, like the Project, the construction workers associated with Alternative 4 would not result in a notable increase in the residential population of the Project area, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site. Also, while construction activities under Alternative 4 would have the potential to result in access restrictions to City parks and recreational facilities in the vicinity, such as the North Hollywood Park, implementation of the Construction Traffic Management Plan similar to that set forth in TR-PDF-1 would ensure that access is maintained. Hence, similar to the Project, construction of Alternative 4 would not generate a demand for park or recreational facilities that would require the provision of new or physically altered government facilities, the construction of which could cause significant environmental impacts. The impacts of Alternative 4 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

Residents are considered the primary users of parks and recreation facilities. Like the Project, Alternative 4 would include the development of new residential uses that would create a demand for RAP parks and recreational facilities. However, this demand would be lower than under the Project owing to 42 less net new floor area under Alternative 4 (including 42 percent fewer residential units). Furthermore, like the Project, Alternative 4 would meet City open space requirements through the provision of residential balconies, pools, landscaped park spaces, and outdoor seating areas so that, like the Project, it is

anticipated that Alternative 4 residents would generally utilize on-site open space to meet their recreational needs. However, this alternative would not provide the central open space areas of the Project, thereby offering fewer on-site options for recreation. Additionally, like the Project, the Applicant under Alternative 4 would be required to pay Quimby fees to the City that could be used to add or improve park facilities in the vicinity of the Project Site. Lastly, while non-residential uses can generate a small indirect demand for parks and recreational facilities, the new non-residential floor area under Alternative 4 would be 42 percent of that of the Project. Therefore, Alternative 4 operation would not generate a demand for park or recreational facilities that would result in the physical deterioration of an existing facility or require the provision of new or physically altered government facilities, the construction of which could cause significant environmental impacts. Impacts would be less than significant and less than the less than significant impacts of the Project.

(5) Libraries

(a) Construction

Similar to the Project, Alternative 4 would result in a temporary increase of construction workers on the Project Site. However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities. Therefore, construction employment generated by Alternative 4, which would be less than under the Project, would not result in a notable increase in the resident population or a corresponding demand for library services in the vicinity of the Project Site, and would not result in the need for new or altered library facilities, the construction of which could cause significant environmental impacts. As such, impacts to library facilities during construction of Alternative 4 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

As described in Section IV.J.5, Libraries, of this Draft EIR, the Project Site is located within the service area of the North Hollywood–Amelia M. Earhart Regional Library and the Valley Plaza Branch Library. Like the Project, operation of Alternative 4 would increase the demand for service from these LAPL libraries. While both of these libraries are currently below the building size recommendations set forth in the 2007 Branch Facilities Plan for their existing service populations, the service populations of both libraries are also below the service population level at which a new Branch Library is recommended (e.g., 90,000 people). Alternative 4 would generate a residential population of an estimated 2,151⁴⁰ as

⁴⁰ From the VMT Calculator runs for the alternatives included as Appendix V.2 of this Draft EIR.

compared to the Project's 3,717 residents. Thus, similar to the Project, the Valley Plaza Branch Library, which would have a service population in 2037 (e.g., the Project buildout year) of 88,555⁴¹ persons, would reach LAPL's recommended level to provide an additional library under future with Alternative 4 conditions. However, like the Project, Alternative 4 would generate tax revenues for the City's General Fund which would help offset their increases in library demand. For these reasons, like the Project, Alternative 4 would not result in the need for new or altered library facilities, the construction of which could cause significant environmental impacts, and its impacts would be less than significant and less than the less than significant impacts of the Project.

k. Transportation

Similar to the Project, Alternative 4 would generally support applicable transportation plans (Mobility Plan 2035, Plan for a Health Los Angeles, Vision Zero, etc.) and multimodal transportation options. Like the Project, Alternative 4 would include passenger drop-offs to minimize impacts to the public right of way and enhance the user experience by integrating multi-modal transportation options, and new sidewalks, street trees, pedestrian lighting, and bicycle parking in accordance with the LAMC. Like the Project, Alternative 4 would also include certain TDM program elements (e.g., reduced parking supply, promotions/marketing, traffic calming improvements, etc.) which would support bicycle and pedestrian activity. Like the Project, Alternative 4 would also represent urban infill development in close proximity to transit which would encourage alternative transportation use. Therefore, like the Project, Alternative 4 would not conflict with a program, plan, ordinance, or policy addressing the circulation system and impacts. The impacts of Alternative 4 would be less than significant and similar to the less than significant impacts of the Project.

With respect to VMT, with TDM measures included, Alternative 4 would result in an average household VMT per capita of 5.4 and an average work VMT per employee of 11.7, versus the Project which would result in an average household VMT per capita of 4.5 and an average work VMT per employee of 8.7.⁴² These are compared to the South Valley Area APC thresholds of 9.4 household VMT per capita and 11.6 VMT per employee. The work VMT per employee would exceed the threshold without the inclusion of TDM measures. With TDM measures included, the average household VMT per capita would be 4.7 and the average work VMT per employee would be 10.2, which would be below the applicable thresholds. It should be noted that the TDM measures included are inherent to Alternative 4's design and location and are therefore not considered mitigation measures.

⁴¹ *Written communication from Los Angeles Public Library, August 6, 2020. See Appendix Q of this Draft EIR.*

⁴² *From the VMT Calculator runs for the alternatives included as Appendix V.2G of this Draft EIR.*

Impacts would be less than significant, but greater than the less than significant impacts of the Project.

As with the Project, Alternative 4 would not introduce hazardous geometric design features and all driveways would be designed to LADOT standards. Impacts would be less than significant and similar to the less than significant impacts of the Project.

Lastly, similar to the Project, Alternative 4 would not interfere with emergency access (for example, would implement a Construction Traffic Management Plan during construction to ensure emergency access during the construction period, would not close any existing public streets, and would provide emergency access in accordance with applicable requirements). The impacts of Alternative 4 would be less than significant and similar to the less than significant impacts of the Project.

I. Tribal Cultural Resources

Alternative 4 would include grading and excavation activities within the same footprint (i.e., same Blocks and Off-Site Metro Parking Areas) as the Project. Therefore, like the Project, Alternative 4 would have the potential to uncover previously unidentified tribal cultural resources. However, Alternative 4 would implement the same mitigation measure as the Project in the event that tribal cultural resources are uncovered during grading and excavation activities (i.e., Mitigation Measure TCR-MM-1). Therefore, like the Project, Alternative 4 would result in less than significant impacts to tribal cultural resources with mitigation included. Because Alternative 4 would include 42 percent less net new floor area than the Project and would require fewer subterranean parking levels, Alternative 4 would have less of a potential to uncover previously unidentified tribal cultural resources if present. Therefore, the impact would be less under Alternative 4.

m. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities for Alternative 4 would result in a temporary demand for water for dust control, cleaning of equipment, excavation/export, removal and re-compaction, and other short-term related activities. These activities would occur incrementally throughout construction of Alternative 4. The amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed (the average is identified as 1,000 to 2,000 gpd per block in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR). However, given the temporary nature of construction activities, water use

during construction of Alternative 4 would be short-term and intermittent. Furthermore, both Alternative 4 and the Project would include the demolition of 49,111 square feet of existing on-site industrial/warehouse uses (which have an estimated demand of 3,374 gpd) which would partially offset the water demand associated with construction activities.⁴³ As with the Project, water for construction activities of Alternative 4 would be conveyed using the existing water infrastructure at the Project Site, and no infrastructure upgrades would be needed to provide water during construction. As such, construction activities would not require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental impacts. Construction-related impacts to water supply and infrastructure under Alternative 4 would be less than significant and less than the less than significant impacts of the Project owing to the 42 percent less net new floor area and associated construction activities and construction-related water use under this alternative.

(b) Operation

Like the Project, Alternative 4 would result in an increase in long-term water demand. As discussed in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, a WSA was prepared by LADWP for the Project, as required by SB 610, which concludes that sufficient water supplies would be available to serve the Project. Because Alternative 4 would include 42 percent less net new floor area than the Project, Alternative 4 would generate less operational water demand than the Project. Furthermore, in addition to complying with applicable water conservation requirements, both Alternative 4 and the Project would incorporate the additional water conservation measures set forth in Project Design Feature WAT-PDF-1. Therefore, as with the Project, LADWP would also have sufficient water supplies available to serve Alternative 4 during normal, dry, and multiple dry years.

Regarding water infrastructure, as indicated in Section IV.M.1, conservative analysis for both fire suppression and domestic water flows has been completed by LADWP for the Project as summarized in the Utility Report included as Appendix G of this Draft EIR. Specifically, see Exhibits 1 and 2 of the Utility Report for the results of the IFFAR and SAR, respectively, which demonstrate that adequate water infrastructure capacity exists (e.g., the existing water mains in Lankershim Boulevard, Cumpston Street, Fair Avenue, North and South Chandler Boulevard, and Bakman Avenue, and the existing fire hydrants) to serve the Project.⁴⁴ Because Alternative 4 would include 42 percent less net new floor

⁴³ On December 21, 2020, a fire destroyed the existing building on Block 7. Nevertheless, because it was present at the time the NOP was published on July 7, 2020, it is considered part of the existing conditions.

⁴⁴ KPFF Consulting Engineers, *District NoHo Utility Technical Report: Water, Wastewater, and Energy*, January 2022.

area than the Project and generate a lower operational water demand, adequate water infrastructure capacity also exists to serve Alternative 4. Therefore, like the Project, Alternative 4 operation would not require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects.

Based on the above, the operational impacts of Alternative 4 would be less than significant and less than the less than significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, existing sewer laterals would be capped, temporary facilities (e.g., portable toilet, hand wash areas, etc.) would be provided, and sewage from these facilities would be collected and hauled off-site, during construction of Alternative 4. Furthermore, both Alternative 4 and the Project would remove 49,111 square feet of existing industrial/warehouse development at the Project Site that would result in a net reduction in sewage generation at the Project Site during the construction period.⁴⁵ Therefore, like the Project, Alternative 4 would not cause a measurable increase in wastewater flows and/or require or result in the relocation or construction of new or expanded wastewater conveyance and treatment facilities during construction. The impact of Alternative 4 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

As discussed in Section IV.K.2, Utilities and Service Systems—Wastewater, of the Draft EIR, wastewater generated by the Project would be conveyed by LASAN's existing wastewater conveyance system to the HWRP for treatment. The same would occur under Alternative 4. Because the existing sewer lines and the HWRP have adequate capacity to serve the Project, and Alternative 4 would include 42 percent less development and generate substantially less operational wastewater than the Project, the capacities of the sewer system and HWRP serving the Project Site would also be adequate to serve Alternative 4. Furthermore, both Alternative 4 and the Project would comply with applicable City wastewater infrastructure design and wastewater reduction requirements, and both would implement Project Design Feature WAT-PDF-1 requiring water conservation measures above applicable requirements which would also reduce wastewater generation.

⁴⁵ On December 21, 2020, a fire destroyed the existing building on Block 7. Nevertheless, because it was present at the time the NOP was published on July 7, 2020, it is considered part of the existing conditions.

Lastly, additional detailed sewer gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permits during the standard required permitting process under both Alternative 4 and the Project. Therefore, like the Project, operation of Alternative 4 would not either: (1) require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects; or (2) result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has inadequate capacity to serve the Project's projected demand in addition to the provider's existing commitments. The impacts of Alternative 4 would be less than significant and less than the less than significant impacts of the Project.

(3) Energy Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 4 would consume minor quantities of electricity (construction activities do not typically involve the consumption of natural gas). However, both Alternative 4 and the Project would include the removal of 49,111 square feet of existing industrial/warehouse use that would result in some reduction in on-site electricity and natural gas use during construction.⁴⁶ The energy consumed during construction of Alternative 4 would be less than under the Project owing to the construction of 42 percent less net new floor area and the associated reduction in construction activities and the overall duration of construction under this alternative. Furthermore, because the Project Site is an urban infill site that is already served by energy infrastructure, it is anticipated that, like the Project, Alternative 4 would not require the construction of extensive off-site energy infrastructure improvements. Lastly, like the Project, Alternative 4 would be required to coordinate energy infrastructure improvements with LADWP and SoCalGas, and to develop on-site energy infrastructure and connections to the existing off-site energy infrastructure in accordance with applicable requirements. Hence, like the Project, construction activities under Alternative 4 would not result in an increase in energy demand that exceeds available distribution infrastructure capabilities that would require the construction of new or expanded energy facilities, the construction of which could cause significant environmental effects. Therefore, impacts on energy infrastructure associated with short-term construction activities under Alternative 4 would be less than significant and less than the less than significant impacts of the Project.

⁴⁶ On December 21, 2020, a fire destroyed the existing building on Block 7. Nevertheless, because it was present at the time the NOP was published on July 7, 2020, it is considered part of the existing conditions.

(b) Operation

As with the Project, operation of Alternative 4 would generate an increased consumption of electricity and natural gas relative to existing conditions. Also, as with the Project, the energy required to be conveyed to the Project Site under Alternative 4 would be minimal when compared to total energy flows in the local infrastructure. In addition, Alternative 4 operation would result in less electricity and natural gas demand than the Project owing to the development of 42 percent less net new floor area under this alternative. Hence, Alternative 4 would result in reduced operational impacts on energy infrastructure when compared to the Project. Also, as discussed in the Utility Report, LADWP and SoCalGas have confirmed that the existing energy infrastructure in the area is sufficient to serve the Project. Because Alternative 4 would result in less operational energy demand, the existing energy infrastructure in the area would also be adequate to serve Alternative 4. Therefore, as with the Project, Alternative 4 operation would not result in an increase in energy demand that would exceed available distribution infrastructure capabilities that would require the construction of new or expanded energy facilities, the construction of which could cause significant environmental effects. Impacts on energy infrastructure under Alternative 4 would be less than significant and less than the less than significant impacts of the Project.

3. Comparison of Impacts

As evaluated above and shown in Table V-2 on page V-11, Alternative 4 would avoid the Project's significant unavoidable operational air quality (NO_x) impacts. However, similar to the Project, Alternative 4 would result in significant unavoidable impacts with respect to concurrent construction/operational air quality (NO_x), historic resources, on- and off-site construction noise, and on- and off-site construction vibration (human annoyance). Like the Project, Alternative 4 would also result in significant cumulative impacts that cannot feasibly mitigated with regard to on- and off-site construction noise, and on- and off-site construction vibration (human annoyance). The balance of the impacts under this alternative would be similar to the Project or less owing to the overall reduction in development. The exception is transportation (specifically, VMT) for which the impact would be greater but still less than significant under Alternative 4. Overall, Alternative 4 would be less impactful than the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 4 would develop the same mix of uses as the Project, but all development would be reduced by 42 percent. As such, Alternative 4 would meet the underlying purpose of the Project, which is to redevelop the area around the Metro North Hollywood Station with a high-density, mixed-use development which is transit and

pedestrian oriented and provides housing and jobs in the North Hollywood Valley Village Community Plan Area.

Because the same mix of uses would be provided, Alternative 4 would also meet the following Project objectives set forth below to the same extent as the Project:

- The orderly development of residential uses, commercial uses, office uses, and transit uses, as a unified site in furtherance of Metro's commitment to creating transit-oriented communities that offer compact, bikeable, and walkable communities centered around public transit.
- Facilitate an urban in-fill development with a mix of residential, commercial, and office land uses at a density and scale to enable the Project Site to function as a regional center and support transit use.
- Promote resource and energy conservation through incorporating sustainable and green building design and construction above code requirements.
- Promote fiscal benefits, economic development, and job creation by generating jobs during the construction and operation of the project and generating tax revenue for the City and ground lease revenues to Metro to support its mission to improve mobility in Los Angeles County.
- Promote and enhance transit ridership by consolidating and revitalizing the Metro transit center to accommodate current local and municipal buses as well as the G (Orange) Line terminus and to provide enhancements to the North Hollywood Metro Station, including an improved terminal and security office, Metro employee break room, other support structures, new Metro portal structures on the West and East sides of Lankershim, and the retention of the historic Lankershim Depot.
- Support Metro's regional planning efforts such as the Metro Vision 2028 Strategic Plan by improving pedestrian, bicycle, and transit facilities in North Hollywood.
- Improve Metro infrastructure in furtherance of Metro's commitment to convert to an all-electric fleet by 2040.

