V. Alternatives

V. Alternatives

1. Introduction

The identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process under CEQA. Specifically, Public Resources Code (PRC) Section 21001 states, in part, that the environmental review process is intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives which will avoid or substantially lessen such significant effects. In addition, 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 decision making and public participation. An EIR is not required to consider alternatives which are infeasible.*

The CEQA Guidelines indicate that the selection of project alternatives be based primarily on the ability to avoid or substantially lessen significant impacts relative to the proposed project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. The CEQA Guidelines further direct that the range of alternatives be guided by a "rule of reason," 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 considered.

2. Overview of Selected Alternatives

As indicated above, the intent of the alternatives is to avoid or substantially lessen any of the significant effects of a project while still feasibly obtaining most of the basic project objectives. Based on the analyses provided in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with respect to on- and off-site noise sources during construction; on- and off-site vibration during construction (pursuant to the significance threshold for human annoyance); and on-site vibration during construction (pursuant to the significance threshold for building damage). Cumulative impacts associated with off-site noise during construction and off-site vibration during construction (pursuant to the significance threshold for human annoyance) would also be significant and unavoidable. Additionally, the Project would result in significant impacts that would be reduced to a less-than-significant level with implementation of mitigation measures with regard to the following: construction-related regional emissions, construction-related localized emissions, and freeway safety.

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

- **Alternative 1, No Project Alternative:** Alternative 1 assumes that the Project would not be approved, no new permanent development would occur within the Project Site, and the existing environment would be maintained. Thus, the physical conditions of the Project Site would generally remain as they are today. Specifically, the existing buildings, as well as the surface parking areas, would remain on the Project Site, and no new construction would occur.

- **Alternative 2, Existing Zoning Compliant Alternative:** Alternative 2 would develop the Project Site in accordance with the existing zoning of the Project Site. Alternative 2 would include the development of a 7-story (144 feet) commercial building with a floor area of 131,238 square feet consisting of 117,052 square feet of office space and 14,186 square feet of ground floor restaurant space,[1] resulting in a 2:1 FAR. Additionally, as included under the Project, Alternative 2 also includes a LADWP equipment area that would include electrical distribution equipment and emergency generators within the De Longpre Lot.

- **Alternative 3, Reduced Excavation Alternative:** Alternative 3 would eliminate the subterranean parking proposed by the Project, and all parking for the commercial component would be provided above grade, with the building increasing in height from the 15 stories (275 feet) proposed under the Project to 17 stories (311 feet). The remaining Project components, and the FAR, would be the same as the Project. Additionally, as included under the Project, Alternative 3 also includes a LADWP equipment area that would include electrical distribution equipment and emergency generators within the De Longpre Lot.

- **Alternative 4, Development in Accordance with Community Plan Update Alternative:** Alternative 4 would develop the Project Site in accordance with the parameters set forth by the Regional Center (RC1B) land use designation of the Project Site proposed by the Hollywood Community Plan Update, which permits multi-family residential, commercial (retail, restaurants), and office uses at a 4:1 FAR. Accordingly, this alternative would include development of a 297,412-square-foot commercial building, consisting of 283,226 square feet of office space and 14,186 square feet of ground floor restaurant space, resulting in a 4:1 FAR. The building would consist of 11 stories above grade with a height of 216 feet. Additionally, as included under the Project, Alternative 4 also includes a LADWP equipment area that would include electrical distribution equipment and emergency generators within the De Longpre Lot.

- **Alternative 5, Residential Alternative:** Alternative 5 would include the development of a 445,218-square-foot mixed-use project, consisting of 500 multi-family residential units and 14,186 square feet of ground floor restaurant space. This alternative would be developed pursuant to the City's Density Bonus Ordinance (Ordinance No. 179,681), which allows qualifying projects that provide the requisite affordable housing to request an increase in residential density and certain incentives and waiver or modifications of development standards. The proposed uses would be provided in a 28-story building (355 feet), resulting in a 6:1 FAR. Additionally, as included under the Project, Alternative 5 also includes a

[1] *As discussed in Section II, Project Description, of this Draft EIR, for conservative environmental analysis purposes, this Draft EIR assumes the outdoor eating area adjacent to the ground floor restaurant space would count as floor area, resulting in a floor area of 14,186 square feet of restaurant space. This assumption is also made for the alternatives listed here.*

LADWP equipment area that would include electrical distribution equipment and emergency generators within the De Longpre Lot.

Table V-1 on page V-5 provides a comparison of the Project and the five alternatives being considered. Each of these alternatives is described in the sections that follow. In addition, CEQA Guidelines Section 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible, and such rejected alternatives are described below.

Table V-1
Summary Comparison of Development Proposed under Alternatives to the Project[a]

	Project	Alternative 1: No Project Alternative	Alternative 2: Existing Zoning Compliant Alternative	Alternative 3: Reduced Excavation Alternative	Alternative 4: Development in Accordance with Community Plan Alternative	Alternative 5: Residential Alternative
Office	431,032 sf	—	117,052 sf	431,032 sf	283,226 sf	—
Restaurant	14,186 sf[b]	—	14,186 sf[b]	14,186 sf[b]	14,186 sf[b]	14,186 sf[b]
Residential	—	—	—	—	—	500 du
Utility	3,550 sf[c]	—	3,550 sf[c]	3,550 sf[c]	3,550 sf[c]	3,550 sf[c]
Existing Office and Retail	(26,261) sf	—[d]	(26,261) sf	(26,261) sf	(26,261) sf	(26,261) sf
Total Gross Square Footage	445,218 sf	—[d]	131,238 sf	445,218 sf	297,412 sf	445,218 sf
Total Net Square Footage	**418,957 sf**	—	**104,977 sf**	**418,957 sf**	**271,151 sf**	**418,957 sf**
Total FAR	6:1	—	2:1	6:1	4:1	6:1
Total Parking	1,291 sp	—	329 sp	1,291 sp	903 sp	654 sp
Subterranean Parking Levels	3	—	1	0	2	2
Maximum Height	275 ft	—	144 ft	311 ft	216 ft	355 ft
Maximum Depth of Excavation	52 ft	—	27 ft	22 ft	38 ft	38 ft
Soil Export	93,000 cy	—	40,645 cy	7,734 cy	66,030 cy	68,397 cy

cy = cubic yards *du = dwelling units*
FAR = floor area ratio *ft = feet*
sp = spaces *sf = square feet*

[a] *The office, restaurant, total gross, and total net square footage in this table are in floor area as defined by LAMC Section 12.03.*

[b] *Includes 12,386 square feet of ground floor restaurant space plus 1,800 square feet of outdoor covered dining area, which is counted as floor area to provide a conservative analysis.*

[c] *The LADWP equipment area proposed under the Project and Alternatives 2 through 5 on the De Longpre Lot does not constitute floor area as defined by LAMC Section 12.03 and is not included in the total gross and total net square footage estimates.*

[d] *The Project Site contains 26,261 square feet of existing office and retail uses. Because this square footage would neither be developed nor removed under the No Project Alternative, this square footage is not identified under the No Project Alternative in this table.*

Source: Gensler, Eyestone Environmental, 2022.

3. Alternatives Considered and Rejected as Infeasible

As set forth in CEQA Guidelines Section 15126.6(c), the range of potential alternatives to a proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant impacts. As further set forth in CEQA Guidelines Section 15126.6(c), the EIR should briefly describe the rationale for selecting the alternatives to be discussed as well as 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. Based on the CEQA Guidelines, the alternatives that have been considered and rejected include the following:

- **Alternatives to Eliminate Significant Noise and Vibration Impacts During Construction:** As discussed in Section IV.F, Noise, of this Draft EIR, the Project would result in short-term significant and unavoidable construction-related noise and vibration (building damage and human annoyance) impacts. Specifically, Project construction activities would result in significant unavoidable construction-related noise impacts related to on-site and off-site construction activities, significant unavoidable vibration (human annoyance) impacts related to both on-site construction activities and off-site construction traffic, and on-site vibration during construction (pursuant to the significance threshold for building damage). The following potential alternatives were considered to avoid or substantially lessen these impacts:

  - Potential Alternative (a)—Extended Construction Duration: This potential alternative considers extending the construction period, thus reducing the amount of daily construction activity that would occur under the Project. This alternative was rejected as follows:

    - First, it is noted that construction noise levels are dependent on the type of and number of construction equipment (on-site equipment or off-site construction trucks). There would be no change in the type of construction equipment used, regardless of the duration of construction. Therefore, under an extended construction duration, the number of on-site construction equipment and off-site construction trips would be reduced on a daily basis. Typically, a reduction of 50 percent in the number of construction equipment pieces or construction traffic (haul and delivery trucks trips) would reduce the construction-related noise levels by

approximately 3 dBA (just perceptible).[2] For example, a 50-percent reduction in construction trucks during site grading/excavation from 50 truck trips to 25 truck trips per hour would reduce the truck noise along Wilcox Avenue from 66.2 dBA L_{eq} (refer to Table IV.F-11 in Section IV.F, Noise) to 63.8 dBA L_{eq}, along Cahuenga Boulevard from 67.3 dBA L_{eq} to 63.8 dBA L_{eq}, and along Sunset Boulevard from 66.6 dBA L_{eq} to 63.6 dBA L_{eq}, respectively (an approximately 3-dBA reduction as compared to the Project). However, when accounting for the ambient noise level (i.e., the Project plus ambient noise levels due to off-site construction trucks) the actual noise levels would only be reduced by 1.2 dBA, 1.0 dBA, and 0.5 dBA along Wilcox Avenue, Cahuenga Boulevard, and Sunset Boulevard, respectively.

In addition, a 50-percent reduction in the construction trucks during the mat foundation phase, from 100 to 50 truck trips per hour, would reduce the truck noise along Wilcox Avenue, Cahuenga Boulevard, and Sunset Boulevard from 69.2 dBA Leq, 70.3 dBA Leq, and 69.6 dBA Leq (based on Table IV.F-11 in Section IV.F, Noise, of this Draft EIR) to 66.6 dBA Leq (an approximately 3-dBA reduction as compared to the Project). However, when accounting for the ambient noise level (i.e., the Project plus ambient noise levels due to off-site construction trucks) the actual noise levels would only be reduced by 1.8 dBA, 1.6 dBA, and 1.0 dBA along Wilcox Avenue, Cahuenga Boulevard, and Sunset Boulevard, respectively. Furthermore, when accounting for the nighttime ambient noise levels, the Project plus ambient noise levels due to off-site construction trucks during the mat foundation phase would be reduced by 2.6 dBA, 2.4 dBA, and 1.8 dBA along Wilcox Avenue, Cahuenga Boulevard, and Sunset Boulevard, respectively. The off-site construction noise with a 50-percent reduction would still exceed the significance threshold by 2.9 dBA and 1.7 dBA along Wilcox Avenue and Cahuenga Boulevard, respectively. Thus, a 50-percent reduction in the truck trips would result in a minimal reduction in noise (i.e., less than the 3-dBA perceptible level) and the off-site noise impacts along Wilcox Avenue and Cahuenga Boulevard would remain significant.