Alternative 4 would meet the Project objectives as set forth below to a lesser extent than the Project due to the 42-percent reduction in development and due to the fact the publicly accessible plaza areas would not be provided:

- Provide housing in furtherance of the goals of the City's Housing Element, City's Regional Housing Needs Assessment, and which serves the surrounding area and citywide market, by providing housing in a range of unit types, affordability levels, and sizes adjacent to public transit.

- Provide community benefits such as new community-serving retail uses, enhanced streetscapes, and publicly accessible open space amenities for the community.
- Promote local and regional mobility objectives and reduce VMT by providing a mix of higher density housing and commercial uses that are in close proximity to public transportation, including numerous bus lines as well as rail transit, which are supported by recreational amenities, commercial services, and enhancements to bicycle and pedestrian amenities.

V. Alternatives

E. Alternative 5: Historic Preservation Alternative

1. Description of the Alternative

Alternative 5 would not include development of the previously approved Consolidated Transit Center (including the relocation of the Lankershim Depot) on Block 0 West, thereby avoiding the significant unavoidable historical resources impact of the Project. Because the Consolidated Transit Center would not be built, local buses would remain on the east side of Lankershim Boulevard, and Blocks 4, 5, and 6 would not be developed to maintain existing Metro parking and the local bus plaza. Specifically, Alternative 5 would: (1) retain the existing transit and transit parking uses on Blocks 0 West, 4, and 5/6 instead of developing the Consolidated Transit Center and residential, office, retail/restaurant and parking uses on these blocks as proposed under the Project; and (2) develop 751 residential units, including 600 market rate and 151 affordable units (20 percent of the total), 488,320 square feet of office uses, 45,792 square feet of retail/restaurant uses (32,600 square feet of which would be restaurant uses), and parking uses in the balance of the Project Site blocks (e.g., Blocks 0 East, 1, 2, 3, 7, and 8) similar to the Project. Within these blocks, building footprints, heights, and design; vehicular, bus, and pedestrian access; signage; lighting; setbacks; and sustainability features would all be similar to the Project. In all, 1,234,296 square feet of net new floor area (including 751 residential units) would be developed under Alternative 5, as compared to 2,158,191 square feet (including 1,527 residential units) under the Project. Because only a portion of Metro's existing parking would be removed, the Off-Site Metro Parking Areas would not be redeveloped under this Alternative.

Alternative 5 would provide: 82,314 square feet of open space, compared to 211,280 square feet of open space under the Project; 2,512 vehicle parking spaces within subterranean levels and above ground parking areas, compared to 3,313 vehicle parking spaces within subterranean and above ground parking areas under the Project; and a total of 693 bicycle parking spaces with 117 short-term spaces and 576 long-term spaces compared to 1,158 bicycle parking spaces consisting of 970 long-term and 188 short-term spaces under the Project. Like the Project, up to 274 parking spaces for Metro uses would be provided within the Project Site.

The discretionary entitlements and approvals required under Alternative 5 would be similar to the Project, except that they would cover fewer blocks. The extent and duration

of construction activities would also be less under Alternative 5 owing to the lack of development on Blocks 0 West, 4, and 5/6 under this alternative.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

As with the Project, construction of Alternative 5 has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. 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 5, the overall amount and duration of construction would be reduced in comparison to the Project because of the percent reduction in net new floor area under this alternative (e.g., 1,234,296 square feet under Alternative 5 versus 2,158,191 square feet under the Project) and because no development would occur under this alternative in Blocks 0 West, 4, and 5/6 and in the Off-Site Metro Parking Areas. For example, no grading and excavation activities would occur in Blocks 0 West, 4, 5, and 6, or in the Off-Site Metro Parking Areas, under this alternative which would avoid the construction air emissions from these areas under the Project. However, peak day construction activities and the associated air emissions, upon which construction emissions analysis/modeling is based in accordance with SCAQMD and City requirements, would be similar to the Project, although the duration of construction would be reduced. Therefore, the construction-related regional and localized air quality impacts of Alternative 4 with implementation of Project mitigation measures would be less than significant and similar to the Project.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 5 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities would represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less than significant construction impacts with regard to TAC emissions. Overall construction emissions generated by Alternative 5 would be less than those of the Project because

Alternative 5 would include less net new floor area and would not develop Blocks 0 West, 4, and 5/6 and the Off-Site Metro Parking Areas. Thus, impacts due to construction-related TAC emissions and the corresponding individual cancer risk under Alternative 5 would be less than significant and less than the less than significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Similar to the Project as discussed in Section IV.A, Air Quality, of this Draft EIR, operational regional air pollutant emissions under Alternative 5 would be generated by Project energy (natural gas usage, HVAC, etc.) and mobile (e.g., traffic) sources by the associated consumption of natural gas and petroleum-based fuels. As discussed under Transportation below, due to the reduction in development, Alternative 5 would result in 7,885 post-TDM daily vehicle trips compared to 12,425 with the Project, and a corresponding 34-percent reduction in total daily VMT compared to the Project (68,330 total daily VMT compared to 103,775 total daily VMT).⁴⁷ As vehicular emissions depend on the number of trips, mobile sources would result in a smaller increase in air emissions compared to the Project. In addition, because the overall square footage would be reduced when compared to the Project, the demand for natural gas would be less than the Project. Furthermore, with the reduction in residential units, use of consumer products would have a proportional reduction in VOC emissions. As shown in Table IV.A-8 of this Draft EIR, the Project results in 82 pounds per day of regional operational NO_x emissions of which 66 pounds of the total Project emissions are from mobile sources. Since VMT under this alternative would be reduced by 34 percent in comparison to the Project, mobile source emissions would be reduced to approximately 44 pounds per day. The 43-percent reduction in square footage would have a corresponding reduction in energy and area source NO_x emissions from 13 pounds per day under the Project to 7 pounds per day under Alternative 5. Total NO_x emissions under Alternative 5 would be reduced to approximately 54 pounds per day and less than the SCAQMD regional operational significance threshold of 55 pounds per day. Therefore, operational regional impacts would be less than significant under Alternative 5 and avoid the significant unavoidable impacts of the Project.

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 5 would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, localized impacts from on-site stationary sources under Alternative 5 would be less than significant. Such impacts would be less than those of the Project due to the reduction in net new floor area under this

⁴⁷ From the VMT Calculator runs for the alternatives included as Appendix V.2 of this Draft EIR.

alternative. Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. As discussed above, Alternative 5 would result in a substantial decrease in daily vehicle trips when compared to the Project, which would correspond to a decrease in peak-hour trips. Therefore, operational localized air quality impacts under Alternative 5 would be less than significant and less than the Project's less than significant impacts.

As with the Project, portions of the Project Site under Alternative 5 would be completed and occupied while construction of the later Project components would be ongoing. The intensity of this interim year air quality impact would remain similar under Alternative 5 since the intensity of construction and amount of interim-year completed and occupied Project components could be similar (i.e., the reduction in net new floor area reflects total at buildout). Therefore, concurrent construction and operational regional air quality impacts under Alternative 5 would be similar to the significant unavoidable impacts of the Project.

(b) Toxic Air Contaminants

As discussed in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include diesel particulate matter from delivery trucks. As Alternative 5 would include less net new floor area than the Project, the number of delivery trucks would also be reduced in comparison to the Project. Additionally, the types of uses proposed with both the Project and Alternative 5 are not considered land uses that generate substantial TAC emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities).⁴⁸ Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not proposed by the Project or Alternative 5. Similar to the Project, Alternative 5 would not release substantial amounts of TACs and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Thus, as with the Project, potential TAC impacts under Alternative 5 would be less than significant, and less than the less than significant impacts of the Project.

b. Cultural Resources

(1) Historical Resources

Like the Project, Alternative 5 would include development of Block 8, which is located immediately adjacent to the Security Trust and Savings Bank located at

⁴⁸ CARB, *Air Quality and Land Use Handbook, a Community Health Perspective*, April 2005.

5301 Lankershim Boulevard which is eligible for listing in the National Register and listed in the California Register. Mitigation Measure NOI-MM-2, which would be implemented under both the Project and Alternative 5, would reduce the potential construction-related vibration impacts on the Bank to less than significant levels. However, as discussed in Section IV.B, Cultural Resources, of this Draft EIR, the Lankershim Depot within the Block 0 West portion of the Project Site is listed in the California Register and is therefore considered a historic resource under CEQA. Because Alternative 5 would retain the Lankershim Depot in its current location and would not include new transit development in Block 0 West, it would avoid the Project's significant unavoidable historical resources impacts on the Lankershim Depot. Therefore, Alternative 5 would result in less than significant impacts and would avoid the significant unavoidable impacts of the Project.

(2) Archaeological Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, SCCIC records indicate that three archaeological resources have been previously recorded within the Project Site consisting of two historic-era sites and one prehistoric isolate. Alternative 5 would include the same development as the Project in Blocks 0 East 1, 2, 3, 7, and 8, but would not include development on the balance of Project Site or Off-Site Metro Parking Areas. Therefore, the potential for Alternative 5 to uncover subsurface archaeological resources would be reduced when compared to that of the Project. Furthermore, Alternative 5 would comply with the same regulatory requirements and would implement the same mitigation measures (i.e., Mitigation Measures CUL-MM-4 through CUL-MM-6) as the Project. Therefore, like the Project, impacts to archeological resources under Alternative 5 would be less than significant after mitigation, and less compared to the Project.

c. Energy

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

Similar to the Project as discussed in Section IV.C, Energy, of this Draft EIR, construction activities associated with Alternative 5 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be reduced compared to the Project due to the reduced amount of net new floor area under this alternative (1,234,296 square feet under Alternative 5 versus 2,158,1919 square feet under the Project). Furthermore, as with the Project, construction activities under Alternative 5 would comply with all applicable requirements relating to energy use. Therefore, like the Project, short-term energy use during construction of

Alternative 5 would not occur in a wasteful, inefficient or and manner, and would be less than significant similar to the less than significant impacts of the Project.

As with the Project, operation of Alternative 5 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels compared to existing conditions. However, Alternative 5 would result in less operational energy demand than the Project owing to less net new floor area under this alternative. In terms of petroleum-based fuel usage, the number of daily trips generated by this alternative would be lower in comparison to the Project due to the lower net new floor area under this alternative. Additionally, LADWP has confirmed that the electrical infrastructure in the Project area has adequate capacity to serve the Project; thus, adequate capacity would also be available to serve Alternative 5. Lastly, like the Project, the consumption of electricity, natural gas, and petroleum-based fuels under this alternative would not be wasteful, inefficient, or unnecessary because the development would represent urban infill within an urbanized area in close proximity to transit which would contribute to an energy efficient land use pattern, because operation of the proposed uses would comply with applicable energy efficiency standards, and because some older buildings would be replaced with new buildings developed to the latest energy efficiency standards. Therefore, like the Project, long-term energy use during operation of Alternative 5 would not occur in a wasteful, inefficient or unnecessary manner, and would be less than significant similar to the less than significant impacts of the Project.

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

Alternative 5 would result in less operational energy demand than the Project owing to the development of less net new floor area under this alternative. Also, like the Project, Alternative 5 would replace the existing development on Blocks 0 East, 1, 2, 3, 7, and 8 with new buildings meeting updated energy efficiency standards (e.g., Title 24 energy efficiency standards, 2019 CalGreen requirements, Los Angeles Green Building Code requirements, etc.). In addition, like the Project, the consumption of electricity, natural gas, and petroleum-based fuels under this alternative would not be wasteful, inefficient, or unnecessary because the development would represent urban infill within an urbanized area in close proximity to transit which would contribute to an energy efficient land use pattern consistent with SCAG's 2020–2045 RTP/SCS growth forecast in TPAs, and because operation of the proposed uses would comply with applicable energy efficiency standards. Therefore, like the Project, Alternative 5 would not conflict with plans for renewable energy or energy efficiency and would result in less than significant impacts similar to the less than significant impacts of the Project.

d. Geology and Soils

(1) Geologic Hazards

Under Alternative 5, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, and site stability would be similar to those under the Project discussed in Section IV.D, Geology and Soils, of this Draft EIR. This is because such impacts are a function of the Project Site's underlying geologic conditions rather than the types or amounts of land uses proposed. Alternative 5 would be developed within the same location as the Project and would comply with the same regulatory requirements as the Project to ensure that the soils underlying the Project Site can adequately support the proposed development. As with the Project, Alternative 5 would be designed and constructed to conform to the current seismic design provisions of the California Building Code and the Los Angeles Building Code. Alternative 5 would also comply with the same regulatory requirements as the Project, which require the preparation of a final design-level geotechnical engineering report to identify and minimize seismic risks. Lastly, similar to the Project, Alternative 5 would not include uses such as mining operations, deep excavation into the earth, or boring of large areas creating unstable seismic conditions or stresses in the earth's crust. Therefore, as with the Project, Alternative 5 would not cause or accelerate geologic conditions which could result in substantial damage to proposed structures or infrastructure or expose people to substantial risk of injury. Impacts related to geology and soils under Alternative 5 would be less than significant, and similar to the less than significant impacts of the Project.

(2) Paleontological Resources

As discussed in Section IV.D, Geology and Soils, of this Draft EIR, a records search conducted for the Project Site indicates there are no previously encountered fossil vertebrate localities located within the Project Site. Therefore, like the Project, Alternative 5 would not impact listed paleontological resources. Alternative 5 would include development of fewer of the Project Site blocks than the Project and would not develop the Off-Site Metro Parking Areas, thereby resulting in less grading and excavation and less of a potential to uncover subsurface paleontological resources than the Project. Also, Alternative 5 would comply with the same regulatory requirements and implement the same standard City condition of approval for paleontological resources as the Project in the event paleontological resources are uncovered during site grading activities. Therefore, impacts to paleontological resources under Alternative 5 would be less than significant and less than the less than significant impacts of the Project.

e. Greenhouse Gas Emissions

(1) Construction

Under Alternative 5, the overall amount and duration of construction would be reduced in comparison to the Project because of the percent reduction in net new floor area under this alternative (e.g., 1,234,296 square feet under Alternative 5 versus 2,158,191 square feet under the Project) and because no development would occur under this alternative in Blocks 0 West, 4, and 5/6 and in the Off-Site Metro Parking Areas. The mix of equipment and emissions factors would be the same under Alternative 5, but overall equipment requirements would be less under this alternative. As a result, GHG emissions over the construction duration under Alternative 5 would be less than the Project.

(2) Operation

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 the number of daily trips generated and energy consumption from proposed land uses. As discussed above, Alternative 5 would include less net new floor area, consume less energy, and generate fewer daily vehicle trips than the Project. Thus, the GHG emissions generated by Alternative 5 would be less than under the Project. Also, as with the Project, Alternative 5 would incorporate project design features (e.g., sustainability features, etc.) to reduce GHG emissions and would be designed to comply with the City's Green Building Ordinance, as applicable. Furthermore, as with the Project, Alternative 5 would represent infill development within an urban area in close proximity to transit, and thus would contribute to an energy efficient land use pattern which would support the goals of the RTP/SCS intended to reduce GHG emissions. Therefore, with compliance with the City's Green Building Ordinance and the implementation of similar project design features as the Project (e.g., GHG-PDF-1 and GHG-PDF-2), Alternative 5, like the Project, would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 5 would be less than significant, and less than the less than significant impacts of the Project.

f. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, would be used during construction of Alternative 5 and, therefore, would require proper handling and management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials

releases and, subsequently, the exposure of the public to hazardous materials. However, similar to the Project as discussed in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, all potentially hazardous materials under Alternative 5 would be used, stored, and disposed in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use.

With respect to existing conditions, like the Project, Alternative 5 would have the potential to encounter contaminated soils and soil gas during construction. Additionally, as discussed in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, the Project Site is identified in multiple databases compiled pursuant to Government Code Section 65962.5. These listings collectively constitute a REC. However: (1) such potential would be reduced due as compared to that of the Project owing to the reduced amount of development and thus excavation activities under this alternative (including lack of development and associated excavation activities in Blocks 0 West, 4, and 5/6 and the Off-Site Metro Parking Areas); and (2) any contaminated soils and/or soil gas found would be treated and disposed of in accordance with applicable regulations and HAZ-MM-1 through HAZ-MM-3⁴⁹ to reduce potential impacts to less than significant levels. Furthermore, while Alternative 5, like the Project, would include the removal of some existing buildings that could potentially contain ACM, LBP, and/or PCB: however, like the Project, the identification and removal of such materials would occur in accordance with applicable regulations which would mitigate any impacts. Overall, similar to the Project, the impacts under Alternative 5 would be less than significant with mitigation, although such impacts would be less due to the reduction in development.

(2) Operation

Operation of Alternative 5 would use limited quantities of potentially hazardous materials typical of those used in transit, residential, retail/restaurant and office uses, including fuels, batteries, cleaning agents, paints, pesticides, and other materials used for landscaping. Like under the Project as discussed in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, all hazardous materials on the Project Site under Alternative 5 would be acquired, handled, used, stored, and disposed of in accordance with all applicable federal, state and local requirements. Similar to the Project, Alternative 5 would also not include the use of ACMs, LBP, or PCBs. Additionally, like the Project, Alternative 5's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency access and also like the Project, Alternative 5 would not physically interfere with an adopted emergency response plan or evacuation plan. Overall, the impacts of

⁴⁹ Mitigation Measure HAZ-MM-4 applies to the West Lot which would not be developed under this Alternative.

Alternative 5 would be less than significant and less than the less than significant impacts of the Project as a result of less development and less on-site use of fuels, cleaning agents, etc.

g. Land Use

Under Alternative 5, the Metro North Hollywood Station in Block 0 West and the associated parking in Blocks 4, and 5/6 and the Off-Site Metro Parking Areas would be retained, and mixed-use development would occur on Blocks 0 East, 1, 2, 3, 7, and 8 consistent with that proposed under the Project. Therefore, the land use entitlements being sought under the Project as discussed in Section IV.G, Land Use, of this Draft EIR, including but not limited to a General Plan Amendment and Vesting Zone Change, would need to be applied to only a portion of the Project Site under Alternative 5. Furthermore, as with the Project, all permits and approvals required to facilitate development would be obtained under Alternative 5 (e.g., General Plan Amendment and Vesting Zone Change, etc.) in compliance with City requirements. Also, Alternative 5 would comply with City development requirements, including but not limited to those related to parking, open space, lighting, landscaping, driveway, access, street frontages and building design. Lastly, like the Project, Alternative 5 would provide affordable housing, would be consistent with applicable regional and City growth projections, and would represent infill development within an urban area in close proximity to transit which would support local and regional planning efforts to reduce air emissions and VMT and provide for an efficient land use pattern. Therefore, with approval of the proposed land use entitlements, Alternative 5, like the Project, would not result in conflicts with existing land use plans and policies that govern the Project Site, including those adopted for the purpose of avoiding or mitigating an environmental effect, and similar to the Project, the impact would be less than significant.

h. Noise

(1) Construction

Like the Project, Alternative 5 would include on- and off-site (e.g., traffic) construction activities that would generate noise and vibration, including along the proposed construction haul route. Alternative 5 would implement Project Design Features similar to NOI-PDF-1 and NOI-PDF-2 to minimize this noise and vibration at existing sensitive receptors. However, while Alternative 5 would result in the same amount of development in Blocks 0 East, 1, 2, 3, 7, and 8 as the Project, and generate the same on-site construction noise and vibration from these blocks, Alternative 5 would not include development in Blocks 0 West, 4, 5/6, and the Off-Site Metro Parking Areas, and thus would not generate the Project's on-site noise construction noise and vibration from these blocks. Nonetheless, Alternative 5 would result in similar impacts from Blocks 0 East, 1, 2,

3, 7 and 8 as the Project for on- and off-site construction activities, as the peak daily construction activities, which serves as the basis of the construction noise analysis, would be similar to the Project (for Blocks 0 East, 1, 2, 3, 7, and 8). In particular, Alternative 5 would avoid the significant unavoidable on-site construction noise and vibration impacts of the Project on several sensitive receptors (for example, on receptor locations R7 and R8 in close proximity to Block 0 West, on receptor location R13 in close proximity to the East Lot, and on receptor locations R7 and R14 in close proximity to the West Lot). However, noise impacts at receptor locations R1, R2, and R5 and R9 through R11 under Alternative 5 would be significant (even with mitigation measures) due to on-site construction activities associated with Blocks 0 East, 1, 2, 3, 7, and 8 (see Table IV.H-27 of this Draft EIR). In addition, vibration levels associated with on-site construction activities at Blocks 0 East, 1, 2, 3, 7, and 8 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. Therefore, due to the proximity to Block 0 East, 1, 2, 3, 7, and 8, on-site construction vibration impacts at receptor locations R2 (near Block 2) and R9 (near Block 8) would be similar to the Project, which would result in significant vibration impacts with respect to human annoyance (see Table IV.H-30 of Section IV.H of this Draft EIR).

Although Alternative 5 would generate fewer off-site construction truck trips than the Project owing to less overall net new development and associated construction traffic under this alternative, the off-site truck trips during peak days would be similar to the Project. Therefore, noise impacts associated with off-site construction would be similar to the Project. In addition, off-site vibration levels generated by construction trucks would be similar to the Project, as vibration levels are based on the peak vibration levels generated by the individual truck. As such, off-site construction vibration impacts under Alternative 5 with respect to human annoyance would also be significant and unavoidable, similar to the Project. Cumulative on-site noise and vibration, as well as off-site noise and vibration, would also remain significant and unavoidable under Alternative 5, similar to the Project. However, because Alternative 5 would include substantially less development and thus generate less construction-related noise and vibration impacts than the Project, and would not involve development in proximity to certain adjacent sensitive uses, on- and off-site construction noise and vibration impacts would be less under this alternative. Additionally, conventional mitigation measures, such as providing temporary noise barrier walls to reduce the off-site construction truck traffic noise impacts, would not be feasible as the barriers would obstruct the access and visibility to the properties along the anticipated truck route. In addition, there are no technologically feasible mitigation measures to reduce the potential vibration human annoyance impacts. Therefore, Alternative 5 would result in significant unavoidable on- and off-site Project-level and cumulative construction noise and vibration impacts as it relates to human annoyance that would be less compared to the significant unavoidable impacts of the Project (i.e., fewer impacted receptors).

Regarding construction vibration as it relates to building damage, as discussed in Section IV.B, Cultural Resources, of the Draft EIR, there is one historic structure (Lankershim Depot) located on the Project Site and six historic structures located in the close vicinity (i.e., Security Trust and Savings Bank, Angelino Valley Mortuary, United States Post Office, Fire Station #60, Air Raid Siren #210, and El Portal Theater). Like the Project, Alternative 5 would result less than significant construction vibration impacts at the majority of these historic structures, including the Angelino Valley Mortuary, United States Post Office, Fire Station #60, Air Raid Siren #210, and El Portal Theater. The vibration levels associated with on-site construction activities at Block 8 would exceed the building damage significance threshold at the Security Trust and Savings Bank. Similar to the Project, Alternative 5 would implement NOI-MM-2, which would reduce the vibration impacts at the Security Trust and Savings Bank to less than significant. However, unlike the Project, Alternative 5 would not result in construction vibration impacts at the Lankershim Depot, as this alternative would not include development and associated construction activities within Block 0 West. Furthermore, Alternative 5 would result in less overall construction vibration as it relates to building damage owing to the reduce amount of net new development under this alternative. Therefore, Alternative 5 would result in less than significant construction vibration impacts as it relates to building damage after mitigation which would be less than the less than significant impacts after mitigation of the Project.

(2) Operation

Like the Project as discussed in Section IV.H, Noise, of this Draft EIR, Alternative 5 would generate on-site operational noise associated with increased on-site activities, and off-site operational noise associated with project traffic. Like the Project, Alternative 5 would implement Project Design Features similar to NOI-PDF-3 through NOI-PDF-5 to minimize operational noise.⁵⁰ However, because Alternative 5 would include less net new floor area than the Project and would not include new development in Blocks 0 West, 4, 5/6, and the Off-Site Metro Parking Areas, Alternative 5 would generate less operational on- and off-site noise than the Project. Therefore, Alternative 5 would result in less than significant on- and off-site operational noise that would be less than the less than significant on- and off-site operational noise of the Project.

Like the Project, Alternative 5 would generate on-site operational vibration associated with vehicle circulation, delivery trucks, and building mechanical equipment. However, because Alternative 5 would include substantially less net new floor area than the Project and would not include new development in Blocks 0 West, 4, 5/6, and the

⁵⁰ Project Design Feature NOI-PDF-6 applies to NoHo Square located within Block 5/6 which would not be developed under this alternative.

Off-Site Metro Parking Areas, Alternative 5 would generate less operational vibration than the Project. Therefore, Alternative 5 would result in less than significant operational vibration that would be less than the less than significant operational vibration of the Project.

i. Population and Housing

(1) Construction

As discussed in Section IV.I, Population and Housing, of this Draft EIR, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by a particular development. Many construction workers are highly specialized (e.g., crane operators, steel workers, masons), and move from job site to job site as dictated by the demand for their skills. Additionally, as the overall amount of construction under Alternative 5 would be less than the Project, fewer construction workers would be needed under Alternative 5. Therefore, population impacts related to substantial unplanned household growth in the City of Los Angeles or the SCAG Region as a result of construction worker relocation under Alternative 5 would be less than significant and less than the less than significant impacts of the Project.

(2) Operation

Alternative 5 would include the development of 751 residential units, 488,320 square feet of office uses, and 45,792 square feet of retail/restaurant uses. Alternative 5 would directly generate an estimated 1,826 residents and 2,110 employees, as compared to the Project which would generate an estimated 3,717 residents and 2,882 employees.⁵¹ Because Alternative 5 would directly generate fewer residents and employees than the Project, and because the Project's residents and employees would represent only a small fraction of the growth in population and employees projected within the SCAG region and City between 2020 and 2037 (the buildout year of the Project) and thus would be within applicable growth projections, Alternative 5, like the Project, would not directly induce substantial unplanned population growth.

Regarding indirect population growth, like the Project, Alternative 5 could potentially indirectly generate jobs in the surrounding community to serve Alternative 5 residents that could generate some small demand for housing. However, like the Project, these employment positions under Alternative 5 would include a range of permanent and part-

⁵¹ From the VMT Calculator runs for the alternatives included as Appendix V.2 of this Draft EIR.

time positions that may be filled, in part, by persons already residing in the vicinity of the workplace and who generally do not relocate their households due to such employment opportunities, and other persons who would commute to the Project Site from other communities in and outside of the City. Also similar to the Project, any indirect housing demand created by Alternative 5 would be fulfilled by a combination of the proposed new dwelling units, vacancies in the surrounding housing market, and from other new units in the vicinity of the Project Site. Additionally, similar to the Project, all circulation improvements planned for Alternative 5 are intended to improve circulation flows and safety throughout the Project Site and vicinity, and utility and other infrastructure improvements planned for Alternative 5 are intended to connect the proposed uses to the existing main infrastructure system and would not require upgrades to the main system. As such, like the Project, Alternative 5 would not indirectly induce substantial population. The impacts of Alternative 5 would be less than significant and less than the less than significant impacts of the Project.

j. Public Services

(1) Fire Protection

(a) Construction

As discussed in Section IV.J.1, Public Services—Fire Protection, of this Draft EIR, construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings, and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. However, as with the Project, construction of Alternative 5 would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, as with the Project, compliance with regulatory requirements would reduce the potential for construction activities under Alternative 5 to expose people to the risk of fire or explosion.

Like under the Project, construction activities under Alternative 5 could potentially slow LAFD emergency response times and interfere with emergency access during the construction period through temporary lane closures, etc. While Alternative 5 would include less development than the Project, and generate less overall construction activities and construction traffic, peak day construction activities, and construction traffic would be similar to the Project. Furthermore, both Alternative 5 and the Project would implement the required Construction Traffic Management Plan (similar to Project Design Feature TR-PDF-1) that would ensure continued provision of emergency access during construction. Lastly, emergency vehicles normally have a variety of options for dealing with traffic pursuant to CVC Section 21806, such as using their sirens to clear a path of travel or

driving in the lanes of opposing traffic. Therefore, like the Project, construction activities under Alternative 5 would not result in the need for new or altered government facilities (i.e. fire stations), the construction of which could cause significant environmental impacts. Impacts under Alternative 5 would be less than significant and less than the less than significant impacts of the Project owing to less development.

(b) Operation

As discussed in Section IV.J.1, Public Services—Fire Protection, of this Draft EIR, the Project Site would continue to be served by Fire Station No. 60, the “first-in” station, as well as Fire Station Nos. 86, 102, 89, and 78. Alternative 5 would result in less net new development than the Project, thus resulting in a smaller service population and lower net increase in demand for fire protection and emergency medical services than the Project. Specifically, Alternative 5 would directly generate an estimated 1,826 residents and 2,110 employees, as compared to the Project which would generate an estimated 3,717 residents and 2,882 employees.⁵² In addition, similar to the Project, Alternative 5 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Lastly, because of the reduced amount of net new development under this alternative, operational traffic and the potential for impacts to emergency response times would be reduced compared to those of the Project.

As with the Project, domestic and fire water service to the Project Site under Alternative 5 would continue to be supplied by LADWP. As discussed in Section IV.J.1, the IFFAR and SAR indicate that adequate hydrant pressure and flow is currently available at the Project Site to serve the Project. As the amount of net new development under Alternative 5 would be less under the Project, as Blocks 0 West, 4, 5/6, and the Off-Site Metro Parking Areas would not be developed under this alternative, and as this alternative would include the same land uses as the Project, existing fire flows would also be adequate to serve Alternative 5. Like the Project, Alternative 5 would also incorporate fire sprinkler suppression systems in its buildings.

Based on the above, operation of Alternative 5 would not require the addition of a new or expanded fire station in order to maintain service, and like the Project, would not result in the need for new or altered government facilities (i.e. fire stations), the construction of which could result in significant environmental impacts. Impacts under Alternative 5 would be less than significant and less than the less than significant impacts of the Project.

⁵² From the VMT Calculator runs for the alternatives included as Appendix V.2 of this Draft EIR.

(2) Police Protection

(a) Construction

Similar to the Project, construction of Alternative 5 could create a small demand for police services during the construction period. However, as with the Project, Alternative 5 would incorporate Project Design Feature similar to POL-PDF-1 into its design to implement temporary security measures, including security fencing, lighting, and locked entry to secure the Project Site during construction which would reduce demand for police protection services. Similar to the Project, the implementation of this project design feature, would reduce the potential for theft and vandalism during construction under this alternative.

Like under the Project, construction activities under Alternative 5 could potentially slow LAPD emergency response times and interfere with emergency access during the construction period through temporary lane closures, etc. While Alternative 5 would include less development than the Project, and generate less overall construction activities and construction traffic, peak day construction activities, and construction traffic would be similar to the Project. Furthermore, both Alternative 5 and the Project would implement the required Construction Traffic Management Plan (similar to Project Design Feature TR-PDF-1) that would ensure continued provision of emergency access during construction. Lastly, emergency vehicles normally have a variety of options for dealing with traffic pursuant to CVC Section 21806, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, like the Project, construction of Alternative 5 would not result in the need for new or altered government facilities (i.e., police stations), the construction of which could cause significant environmental impacts. Impacts under Alternative 5 would be less than significant and less than the less than significant impacts of the Project.