As described in Section IV.F, Noise, subsection 2.a.(3), Effects of Noise on People, of this Draft EIR, a change in noise levels of 5 dBA is required in order to be readily perceptible. Therefore, the estimated noise reduction provided with the 50-percent reduction in construction equipment (1.0 to 2.6 dBA) is not sufficient to avoid or substantially lessen the significant and unavoidable impact. In order to reduce the off-site

[2] *The reference to 3 dBA here and in other parts of this discussion relates to: (1) the minimum reduction required to be audible to the human ear; and (2) the fact that a lowering of the number of construction pieces and volume of construction traffic by 50 percent would result in a barely audible reduction in construction noise.*

construction noise impacts along Wilcox Avenue, the concrete truck trips would need to be reduced to a maximum of 11 truck trips per hour, which represents a 78-percent reduction (from 100 truck trips to 11 truck trips per hour). However, a 78-percent reduction in the concrete trucks (during the mat foundation phase) would not be feasible for the construction of the Project.

- With respect to on-site construction, a reduction in the number of pieces of construction equipment would also reduce noise levels compared to the Project (depending on the amount of reduction) but would still exceed the significance threshold. In addition, the reduction in noise levels would also be less than 3.0 dBA, which is the level where noise is barely perceptible, and would not be sufficient to substantially lessen the significant and unavoidable impact. Specifically, reducing the on-site construction equipment during the site demolition phase from nine pieces to five pieces of equipment (44-percent reduction) would reduce the construction noise at the off-site receptors by 0.8 dBA L_{eq} at receptor location R6, 2.2 dBA L_{eq} at receptor location R2, 2.4 dBA L_{eq} at receptor location R5, and 2.5 dBA L_{eq} at receptor locations R1, R3 and R4 (as compared to the Project). The estimated construction noise levels with a 44-percent reduction in the number of pieces of construction equipment would still exceed the significance threshold by up to 9.8 dBA L_{eq} at receptor location R1 and 29.1 dBA L_{eq} at receptor location R6 during the site demolition phase. Therefore, on-site 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, as previously stated, the reduction would be less than 3.0 dBA, which is the level where noise is barely perceptible and, therefore, would not be sufficient to avoid or substantially lessen the significant and unavoidable impact. Furthermore, due to the proximity of the off-site noise sensitive receptors and the building heights, it would not be practical to reduce the construction noise levels to below the significance threshold as a single piece of equipment would result in noise levels above the significance threshold. For example, a single piece of construction equipment would generate a noise level up to 93 dBA L_{eq} at receptor location R6 (located adjacent to the Project Site). Even with the mitigation measure (15 dBA noise reduction), the construction noise level at receptor location R6 (78 dBA L_{eq}) would still exceed the significance criteria by 14 dBA. As such, the on-site and off-site construction noise impacts under this approach would not be substantially less than the Project and would remain significant. In addition, the estimated noise reduction provided with the 44-percent reduction (0.4 to 2.5 dBA) is not considered a substantial reduction as this reduction would be less than 3.0 dBA, which is the level where noise is barely perceptible.

- The on-site construction vibration impacts 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 this approach would utilize similar construction equipment (e.g., drill rig and large bulldozer). In order to reduce the on-site construction vibration impacts, the construction equipment (e.g., large bulldozer and caisson drilling) shall be limited to a minimum of 140 feet from receptor location R6 and the TV Studio (inside the CNN building). However, it would not be feasible to provide the 140 feet setback from the off-site vibration-sensitive receptors due the size of the Project Site (approximately 155 feet between the east and west property lines). In addition, off-site construction vibration impacts (human annoyance), due to heavy trucks traveling by sensitive receptors, would also continue to be significant similar to the Project as there are no feasible mitigation measures to reduce the off-site construction vibration impacts.

- Potential Alternative (b)—Reduced Development: This alternative considers reducing 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 lessened. Alternatives 2 and 4 evaluated in detail below also consider a reduced development. As concluded therein, due to the close proximity of the sensitive receptors (i.e., directly across from the Project Site) and a constrained Project Site that does not have the space to create a meaningful buffer zone, it would not be practical to mitigate the on-site construction noise impacts of the Project, although the duration these impacts would be experienced would be reduced. In order to reduce the on-site construction noise impacts to less than significant, a minimum buffer zone of 100 feet would be required between receptor location R6 and the construction area. However, due to the site constraints, i.e., limited area of the De Longpre Lot and adjacency to receptor location R6, it would not be possible to provide the required buffer zone. In addition, the on-site construction vibration impacts would be significant since the vibration impact analysis is based on the peak vibration level generated by individual construction equipment pieces that would still be required near the perimeter of the Project Site. It would not be feasible to provide the required 140 foot buffer zone between the off-site vibration-sensitive receptors and the Project construction area due the size of the Project Site (approximately 155 feet between the east and west property lines), to reduce the on-site construction vibration impacts. Although off-site construction vibration impacts (human annoyance) would be shorter in duration, due to heavy trucks traveling by sensitive receptors, impacts would be significant similar to the Project.

Based on the above, neither one of the above approaches would avoid or substantially lessen the significant and unavoidable construction-related on-site and off-site noise (during nighttime concrete mat pour) and vibration impacts of the Project. This is because the significant and unavoidable construction-related noise and vibration impacts of the Project are heavily influenced by the close proximity of the Project Site and the proposed haul route to existing noise- and

vibration-sensitive uses rather than the amount or duration of Project construction activities. Therefore, an alternative that includes one or both of these approaches would not avoid or substantially lessen the significant noise and vibration impacts of the Project, and, thus, no further consideration of these alternatives in the EIR is required.

- **Alternative Project Site:** The results of a search to find an alternative site on which the Project could be built determined that suitable similar locations are not available to meet the underlying purpose of the Project to revitalize the Project Site by developing an integrated high-density commercial development that would generate new economic opportunities for the Hollywood area and support the growing media, entertainment, and technology industries located within the Hollywood community. The availability of an alternative site is also restricted by the Project's objectives, which include, but are not limited to: (1) locating employment opportunities and residential opportunities near one another along a major transit corridor within a high activity area to promote sustainability and reduce vehicle miles traveled, with associated reductions in air quality and greenhouse gas emissions; and (2) maximizing the value of the underutilized site through replacement of existing low intensity commercial uses with a modern structure and a mix of uses consistent with anticipated market demands. Therefore, an alternative site is not considered feasible as it is not expected that the Applicant can reasonably acquire, control, or have access to a suitable alternative site that would provide for the uses and square footage proposed by the Project. Furthermore, if a suitable alternative site could be found, it is anticipated that the significant and unavoidable impacts with respect to on- and off-site noise and vibration sources during construction would still occur. Specifically, (1) given that an alternative site would also likely be an infill site with nearby noise-sensitive receptors, and since noise levels during peak day construction activities are used for measuring impacts, noise levels from on- and off-site construction activities would be similar to those of the Project; and (2) since construction vibration impacts are evaluated based on the peak vibration levels generated by each type of construction equipment, vibration levels associated with on- and off-site construction activities would be similar to the Project. Thus, in accordance with CEQA Guidelines Section 15126.6(f), this alternative was rejected from further consideration.

4. Alternatives Analysis Format

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the Project. 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.[3] 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.

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

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

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

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

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

A summary matrix that compares the impacts associated with the Project with the impacts of each of the analyzed alternatives is provided in Table V-2 on page V-12.

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

Table V-2
Comparison of Impacts Associated with the Alternatives

Impact Area	Project	Alternative 1: No Project Alternative	Alternative 2: Existing Zoning Compliant Alternative	Alternative 3: Reduced Excavation Alternative	Alternative 4: Development in Accordance with Community Plan Alternative	Alternative 5: Residential Alternative
A. AIR QUALITY[a]						
Regional Emissions						
Construction	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)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Localized Emissions						
Construction	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)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Toxic Air Contaminants						
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
B. CULTURAL RESOURCES						
Historical Resources	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
C. ENERGY						
Wasteful, inefficient, or unnecessary consumption of Energy Resources						
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Conflict with Plans for Renewable Energy or Energy Efficiency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
D. GREENHOUSE GAS EMISSIONS						
Greenhouse Gas Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
E. LAND USE AND PLANNING						
Conflict with Land Use Plans	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
F. NOISE[b]						
Construction						
On-Site Noise	Significant and Unavoidable	Less (No Impact)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)
Off-Site Noise	Significant and Unavoidable	Less (No Impact)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)
On-Site Vibration (Building Damage)	Significant and Unavoidable	Less (No Impact)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)
On-Site Vibration (Human Annoyance)	Significant and Unavoidable	Less (No Impact)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)

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

Impact Area	Project	Alternative 1: No Project Alternative	Alternative 2: Existing Zoning Compliant Alternative	Alternative 3: Reduced Excavation Alternative	Alternative 4: Development in Accordance with Community Plan Alternative	Alternative 5: Residential Alternative
Off-Site Vibration (Building Damage)	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Off-Site Vibration (Human Annoyance)	Significant and Unavoidable	Less (No Impact)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)
Operation						
On-Site Noise	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)
Off-Site Noise	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Vibration	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
G. PUBLIC SERVICES						
Fire Protection						
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Police Protection						
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)
Libraries						
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
H. TRANSPORTATION[c]						
Conflict with Plans	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Vehicle Miles Traveled	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Similar (Less Than Significant)	Greater (Less Than Significant)	N/A (Less Than Significant)
Freeway Safety Analysis	Less Than Significant w/Mitigation	Less (No Impact)	Less (Less Than Significant w/Mitigation)	Similar (Less Than Significant w/Mitigation)	Less (Less Than Significant w/Mitigation)	Less (Less Than Significant w/Mitigation)
I. TRIBAL CULTURAL RESOURCES						
Tribal Cultural Resources	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
J. UTILITIES AND SERVICE SYSTEMS						
Water Supply and Infrastructure						
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)
Wastewater						
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)

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

Impact Area	Project	Alternative 1: No Project Alternative	Alternative 2: Existing Zoning Compliant Alternative	Alternative 3: Reduced Excavation Alternative	Alternative 4: Development in Accordance with Community Plan Alternative	Alternative 5: Residential Alternative
Energy Infrastructure						
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)

[a] *Cumulative regional emission impacts would be significant before mitigation and less than significant after mitigation.*
[b] *Cumulative off-site noise impacts and cumulative off-site vibration impacts with respect to human annoyance during Project construction would be significant and unavoidable.*
Source: Eyestone Environmental, 2021.