(b) Operation

As discussed in Section IV.J.2, Public Services—Police Protection, of this Draft EIR, the Project Site would continue to be served by North Hollywood Community Police Station. The same would be true under Alternative 5. Alternative 5 would result in less net new development than the Project, thus resulting in a smaller service population, a lower net decrease in the existing officer-to-resident population ratio, and lower net increase in demand for police protection service, than the Project. Specifically, Alternative 5 would directly generate an estimated 1,826 residents and 2,110 employees, as compared to the Project which would generate an estimated 3,717 residents and 2,882 employees.⁵³

⁵³ From the VMT Calculator runs for the alternatives included as Appendix V.2 of this Draft EIR.

Furthermore, similar to the Project, Alternative 5 would implement Project Design Features similar to POL-PDF-2 through POL-PDF-4 which require: a standard set of security measures (e.g., closed circuit cameras, etc.) be incorporated into the proposed buildings; sufficient lighting and design of buildings, walkways, plazas, parking, etc., to ensure visibility/security; provision to the LAPD of Project diagrams showing Project access routes, etc. to facilitate police response; and implementation of a Safety and Security Plan in accordance with Metro's Guide for Development at the North Hollywood Station. These project design features would help reduce the increase in demand for police services under both Alternative 5 and the Project. Lastly, because of the reduced amount of net new development under this alternative, operational traffic and the potential for impacts to emergency response times would be reduced compared to those of the Project. Therefore, operation of Alternative 5, like the Project, would not result in the need for new or altered government facilities (i.e., police stations), the construction of which could result in significant environmental impacts. Impacts under Alternative 5 would be less than significant and less than the less than significant impacts of the Project.

(3) Schools

(a) Construction

Similar to the Project, Alternative 5 would generate part-time and full-time jobs associated with construction 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, which require construction workers to commute to job sites that change many times in the course of a year, construction workers are not likely to relocate their households as a consequence of the construction job opportunities under either project. Therefore, like the Project, the construction employment generated by Alternative 5 would not result in a notable increase in the resident population or a corresponding demand for schools in the vicinity of the Project Site. Impacts on school facilities during construction under Alternative 5 would be less than significant and similar to the Project's less than significant impacts.

(b) Operation

Like the Project, Alternative 5 would include new development that would create a demand for LAUSD school facilities (e.g., Lankershim Elementary, Walter Reed Middle School, North Hollywood Senior High, and East Valley Senior High). However, the demand for LAUSD facilities under Alternative 5 would be less than under the Project owing to less net new floor area under this alternative, including fewer residential units (e.g., 751 under this alternative versus 1,527 under the Project). Furthermore, like the Project, the Applicant under Alternative 5 would be required to pay the applicable (e.g., LAUSD) SB 50 development fees for schools, which per Government Code Section 65995, is considered by the State to represent full mitigation of the impact of new development on schools.

Therefore, while some of the above schools currently have seating shortages which would be exacerbated by the Project, and while the same would be true for Alternative 5, the operational impacts of Alternative 5 on schools would be less than significant and less than the less than significant impacts of the Project.

(4) Parks and Recreation

(a) Construction

Construction of Alternative 5, like the Project, would result in a temporary increase in the number of construction workers at the Project Site. However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, the likelihood that construction workers would relocate their households as a consequence of working on Alternative 5 is low. Also, while there would be some potential for construction workers to spend their lunch breaks at parks and recreational facilities, any resulting increase in use would be temporary and negligible. Therefore, like the Project, the construction workers associated with Alternative 5 would not result in a notable increase in the residential population of the Project area, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site. Also, while construction activities under Alternative 5 would have the potential to result in access restrictions to City parks and recreational facilities in the vicinity, such as the North Hollywood Park, implementation of the Construction Traffic Management Plan similar to that set forth in TR-PDF-1 would ensure that access is maintained. Hence, similar to the Project, construction of Alternative 5 would not generate a demand for park or recreational facilities that would require the provision of new or physically altered government facilities, the construction of which could result in significant environmental impacts. Impacts under Alternative 5 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

Residents are considered the primary users of parks and recreation facilities. Like the Project, Alternative 5 would include the development of new residential uses that would create a demand for RAP parks and recreational facilities. However, this demand would be lower than under the Project owing to substantially less net new floor area under Alternative 5, including fewer residential units (e.g., 751 under this alternative versus 1,527 under the Project). Furthermore, like the Project, Alternative 5 would meet City open space requirements through the provision of residential balconies, pools, landscaped park spaces and outdoor seating areas so that, like the Project, it is anticipated that Alternative 5 residents would generally utilize on-site open space to meet their recreational needs. However, this alternative would not provide the central open space areas of the Project, thereby offering fewer on-site options for recreation. Additionally, like the Project, the Applicant under Alternative 5 would be required to pay Quimby fees to the City that could

be used to add or improve park facilities in the vicinity of the Project Site. Lastly, while non-residential uses can generate a small indirect demand for parks and recreational facilities, the new non-residential floor area under Alternative 5 would be less than under the Project (e.g., 534,112 square feet versus 683,774 square feet under the Project). Therefore, Alternative 5 operation would not generate a demand for park or recreational facilities that would result in the physical deterioration of an existing facility or require the provision of new or physically altered government facilities, the construction of which could cause significant environmental impacts. Impacts would be less than significant and less than the less than significant impacts of the Project.

(5) Libraries

(a) Construction

Similar to the Project, Alternative 5 would result in a temporary increase of construction workers on the Project Site. However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities. Therefore, construction employment generated by Alternative 5, which would be less than the Project, would not result in a notable increase in the resident population or a corresponding demand for library services in the vicinity of the Project Site, and would not result in the need for new or altered library facilities. As such, impacts to library facilities during construction of Alternative 5 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

As described in Section IV.J.5, Libraries, of this Draft EIR, the Project Site is located within the service area of the North Hollywood–Amelia M. Earhart Regional Library and the Valley Plaza Branch Library. Like the Project, operation of Alternative 5 would increase the demand for service from these Los Angeles Public Library (LAPL) libraries. While both of these libraries are currently below the building size recommendations set forth in the 2007 Branch Facilities Plan for their existing service populations, the service populations of both libraries are below the level at which a new Branch Library is recommended (e.g., 90,000 people). Alternative 5 would generate a residential population of an estimated 1,826⁵⁴ as compared to the Project's 3,717 residents. Thus, similar to the Project, the Valley Plaza Branch Library, which would have a service population in 2037 (e.g., the Project buildout year) of 88,555⁵⁵ person, would reach LAPL's recommended level to

⁵⁴ From the VMT Calculator runs for the alternatives included as Appendix V.2 of this Draft EIR.

⁵⁵ Written communication from Los Angeles Public Library, August 6, 2020. See Appendix Q of this Draft EIR.

provide an additional library under future with Alternative 5 conditions. However, like the Project, Alternative 5 would generate tax revenues for the City's General Fund which would help offset their increases in library demand. For these reasons, like the Project, Alternative 5 would not result in the need for new or altered library facilities, and its impacts would be less than significant and less than the less than significant impacts of the Project.

k. Transportation

Similar to the Project, Alternative 5 would generally support applicable transportation plans (Mobility Plan 2035, Plan for a Health Los Angeles, Vision Zero, etc.) and multimodal transportation options. Like the Project, Alternative 5 would include passenger drop-offs to minimize impacts to the public right of way and enhance the user experience by integrating multi-modal transportation options, and new sidewalks, street trees, pedestrian lighting, and bicycle parking in accordance with the LAMC which would favor bicycle and pedestrian over vehicular traffic. Like the Project, Alternative 5 would also include certain TDM program elements (e.g., reduced parking supply, promotions/marketing, traffic calming improvements, etc.). Like the Project, Alternative 5 would also represent urban infill development in close proximity to transit which would encourage alternative transportation use. Therefore, like the Project Alternative 5 would not conflict with a program, plan, ordinance, or policy addressing the circulation system and impacts would be less than significant, similar to the Project.

With respect to VMT, with TDM measures included, Alternative 5 would result in an average household VMT per capita of 4.9 and an average work VMT per employee of 10.1, versus the Project which would result in an average household VMT per capita of 4.5 and an average work VMT per employee of 8.7.^{56,57} These are compared to the South Valley APC thresholds of 9.4 household VMT per capita and 11.6 VMT per employee. Impacts would be less than significant, but greater than the Project.

As with the Project, Alternative 5 would not introduce hazardous geometric design features and all driveways would be designed to LADOT standards. Impacts would be less than significant and similar to the less than significant impacts of the Project.

Lastly, similar to the Project, Alternative 5 would not interfere with emergency access (for example, would implement a Construction Traffic Management Plan during

⁵⁶ From the VMT Calculator runs for the alternatives included as Appendix V.2 of this Draft EIR.

⁵⁷ Per the VMT Calculator runs for the alternatives, Alternative 5 would generate 7,885 daily vehicle trips and 68,330 VMT under post-TDM conditions, versus the Project's 12,425 daily vehicle trips and 103,775 VMT under post-TDM conditions.

construction to ensure emergency access during the construction period, would not close any existing public streets, and would provide emergency access in accordance with applicable requirements). The impacts of Alternative 5 would be less than significant and similar to the less than significant impacts of the Project.

I. Tribal Cultural Resources

Alternative 5 would include grading and earthwork on Blocks 0 East, 1, 2, 3, 7, and 8, which is a smaller footprint than the Project (e.g., would not include development on some of the Project Site Blocks and in the Off-Site Metro Parking Areas). Therefore, like the Project, Alternative 5 would have the potential to uncover previously unidentified tribal cultural resources, although this potential would be reduced due to the smaller footprint. Nevertheless, Alternative 5 would implement the same mitigation measure as the Project in the event that tribal cultural resources are uncovered during grading and excavation activities (i.e., Mitigation Measure TCR-MM-1). Therefore, like the Project, Alternative 5 would result in less than significant impacts to tribal cultural resources. The impact would be less than the Project under Alternative 5 due to the reduction in development.

m. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities for Alternative 5 would result in a temporary demand for water for dust control, cleaning of equipment, excavation/export, removal and re-compaction, and other short-term related activities. These activities would occur incrementally throughout construction of Alternative 5. The amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed (the average is identified as 1,000 to 2,000 gpd per block in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR). However, given the temporary nature of construction activities, water use during construction of Alternative 5 would be short-term and intermittent. Furthermore, Alternative 5 would include the demolition of 25,145 square feet of existing industrial/warehouse uses on the Project Site (which have an estimated demand of 1,728 gpd) which would partially offset the water demand associated with construction activities.^{58,59} As with

⁵⁸ On December 21, 2020, a fire destroyed the existing building on Block 7. Nevertheless, because it was present at the time the NOP was published on July 7, 2020, it is considered part of the existing conditions.

⁵⁹ The existing 23,966 square feet of industrial/warehouse uses on the Off-Site Metro Parking Areas would not be removed under this alternative.

the Project, water for construction activities of Alternative 5 would be conveyed using the existing water infrastructure at the Project Site, and no infrastructure upgrades would be needed to provide water during construction. As such, construction activities would not require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental impacts, under either project. Like with the Project, construction-related impacts to water supply and infrastructure under Alternative 5 would be less than significant. The impacts would be less under this alternative due to less development.

(b) Operation

Like the Project, Alternative 5 would result in an increase in long-term water demand. As discussed in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, a WSA was prepared by LADWP for the Project, as required by SB 610, which concludes that sufficient water supplies would be available to serve the Project. Because Alternative 5 would include less net new development than the Project (e.g., 1,234,296 square feet [including 751 residential units], versus 2,158,191 square feet [including 1,527 residential units] under the Project), Alternative 5 would generate less operational water demand than the Project. Furthermore, in addition to complying with applicable water conservation requirements, both Alternative 5 and the Project would incorporate the additional water conservation measures set forth in Project Design Feature WAT-PDF-1.⁶⁰ Therefore, as with the Project, LADWP would have sufficient water supplies available to serve Alternative 5 during normal, dry, and multiple dry years.

Regarding water infrastructure, as indicated in Section IV.M.1, conservative analysis for both fire suppression and domestic water flows has been completed by LADWP for the Project as summarized in the Utility Report included as Appendix G of this Draft EIR. Specifically, see Exhibits 1 and 2 of the Utility Report for the results of the IFFAR and SAR, respectively, which demonstrate that adequate water infrastructure capacity exists (e.g., the existing water mains in Lankershim Boulevard, Cumpston Street, Fair Avenue, North and South Chandler Boulevard, and Bakman Avenue, and the existing fire hydrants) to serve the Project.⁶¹ Because Alternative 5 would include less net new development than the Project and generate lower operational water demand, adequate water infrastructure capacity also exists to serve Alternative 5. Therefore, like the Project, Alternative 5 operation would not require or result in the relocation or construction of new or expanded

⁶⁰ Alternative 5 would implement only those water conservation measures identified in WAT-PDF-1 for Blocks 0 East, 1, 2, 3, 7, and 8 because only those blocks would be developed under Alternative 5.

⁶¹ KPFF Consulting Engineers, District NoHo Utility Technical Report: Water, Wastewater, and Energy, January 2022.

water facilities, the construction or relocation of which could cause significant environmental effects.

Based on the above, the operational impacts of Alternative 5 would be less than significant and less than the less than significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, existing sewer laterals would be capped, temporary facilities (e.g., portable toilet, hand wash areas, etc.) would be provided, and sewage from these facilities would be collected and hauled off-site, during construction of Alternative 5. Furthermore, Alternative 5 would remove 25,145 square feet of existing industrial/warehouse development on the Project Site that would result in a net reduction in sewage generation at the Project Site during the construction period.^{62,63} Therefore, like the Project, Alternative 5 would not cause a measurable increase in wastewater flows and/or require or result in the relocation or construction of new or expanded wastewater conveyance and treatment facilities during construction. The impact of Alternative 5 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

As discussed in Section IV.K.2, Utilities and Service Systems—Wastewater, of the Draft EIR, wastewater generated by the Project would be conveyed by LASAN's existing wastewater conveyance system to the HWRP for treatment. The same would occur under Alternative 5. Because the existing sewer lines and the HWRP have adequate capacity to serve the Project, and Alternative 5 would include less development (i.e., 1,234,296 square feet compared to 2,158,191 square feet with the Project) and generate substantially less operational wastewater than the Project, the capacities of the sewer system and HWRP serving the Project Site would also be adequate to serve Alternative 5. Furthermore, both Alternative 5 and the Project would comply with applicable City wastewater infrastructure design and wastewater reduction requirements, and both would implement Project Design Feature WAT-PDF-1 requiring water conservation measures above applicable requirements which would also reduce wastewater generation. Lastly, additional detailed sewer gauging and evaluation, as required by LAMC Section 64.14, would be conducted to

⁶² On December 21, 2020, a fire destroyed the existing building on Block 7. Nevertheless, because it was present at the time the NOP was published on July 7, 2020, it is considered part of the existing conditions.

⁶³ The existing 23,966 square feet of industrial/warehouse uses on the Off-Site Metro Parking Areas would not be removed under this alternative.

obtain final approval of sewer capacity and connection permits during the standard required permitting process under Alternative 5, like the Project. Therefore, like the Project, operation of Alternative 5 would not result in either of: (1) require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects; or (2) result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has inadequate capacity to serve the Project's projected demand in addition to the provider's existing commitments. The impacts of Alternative 5 would be less than significant and less than the less than significant impacts of the Project.

(3) Energy Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 5 would consume minor quantities of electricity (construction activities do not typically involve the consumption of natural gas). However, Alternative 5 would include the removal of 25,145 square feet of existing industrial/warehouse uses on the Project Site that would result in some reduction in on-site electricity and natural gas use during construction.^{64,65} The energy consumed during construction of Alternative 5 would be less than under the Project owing to the reduction in net new development, associated construction activities, and the duration of construction under this alternative. Furthermore, because the Project Site is an urban infill site that is already served by energy infrastructure, it is anticipated that, like the Project, Alternative 5 would not require the construction of extensive off-site energy infrastructure improvements. Lastly, like the Project, Alternative 5 would be required to coordinate energy infrastructure improvements with LADWP and SoCalGas, and to develop on-site energy infrastructure and connections to the existing off-site energy infrastructure in accordance with applicable requirements. Hence, like the Project, construction activities under Alternative 5 would not result in an increase in energy demand that exceeds available distribution infrastructure capabilities that would require the construction of new or expanded energy facilities, the construction of which could cause significant environmental effects. Therefore, impacts on energy infrastructure associated with short-term construction activities under Alternative 5 would be less than significant and less than the less than significant impacts of the Project.