V. Alternatives

A. Alternative 1: No Project

1. Description of the Alternative

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

2. Environmental Impacts

a. Air Quality

(1) Regional Emissions

(a) Construction

Alternative 1 would not alter the existing on-site uses or require any construction activities on the Project Site. Therefore, Alternative 1 would not result in any construction emissions associated with construction worker and construction truck traffic, fugitive dust from demolition and excavation, or the use of heavy-duty construction equipment. Therefore, construction-related regional air quality impacts would not occur. Thus, impacts related to regional air quality emissions during construction would be less under Alternative 1 when compared to the less-than-significant impacts with mitigation of the Project.

(b) Operation

Alternative 1 would not result in new development or increased operations that could generate additional operational emissions related to vehicular traffic or the consumption of electricity and natural gas beyond what is currently generated by the existing uses. Therefore, no operational air quality impacts associated with regional emissions would

occur under Alternative 1. Thus, impacts related to regional air quality emissions during operation would be less under Alternative 1 when compared to the less-than-significant impacts of the Project.

(2) Localized Emissions

(a) Construction

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

(b) Operation

Alternative 1 would not result in new development or increased operations that could generate additional operational emissions related to vehicular traffic or the consumption of electricity and natural gas beyond what is currently generated by the existing uses. Therefore, no operational air quality impacts associated with localized emissions would occur under Alternative 1, and such impacts would be less when compared to the less-than-significant impacts of the Project.

(3) Toxic Air Contaminants

(a) Construction

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

(b) Operation

Alternative 1 would not result in new development or increase the intensity of the existing uses on the Project Site. As such, no increase in mobile source emissions and their associated TACs would be generated under Alternative 1, and no impact would occur. Therefore, the operational TACs impacts of Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

b. Cultural Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, there are no historical resources on the Project Site. In addition, no construction activities that could potentially directly affect nearby historical resources would occur under Alternative 1, and Alternative 1 would not introduce new buildings or otherwise change the physical environment that could potentially indirectly affect the historical context of nearby historical resources. Therefore, Alternative 1 would result in no impacts to historical resources, which would be less when compared to the less-than-significant impacts of the Project.

c. Greenhouse Gas Emissions

Alternative 1 would not develop new uses on the Project Site. As such, no new greenhouse gas (GHG) emissions beyond what is currently generated by the existing uses on the Project Site would be generated under Alternative 1. Therefore, no impacts related to GHG emissions would occur, and the GHG impacts of Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

d. Energy

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

(a) Construction

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

(b) Operation

The No Project Alternative would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the long-term energy demand on the Project Site and would have no potential to result in an increase in the wasteful, inefficient, or unnecessary consumption of energy resources. It is noted, however, that the Project would replace existing older buildings, which may use energy less efficiently than modern buildings incorporating the latest Title 24 standards, City Green Building Code, and LEED Gold requirements, thereby improving the energy efficiency of buildings. Notwithstanding, the existing buildings comprising approximately 26,261 square feet would still consume less energy compared to the proposed 445,218-square-foot

building. As such, Alternative 1 would result in no operational energy impacts, and such impacts would be less when compared to the less-than-significant impacts of the Project.

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

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

e. Land Use and Planning

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

f. Noise

(1) Noise

(a) Construction

No new construction activities would occur under Alternative 1. As such, no construction-related on-site and off-site noise impacts would occur under this alternative. Therefore, Alternative 1 would avoid the significant unavoidable construction-related on-site and off-site noise impacts of the Project.

(b) Operation

Alternative 1 would not develop new uses on the Project Site, and no changes to existing site operations would occur. Thus, no new stationary or mobile (e.g., traffic) noise sources would be introduced to the Project Site or the vicinity of the Project Site. As such, no impacts associated with operational on-site and off-site noise would occur under Alternative 1. Therefore, the operational on-site and off-site noise impacts of Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

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

(b) Operation

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

g. Public Services

(1) Fire Protection

(a) Construction

As Alternative 1 would not include any construction activities, it would not result in a construction-related demand for Los Angeles Fire Department (LAFD) fire protection facilities or services. Thus, no construction-related fire protection impacts would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

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

(2) Police Protection

(a) Construction

As Alternative 1 would not include any construction, it would not result in a construction-related demand for police protection facilities or services from the Los Angeles Police Department (LAPD). Therefore, Alternative 1 would not result in any police protection impacts due to construction, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

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

(3) Libraries

(a) Construction

As Alternative 1 would not require construction activities, Alternative 1 would not have the potential to impact the provision of library services in the vicinity of the Project Site during construction. Thus, no construction-related library impacts would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

No changes to existing onsite land uses or operations would occur under Alternative 1. Therefore, there would be no potential to increase the level of activity on the Project Site or increase the service population for the Los Angeles Public Library (LAPL) library branches that serve the Project Site. No impacts to library facilities would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

h. Transportation

Since Alternative 1 would not develop new or additional land uses on the Project Site, Alternative 1 would not generate any additional vehicle trips or alter existing access or circulation within the Project Site during operation. Therefore, no impacts would occur with respect to operational traffic, including conflicts with programs, plans, ordinances, or

policies addressing the circulation system; vehicle miles traveled (VMT); and emergency access. Therefore, impacts under Alternative 1 would be less when compared to the Project, which would be less than significant with mitigation.

i. Tribal Cultural Resources

Grading and other earthwork activities would not occur under Alternative 1. Therefore, there would be no potential for Alternative 1 to uncover subsurface tribal cultural resources. As such, no impacts to tribal cultural resources would occur under Alternative 1, and impacts would be less when compared to those of the Project, which would be less than significant.

j. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

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

(b) Operation

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

(2) Wastewater

(a) Construction

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

(b) Operation

Alternative 1 would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase operational wastewater flows from the Project Site. Since no operational impacts related to wastewater conveyance and treatment facilities would occur, Alternative 1 impacts related to wastewater would be less when compared to the less-than-significant impacts of the Project.

(3) Energy Infrastructure

(a) Construction

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 infrastructure would not occur. As such, impacts related to energy infrastructure under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

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

3. Comparison of Impacts

Alternative 1 would eliminate the Project's significant and unavoidable impacts with respect to on- and off-site noise sources during construction; on- and off-site vibration during construction (pursuant to the significance threshold for human annoyance); and on-site vibration during construction (pursuant to the significance threshold for building damage). Alternative 1 would also avoid the Project's significant and unavoidable cumulative impacts with respect to off-site noise during construction and off-site vibration during construction (pursuant to the significance threshold for human annoyance). In addition, Alternative 1 would avoid the Project's less-than-significant impact with mitigation, including those related to regional and localized air quality emissions during construction and freeway safety. Impacts associated with the remaining environmental issues would be less than those of the Project.

4. Relationship of the Alternative to Project Objectives

Under Alternative 1, the existing buildings and associated surface parking would remain on the Project Site, and no new development would occur. As such, Alternative 1 would not meet the underlying purpose of the Project, which is to revitalize the underutilized infill Project Site by developing an integrated high-density commercial development that would generate new economic opportunities for the Hollywood area. Furthermore, Alternative 1 would not meet any of the Project basic objectives as listed below:

- To support the Hollywood Community Plan's Objective 1 to further the development of Hollywood as a major center of population, employment, retail services, and entertainment;
- To support the Hollywood Community Plan's Objective 4(a) to promote economic well-being and public convenience through allocating and distributing commercial lands for office, retail, service, and residential uses in quantities and patterns based on accepted planning principles and standards;
- Maximize the value of the underutilized site through replacement of existing low intensity commercial uses with a modern structure and a mix of uses consistent with anticipated market demands;
- Provide office space with large open floor plates, high ceilings, and a combination of indoor and outdoor spaces to meet the demand for creative work spaces that encourage collaboration and productivity;
- Locate employment opportunities and residential opportunities near one another along a major transit corridor within a high activity area to promote sustainability and reduce vehicle miles traveled, with associated reductions in air quality and greenhouse gas emissions to create a dynamic and economically viable commercial project with sufficient density to facilitate a healthy jobs-housing balance in the Hollywood area;
- To create a pedestrian-friendly project by creating a street-level identity for the Project Site and improving the pedestrian experience through the introduction of commercial uses on the ground level; and
- Revitalize the Project Site by creating a commercial project with proximity to existing and future transit lines, employment opportunities, housing, shops, and restaurants while incorporating the principles of smart growth and environmental sustainability by capitalizing on the Project Site's location within an employment hub, proximity to transit and walkable streets, and the presence of existing infrastructure needed to service the proposed uses, while incorporating

sustainable design components that emphasize resource conservation and efficiency.

V. Alternatives

B. Alternative 2: Existing Zoning Compliant Alternative

1. Description of the Alternative

Alternative 2, the Existing Zoning Compliant Alternative, considers development of the Project Site in accordance with the parameters set forth by the existing zoning on the Project Site, which is C4-2D-SN (Commercial Zone, Height District 2 with Development Limitation, Hollywood Signage Supplemental Use District), C4-2D (Commercial Zone, Height District 2 with Development Limitation), and C2-1XL (Commercial Zone, Height District 1XL). The C2 and C4 zones allow for a wide variety of land uses, including retail stores, offices, restaurants, theaters, hotels, broadcasting studios, parking buildings, parks, and playgrounds. Height District 2 allows a 6:1 FAR with no height or story limit. However, the Project Site's C4-zoned portions in Height District 2 are subject to a D Limitation, which limits these portions of the Project Site to a 2:1 FAR. The D Limitation does not impose any height limits on the Project Site's C4-zoned portions. The Project Site's C2-zoned portions are within Height District Number 1XL, which allows a 1.5:1 FAR on these portions with a 30-foot and two-story height limit. A conceptual site plan for Alternative 2 is provided in Figure V-1 on page V-26.

Based on the existing zoning of the Project Site described above, Alternative 2 would include the development of a 7-story commercial building with a floor area of 131,238 square feet consisting of 117,052 square feet of office space and 14,186 square feet of ground floor restaurant space (inclusive of the proposed outdoor covered dining area). The proposed 7-story building would feature a height of approximately 144 feet. As with the Project, this alternative would also include the construction of an LADWP equipment area within the De Longpre Lot that would include electrical distribution equipment and emergency generators. The area proposed for this LADWP use would not constitute floor area as defined by LAMC Section 12.03.

Alternative 2 would include 329 vehicular parking spaces. Parking would be provided within one subterranean level extending to a depth of 27 feet, at-grade parking, a small parking mezzanine, and one full floor fully enclosed, mechanically ventilated above-grade level. Five vehicular parking spaces would be provided in a small surface parking area adjacent to the LADWP equipment area. It is estimated that approximately 40,645 cubic yards of export would be hauled from the Project Site as part of this alternative.

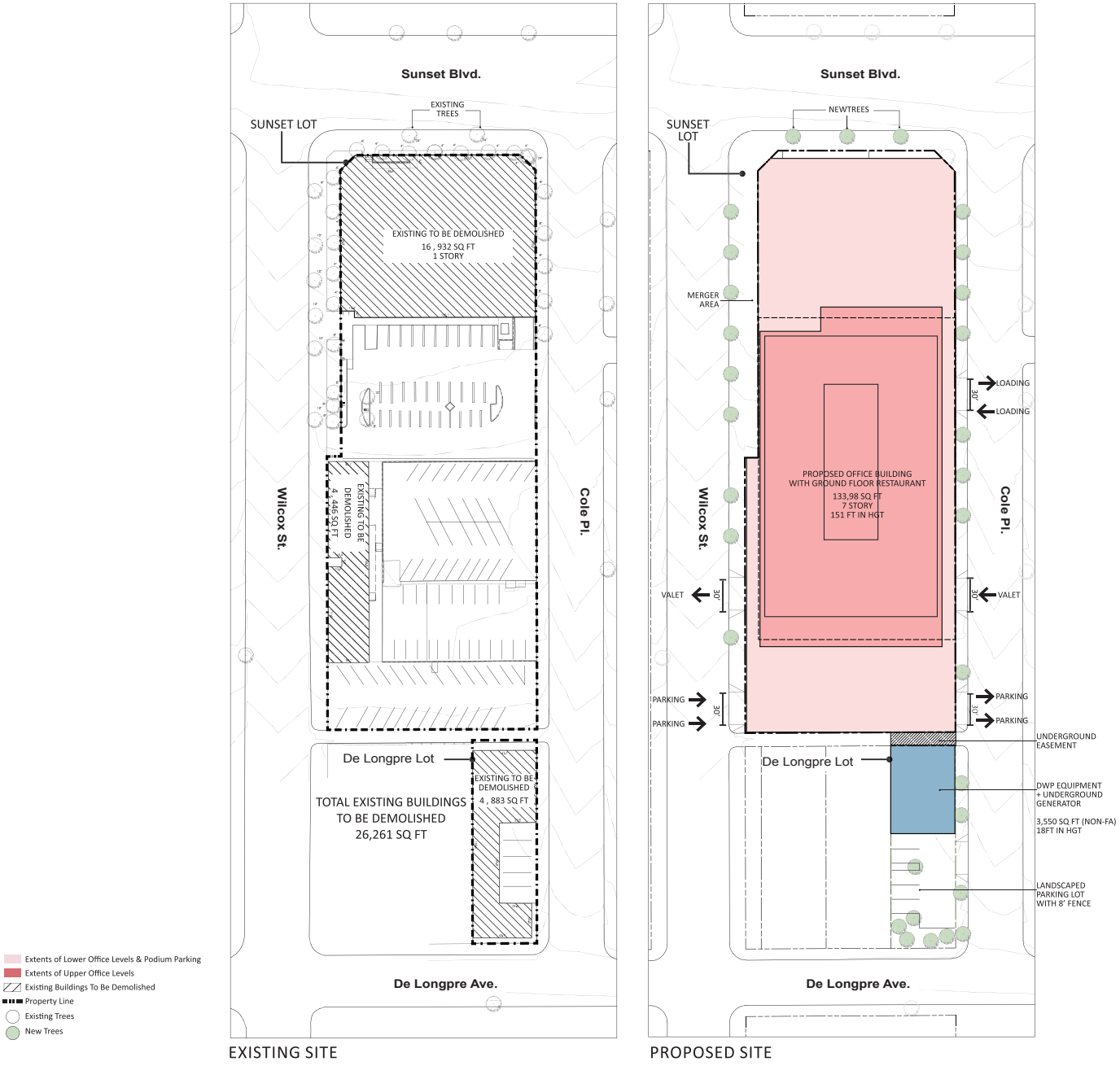

Figure V-1
Alternative 2 Conceptual Site Plan

Source: Gensler, April 12, 2021.

As with the Project, the existing office and retail uses comprising 26,261 square feet, as well as the associated surface parking, would be removed. Upon completion, Alternative 2 would result in a net floor area of 104,977 square feet on the Project Site and an FAR of 2:1 (1.5:1 on the De Longpre Lot).

Overall, Alternative 2 would reduce the commercial floor area proposed by the Project by approximately 313,980 square feet from a total of 445,218 square feet to 131,238 square feet (inclusive of the outdoor covered dining area). With the reduced floor area, Alternative 2 would result in a corresponding decrease in the height of the building from 15 stories and a height of 275 feet to 7 stories with a height of 144 feet. Alternative 2 would also reduce the excavation required for the subterranean parking levels and would reduce the estimated amount of export from approximately 93,000 cubic yards to 40,645 cubic yards (a reduction of 52,355 cubic yards). As such, Alternative 2 would result in an overall reduction in the duration of construction.

2. Environmental Impacts

a. Air Quality

(1) Regional Emissions

(a) Construction

As with the Project, construction of Alternative 2 has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. As with the Project, Alternative 2 would comply with applicable air quality regulations during construction and implement Project Design Feature AIR-PDF-1 requiring the use of existing electrical infrastructure and/or solar generators rather than temporary diesel or gasoline generators during the construction period to minimize stationary source construction emissions.

During Project construction, maximum daily emissions occur during the excavation and mat foundation phases. During these phases, the number of equipment as well as trucks exporting soil and delivering concrete would be greater than other phases of construction (e.g., building construction, architectural coatings phases).

Under Alternative 2, construction activities would be reduced in comparison to the Project due to the reduction in development (i.e., a reduction in duration of construction

activities), excavation, and reduced mat foundation. Specifically, under Alternative 2, total excavation quantities would be reduced by 55 percent in comparison to the Project from approximately 93,000 cubic yards for the Project to 40,645 cubic yards (a reduction of 52,355 cubic yards). In addition, under Alternative 2, the thickness of the mat slab foundation would be reduced from approximately 7 feet for the Project to 5 feet (a reduction of 2 feet). However, the intensity of air emissions and fugitive dust from site preparation and construction activities under Alternative 2 would be similar to the Project on peak construction days because the maximum number of trucks and equipment operating during the excavation and mat foundation phases would be similar to the Project on a daily basis (i.e., there would be no change to the intensity for days in which the maximum construction activity is required). As such, air emissions during maximum activity days, which is one of the metrics used for measuring impact significance, would be similar to those of the Project. It is noted however that with the reduced duration of the excavation phase, which would be shortened by approximately 55 percent (based on the corresponding 55-percent reduction in excavation quantities), and the reduction in the duration of the mat foundation phase, which would be reduced by approximately one day (a 25-percent reduction), in comparison to the Project, the Project's significant and unavoidable regional air emissions impact would occur for a shorter duration compared to the Project. Thus, the duration of the Project's regional air emissions significant and unavoidable impact would be substantially less under Alternative 2. While regional NOx emissions under Alternative 2 would continue to exceed significance thresholds during the mat foundation phase prior to mitigation, the duration that the NOx emissions significance threshold is exceeded would be reduced by 25 percent under Alternative 2 than compared to the Project. While impacts would remain significant and unavoidable prior to implementation of mitigation measures, implementation of Mitigation Measure AIR-MM-1 would reduce this impact to less than significant levels, similar to the Project. Thus while the reduction in development and excavation activities would substantially lessen impacts associated with regional daily emissions as compared to the Project prior to implementation of mitigation measures; impacts under Alternative 2, as with the Project, would be less than significant with implementation of Mitigation Measure AIR-MM-1.

(b) Operation

As previously discussed, the development and depth of excavation proposed under Alternative 2 would be reduced compared to the Project. Based on the proposed uses, the number of daily trips and daily VMT generated by Alternative 2 would be less than the number of daily trips generated by the Project. As vehicular emissions depend on the number of trips and associated VMT, the overall pollutant emissions generated by this alternative would be less than the emissions generated by the Project because the number of vehicular trips would decrease.

As Alternative 2 would result in less daily trips and VMT, with the reduction in uses and overall floor area, both area sources and stationary sources would result in reduced on-site operational air emissions associated with energy consumption compared to the Project. As a result, the overall pollutant emissions generated by Alternative 2 would be less than the emissions generated by the Project. Therefore, impacts associated with regional air pollutant emissions during operation of Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(2) Localized Emissions

(a) Construction

On-site construction activities under Alternative 2 would be located at similar distances from sensitive receptors as the Project. As previously discussed above, the intensity of construction activities would be similar on days with maximum construction activities, although Alternative 2 would result in a reduction in the amount and duration of proposed development and excavation compared to the Project(i.e., there would be no change to the intensity for days in which the maximum construction activity is required). As such, air emissions during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Therefore, while the reduction in development (i.e., a reduction in duration of construction activities), excavation, and reduced mat foundation activities would reduce overall impacts associated with localized daily emissions as compared to the Project. As such, air emissions under Alternative 2, as with the Project, would continue to exceed the SCAQMD localized screening threshold for NO_X during the concrete mat slab foundation phase. It is noted however that with the reduced duration of the excavation phase, which would be shortened by approximately 55 percent (based on the corresponding 55-percent reduction in excavation quantities), and the reduction in the duration of the mat foundation phase, which would be reduced by approximately one day (a 25-percent reduction), in comparison to the Project (based on the reduction in mat slab foundation thickness), the Project's significant and unavoidable localized air emissions impact would occur for a shorter duration compared to the Project. Notwithstanding, as with the Project, with the incorporation of Mitigation Measure AIR-MM-1 as part of Alternative 2, localized air quality impacts would be reduced to less than significant with implementation of mitigation, with the degree of the impact similar to that of the Project.