⁶⁴ On December 21, 2020, a fire destroyed the existing building on Block 7. Nevertheless, because it was present at the time the NOP was published on July 7, 2020, it is considered part of the existing conditions.

⁶⁵ The existing 23,966 square feet of industrial/warehouse uses on the Off-Site Metro Parking Areas would not be removed under this alternative.

(b) Operation

As with the Project, operation of Alternative 5 would generate an increased consumption of electricity and natural gas relative to existing conditions which would be minimal when compared to total energy supplies and energy flows in the local infrastructure. Also, Alternative 5 operation would result in less electricity and natural gas demand than the Project, owing to less net new development (e.g., 1,234,672 square feet [including 751 residential units], versus 2,158,191 square feet [including 1,527 residential units] under the Project) under this alternative. Hence, Alternative 5 would result in reduced operational impacts on energy supplies when compared to the Project. Also, as discussed in the Utility Report, LADWP and SoCalGas have confirmed that the existing energy infrastructure in the area is sufficient to serve the Project. Because Alternative 5 would result in less operational energy demand than the Project, the existing energy infrastructure in the area would also be adequate to serve Alternative 5. Therefore, as with the Project, Alternative 5 operation would not result in an increase in energy demand that exceeds available distribution infrastructure capabilities that would require the construction of new or expanded energy facilities, the construction of which could cause significant environmental effects. Impacts on energy infrastructure under Alternative 5 would be less than significant and less than the less than significant impacts of the Project.

3. Comparison of Impacts

As evaluated above and shown in Table V-2 on page V-11, Alternative 5 would avoid the Project's significant unavoidable historical resources impact and significant unavoidable operational air quality (NO_x) impacts. However, similar to the Project, Alternative 5 would result in significant unavoidable impacts with respect to concurrent construction/operational air quality (NO_x), on- and off-site construction noise, and on- and off-site construction vibration (human annoyance). Like the Project, Alternative 5 would also result in significant cumulative impacts that cannot feasibly mitigated with regard to on- and off-site construction noise, and on- and off-site construction vibration (human annoyance). Alternative 5 would result in similar impacts to the Project for the balance of the environmental issues, or less impacts owing to let development under this alternative. The exception would be for transportation (VMT) where the impact would be greater than the Project but still less than significant. Overall, Alternative 5 would be less impactful than the Project.

4. Relationship of the Alternative to Project Objectives

Under Alternative 5, the same residential, office, and retail/restaurant uses as proposed by the Project would be developed, but within Blocks 0 East, 1, 2, 3, 7, and 8 only. As such, Alternative 5 would only partially meet the underlying purpose of the

Project, which is to redevelop the area around the Metro North Hollywood Station with a high-density, mixed-use development which is transit and pedestrian oriented and provides housing and jobs in the North Hollywood Valley Village Community Plan Area. Furthermore, Alternative 5 would not meet the following Project objectives because the proposed transit improvements are not included:

- Promote and enhance transit ridership by consolidating and revitalizing the Metro transit center and providing enhancements to the G (Orange) Line terminus property, including an improved terminal and security office, Metro employee break room, other support structures, new Metro portal structures on the West and East sides of Lankershim, and the retention of the historic Lankershim Depot.
- Improve Metro infrastructure in furtherance of Metro's commitment to convert to an all-electric fleet by 2040.
- Support Metro's regional planning efforts such as the Metro Vision 2028 Strategic Plan by improving pedestrian, bicycle, and transit facilities in North Hollywood.

Alternative 5 would meet the following Project objectives to a lesser extent due to the fact that Blocks 0 West, 4, and 5/6 would not be developed and the central open space areas would not be provided:

- The orderly development of residential uses, commercial uses, office uses, and transit uses, as a unified site in furtherance of Metro's commitment to creating transit-oriented communities that offer compact, bikeable, and walkable communities centered around public transit.
- Facilitate an urban in-fill development with a mix of residential, commercial, and office land uses at a density and scale to enable the Project Site to function as a regional center and support transit use.
- Provide housing in furtherance of the goals of the City's Housing Element, City's Regional Housing Needs Assessment, and which serves the surrounding area and citywide market, by providing housing in a range of unit types, affordability levels, and sizes adjacent to public transit. Promote local and regional mobility objectives and reduce VMT by providing a mix of higher density housing and commercial uses that are in close proximity to public transportation, including numerous bus lines as well as rail transit, which are supported by recreational amenities, commercial services, and enhancements to bicycle and pedestrian amenities.
- Promote fiscal benefits, economic development, and job creation by generating jobs during the construction and operation of the project and generating tax

revenue for the City and ground lease revenues to Metro to supports its mission to improve mobility in Los Angeles County.

- Provide community benefits such as new community-serving retail uses, enhanced streetscapes, and publicly accessible open space amenities for the community.

Alternative 5 would, however, meet the following objective to the same extent as the Project:

- Promote resource and energy conservation through incorporating sustainable and green building design and construction above Title 24 (CALGreen) code requirements.

V. Alternatives

F. Alternative 6: Alternative Land Use Mix Alternative

1. Description of the Alternative

As permitted by current zoning, indoor studio space would be developed on Blocks 2 and 3 under Alternative 6 instead of the residential uses proposed on these blocks under the Project. Specifically, Alternative 6 would: (1) develop the Consolidated Transit Center in Block 0 West similar to the Project; (2) develop 485,484 square feet of indoor visual media studio space in Blocks 2 and 3 in place of the residential uses proposed on these blocks under the Project; and (3) develop the balance of the blocks (e.g., Blocks 0 East, 1, and 4-8) similar to the Project. The breakdown of new net floor area under this alternative would be: 755 residential units, including 604 market rate units and 151 affordable units (20 percent of the total units); 580,373 square feet of office; 485,484 square feet of studio; and 102,150 square feet of retail/restaurant (72,750 square feet of which would be restaurant). In all 1,872,183 square feet of net new floor area (including 755 residential units) would be developed under Alternative 6, as compared to 2,158,191 square feet (including 1,527 residential units) under the Project. Alternative 6 includes the Off-Site Metro Parking Areas located at the southwest corner of N. Chandler Boulevard and Tujunga Avenue and on the north side of Chandler Boulevard between Fair Avenue and Vineland Avenue.

Regarding the configuration of the studio development in Blocks 2 and 3 under Alternative 6, it would consist of two standalone buildings, up to 235 feet and 85 feet respectively, on either side of Klump Avenue (which would be extended into the Project Site similar to the Project), housing sound stages, production offices, loading, storage, parking, support, and post-production facilities. To accommodate the studio use, no aboveground parking would be provided on Blocks 2 and 3. Because development in Blocks 0 East and West and Blocks 1 and 4-8 under Alternative 6 would be similar to that under the Project, so too would be the following on these blocks: the new buildings including the building footprints and building heights (e.g., ranging from one-story and 36 feet to 28 stories and 325 feet); vehicular, bus and pedestrian access; building design; signage; lighting; setbacks; and sustainability features. See Section II, Project Description, of this Draft EIR for descriptions of these project elements on these blocks.

Alternative 6 would provide: 167,794 square feet of open space, compared to 211,280 square feet of open space under the Project; 3,737 vehicle parking spaces within

subterranean and above ground levels, compared to 3,313 vehicle parking spaces within subterranean and above ground parking areas under the Project; and a total of 925 bicycle parking spaces with 203 short-term spaces and 722 long-term spaces compared to 1,158 bicycle parking spaces consisting of 970 long-term and 188 short-term spaces under the Project. Like the Project, up to 274 parking spaces for Metro uses would also be provided within the Project Site. This alternative would require two additional subterranean parking levels on Blocks 2 and 3 because no above ground parking would be provided with the proposed studio use.

The discretionary entitlements and approvals required under Alternative 6 would be similar to the Project, except that the General Plan Amendment and Zone Change required under the Project would not be required for Blocks 2 and 3 under this alternative as indoor studio space is permitted by the existing Commercial Manufacturing zoning for these blocks. The extent and duration of construction activities would be less under Alternative 6 as a result of approximately 13 percent less total development under this alternative.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

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

Under Alternative 6, the overall amount and duration of construction would be reduced in comparison to the Project because of the reduction in net new floor area under this alternative (e.g., 1,872,183 square feet under Alternative 6 versus 2,158,191 square feet under the Project). However, the depth of excavation would increase under this Alternative because two additional levels of subterranean parking would be required on Blocks 2 and 3. Additionally, the same Project Site Blocks and Off-Site Metro Parking Areas would be developed under this alternative such that the area of grading would be similar to that of the Project, as would the peak day of construction activities. Because the construction emissions analysis/modeling is based on the peak day of construction activities in accordance with SCAQMD and City requirements, like the Project, the

construction-related regional and localized air quality impacts of Alternative 6 with implementation of Project mitigation measures would be less than significant and similar to the less than significant air quality impacts of the Project.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 6 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities would represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less than significant construction impacts with regard to TAC emissions. Overall construction emissions generated by Alternative 6 would be similar to those of the Project because, while Alternative 6 would include less net new floor area and less overall construction activity (although roughly the same peak day construction activity), it would result in an increase in total export because of the additional depth of excavation. Thus, impacts due to construction-related TAC emissions and the corresponding individual cancer risk under Alternative 6 would be less than significant and similar to the less than significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

With regard to regional operational emissions, similar to the Project as discussed in Section IV.A, Air Quality, of this Draft EIR, operational regional air pollutant emissions under Alternative 6 would be generated by Project energy (natural gas, HVAC, etc.) and mobile (e.g., traffic) sources by the associated consumption of electricity, natural gas and petroleum-based fuels. Because of the overall reduction in square footage under Alternative 6 (e.g., 1,872,183 square feet versus 2,158,191 square feet under the Project), regional air emissions from operational natural gas use would be slightly less under this alternative. Alternative 6 would result in 11,793 post-TDM daily vehicle trips versus 12,425 under the Project, but a 0.7-percent increase in total daily VMT compared to the Project (104,484 total daily VMT compared to 103,775 total daily VMT under the Project) which would result in slightly greater regional vehicular air emissions.⁶⁶ Therefore, the significant unavoidable operational regional air emissions (NO_x) impacts of Alternative 6 would be greater than the significant unavoidable impacts of the Project.

With regard to localized operational emissions, as with the Project, Alternative 6 would not introduce any major new stationary sources of air pollution within the Project

⁶⁶ From the VMT Calculator runs for the alternatives included as Appendix V.2 of this Draft EIR.

Site. Therefore, similar to the Project, localized impacts from on-site stationary sources under Alternative 6 would also be less than significant, with these impacts less under this alternative owing to less development. Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. As with regional operational emissions, localized operational emissions would be slightly greater under Alternative 6 owing to the slightly greater post-TDM daily motor vehicle trips and associated traffic under this alternative, but still beneath the threshold of significance. Therefore, the less than significant localized impacts of Alternative 6 would be similar to the Project's less than significant localized impacts.

As with the Project, portions of the Project Site under Alternative 6 would be completed and occupied while construction of the later Project components would be ongoing. The intensity of this interim year air quality impact would remain similar under Alternative 6 since the intensity of construction and amount of completed and occupied interim-year Project components could be similar (i.e., the reduction in net new floor area reflects total at buildout). Therefore, concurrent construction and operational regional air quality impacts under Alternative 6 would be similar to the significant unavoidable impacts of the Project.

(b) Toxic Air Contaminants

As discussed in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include diesel particulate matter from delivery trucks. As Alternative 6 would include 286,008 square feet less net new floor area than the Project but would also include 485,484 square feet of studio use, this alternative would be expected to result in similar overall operational deliveries and similar associated TAC emissions as the Project. Additionally, the types of uses proposed with both the Project and Alternative 6 are not considered land uses that generate substantial TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not proposed by the Project or Alternative 6. Similar to the Project, Alternative 6 would not release substantial amounts of TACs and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Thus, as with the Project, potential TAC impacts under Alternative 6 would be less than significant, and similar to the Project's less than significant impacts.

b. Cultural Resources

(1) Historical Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, the Lankershim Depot within the Block 0 West portion of the Project Site is listed in the California Register

and is therefore considered a historic resource under CEQA. Similar to the Project, Alternative 6 would include the relocation of the Lankershim Depot within Block 0 West and excavation and grading activity associated with the expanded portal to the B (Red) Line station in close proximity to the relocated Depot. Like the Project, Alternative 6 would also include development of Block 8 which is located immediately adjacent to the Security Trust and Savings Bank located at 5301 Lankershim Boulevard which is eligible for listing in the National Register and listed in the California Register. Mitigation Measures CUL-MM-1 through CUL-MM-3 and NOI-MM-2, which would be implemented under the Project, would also be implemented under Alternative 6. As with the Project, these mitigation measures would reduce the potential construction-related vibration impacts on the Lankershim Depot and Security Trust and Savings Bank to less than significant levels. However, like for the Project, the impacts to the historical resources context of the Lankershim Depot associated with its relocation would remain significant and unavoidable under Alternative 6 because the relationship to the intersection of Lankershim and Chandler Boulevards would be lost. Given that relocation of the Lankershim Depot and development adjacent to the Bank are proposed under both Alternative 6 and the Project, the impacts under this alternative would be similar to the Project.

(2) Archaeological Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, SCCIC records indicate that three archaeological resources have been previously recorded within the Project Site consisting of two historic-era sites and one prehistoric isolate. While Alternative 6 would include 286,008 square feet less net new floor area than the Project, it would include development on the same footprint as the Project (including on the same Project Site blocks and Off-Site Metro Parking Areas). However, Alternative 6 would require two additional subterranean parking levels on Blocks 2 and 3, resulting in a greater potential to uncover subsurface archaeological resources. Nevertheless, Alternative 6 would comply with the same regulatory requirements and would implement the same mitigation measures for archaeological resources (i.e., Mitigation Measures CUL-MM-4 through CUL-MM-6) as the Project. Therefore, like the Project, impacts to archeological resources under Alternative 6 would be less than significant after mitigation, although impacts would be greater under this alternative.

c. Energy

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

Similar to the Project as discussed in Section IV.C, Energy, of this Draft EIR, construction activities associated with Alternative 6 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting,

electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be reduced compared to the Project due to the reduction in the net new development, overall amount of construction, and duration of construction under this alternative. Furthermore, as with the Project, construction activities under Alternative 6 would comply with all applicable requirements relating to energy use. Therefore, like the Project, short-term energy use during construction of Alternative 6 would not occur in a wasteful, inefficient or and manner, and would be less than significant similar to the less than significant impacts of the Project.

As with the Project, operation of Alternative 6 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels compared to existing conditions. Using inputs from the California Emissions Estimator Mode (CalEEMod), the differences in development between Alternative 6 (485,484 square feet of indoor studio use) and the Project (772 residential units) within Blocks 2 and 3 were evaluated to determine the differences in operational electricity and natural gas consumption between the two projects. As shown in Appendix V.3, CalEEMod energy factors for Alternative 6 would create a demand for an estimated 19,849,949 kilowatt hours (kWh) of electricity and 31,253,938 cubic feet (cy) of natural gas annually, versus the 18,833,056 kWh of electricity and 36,407,473 cy of natural gas under the Project. Therefore, Alternative 6 would consume more electricity and less natural gas than the Project during operation. The operational consumption of petroleum-based fuels would be slightly more under Alternative 6 owing to 0.7 percent daily VMT under this alternative in comparison to the Project.⁶⁷ Like the Project, the consumption of electricity, natural gas, and petroleum-based fuels under this alternative would not be wasteful, inefficient, or unnecessary because the development would represent urban infill within an urbanized area in close proximity to transit which would contribute to an energy efficient land use pattern, and because operation of the proposed uses would comply with applicable energy efficiency standards. Lastly, like the Project, Alternative 6 would replace older development with new development constructed to the latest energy efficiency requirements. Therefore, like the Project, long-term energy use during operation of Alternative 6 would not occur in a wasteful, inefficient or and manner, and would be less than significant similar to the less than significant impacts of the Project.

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

As indicated above, Alternative 6 would result in greater operational electricity and less natural gas consumption than the Project and slightly greater operational petroleum-based fuel consumption. However, like the Project, Alternative 6 would replace 49,111 square feet of existing uses on the Project Site with new buildings meeting updated

⁶⁷ From the VMT Calculator runs for the alternatives included as Appendix V.2 of this Draft EIR.

energy efficiency standards (e.g., Title 24 energy efficiency standards, 2019 CalGreen requirements, Los Angeles Green Building Code requirements, etc.). In addition, like the Project, the consumption of electricity, natural gas, and petroleum-based fuels under this alternative would not be wasteful, inefficient, or unnecessary because the development would represent urban infill within an urbanized area in close proximity to transit which would contribute to an energy efficient land use pattern consistent with SCAG's 2020–2045 RTP/SCS growth forecast in TPAs, and because operation of the proposed uses would comply with applicable energy efficiency standards. Therefore, like the Project, Alternative 6 would not conflict with plans for renewable energy or energy efficiency and would result in less than significant impacts similar to the less than significant impacts of the Project.

d. Geology and Soils

(1) Geologic Hazards

Under Alternative 6, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, and site stability would be similar to those under the Project discussed in Section IV.D, Geology and Soils, of this Draft EIR. This is because such impacts are a function of the Project Site's underlying geologic conditions rather than the type of land use proposed. Alternative 6 would be developed within the same location as the Project and would comply with the same regulatory requirements as the Project to ensure that the soils underlying the Project Site can adequately support the proposed development. As with the Project, Alternative 6 would be designed and constructed to conform to the current seismic design provisions of the California Building Code and the Los Angeles Building Code. Alternative 6 would also comply with the same regulatory requirements as the Project, which require the preparation of a final design-level geotechnical engineering report to identify and minimize seismic risks. Lastly, similar to the Project, Alternative 6 would not include uses such as mining operations, deep excavation into the earth, or boring of large areas creating unstable seismic conditions or stresses in the earth's crust. Therefore, as with the Project, Alternative 6 would not cause or accelerate geologic conditions which could result in substantial damage to proposed structures or infrastructure or expose people to substantial risk of injury. The impacts of Alternative 6 would be less than significant and similar to the less than significant impacts of the Project.

(2) Paleontological Resources

As discussed in Section IV.D, Geology and Soils, of this Draft EIR, a records search conducted for the Project Site indicates there are no previously encountered fossil vertebrate localities located within the Project Site. Therefore, like the Project, Alternative 6 would not impact listed paleontological resources. While Alternative 6 would result in soil disturbance and excavation activities within the same footprint as the Project (e.g., on the

same Blocks and Off-Site Metro Parking Areas), the depth of the excavations would be greater than the Project because two additional subterranean levels would be required on Blocks 2 and 3. Therefore, the potential for Alternative 6 to uncover subsurface paleontological resources would be greater than the Project. However, Alternative 6 would comply with the same regulatory requirements and implement the same standard City condition of approval for paleontological resources as the Project in the event paleontological resources are uncovered during site grading activities. Therefore, impacts to paleontological resources under Alternative 6 would be less than significant, but greater compared to the less than significant impacts of the Project due to the increased excavation depth.

e. Greenhouse Gas Emissions

(1) Construction

Under Alternative 6, the overall amount and duration of construction would be reduced in comparison to the Project because of the reduction in net new floor area under this alternative (e.g., 1,872,183 square feet under Alternative 6 versus 2,158,191 square feet under the Project). However, excavation under Alternative 6 would increase because two additional levels of subterranean parking would be required on Blocks 2 and 3. As a result, GHG emissions over the construction duration under Alternative 6 would be similar to the Project.

(2) Operation

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 from the proposed land uses and the number of daily trips generated. Alternative 6 would include an overall reduction in square footage when compared to the Project (e.g., 1,872,183 square feet versus 2,158,191 square feet under the Project) which would result in lower operational natural gas related GHG emissions, but slightly greater daily VMT (0.7-percent increase) and slightly greater electricity usage that would result in slightly greater operational mobile source and electricity-related GHG emissions.⁶⁸ However, like the Project, Alternative 6 would incorporate project design features (e.g., sustainability features, etc.) to reduce GHG emissions and would be designed to comply with the City's Green Building Ordinance, as applicable. Furthermore, as with the Project, Alternative 6 would represent infill development within an urban area in close proximity to transit, and thus would contribute to an energy efficiency land use pattern which would support the

⁶⁸ Per the VMT Calculator runs for the alternatives, Alternative 6 would generate 104,484 daily VMT compared to 103,775 daily VMT with the Project when including TDM measures.

goals of the RTP/SCS intended to reduce GHG emissions. Therefore, with compliance with the City's Green Building Ordinance and the implementation of similar project design features as the Project (e.g., GHG-PDF-1 and GHG-PDF-2), it is anticipated that Alternative 6, like the Project, would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 6 would be less than significant and similar to the less than significant impacts of the Project.

f. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, would be used during construction of Alternative 6 and, therefore, would require proper handling and management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases and, subsequently, the exposure of the public to hazardous materials. However, similar to the Project as discussed in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, all potentially hazardous materials under Alternative 6 would be used, stored, and disposed in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use.

With respect to existing conditions, like the Project, Alternative 6 would have the potential to encounter contaminated soils and soil gas during construction. Additionally, as discussed in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, the Project Site is identified in multiple databases compiled pursuant to Government Code Section 65962.5. These listings collectively constitute a REC. While total development would be less, Alternative 6 would require two additional subterranean parking levels on Blocks 2 and 3. However, any contaminated soils and/or soil gas found would be treated and disposed of in accordance with applicable regulations and HAZ-MM-1 through HAZ-MM-4 to reduce potential impacts to less than significant levels. Furthermore, while Alternative 6, like the Project, would include the removal of the same existing buildings, some of which could potentially contain ACM, LBP, and/or PCB, like the Project, the identification and removal of such materials would occur in accordance with applicable regulations which would mitigate any impacts. Overall, similar to the Project, the impacts under Alternative 6 would be less than significant with mitigation, and but impacts would be greater than the Project because of the additional subterranean parking levels.

(2) Operation

Like the Project, operation of Alternative 6 would use limited quantities of potentially hazardous materials typical of those used in transit, residential, retail/restaurant and office uses, including fuels, batteries, cleaning agents, paints, pesticides, and other materials used for landscaping. However, Alternative 6 would also include indoor studio uses which could potentially include the use of potentially hazardous substances used in visual media production, and additional quantities of paints and thinners used in set production. However, similar to the Project as discussed in Section IV.F, Hazards and Hazardous Materials, all hazardous materials on the Project Site under Alternative 6 would be acquired, handled, used, stored, and disposed of in accordance with all applicable federal, state and local requirements. Similar to the Project, Alternative 6 would also not include the use of ACMs, LBP, or PCBs. Additionally, like the Project, Alternative 6's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency access, and also like the Project, Alternative 6 would not physically interfere with an adopted emergency response plan or evacuation plan. Overall, impacts would be less than significant and slightly greater than the less than significant impacts of the Project owing to potential increased hazardous materials associated with studio uses under this alternative.

g. Land Use

Alternative 6 would develop the same blocks and Off-Site Metro Parking Areas of the Project, with the same uses, except that Blocks 2 and 3 would be developed with indoor studio instead of residential uses. Like the Project, Alternative 6 would require: a Specific Plan to regulate development within the Project Site; a General Plan Amendment to Regional Center; an amendment to the North Hollywood-Valley Village Community Plan to create a Regional Center land use designation; a Vesting Zone Change and Height District change for blocks other than 2 and 3; a Sign District; and other land use entitlements/approvals. Furthermore, as with the Project, all other permits and approvals required to facilitate development would be obtained under Alternative 6 in compliance with City requirements, and all new development would comply with applicable City development requirements, including but not limited to those related to parking, open space, lighting, landscaping, driveway, access, street frontages and building design. Lastly, like the Project, Alternative 6 would provide affordable housing, would be consistent with applicable regional and City growth projections, and would represent infill development within an urban area in close proximity to transit which would support local and regional planning efforts to reduce air emissions and VMT and provide for an efficient land use pattern. Unlike the Project, Alternative 6 would include the development of indoor studio uses in Blocks 2 and 3 instead of a mix of residential and retail uses, as proposed under the Project. Because indoor studio uses are permitted by the existing zoning at Blocks 2 and 3, the General Plan Amendment and Vesting Zone Change would not be required for

these two blocks under this alternative. Regardless, like the Project, Alternative 6 would not result in any conflicts with existing land use plans and policies that govern the Project Site, including those that were adopted for the purpose of avoiding or mitigating an environmental effect, with approval of the proposed land use entitlements. The impacts of Alternative 6 would be less than significant and less than the less than significant impacts of the Project.

h. Noise

(1) Construction

Alternative 6 would be developed within the proximity of the same existing sensitive receptors (e.g., a mix of residential, school, park, and recording studio uses located north of Cumpston Street, south of Chandler Boulevard, immediately east and west of the Project Site, etc.) as the Project. Since the construction noise analysis is based on the maximum or peak day of construction activity, the maximum daily construction noise level under Alternative 6 would be similar to the Project. Like the Project, Alternative 6 would also include the same construction haul route in proximity to existing sensitive receptors. Additionally, like the Project, Alternative 6 would implement Project Design Features similar to NOI-PDF-1 and NOI-PDF-2 to minimize construction noise and vibration at existing sensitive receptors and would implement Mitigation Measures NOI-MM-1. However, conventional mitigation measures, such as providing temporary noise barrier walls to reduce the noise associated with the upper levels of on-site construction and off-site construction truck traffic noise would not be feasible under either the Project or Alternative 6, as the barriers would not be able to be tall enough and/or would obstruct the access and visibility to the properties along the anticipated truck route. In addition, vibration impacts are based on the peak vibration levels generated by the individual on-site construction equipment and off-site truck. As such, on- and off-site construction vibration impacts (human annoyance) under Alternative 6 would also be significant and unavoidable, similar to the Project. As such, like the Project, construction activities at each of the Project Site blocks and Off-Site Metro Parking Areas under Alternative 6 would result in significant and unavoidable Project-level and cumulative on- and off-site construction noise and vibration (human annoyance) impacts at multiple off-site sensitive receptors (noise impacts at receptor locations R1 through R11, R13, and R14 and vibration impacts at receptor locations R1, R2, R5, R7, R9, R13, and R14), especially during peak construction days, which would be anticipated to include the same amount of construction activity under both Alternative 6 and the Project. As impacts are based on peak construction days, impacts would be similar to those of the Project.

Regarding construction vibration as it relates to building damage, as discussed in Section IV.B, Cultural Resources, of the Draft EIR, there is one historic structure (Lankershim Depot) located on the Project Site and six historic structures located in the

close vicinity (i.e., Security Trust and Savings Bank, Angelino Valley Mortuary, United States Post Office, Fire Station #60, Air Raid Siren #210, and El Portal Theater). Like the Project, Alternative 6 would result in less than significant construction vibration impacts at the majority of these historic structures, and impacts at the Lankershim Depot and the Security Trust and Savings Bank would be less than significant with implementation of Mitigation measure NOI-MM-2. These impacts under Alternative 6 would be similar to the Project, as impacts are based on the peak construction days.

(2) Operation

Like the Project, Alternative 6 would generate on-site operational noise and vibration associated with increased on-site activities, and off-site operational noise and vibration associated with operational traffic. Additionally, like the Project, Alternative 6 would implement Project Design Features similar to NOI-PDF-3 through NOI-PDF-6 to minimize operational noise at existing sensitive receptors. Alternative 6 would include 286,008 square feet less net new development than the Project and would include indoor studio rather than mixed uses in Blocks 2 and 3 that would likely generate less on-site outdoor activity noise (for example, less noise from kids playing and outdoor activities) and fewer daily vehicle trips. Hence, Alternative 6 would generate less on-site operational noise and vibration. Therefore, the operational noise and vibration impacts of Alternative 6 would be less than significant and less than the less than significant impacts of the Project.

i. Population and Housing

(1) Construction

As discussed in Section IV.I, Population and Housing, of this Draft EIR, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by a particular development. Many construction workers are highly specialized (e.g., crane operators, steel workers, masons), and move from job site to job site as dictated by the demand for their skills. Additionally, as the overall amount of construction under Alternative 6 would be less than the Project, owing to 286,008 square feet less net new floor area, fewer construction workers would be needed under Alternative 6. Therefore, population impacts related to substantial unplanned household growth in the City of Los Angeles or the SCAG Region as a result of construction worker relocation under Alternative 6 would be less than significant and less than the less than significant impacts of the Project.

(2) Operation

Alternative 6 would include the development of 755 residential units, 580,374 square feet of office uses, 485,484 square feet of studio uses, and 102,150 square feet of retail/restaurant uses. Alternative 6 would directly generate an estimated 1,835 residents and 4,109 employees, as compared to the Project which would generate an estimated 3,717 residents and 2,882 employees.⁶⁹ Because Alternative 6 would directly generate fewer residents than the Project, and because the Project's residents would represent only a small fraction of the growth in population projected within the SCAG region and City between 2020 and 2037 (the buildout year of the Project) and thus would be within applicable growth projections, Alternative 6, like the Project, would not directly induce substantial unplanned residential population growth. Also, while Alternative 6 would directly generate more employees than the Project, the direct employees under Alternative 6 would represent only approximately 0.4 percent of the employment growth projected in the SCAG region (e.g., 973,103 employees) and 2.4 percent of the employment growth projected in the City (e.g., 168,593 employees) between 2020 and 2037.⁷⁰ Thus, as with the Project, the direct employment growth under Alternative 6 would be within applicable growth projections.

Regarding indirect unplanned population growth, like the Project, Alternative 6 would generate jobs that could potentially attract people to the area and generate a demand for housing. However, similar to the Project, these employment positions would include a range of permanent and part-time positions that may be filled, in part, by persons already residing in the vicinity of the workplace and who generally do not relocate their households due to such employment opportunities, and other persons who would commute to the Project Site from other communities in and outside of the City. Also similar to the Project, indirect housing demand created by Alternative 6 would be fulfilled by a combination of the proposed new dwelling units, vacancies in the surrounding housing market, and from other new units in the vicinity of the Project Site. Additionally, similar to the Project, all circulation improvements planned for Alternative 6 are intended to improve circulation flows and safety throughout the Project Site and vicinity, and utility and other infrastructure improvements planned for Alternative 6 are intended to connect the proposed uses to the existing main infrastructure system and would not require upgrades to the main system. As such, like the Project, Alternative 6 would not indirectly induce substantial population growth associated with potential employment opportunities that may be generated by the proposed development.

⁶⁹ From the VMT Calculator runs for the alternatives included as Appendix V.2 of this Draft EIR.

⁷⁰ SCAG 2020–2045 RTP/SCS, Demographics and Growth Forecast, Table 14; Eyestone Environmental, 2021.

Based on the above, Alternative 6 would result in less than significant impacts that would be less than the less than significant impacts of the Project because the total on-site population would be less.

j. Public Services

(1) Fire Protection

(a) Construction

As discussed in Section IV.J.1, Public Services—Fire Protection, of this Draft EIR, construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings, and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. However, as with the Project, construction of Alternative 6 would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, as with the Project, compliance with regulatory requirements would reduce the potential for construction activities under Alternative 6 to expose people to the risk of fire or explosion related to hazardous. The impact would be less under this alternative owing to less development.