(b) Operation

Localized operational impacts are determined primarily by traffic volumes. As provided above, Alternative 2 would reduce the commercial floor area proposed by the Project by approximately 313,980 square feet from a total of 445,218 square feet to 131,238 square feet. As such, this alternative would generate less daily trips compared to the Project. Therefore, total vehicular emissions would be less compared to the Project. In

addition, the development and depth of excavation proposed under Alternative 2 would be reduced compared to the Project; therefore, area and stationary sources would generate less on-site operational air emissions compared to the Project. As such, under Alternative 2, total contributions to localized air pollutant emissions during operation would be less than the Project's contribution. Accordingly, localized air quality impacts under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(3) Toxic Air Contaminants

(a) Construction

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

(b) Operation

As set forth in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential TAC emissions associated with Project operations would include diesel particulate matter (DPM) from delivery trucks. Because of its reduced development, Alternative 2 would result in less operational truck deliveries. As such, the overall increase in the number of deliveries and associated diesel particulate matter emissions would be reduced when compared to the Project due to the reduction in trips generated by Alternative 2's reduced activity. Furthermore, similar to the Project, the land uses proposed under Alternative 2 are not considered land uses that generate substantial TAC emissions. Therefore, Alternative 2 would not release substantial amounts of TACs. Impacts due to TAC emissions and the corresponding cancer risk under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

b. Cultural Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, there are no listed historical resources on the Project Site, and the existing buildings on the Project Site are not eligible for listing. Therefore, as with the Project, Alternative 2 would not result in direct impacts to historical resources from removal of the existing on-site buildings. As with

the Project, Alternative 2 would not include the demolition, relocation, rehabilitation, alteration, relocation or conversion of any nearby historical resources, or any contributing or non-contributing building to the De Longpre Park Residential Historic District. All of the existing buildings and sites that comprise the district would remain unchanged and in their original location after implementation of Alternative 2. Additionally, as with the Project, the height and general character of this alternative also would not interfere or conflict with the historic context (i.e., impair the ability to convey significance) of the listed/potential historical resources and historic district in the vicinity of the Project Site as the height would be reduced, and the building would feature similar design elements as the Project. Therefore, Alternative 2 would result in less-than-significant impacts with respect to historical resources, and such impacts would be similar when compared to the less than significant impacts of the Project.

c. Energy

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

(a) Construction

Similar to the Project, construction activities under Alternative 2 would consume electricity to convey water for dust control and to power lighting, electronic equipment, and other construction activities, and petroleum-based fuels for heavy construction equipment, delivery and haul trucks, and construction worker traffic. Similar to the Project, construction activities associated with Alternative 2 would not involve the consumption of natural gas. As with the Project, Alternative 2 would also generate a demand for transportation energy associated with on- and off-road vehicles. However, the energy consumed during construction of Alternative 2 would be reduced compared to the Project due to the reduction in overall construction activities. As with the Project, the use of construction equipment/vehicles used during construction of Alternative 2 would comply with Title 24 standards and other applicable energy conservation requirements, CARB anti-idling and In-Use Off-Road Diesel-Fueled Fleet regulations, federal fuel efficiency standards, and other applicable requirements. Alternative 2 would also implement design features, similar to the Project, to reduce energy usage and fuel consumption during construction. Specifically, as with the Project, Alternative 2 would implement Project Design Feature AQ-PDF-1 which would require the use of electricity from power poles rather than temporary diesel or gasoline powered generators where available. Therefore, as with the Project, Alternative 2 construction activities would require energy demand that is not wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 2 and less when compared to the less-than-significant impacts due to the reduction in construction activities and duration.

(b) Operation

As with the Project, Alternative 2 operations would generate an increased demand for electricity and natural gas. As indicated in Section IV.J.3, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR, LADWP and SoCalGas have confirmed that the Project's electricity and natural gas demand would be able to be adequately served by the existing electricity and natural gas infrastructure in the Project Area. Since Alternative 2 would include less development than the Project, uses under Alternative 2 would create less operations-related electricity and natural gas demand than the Project. In addition, as with the Project, Alternative 2 would be developed in accordance with applicable energy conservation requirements, including those in California's Building Energy Efficiency Standards (Title 24 standards), CALGreen Code, and the Green Building Code; implement additional energy conservation requirements (such as those required to achieve LEED Gold certification); as well as provide LAMC-required bicycle parking and EV/EVA-ready parking. Therefore, as with the Project, operation of Alternative 2 would not involve the wasteful, inefficient, or unnecessary consumption of energy resources. As such, Alternative 2 would result in less-than-significant impacts related to energy use during operation, and such impacts would be similar to the less-than-significant impacts of the Project.

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

As discussed in Section IV.C, Energy, of this Draft EIR, the energy conservation policies and plans relevant to the Project include the Title 24 energy standards, the 2019 CALGreen Code, the City of Los Angeles Green Building Code, City of LA Green New Deal, and the 2020–2045 RTP/SCS. As these conservation policies are mandatory under the City's Building Code, Alternative 2, as with the Project, would not conflict with applicable plans for renewable energy or energy efficiency. Furthermore, as discussed previously, as with the Project, Alternative 2 would represent urban infill development within a TPA and HQTA in close proximity to transit, which would reduce vehicle trips, VMT, per capita VMT, and associated fuel usage in accordance with the SB 375 and SCAG's RTP/SCS. As with the Project, Alternative 2 would also be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction, which would save transportation energy. Therefore, Alternative 2, as with the Project, would not conflict with plans for renewable energy or energy efficiency. The impacts of Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

d. Greenhouse Gas Emissions

As discussed in Section IV.C, Greenhouse Gas Emissions, of this Draft EIR, GHG emissions from a development project are determined in large part by the number of daily vehicle trips generated and associated VMT, as well as by energy consumption from

proposed land uses. As previously discussed above, due to the reduction in proposed development, the number of daily trips and daily VMT under Alternative 2 would be reduced compared to the Project. In addition, energy and water consumption from the proposed land uses would be reduced compared to the Project due to the reduction in net development (i.e., 104,977 square feet versus net 419,957 square feet under the Project). Thus, the amount of GHG emissions generated by Alternative 2 would be less than the amount generated by the Project. As with the Project, Alternative 2 would be designed to comply with the requirements of the CALGreen Code and the Los Angeles Green Building Code. As with the Project, Alternative 2 would incorporate design features to reduce GHG emissions such as the sustainability features required to achieve LEED Gold certification per Project Design Feature GHG-PDF-1 and would be designed to comply with the City's Green Building Ordinance, as applicable. Alternative 2 would also increase urban density within a Transit Priority Area (TPA) and High Quality Transit Area (HQTA) in proximity to transit, would include LAMC-required bicycle parking, and would include electric vehicle- (EV) ready parking, which would reduce VMT and associated fuel usage and GHG emissions. With compliance with applicable regulations and with implementation of comparable sustainability features as the Project, Alternative 2 would be consistent with the GHG reduction goals and objectives included in adopted State, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

e. Land Use and Planning

Alternative 2, the Existing Zoning Compliant Alternative, considers development of the Project Site in accordance with the parameters set forth by the existing C4-2D-SN, C4-2D, and C2-1XL zoning of the Project Site. As indicated previously, the C2 and C4 zones allow retail stores, offices, restaurants, theaters, hotels, broadcasting studios, parking buildings, parks, and playgrounds. Height District 2 allows a 6:1 FAR with no height limit, although the Project Site's C4-zoned portions in Height District 2 are subject to a D Limitation, which limits these portions of the Project Site to a 2:1 FAR but does not impose any height limits on the Project Site's C4-zoned portions. Height District Number 1XL allows a 1.5:1 FAR with a 30-foot and two-story height limit. Based on this existing zoning, Alternative 2 would include the development of a 7-story, 144 foot tall commercial building (as opposed to the Project's 15-story, 275 foot building height) with a total floor area of 131,238 square feet, consisting of 117,052 square feet of office space and 14,186 square feet of ground floor restaurant space with a 2:1 FAR (as opposed to the Project's 6:1 FAR). This alternative would also include the LADWP equipment area on the De Longpre Lot, which would not count as floor area as defined by LAMC 12.03.

Based on the zoning and land use designation of the Project Site, the proposed office and commercial uses are permitted on the Project Site, and such uses, as proposed

by Alternative 2, would not conflict with other surrounding uses. In addition, as Alternative 2 would construct a project consistent with the existing zoning of the Project Site, this alternative also would not conflict with the applicable plans, policies, and regulations that were adopted for the purpose of avoiding or mitigating an environmental effect, including, but not limited to, the City's General Plan Framework Element, Hollywood Community Plan, LAMC, and SCAG's 2020–2045 RTP/SCS. Therefore, the impacts of Alternative 2 related to potential conflicts with applicable land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant and less when compared to the less-than-significant impacts of the Project.

f. Noise

(1) Noise

(a) Construction

The types of construction activities under Alternative 2 would be substantially similar to the Project, although the amount of construction activities and duration would be reduced due to the reduction in total floor area (i.e., 131,238 square feet versus 445,218 square feet under the Project, a 70-percent reduction in total floor area) and the reduction in required excavations depths due to the reduction in subterranean parking levels under this alternative (i.e., 27 feet versus 52 feet under the Project, a 48-percent reduction). As with the Project, construction of Alternative 2 would generate noise from the use of heavy-duty construction equipment, as well as from haul truck and construction worker trips. Under Alternative 2, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to that of the Project during maximum activity days during the excavation and mat slab foundation phases (i.e., there would be no change to the intensity for days in which the maximum construction activity is required). However, as previously noted, both the excavation and the mat foundation phases under Alternative 2 would be shortened by 55 percent and 25 percent respectively. As such, the impact experienced during these peak construction phases would occur over a shorter period as compared to the Project.As such, noise levels during maximum activity days, which is one metric used for measuring impact significance, would be similar to those of the Project, however the duration of noise levels, another metric used for measuring impact significance would be substantially less than compared to the Project. As with the Project, Alternative 2 would implement similar project design features and mitigation measures, which would minimize construction noise. Thus, the Project's on-site and off-site construction noise (both Project-level and cumulative) would be significant and unavoidable under Alternative 2, as the noise levels during maximum activity days would be similar to the Project, however, as Alternative 2's construction duration would be substantially less (for both excavation and the mat pour) as compared to the Project, the significant and unavoidable on-site and off-site noise impact would be substantially less under Alternative 2.

(b) Operation

As discussed in Section IV.F, Noise, of this Draft EIR, sources of operational noise under the Project would include (a) on-site stationary noise sources, including mechanical equipment and the LADWP equipment area, activities within the proposed outdoor spaces (i.e., outdoor dining and terraces), parking facilities and loading dock; and (b) off-site mobile (roadway traffic) noise sources. Regarding on-site operational noise, Alternative 2 would introduce noise from similar on-site noise sources to the Project. However, it is anticipated that with the overall reduction in total floor area and uses under this alternative (i.e., 131,238 square feet versus 445,218 square feet under the Project), the noise levels from building mechanical equipment, outdoor spaces, and parking facilities would be reduced. In addition, similar to the Project, Alternative 2 would implement project design features similar to Project Design Feature NOI-PDF-3 (acoustic screening of mechanical equipment) and Project Design Feature NOI-PDF-4 (controls on amplified sound), which would minimize on-site operational noise. As with the Project, Alternative 2 would also comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. Thus, operational on-site noise impacts under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

With regard to operational off-site (i.e., traffic) noise, Alternative 2 would generate less operational traffic than the Project due to the reduction in total development. The reduction in vehicle trips would result in a decrease in off-site operational traffic-related noise levels under Alternative 2. Therefore, as with the Project, off-site noise impacts under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 2 would be similar to the Project, although the amount and duration of construction activities would be substantially reduced. As with the Project, construction of Alternative 2 would generate on- and off-site vibration from the use of heavy-duty construction equipment and from truck trips. Also as with the Project, Alternative 2 would implement Mitigation Measure NOI-MM-2 (i.e., construction vibration monitoring) to minimize construction vibration impacts on the existing single-story commercial building adjacent to the southern portion of the Project Site to the west. The overall amount and duration of construction activities (including excavation) would be reduced under Alternative 2, on- and off-site construction activities and the associated construction on- and off-site vibration levels would be expected to be similar to those of the Project as construction vibration impacts are

evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment (i.e., there would be no change to the intensity for days in which the maximum construction activity is required). However, as previously noted, both the excavation and the mat foundation phases under Alternative 2 would be shortened by 55 percent and 25 percent respectively. As such, the impact experienced during these peak construction phases would occur over a shorter period as compared to the Project. Peak vibration levels generated by construction equipment and construction truck trips under Alternative 2 would be similar to those of the Project. Accordingly, as with the Project, construction activities under Alternative 2 would result in significant unavoidable on-site vibration impacts (both building damage and human annoyance), significant unavoidable off-site vibration impacts (human annoyance) and less-than-significant off-site vibration impacts (building damage). However, as Alternative 2's construction duration would be substantially less (for both excavation and the mat pour) as compared to the Project, the significant and unavoidable on-site and off-site construction vibration impact would be substantially less under Alternative 2, but would remain significant and unavoidable.