Like under the Project, construction activities under Alternative 6 could potentially slow LAFD emergency response times and interfere with emergency access during the construction period through temporary lane closures, etc. While Alternative 6 would include the construction of 286,008 square feet less net new development than the Project and generate overall less construction activities and construction traffic, peak day construction activities and construction traffic would be similar between the two projects. However: (1) any impacts on LAFD emergency response times would be temporary under both Alternative 6 and the Project; (2) like the Project, Alternative 6 would implement the required Construction Traffic Management Plan (similar to Project Design Feature TR-PDF-1) that would ensure continued provision of emergency access during construction; (3) construction traffic under Alternative 6, like the Project, would avoid peak commute hours to the degree possible; and (4) emergency vehicles normally have a variety of options for dealing with traffic pursuant to CVC Section 21806, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, like the Project, construction activities under Alternative 6 would not result in the need for new or altered government facilities (i.e., fire stations) the construction of which could cause significant environmental impacts. Impacts under Alternative 6 would be less than significant and less than the less than significant impacts of the Project.

(b) Operation

As discussed in Section IV.J.1, Public Services—Fire Protection, of this Draft EIR, the Project Site would continue to be served by Fire Station No. 60, the “first-in” station, as well as Fire Station Nos. 86, 102, 89, and 78. Alternative 6 would result in less net new development than the Project, thus resulting in a smaller total service population and lower net increase in demand for fire protection and emergency medical services than the Project. Specifically, Alternative 6 would directly generate an estimated 1,835 residents and 4,109 employees, as compared to the Project which would generate an estimated 3,717 residents and 2,882 employees.⁷¹ In addition, similar to the Project, Alternative 6 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Lastly, because of the reduced amount of net new development under this alternative, operational traffic and the potential for impacts to emergency response times would be reduced compared to those of the Project.

As with the Project, domestic and fire water service to the Project Site under Alternative 6 would continue to be supplied by LADWP. As discussed in Section IV.J.1, the IFFAR indicates that 11 nearby hydrants flowing simultaneously provide 16,500 gallons per minute of fire flow. As the amount of net new development under Alternative 6 would be less under the Project, existing fire flows would also be adequate to serve Alternative 6. Like the Project, Alternative 6 would also incorporate fire sprinkler suppression systems in its buildings.

Based on the above, operation of Alternative 6 would not require the addition of a new or expanded fire station in order to maintain service. Therefore, like the Project, operation of Alternative 6 would not result in the need for new or altered government facilities (i.e., fire stations), the construction of which could result in significant environmental impacts. Impacts under Alternative 6 would be less than significant and less than the less than significant impacts of the Project because of the lower on-site service population.

(2) Police Protection

(a) Construction

Similar to the Project, construction of Alternative 6 could create a small demand for police services during the construction period. However, as with the Project, Alternative 6

⁷¹ From the VMT Calculator runs for the alternatives included as Appendix V.2 of this Draft EIR.

would incorporate Project Design Feature similar to POL-PDF-1 to implement temporary security measures, including security fencing, lighting, and locked entry to secure the Project Site during construction which would reduce demand for police protection services. Similar to the Project, with implementation of this project design feature would reduce the potential for theft and vandalism during construction under this alternative.

Like under the Project, construction activities under Alternative 6 could potentially slow LAPD emergency response times and interfere with emergency access during the construction period through temporary lane closures, etc. While peak daily and peak-hour construction traffic would be similar under Alternative 6 to that of the Project, overall construction traffic would be less under Alternative 6 owing to less development and overall construction activities under this alternative. Furthermore, Alternative 6, like the Project, would implement the required Construction Traffic Management Plan (similar to Project Design Feature TR-PDF-1) that would ensure continued provision of emergency access during construction. Lastly, emergency vehicles normally have a variety of options for dealing with traffic pursuant to CVC Section 21806, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, like the Project, construction of Alternative 6 would not result in the need for new or altered government facilities (i.e., police stations), the construction of which could cause significant environmental impacts. Impacts under Alternative 6 would be less than significant and less than the less than significant impacts of the Project.

(b) Operation

As discussed in Section IV.J.2, Public Services—Police Protection, of this Draft EIR, the Project Site would continue to be served by North Hollywood Community Police Station. The same would be true under Alternative 6. Alternative 6 would result in less net new development than the Project, thus resulting in a smaller total service population, a lower net decrease in the existing officer-to-resident population ratio, and lower net increases in the demand for police protection service, than the Project. Specifically, Alternative 6 would directly generate an estimated 1,835 residents and 4,109 employees, as compared to the Project which would generate an estimated 3,717 residents and 2,882 employees.⁷² Furthermore, similar to the Project, Alternative 6 would implement Project Design Features similar to POL-PDF-2 through POL-PDF-4 which require: a standard set of security measures (e.g., closed circuit cameras, etc.) be incorporated into the proposed buildings; sufficient lighting and design of buildings, walkways, plazas, parking, etc., to ensure visibility/security; provision to the LAPD of Project diagrams showing Project access routes, etc. to facilitate police response; and implementation of a Safety and Security Plan in accordance with Metro's Guide for Development at the North

⁷² From the VMT Calculator runs for the alternatives included as Appendix V.2 of this Draft EIR.

Hollywood Station. These project design features would help reduce the increase in demand for police services under both Alternative 6 and the Project. Lastly, because of the reduced amount of net new development under this alternative, operational traffic and the potential for impacts to emergency response times would be reduced compared to those of the Project. Therefore, operation of Alternative 6, like the Project, would not result in the need for new or altered government facilities (i.e., police stations), the construction of which could cause significant environmental impacts. Impacts under Alternative 6 would be less than significant and less than the less than significant impacts of the Project.

(3) Schools

(a) Construction

Similar to the Project, Alternative 6 would generate part-time and full-time jobs associated with construction 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, which require construction workers to commute to job sites that change many times in the course of a year, construction workers are not likely to relocate their households as a consequence of the construction job opportunities under either project. Therefore, like the Project, the construction employment generated by Alternative 6 would not result in a notable increase in the resident population or a corresponding demand for schools in the vicinity of the Project Site. Impacts on school facilities during construction under Alternative 6 would be less than significant and similar to the Project's less than significant impacts.

(b) Operation

Like the Project, Alternative 6 would include new development that would create a demand for LAUSD school facilities (e.g., Lankershim Elementary, Walter Reed Middle School, North Hollywood Senior High, and East Valley Senior High). However, the demand for LAUSD facilities under Alternative 6 would be less than under the Project owing to 286,008 square feet less net new floor area under this alternative, including approximately 49 percent fewer residential units and associated residents and students. Furthermore, like the Project, the Applicant under Alternative 6 would be required to pay the applicable (e.g., LAUSD) SB 50 development fees for schools, which per Government Code Section 65995, is considered by the State to represent full mitigation of the impact of new development on schools. Therefore, while some of the above schools currently have seating shortages which would be exacerbated by the Project, and while the same would be true for Alternative 6, the operational impacts of Alternative 6 on schools would be less than significant and less than the less than significant impacts of the Project.

(4) Parks and Recreation

(a) Construction

Construction of Alternative 6, like the Project, would result in a temporary increase in the number of construction workers at the Project Site. However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, the likelihood that construction workers would relocate their households as a consequence of working on Alternative 6 is low. Also, while there would be some potential for construction workers to spend their lunch breaks at parks and recreational facilities, any resulting increase in use would be temporary and negligible. Therefore, like the Project, the construction workers associated with Alternative 6 would not result in a notable increase in the residential population of the Project area, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site. Also, while construction activities under Alternative 6 would have the potential to result in access restrictions to City parks and recreational facilities in the vicinity, such as the North Hollywood Park, implementation of the Construction Traffic Management Plan similar to that set forth in TR-PDF-1 would ensure that access is maintained. Hence, similar to the Project, construction of Alternative 6 would not generate a demand for park or recreational facilities that would require the provision of new or physically altered government facilities. The impacts of Alternative 6 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

Residents are considered the primary users of parks and recreation facilities. Like the Project, Alternative 6 would include the development of new residential uses that would create a demand for RAP parks and recreational facilities. However, this demand would be lower than under the Project owing to 286,008 square feet less net new floor area under Alternative 6 (including approximately 49 percent fewer residential units). Furthermore, like the Project, Alternative 6 would meet City open space requirements through the provision of residential balconies, pools, landscaped park spaces and outdoor seating areas so that, like the Project, it is anticipated that Alternative 6 residents would generally utilize on-site open space to meet their recreational needs. Additionally, like the Project, the Applicant under Alternative 6 would be required to pay Quimby fees to the City that could be used to add or improve park facilities in the vicinity of the Project Site. Lastly, while non-residential uses can generate a small indirect demand for parks and recreational facilities, and while Alternative 6 would include approximately 485,000 square feet more net new non-residential floor area than the Project (e.g., the proposed indoor studio area): (1) the likelihood that the studio workers would relocate their households as a consequence of the Project is relatively low; (2) while there would be some potential for studio workers to spend their lunch breaks at parks and recreational facilities, any resulting increase in use would be temporary and negligible; and (3) the studio workers would have access to the proposed

publicly accessible park and open space facilities. Therefore, Alternative 6 operation would not generate a demand for park or recreational facilities that would result in the physical deterioration of an existing facility or require the provision of new or physically altered government facilities, the construction of which could cause significant environmental impacts. Impacts would be less than significant and less than the less than significant impacts of the Project.

(5) Libraries

(a) Construction

Similar to the Project, Alternative 6 would result in a temporary increase of construction workers on the Project Site. However, the number of construction workers under Alternative 6 would be lower than under the Project owing to the reduced amount of net new development under this alternative. Furthermore, 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. Therefore, construction employment generated by Alternative 6, which would be less than under the Project, would not result in a notable increase in the resident population or a corresponding demand for library services in the vicinity of the Project Site, and would not result in the need for new or altered library facilities. As such, impacts to library facilities during construction of Alternative 6 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

As described in Section IV.J.5, Libraries, of this Draft EIR, the Project Site is located within the service area of the North Hollywood–Amelia M. Earhart Regional Library and the Valley Plaza Branch Library. Like the Project, operation of Alternative 6 would increase the demand for service from these LAPL libraries. While both of these libraries are currently below the building size recommendations set forth in the 2007 Branch Facilities Plan for their existing service populations, the service populations of both libraries are also below the service population level at which a new Branch Library is recommended (e.g., 90,000 people). Alternative 6 would generate a residential population of an estimated 1,835,⁷³ as compared to the Project's 3,717 residents. Thus, similar to the Project, the Valley Plaza Branch Library, which would have a service population in 2037 (e.g., the Project buildout year) of 88,555⁷⁴ person, would reach LAPL's recommended level to

⁷³ From the VMT Calculator runs for the alternatives included as Appendix V.2 of this Draft EIR.

⁷⁴ Written communication from Los Angeles Public Library, August 6, 2020. See Appendix Q of this Draft EIR.

provide an additional library under future with Alternative 6 conditions. Because residents are the primary users of libraries and LAPL service populations are based on residents only, the increase in employees under this Alternative would not affect library service numbers. However, Alternative 6, like the Project, would generate tax revenues for the City's General Fund which would help offset their increases in library demand. For these reasons, like the Project, Alternative 6 would not result in the need for new or altered library facilities, the construction of which could cause significant environmental impacts, and its impacts would be less than significant and less than the less than significant impacts of the Project.

k. Transportation

Similar to the Project, Alternative 6 would generally support applicable transportation plans (Mobility Plan 2035, Plan for a Health Los Angeles, Vision Zero, etc.) and multimodal transportation options. Like the Project, Alternative 6 would include passenger drop-offs to minimize impacts to the public right of way and enhance the user experience by integrating multi-modal transportation options, and new sidewalks, street trees, pedestrian lighting, and bicycle parking in accordance with the LAMC. Like the Project, Alternative 6 would also include certain TDM program elements (e.g., reduced parking supply, promotions/marketing, traffic calming improvements, etc.) which would support bicycle and pedestrian activity. Alternative 6, similar to the Project, would also represent urban infill development in close proximity to transit which would encourage alternative transportation use. Therefore, like the Project Alternative 6 would not conflict with a program, plan, ordinance, or policy addressing the circulation system and impacts. The impacts of Alternative 6 would be less than significant and similar to the less than significant impacts of the Project.

With respect to VMT, with TDM measures included, Alternative 6 would result in an average household VMT per capita of 4.4 and an average work VMT per employee of 8.4, versus the Project which would result in an average post-TDM household VMT per capita of 4.5 and an average work VMT per employee of 8.7.^{75,76} These are compared to the South Valley APC thresholds of 9.4 household VMT per capita and 11.6 VMT per employee. Therefore, Alternative 6 would result in less than significant VMT impacts that would be less than the less than significant impacts of the Project.

⁷⁵ From the VMT Calculator runs for the alternatives included as Appendix V.2 of this Draft EIR.

⁷⁶ Per the VMT Calculator runs for the alternatives, Alternative 6 would generate 11,793 daily vehicle trips and 104,484 VMT under post-TDM conditions, versus the Project's 12,425 daily vehicle trips and 103,775 VMT under post-TDM conditions.

As with the Project, Alternative 6 would not introduce hazardous geometric design features and all driveways would be designed to LADOT standards. Impacts would be less than significant and similar to the less than significant impacts of the Project.

Lastly, similar to the Project, Alternative 6 would not interfere with emergency access (for example, would implement a Construction Traffic Management Plan during construction to ensure emergency access during the construction period, would not close any existing public streets, and would provide emergency access in accordance with applicable requirements). The impacts of Alternative 6 would be less than significant and similar to the less than significant impacts of the Project.

I. Tribal Cultural Resources

Alternative 6 would include grading and excavation activities within the same areas as the Project (i.e., the Project Site and Off-Site Metro Parking Areas), but two additional subterranean parking levels would be provided on Blocks 2 and 3. Therefore, Alternative 6 would have a greater potential to uncover previously unidentified tribal cultural resources on the Project Site blocks and Off-Site Metro Parking Areas than the Project. Nevertheless, Alternative 6 would implement the same mitigation measure as the Project in the event that tribal cultural resources are uncovered during grading and excavation activities (i.e., Mitigation Measure TCR-MM-1). Therefore, like the Project, Alternative 6 would result in less than significant impacts to tribal cultural resources with mitigation included, but this impact would be greater because of the additional subterranean parking levels.

m. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities for Alternative 6 would result in a temporary demand for water for dust control, cleaning of equipment, excavation/export, removal and re-compaction, and other short-term related activities. These activities would occur incrementally throughout construction of Alternative 6. The amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed (the average is identified as 1,000 to 2,000 gpd per block in Section IV.M, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR). However, given the temporary nature of construction activities, water use during construction of Alternative 6 would be short-term and intermittent. Furthermore, Alternative 6, like the Project, would include the demolition of 49,111 square feet of existing on-site industrial/warehouse uses (estimated to consumed 3,374 gpd) which would partially offset

the water demand associated with construction activities. As with the Project, water for construction activities of Alternative 6 would be conveyed using the existing water infrastructure at the Project Site, and no infrastructure upgrades would be needed to provide water during construction. As such, construction activities would not require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental impacts. Construction-related impacts to water supply and infrastructure under Alternative 6 would be less than significant and less than the less than significant impacts of the Project owing to 286,008 square feet less net new floor area and associated construction activities and construction-related water use under this alternative.

(b) Operation

Like the Project, Alternative 6 would result in an increase in long-term water demand. As discussed in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, a WSA was prepared by LADWP for the Project, as required by SB 610, which concludes that sufficient water supplies would be available to serve the Project. Because Alternative 6 would include 286,008 square feet less net new floor area than the Project, including 772 fewer residential units which are among the highest water users (and higher than indoor studio uses), Alternative 6 would generate less operational water demand than the Project. Furthermore, in addition to complying with applicable water conservation requirements, Alternative 6 and the Project would incorporate the additional water conservation measures similar to those set forth in Project Design Feature WAT-PDF-1. Therefore, as with the Project, LADWP would also have sufficient water supplies available to serve Alternative 6 during normal, dry, and multiple dry years.