(b) Operation

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

g. Public Services

(1) Fire Protection

(a) Construction

The types of construction activities required for Alternative 2 would be similar to those of the Project, although the amount of development and associated construction

activities and construction traffic would be reduced due to the reduced amount of total floor area and excavation activities. As with the Project, as discussed in Section IV.G.1, Public Services—Fire Protection, of this Draft EIR, construction under Alternative 2 would occur in compliance with all applicable federal, State, and local requirements concerning fire prevention and hazardous materials, which would effectively reduce the potential for construction-related fire and explosion. Additionally, similar to the Project, Alternative 2 would maintain travel lanes on all streets around the Project Site throughout the construction period and implement a construction management plan, which would include provisions for maintaining emergency access during construction. Furthermore, emergency vehicles have the ability to avoid traffic delays through the use of sirens to clear paths of travel in accordance with the California Vehicle Code (CVC). Therefore, construction of Alternative 2, as with the Project, would not result in the need for new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Operation

As previously discussed, Alternative 2 would construct similar uses to the Project. Alternative 2 would provide 117,052 square feet of office space and 14,186 square feet of ground floor restaurant space (inclusive of the proposed outdoor covered dining area), which would generate additional employment opportunities. However, the number of new employees would be reduced compared to the Project due to the reduction in development. As such, this alternative would generate a smaller demand for LAFD fire protection services on a daily basis when compared to the Project. Similar to the Project, Alternative 2 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, life safety features (e.g., automatic fire sprinkler systems, fire service access elevators, etc.) and would undergo LAFD fire/life safety plan review to ensure compliance with the above, which would reduce the demand for fire protection and EMS and also ensure adequate emergency access. Furthermore, as with the Project, traffic generated by Alternative 2 would not significantly impact emergency vehicle response to the Project Site and surrounding area as the drivers of emergency vehicles have the ability to bypass traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. The driveways and internal circulation under Alternative 2 would also be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. As with the Project, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for Alternative 2. Therefore, similar to the Project, this alternative would not necessitate the construction of new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. As such, impacts with

regard to fire protection services during operation of Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in development and associated service population.

(2) Police Protection

(a) Construction

As discussed above, construction activities under Alternative 2 would be similar to those of the Project; however, the overall amount of construction activities and duration of construction would be reduced compared to the Project due to the reduced total floor area and subterranean parking. Similar to the Project, construction would not generate a permanent population on the Project Site that would substantially increase the police service population of the Hollywood Division. The existing commercial uses on the Project Site currently generate a daytime population that may require police protection services. The demand for police protection services during construction of Alternative 2 would be offset by the removal of the existing commercial buildings on the Project Site. However, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. However, as with the Project, Alternative 2 would incorporate Project Design Feature POL-PDF-1 to implement temporary security measures, including security fencing, lighting, and locked entry to secure the Project Site during construction, which would serve to reduce demand on LAPD facilities.

Additionally, while peak daily and peak-hour construction traffic would be the same between Alternative 2 and the Project, the duration of construction activities would be less under Alternative 2 due to the reduction in total floor area and excavation activities. Furthermore, both the Project and Alternative 2 would implement the required construction management plan that would ensure continued provision of emergency access during construction. Lastly, pursuant to CVC Section 21806, emergency vehicles can use their sirens to clear a path of travel or drive in the lanes of opposing traffic during an emergency to avoid traffic. Therefore, as with the Project, construction of Alternative 2 would not result in the need for new or altered government facilities (i.e., police stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Operation

As previously discussed, Alternative 2 would construct similar uses as the Project. Specifically, Alternative 2 would include office space and ground floor restaurant space. Alternative 2 would not include any residential uses. Therefore, Alternative 2 would not generate a direct demand for police protection services such that Alternative 2 would

impact the officer to population ratio within the Hollywood Division. Alternative 2 would implement similar project design features as the Project, which would help reduce the demand for police services, and both the Project and Alternative 2 would generate General Fund tax revenues for the City, which could be used to expand law enforcement resources in the Hollywood Division. Therefore, Alternative 2, as with the Project, would not result in the need for new or altered government facilities (i.e., police stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduced service population.

(3) Libraries

(a) Construction

Similar to the Project, construction of Alternative 2 would result in a temporary increase of construction workers on the Project Site. However, due to the employment patterns of construction workers, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by Alternative 2. Therefore, construction workers would not result in a notable increase in the resident population within the service area of the Los Angeles Public Library (LAPL) library branches serving the Project Site. Also, it is unlikely that construction workers would visit library facilities in the vicinity of the Project Site on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Similarly, it is unlikely that construction workers would utilize library facilities at the end of the workday and would likely use library facilities near their places of residence. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. Accordingly, as with the Project, Alternative 2 construction would not necessitate the construction of new or expanded library facilities, the construction of which would cause significant environmental impacts, in order to maintain service. As such, impacts to library facilities during construction would be less than significant under Alternative 2, and similar to the less-than-significant impacts of the Project.

(b) Operation

Residents are considered the primary users of library facilities. As with the Project, Alternative 2 would not generate a residential population on the Project Site, which could create a direct demand for library facilities. In addition, while on-site employees could generate some indirect demand for LAPL library facilities, this demand would be expected

to be negligible since on-site employees would be more likely to use library facilities near their homes during non-work hours. Furthermore, employees at the Project Site would have internet access, which would provide information and research capabilities and reduce library demand. Therefore, as with the Project, Alternative 2 operation would not necessitate the construction of new or expanded library facilities, the construction of which would cause significant environmental impacts, in order to maintain service. As such, impacts under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduced amount of development.

h. Transportation

As previously described, Alternative 2 would be developed within the same Project Site as the Project. As such, the plans, policies, and programs applicable to the Project would also apply to Alternative 2. As with the Project, this alternative would not interfere with the complete streets balanced transportation network (i.e., Transit-Enhanced Network, Bicycle Enhanced Network, and Pedestrian-Enhanced Districts) concept of the Mobility Plan and would enhance pedestrian access within and around the Project Site as called for by the Mobility Plan and the Hollywood Community Plan; prioritize safety and access for all individuals utilizing the Project Site by complying with all American with Disabilities Act (ADA) requirements as required by the LAMC; include sidewalk and driveway design, vehicular parking, bicycle parking, etc., in accordance with LAMC requirements; design parking facilities to promote public safety and prevent unsightly or barren appearance as call for by the Hollywood Redevelopment Plan; and represent urban infill development within a TPA and HQTA in close proximity to transit which would encourage alternative transportation use as called for by the Mobility Plan, Hollywood Redevelopment Plan and 2020–2045 RTP/SCS. Alternative 2 would support these transportation plans for the same reasons as the Project (e.g., would include similar roadway and sidewalk improvements, would comply with LAMC driveway and parking standards, etc.). Alternative 2 would also reduce work VMT per employee, including through the implementation of transportation demand management (TDM) measures as called for by the Mobility Plan, Hollywood Community Plan, 2020–2045 RTP/SCS, and the City's TDM Ordinance. Furthermore, while Sunset Boulevard along the Project Site's northern boundary is identified as part of the Vision Zero's High Injury Network, as with the Project, no specific Vision Zero projects are planned for this roadway segment, and Alternative 2 would not conflict with the implementation of future Vision Zero projects along this roadway segment. Therefore, as with the Project, Alternative 2 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be less than significant. The degree of the impacts would be similar between the Alternative 2 and the Project as neither would conflict with an applicable transportation plan.

With respect to VMT, Alternative 2 would result in a daily work VMT per employee of 7.3, which would be below the work VMT per employee significance threshold for the

Central APC of 7.6. Additionally, this alternative also would not include any residential uses and, therefore, would not result in a household VMT impact. Therefore, as with the Project, Alternative 2 would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b), regarding VMT, and impacts would be less than significant. The degree of the impacts would be greater under Alternative 2.

Regarding freeway safety, as discussed in Section IV.H, Transportation, of this Draft EIR, queuing distances at the US-101 Northbound Off-ramp to Sunset Boulevard would exceed ramp capacity in the A.M. peak hour in the Future Base scenario and the Future plus Project scenario resulting in a significant freeway safety impact at this off-ramp. With implementation of Mitigation Measure TR-MM-1 requiring the addition of a protected/permitted left-turn phase with reoptimized signal timing for westbound Sunset Boulevard at Van Ness Avenue, it is concluded in Section IV.H, Transportation, of this Draft EIR, that this impact would be reduced to a less-than-significant level. Alternative 2 would reduce the overall floor area when compared to the Project and would generate an estimated 63 percent less inbound operational traffic during the A.M. peak hour. It is estimated that a reduction of 93 percent would be required to avoid a significant impact, and thus, as with the Project, Alternative 2 would also result in a significant impact at the US-101 Northbound Off-ramp to Sunset Boulevard. As for the Project and Alternative 2, implementation of Mitigation Measure TR-MM-1 would reduce this impact to a less-than-significant level. The degree of the impact would be less under Alternative 2 due to lower operational traffic and associated vehicle queuing under this alternative when compared to the Project's less-than-significant impact with mitigation.

i. Tribal Cultural Resources

As previously discussed, Alternative 2 would construct fewer subterranean parking levels compared to the Project and would result in reduced excavation activities. However, as tribal cultural resources are typically found in the first six to ten feet of excavation, the potential for Alternative 2 to uncover subsurface tribal cultural resources would be similar compared to that of the Project. As discussed in Section IV.I, Tribal Cultural Resources, of this Draft EIR, no tribal cultural resources have been previously recorded at the Project Site or identified during consultations with the applicable California Native American Tribes conducted in accordance with AB 52. Nonetheless, Alternative 2 would also implement the City's standard condition of approval for the inadvertent discovery of tribal cultural resources, which would mitigate impacts to any tribal cultural resources that may be encountered during construction. Therefore, Alternative 2 would result in less-than-significant impacts to tribal cultural resources, which would be similar to the less-than-significant impacts of the Project.

j. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities for Alternative 2 would result in a temporary demand for dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. Construction-related water use under Alternative 2 would be less due to the reduced amount of proposed development. Furthermore, as with the Project, Alternative 2 would implement a Construction Traffic Management Plan (Project Design Feature TR-PDF-1), which would ensure the safe and efficient flow of vehicular and pedestrian traffic and that emergency access to the Project Site and adjacent properties would be maintained during the construction period. As such, as with the Project, Alternative 2 would not result in construction activities that 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. Overall, Alternative 2 would result in less-than-significant impacts that are less when compared to the less than significant impacts of the Project.