Regarding water infrastructure, as indicated in Section IV.M.1, conservative analysis for both fire suppression and domestic water flows has been completed by LADWP for the Project as summarized in the Utility Report included as Appendix G of this Draft EIR. Specifically, see Exhibits 1 and 2 of the Utility Report for the results of the IFFAR and SAR, respectively, which demonstrate that adequate water infrastructure capacity exists (e.g., the existing water mains in Lankershim Boulevard, Cumpston Street, Fair Avenue, North and South Chandler Boulevard, and Bakman Avenue, and the existing fire hydrants) to serve the Project.⁷⁷ Because Alternative 6 would include 286,008 less net new floor area than the Project and generate a lower operational water demand, adequate water infrastructure capacity also exists to serve Alternative 6. Therefore, like the Project, Alternative 6 operation would not require or result in the relocation or construction of new or

⁷⁷ KPFF Consulting Engineers, *District NoHo Utility Technical Report: Water, Wastewater, and Energy*, January 2022.

expanded water facilities, the construction or relocation of which could cause significant environmental effects. Based on the above, the operational impacts of Alternative 6 would be less than significant and less than the less than significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, existing sewer laterals would be capped, temporary facilities (e.g., portable toilet, hand wash areas, etc.) would be provided, and sewage from these facilities would be collected and hauled off-site, during construction of Alternative 6. Furthermore, Alternative 6, like the Project, would remove 49,111 square feet of existing industrial/warehouse development at the Project Site and Off-Site Metro Parking Areas that would result in a net reduction in sewage generation at the Project Site during the construction period. Therefore, like the Project, Alternative 6 would not cause a measurable increase in wastewater flows and/or require or result in the relocation or construction of new or expanded wastewater conveyance and treatment facilities during construction. The impact of Alternative 6 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

As discussed in Section IV.K.2, Utilities and Service Systems—Wastewater, of the Draft EIR, wastewater generated by the Project would be conveyed by LASAN's existing wastewater conveyance system to the HWRP for treatment. The same would occur under Alternative 6. Because the existing sewer lines and the HWRP have adequate capacity to serve the Project, and Alternative 6 would include less development (i.e., 286,008 less net new floor area than the Project) and because sewer generation rates are the same as water demand rates, generate substantially less operational wastewater than the Project, the capacities of the sewer system and HWRP serving the Project Site would also be adequate to serve Alternative 6.⁷⁸ Furthermore, both Alternative 6 and the Project would comply with applicable City wastewater infrastructure design and wastewater reduction requirements, and both would implement Project Design Feature WAT-PDF-1 requiring water conservation measures above applicable requirements which would also reduce wastewater generation. Lastly, additional detailed sewer gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permits during the standard required permitting process under

⁷⁸ *Alternative 6 would generate less operational wastewater than the Project because: (1) this alternative would include 286,008 square feet less net new floor area than the Project; (2) this alternative would include 772 fewer residential units than the Project; and (3) residential units are among the highest wastewater generators (higher than indoor studio uses).*

both Alternative 6 and the Project. Therefore, like the Project, operation of Alternative 6 would not result in either of: (1) require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects; or (2) result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has inadequate capacity to serve the Project's projected demand in addition to the provider's existing commitments. The impacts of Alternative 6 would be less than significant and less than the less than significant impacts of the Project.

(3) Energy Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 6 would consume minor quantities of electricity (construction activities do not typically involve the consumption of natural gas). However, Alternative 6, like the Project, would include the removal of 49,111 square feet of existing industrial/warehouse uses that would result in some reduction in on-site electricity and natural gas use during construction. The energy consumed during construction of Alternative 6 would be less than under the Project owing to the construction of 286,008 square feet less net new floor area and the associated reduction in the amount and duration of construction activities under this alternative. Furthermore, because the Project Site is an urban infill site that is already served by energy infrastructure, it is anticipated that, like the Project, Alternative 6 would not require the construction of extensive off-site energy infrastructure improvements. Lastly, like the Project, the Alternative 6 applicant would be required to coordinate energy infrastructure improvements with LADWP and SoCalGas, and to develop on-site energy infrastructure and connections to the existing off-site energy infrastructure in accordance with applicable requirements. Hence, like the Project, construction activities under Alternative 6 would not result in an increase in energy demand that exceeds available distribution infrastructure capabilities that would require the construction of new or expanded energy facilities, the construction of which could cause significant environmental effects. Therefore, impacts on energy infrastructure associated with short-term construction activities under Alternative 6 would be less than significant and less than the less than significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 6 would generate an increased consumption of electricity and natural gas compared to existing conditions. According to CalEEMod inputs included as Appendix V.3 of this Draft EIR, Alternative 6 would create a demand for an estimated 19,849,949 kWh of electricity and 31,253,938 cy of natural gas annually, versus the 18,833,056 kWh of electricity and 36,407,473 cy of natural gas under the Project. As with the Project, the electricity and natural gas required to be conveyed to the Project Site under Alternative 6 would be minimal when compared to total energy flows

in the local infrastructure and when compared to the overall electricity and natural gas supplies of LADWP and SoCalGas, respectively. Also, as discussed in the Utility Report, LADWP and SoCalGas have confirmed that the existing energy infrastructure in the area is sufficient to serve the Project. Because Alternative 6 would result in less operational natural gas demand than the Project, the existing natural gas infrastructure in the area has adequate capacity to serve Alternative 6. Also, because Alternative 6 would result in only approximately five percent greater electricity demand than the Project, it is anticipated that the existing electrical infrastructure in the area also has adequate capacity to serve this alternative. If any upgrades to electrical infrastructure would be required, any impacts would be of a relatively short duration (i.e., months) and would cease to occur when installation is complete.

Based on the above, Alternative 6, like the Project, would not result in an increase in energy demand that would exceed available distribution infrastructure capabilities that would require the construction of new or expanded energy facilities, the construction of which could cause significant environmental effects. Impacts on energy infrastructure associated with long-term operational activities under Alternative 6 would be less than significant and similar to the less than significant impacts of the Project.

3. Comparison of Impacts

As evaluated above and shown in Table V-2 on page V-11, Alternative 6 would not avoid any of the significant unavoidable impacts of the Project (e.g., concurrent construction/operational and operational regional air quality [NOx] impacts, cumulative operational regional/localized air quality [NOx] impacts, historic resources impacts, on- and off-site construction noise and vibration impacts, and cumulative construction noise and vibration impacts). Operational NOx impacts would, in fact, be greater than the Project. However, Alternative 6 would reduce some of these impacts (e.g., construction noise/vibration impacts) owing to the less development under this alternative, although these impacts would remain significant and unavoidable. Alternative 6 would result in greater impacts with respect to archeological resources, paleontological resources, hazards and hazardous materials during construction, and tribal cultural resources because of the additional subterranean parking levels, though these impacts would remain less than significant (paleontological resources) or less than significant with mitigation (archeological resources, hazards and hazardous materials, and tribal cultural resources). Alternative 6 would also result in greater impacts associated with operational hazardous materials owing to the anticipated greater use of hazardous materials associated with the interior studio use under this alternative. Alternative 6 would result in similar impacts to the Project for the balance of the environmental issues, or less impacts owing to less development under this alternative. Overall, Alternative 6 would be more impactful than the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 6 would develop the same uses on the same Project Site blocks and Off-Site Metro Parking Areas as the Project, except that Blocks 2 and 3 would be developed with interior studio instead of residential uses resulting in 286,008 square feet less development (but still over 1.8 million square feet of new mixed uses). As such, Alternative 6 would meet the underlying purpose of the Project which is to redevelop the area around the Metro North Hollywood Station with a high-density, mixed-use development which is transit and pedestrian oriented and provides housing and jobs in the North Hollywood Valley Village Community Plan Area. Furthermore, Alternative 6 would meet most of the Project objectives as set forth below:

- The orderly development of residential uses, commercial uses, office uses, and transit uses, as a unified site in furtherance of Metro's commitment to creating transit-oriented communities that offer compact, bikeable, and walkable communities centered around public transit.
- Facilitate an urban in-fill development with a mix of residential, commercial, and office land uses at a density and scale to enable the Project Site to function as a regional center and support transit use.
- Provide community benefits such as new community-serving retail uses, enhanced streetscapes, and publicly accessible open space amenities for the community.
- Promote local and regional mobility objectives and reduce VMT by providing a mix of higher density housing and commercial uses that are in close proximity to public transportation, including numerous bus lines as well as rail transit, which are supported by recreational amenities, commercial services, and enhancements to bicycle and pedestrian amenities.
- Promote fiscal benefits, economic development, and job creation by generating jobs during the construction and operation of the project and generating tax revenue for the City and ground lease revenues to Metro to support its mission to improve mobility in Los Angeles County.
- Promote resource and energy conservation through incorporating sustainable and green building design and construction above Title 24 (CALGreen) code requirements.
- Promote and enhance transit ridership by consolidating and revitalizing the Metro transit center to accommodate current local and municipal buses as well as the G (Orange) Line terminus and to provide enhancements to the North Hollywood Metro Station, including an improved terminal and security office, Metro

employee break room, other support structures, new Metro portal structures on the West and East sides of Lankershim, and the retention of the historic Lankershim Depot.

- Support Metro's regional planning efforts such as the Metro Vision 2028 Strategic Plan by improving pedestrian, bicycle, and transit facilities in North Hollywood.
- Improve Metro infrastructure in furtherance of Metro's commitment to convert to an all-electric fleet by 2040.

While Alternative 6 would meet all of the project objectives, it would meet the following objective to a lesser extent than the Project because 772 fewer residential units are provided:

- Provide housing in furtherance of the goals of the City's Housing Element, City's Regional Housing Needs Assessment, and which serves the surrounding area and citywide market, by providing housing in a range of unit types, affordability levels, and sizes adjacent to public transit

V. Alternatives

G. Environmentally Superior Alternative

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

Table V-2 on page V-11 provides a summary matrix that compares the impacts associated with the Project with the impacts of each of the analyzed alternatives. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to CEQA Guidelines Section 15126.6(c), the analysis below addresses the ability of the Alternatives to “avoid or substantially lessen one or more of the significant effects” of the Project. As indicated therein, five alternatives would be less impactful than the Project and one, Alternative 6, would be more impactful.

Alternative 1, the No Project/No Build Alternative, would be the Environmentally Superior Alternative. This alternative would avoid all of the Project’s significant environmental impacts associated with historic resources, NO_x emissions during operation, on-site construction noise, off-site construction noise, on-site construction vibration (pursuant to the threshold for human annoyance), and off-site construction vibration (pursuant to the threshold for human annoyance). Alternative 1 would also avoid the Project’s significant cumulative impacts that cannot be feasibly mitigated with regard to NO_x emissions during operation, on-site construction noise, off-site construction noise, on-site construction vibration (pursuant to the threshold for human annoyance), and off-site construction vibration (pursuant to the threshold for human annoyance), as well as concurrent construction and operational NO_x emissions. Alternative 1 would not result in greater impacts for any environmental issue.

Alternative 2, the No Project/Development Alternative, would avoid the Project’s significant unavoidable concurrent construction/operational and operational air quality (NO_x) impacts. However, similar to the Project, Alternative 2 would result in significant unavoidable impacts with respect to historic resources, on- and off-site construction noise, and on- and off-site construction vibration (human annoyance). Like the Project, Alternative 2 would also result in significant cumulative impacts that cannot feasibly mitigated with regard to on- and off-site construction noise, and on- and off-site

construction vibration (human annoyance). Alternative 2 would not result in greater impacts for any environmental issue.

However, neither Alternative 1 nor Alternative 2 would meet the underlying purpose of the Project to redevelop the area around the Metro North Hollywood Station with a high-density, mixed-use development, which is transit and pedestrian oriented and provides housing and jobs in the North Hollywood Valley Village Community Plan Area. Alternative 1 would also not meet any of the Project's other objectives. Furthermore, except for the three Project objectives associated with the Metro's Consolidated Transit Center, Alternative 2 would not meet the Project objectives (for example, Alternative 2 would not: facilitate mixed-use infill development that would enable the Project Site to function as a regional center and support transit use; provide new housing and employment opportunities in the immediate vicinity of an abundance of public transit opportunities; provide needed housing at a range of unit types and affordability levels near transit; provide community benefits such as new community-serving retail; or promote local and regional mobility objectives and reducing VMT by intensifying urban uses in close proximity to transit).

As stated above, the CEQA Guidelines require the identification of an Environmentally Superior Alternative other than a No Project Alternative. As such, in accordance with the CEQA Guidelines, a comparative evaluation of the remaining alternatives indicates that Alternative 3, Development in Accordance with Existing Zoning Alternative, would be the Environmental Superior Alternative. Under this Alternative, the Project Site would be developed in accordance with the existing zoning of the Project Site. Specifically, Alternative 3 would develop the previously approved Consolidated Transit Center on Block 0 West (including relocating the Lankershim Depot), and would develop 358 residential units in Block 8, with the balance of the Project Site blocks and the Off-Site Metro Parking Areas retained with their existing uses.

Alternative 3 would avoid the Project's significant unavoidable operational impacts and concurrent construction and operational air quality (NOx) impacts. However, similar to the Project, Alternative 3 would result in significant unavoidable impacts with respect to historic resources, on- and off-site construction noise, and on- and off-site construction vibration (human annoyance). Like the Project, Alternative 3 would also result in significant cumulative impacts that cannot feasibly be mitigated with regard to on- and off-site construction noise, and on- and off-site construction vibration (human annoyance). These and the balance of the impacts would be less under Alternative 3 owing to less development both in terms of square footage and development area. Lastly, for no environmental issues would Alternative 3 result in greater impacts than the Project.

However, Alternative 3 would not meet the underlying purpose of the Project which is to redevelop the area around the Metro North Hollywood Station with a high-density,

mixed-use development which is transit and pedestrian oriented and provides housing and jobs in the North Hollywood Valley Village Community Plan Area.

With the development of residential and retail uses in Block 8, Alternative 3 would partially meet the following Project objectives (not fully meet since the majority of the Project Site blocks and Off-Site Metro Parking Areas would not be redeveloped under this alternative, no public open space plazas would be provided, and the number of new residential units would be less than under the Project) or meet them to a lesser extent:

- The orderly development of residential uses, commercial uses, office uses, and transit uses, as a unified site in furtherance of Metro guidelines and goals of a mixed-use transit village at the North Hollywood station.
- Facilitate an urban in-fill development with a mix of residential, commercial, and office land uses at a density and scale to enable the Project Site to function as a regional center and support transit use.
- Provide housing in furtherance of the goals of the City's Housing Element, City's Regional Housing Needs Assessment, and which serves the surrounding area and citywide market, by providing housing in a range of unit types, affordability levels, and sizes adjacent to public transit.
- Provide community benefits such as new community-serving retail uses, enhanced streetscapes, and publicly accessible open space amenities for the community.
- Promote fiscal benefits, economic development, and job creation by generating jobs during the construction and operation of the project and generating tax revenue for the City and ground lease revenues to Metro to support its mission to improve mobility in Los Angeles County.
- Promote local and regional mobility objectives and reduce VMT by providing a mix of higher density housing and commercial uses that are in close proximity to public transportation, including numerous bus lines as well as rail transit, which are supported by recreational amenities, commercial services, and enhancements to bicycle and pedestrian amenities.
- Promote resource and energy conservation through incorporating sustainable and green building design and construction above code requirements.

With the development of the Consolidated Transit Center, Alternative 3 would meet the following Project objectives:

- Promote and enhance transit ridership by consolidating and revitalizing the Metro transit center to accommodate current local and municipal buses as well as the

G (Orange) Line terminus and to provide enhancements to the North Hollywood Metro Station, including an improved terminal and security office, Metro employee break room, other support structures, new Metro portal structures on the West and East sides of Lankershim, and the retention of the historic Lankershim Depot.

- Support Metro's regional planning efforts such as the Metro Vision 2028 Strategic Plan by improving pedestrian, bicycle, and transit facilities in North Hollywood.
- Improve Metro infrastructure in furtherance of Metro's commitment to convert to an all-electric fleet by 2040.