(b) Operation

As with the Project, Alternative 2 would result in an increase in long-term water demand. However, based on the reduction in total development as compared to the Project, water demand for Alternative 2 would be less than the Project's estimated increase in water demand. Thus, as with the Project, the estimated water demand under Alternative 2 would similarly be met by the available supplies projected by LADWP. Therefore, the estimated water demand under Alternative 2 would also be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040. In addition, the existing water distribution infrastructure would be adequate to serve Alternative 2 since the water demand would be less than the water demand generated by the Project. Furthermore, similar to the Project, Alternative 2 would implement the necessary infrastructure and connections to the LADWP water system pursuant to applicable City requirements to accommodate the new development. Thus, impacts to water supply under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, the existing sewer laterals would be capped during construction of Alternative 2. As such, no new sewage would enter the public sewer

system. As with the Project, temporary facilities, such as portable toilet and hand wash areas, would be provided by the construction contractor; however, any sewage generated from these facilities would be collected and hauled off-site and would not be discharged into the public sewer system. In addition, while no new wastewater would enter the public sewer system during construction, Alternative 2, as with the Project would remove the existing on-site buildings, thereby resulting in a net reduction in the existing sewage entering the sewer system from the Project Site. Lastly, as with the Project, no new off-site sewer lines would be required for Alternative 2, and construction impacts associated with new wastewater infrastructure would primarily be confined to trenching for the placement of pipe and connection into the existing sewer wyes or laterals, and any off-site work that could potentially affect existing sewer service to adjacent properties would be coordinated with the City's Bureau of Engineering (BOE). As such, Alternative 2, as with the Project, would not require or result in the relocation or construction of new or expanded wastewater facilities, the construction or relocation of which could cause significant environmental effects during the construction period. Therefore, Alternative 2 would result in less-than-significant impacts, which would be similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 2 would generate a net increase in wastewater flows from the Project Site. However, based on the reduction in total floor area, operational wastewater generation under Alternative 2 would be less than under the Project. As provided in Section IV.J.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the wastewater generated during Project operation would be able to be accommodated by the existing remaining capacity of the Hyperion Wastewater Reclamation Plan (HWRP). As operational wastewater generation under Alternative 2 would be less than under the Project, the existing remaining capacity and projected future remaining capacity of the HWRP would also be adequate to serve Alternative 2.

Regarding wastewater conveyance (sewer) capacity, as discussed in Section IV.J.2, sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing off-site sewer lines in the adjacent streets. According to the Sewer Capacity Availability Review (SCAR) prepared by the Los Angeles Bureau of Sanitation (LASAN) for the Project, the sewer lines serving the Project Site have adequate capacity to serve the Project. Since Alternative 2 would generate less operational wastewater than the Project, these sewer lines would also have adequate capacity to serve Alternative 2. Also, as with the Project, additional detailed gauging and evaluation would be conducted for Alternative 2, as required by LAMC Section 64.14, to obtain final approval of sewer capacity and connection permit during the permitting process. Furthermore, as with the Project, all sanitary sewer connections and on-site infrastructure under Alternative 2 would be designed and constructed in accordance with applicable standards.

Based on the above, operation of Alternative 2, as with the Project, would not 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. Therefore, Alternative 2 would result in less-than-significant operational wastewater impacts, which would be less when compared to the less-than-significant impacts of the Project.

(3) Energy Infrastructure

(a) Construction

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

(b) Operation

As with the Project, operation of Alternative 2 would generate an increased consumption of electricity and natural gas relative to existing conditions. However, based on the uses and the reduced amount of total floor area proposed under Alternative 2, the total energy consumption of Alternative 2 would be less than the total energy consumption of the Project, and Alternative 2's electricity and natural gas demand can be served by facilities in the vicinity of the Project Site. Therefore, impacts to infrastructure capacity under Alternative 2 would be less than significant and less when compared to the less than significant impacts of the Project.

3. Comparison of Impacts

Based on the analysis above, Alternative 2 would not avoid the Project's significant and unavoidable noise and vibration impacts, including those related to on- and off-site noise sources during construction; on- and off-site vibration during construction (pursuant to the significance threshold for human annoyance); and on-site vibration during construction (pursuant to the significance threshold for building damage). Alternative 2 would also not avoid the Project's significant and unavoidable cumulative noise and vibration impacts related to off-site noise during construction and off-site vibration during construction (pursuant to the significance threshold for human annoyance). However, Alternative 2 would reduce the peak excavation and mat slab foundation construction phases of the Project such that these impacts occur for a shorter duration as compared to

the Project. In addition, Alternative 2 would reduce several of the less-than-significant impacts and less-than-significant impacts with mitigation associated with the Project (e.g., TACs during construction, energy efficiency during construction, land use consistency, tribal cultural resources, police and fire protection services, water and wastewater during operation, and energy infrastructure). Alternative 2 would yield a higher daily work VMT per employee ratio than the Project but less than the significance threshold. All other impacts would be similar to those of the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 2 would develop the Project Site in accordance with the existing commercial zoning of the Project Site. As discussed above, Alternative 2 would develop a total of 131,238 square feet consisting of 117,052 square feet of office space and 14,186 square feet of ground floor restaurant space. While the amount of development under this alternative would be substantially less than under the Project, Alternative 2 would still meet the underlying purpose of the Project, which is to revitalize the underutilized infill Project Site by developing an integrated high-density commercial development that would generate new economic opportunities for the Hollywood area. However, Alternative 2 would be less effective than the Project in meeting this underlying purpose as a result of the reduced amount of development under this alternative.

Regarding the Project objectives, Alternative 2 would meet the following Project objectives as effectively as the Project:

- To create a pedestrian-friendly project by creating a street-level identity for the Project Site and improving the pedestrian experience through the introduction of commercial uses on the ground level.

- Revitalize the Project Site by creating a commercial project with proximity to existing and future transit lines, employment opportunities, housing, shops, and restaurants while incorporating the principles of smart growth and environmental sustainability by capitalizing on the Project Site's location within an employment hub, proximity to transit and walkable streets, and the presence of existing infrastructure needed to service the proposed uses, while incorporating sustainable design components that emphasize resource conservation and efficiency.

Alternative 2 would also meet the following Project objectives, although it would not do so as effectively as the Project due to the reduced amount of development under this alternative.

- To support the Hollywood Community Plan's Objective 1 to further the development of Hollywood as a major center of population, employment, retail services, and entertainment.

- To support the Hollywood Community Plan's Objective 4(a) to promote economic well-being and public convenience through allocating and distributing commercial lands for office, retail, service, and residential uses in quantities and patterns based on accepted planning principles and standards.

- Maximize the value of the underutilized site through replacement of existing low intensity commercial uses with a modern structure and a mix of uses consistent with anticipated market demands.

- Provide office space with large open floor plates, high ceilings, and a combination of indoor and outdoor spaces to meet the demand for creative work spaces that encourage collaboration and productivity.

- Locate employment opportunities and residential opportunities near one another along a major transit corridor within a high activity area to promote sustainability and reduce vehicle miles traveled, with associated reductions in air quality and greenhouse gas emissions to create a dynamic and economically viable commercial project with sufficient density to facilitate a healthy jobs-housing balance in the Hollywood area.

V. Alternatives

C. Alternative 3: Reduced Excavation Alternative

1. Description of the Alternative

Alternative 3, the Reduced Excavation Alternative, would eliminate the subterranean parking proposed by the Project. As all parking for the commercial component would be provided above grade, the height of the building would increase from 15 stories at 275 feet to 17 stories with a height of 311 feet. The remaining Project components would remain as proposed by the Project. Specifically, as with the Project, this alternative would include the development of 445,218 square feet consisting of 431,032 square feet of office space and 14,186 square feet of ground floor restaurant space (inclusive of the proposed outdoor covered dining area). In addition, as with the Project, this alternative would include the construction of the LADWP equipment area on the De Longpre Lot. The area proposed for the LADWP equipment area would not constitute floor area as defined by LAMC Section 12.03. Overall, Alternative 3 would result in a 6:1 FAR similar to the Project. However, due to the elimination of subterranean parking under this alternative, Alternative 3 would reduce the amount of soil export estimated for the Project from approximately 93,000 cubic yards to 7,734 cubic yards (a reduction of 85,266 cubic yards, approximately 90 percent) and result in an associated reduction in the overall construction activities and duration in comparison to the Project due to the reduction in excavation activities. A conceptual site plan for Alternative 3 is provided in Figure V-2 on page V-48.

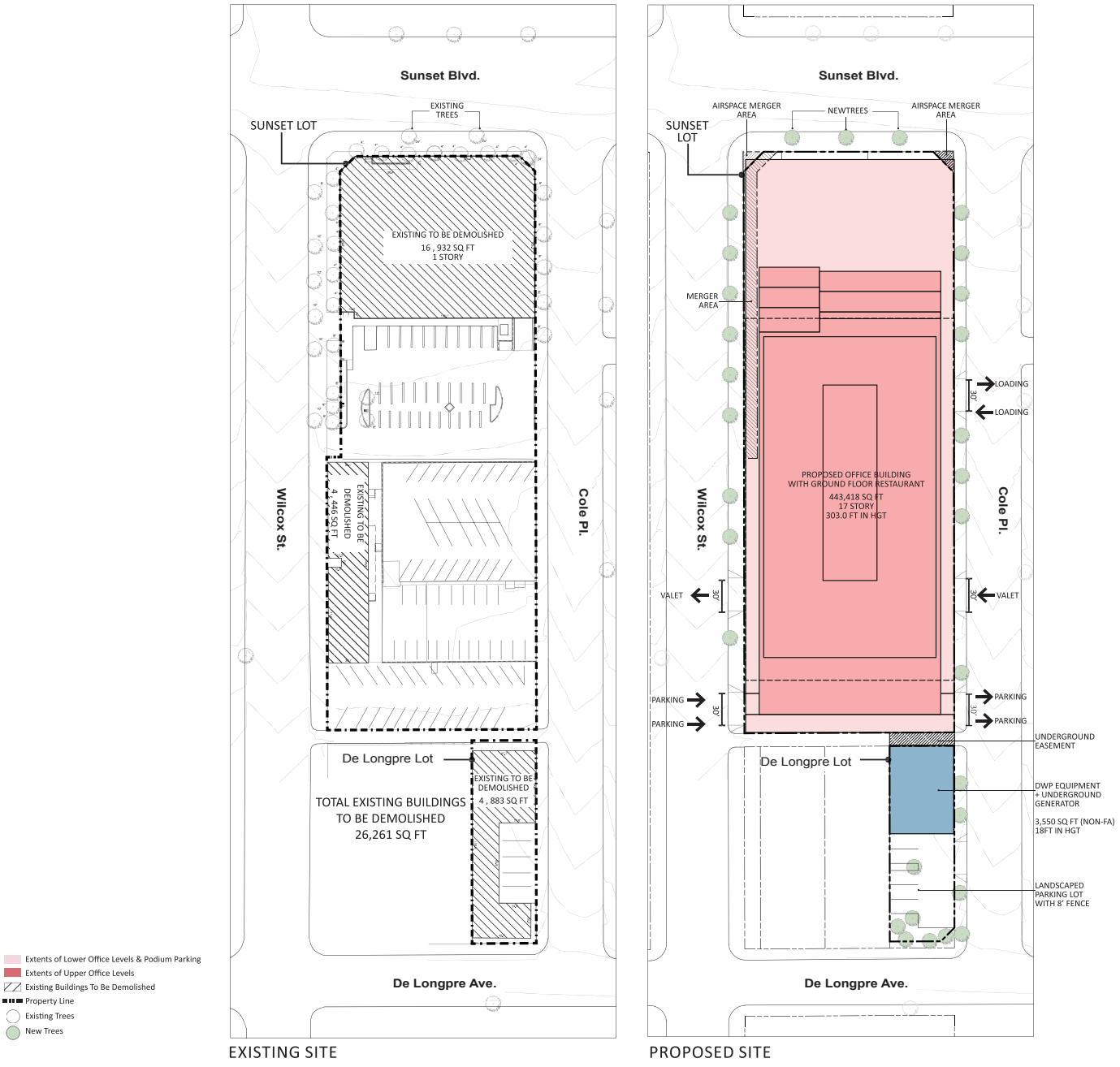

Figure V-2
Alternative 3 Conceptual Site Plan

Source: Gensler, April 12, 2021.

2. Environmental Impacts

a. Air Quality

(1) Regional Emissions

(a) Construction

As with the Project, construction of Alternative 3 has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. As with the Project, Alternative 3 would comply with applicable air quality regulations during construction and implement Project Design Feature AIR-PDF-1 requiring the use of existing electrical infrastructure and/or solar generators rather than temporary diesel or gasoline generators during the construction period to minimize stationary source construction emissions.

During Project construction, maximum daily emissions occur during the excavation and mat foundation phases. During these phases, the number of pieces of construction equipment as well as trucks exporting soil and delivering concrete would be greater than other phases of construction (e.g., building construction, architectural coatings).

Under Alternative 3, the overall amount of construction activities and construction duration would be reduced in comparison to the Project due to the reduction in excavation activities. Specifically, under Alternative 3, total excavation quantities would be reduced by approximately 90 percent in comparison to the Project from approximately 93,000 cubic yards to 7,734 cubic yards (a reduction of 85,266 cubic yards). Alternative 3 would require the same mat slab foundation as the Project. As such, there would be no reduction in activities during this peak phase of construction; however, there would be a reduction in the duration of the activities by approximately 90 percent. Despite the reduction in excavation, the intensity of air emissions and fugitive dust from site preparation and construction activities under Alternative 3 would be similar to the Project on peak construction days because the maximum number of trucks and equipment operating during the excavation and mat foundation phases would be similar to the Project on a daily basis (i.e., there would be no change to the intensity for days in which the maximum construction activity is required). As such, air emissions during maximum activity days, which are one metric used for measuring impact significance, would be similar to those of the Project. It is noted however, that with the reduced duration of the excavation phase, which would be substantially shortened by approximately 90 percent in comparison to the Project, air

emissions during the peak construction phases would be similar to the Project. While regional NOx emissions under Alternative 3 would continue to exceed significance thresholds during the mat foundation phase prior to mitigation, the duration that the NOx emissions significance threshold is exceeded would be reduced by 90 percent under Alternative 3, than compared to the Project. Furthermore, implementation of Mitigation Measure AIR-MM-1 would reduce this impact to less than significant levels, similar to the Project. Thus, the reduction in excavation activities would be substantially less prior to the implementation of mitigation measures and the Alternative 3 impacts associated with regional daily emissions as compared to the Project,would be less than significant with implementation of Mitigation Measure AIR-MM-1.

(b) Operation

As previously discussed, as with the Project, Alternative 3 would include the development of 445,218 square feet consisting of 431,032 square feet of office space and 14,186 square feet of ground floor restaurant space (inclusive of the proposed outdoor covered dining area). Therefore, based on the proposed uses, the number of daily trips and daily VMT generated by Alternative 3 would be similar to the number of daily trips generated by the Project. As vehicular emissions depend on the number of trips and associated VMT, the overall pollutant emissions generated by this alternative would be similar to the emissions generated by the Project because the number of vehicular trips and VMT would be the same.

As discussed above, Alternative 3 would result in the same number of daily trips and VMT; therefore, both area sources and stationary sources would result in similar on-site operational air emissions associated with energy consumption compared to the Project. As a result, the overall pollutant emissions generated by Alternative 3 would be similar to the emissions generated by the Project. Therefore, impacts associated with regional air pollutant emissions during operation of Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Localized Emissions

(a) Construction

On-site construction activities under Alternative 3 would be located at similar distances from sensitive receptors as the Project. Although Alternative 3 would result in a reduced duration and depth of excavation when compared to the Project, the intensity of construction activities would be similar on days with maximum construction activities (i.e., there would be no change to the intensity for days in which the maximum construction activity is required). As such, air emissions during maximum activity days, which is one metric used for measuring impact significance, would be similar to those of the Project. Therefore, while the reduction in development (i.e., a reduction in duration of construction

activities) and excavation activities would reduce overall impacts associated with localized daily emissions as compared to the Project, air emissions under Alternative 3, as with the Project, would continue to exceed the SCAQMD localized screening threshold for NO_X during the concrete mat foundation phase as this alternative would require a similar mat foundation as the Project. It is noted, however, that with the reduced duration of the excavation phase, which would be shortened by approximately 90 percent (based upon the corresponding 90-percent reduction in excavation quantities), the Project's significant and unavoidable localized air emissions impact would occur for a shorter duration compared to the Project, be substantially less, but remain significant and unavoidable prior to the implementation of mitigation. As with the Project, with incorporation of Mitigation Measure AIR-MM-1 as part of Alternative 3, localized air quality impacts would be reduced to less than significant, with the degree of the impact similar to those of the Project.

(b) Operation

Localized operational impacts are determined primarily by traffic volumes. As noted above, given the same amount of development as the Project, Alternative 3 would generate the same amount of daily traffic. Therefore, total vehicular emissions would be similar to the Project. In addition, with the development of the same amount of uses as the Project, area and stationary sources would also generate on-site operational air emissions that are the same as the Project. Overall localized emissions under Alternative 3 would be similar to the Project. As such, under Alternative 3, total contributions to localized air pollutant emissions during operation would be similar to the Project's contribution. Accordingly, localized air quality impacts under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(3) Toxic Air Contaminants

(a) Construction

As with the Project, construction of Alternative 3 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to construction TAC emissions. Overall construction TAC emissions generated by Alternative 3 would be less than to those of the Project due to the reduction of excavation activities associated with the subterranean parking. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Operation

As set forth in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential TAC emissions associated with Project operations would include DPM from delivery trucks. Under Alternative 3, the overall increase in the number of deliveries and associated diesel particulate matter emissions would be similar to the Project since the same uses and same floor area proposed by the Project would be constructed as part of Alternative 3. Similar to the Project, the land uses proposed under Alternative 3 are not considered land uses that generate substantial TAC emissions. Therefore, Alternative 3 would result in less than significant operational TAC emission impacts, and impacts would be similar to those of the Project.

b. Cultural Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, there are no listed historical resources on the Project Site, and the existing buildings on the Project Site are not eligible for listing. Therefore, as with the Project, removal of the existing buildings as part of Alternative 3 would not result in direct impacts to historical resources. Additionally, as with the Project, Alternative 3 would not include the demolition, relocation, rehabilitation, alteration, relocation or conversion of nearby historic buildings, and any contributing or non-contributing building to the De Longpre Park Residential Historic District. All of the existing buildings and sites that comprise the district would remain unchanged and in their original location after implementation of Alternative 3. Features important to the significance of the De Longpre Park Residential Historic District are largely contained within the district boundaries and are best experienced from within the district itself. The new construction associated with Alternative 3 would not interrupt the configuration of buildings and sites, their spatial relationships to each other, and their relationship to the street that characterize the district as it is experienced from the public right-of-way. Overall, Alternative 3 would result in less-than-significant impacts with respect to historical resources and would be similar to the less-than-significant impacts of the Project.

c. Greenhouse Gas Emissions

As discussed in Section IV.C, Greenhouse Gas Emissions, of this Draft EIR, GHG emissions from a development project are determined in large part by the number of daily vehicle trips generated and associated VMT, as well as by energy consumption from proposed land uses. As discussed above, Alternative 3 would develop 445,218 square feet consisting of 431,032 square feet of office space and 14,186 square feet of ground floor restaurant space, as with the Project. As such, the number of daily trips and daily VMT under Alternative 3 would be similar to those of the Project. In addition, energy and water consumption from the proposed land uses would be similar when compared to the Project.

Thus, the amount of GHG emissions generated by Alternative 3 would be similar to the amount generated by the Project. As with the Project, Alternative 3 would be designed to comply with the requirements of the CALGreen Code and the Los Angeles Green Building Code. As with the Project, Alternative 3 would also incorporate design features to reduce GHG emissions, such as the sustainability features required to achieve LEED Gold certification per Project Design Feature GHG-PDF-1 and would be designed to comply with the City's Green Building Ordinance, as applicable. Alternative 3, as with the Project, would also increase urban density within a TPA and HQTA in proximity to transit, would include LAMC-required bicycle parking, and would include EV/EVA-ready parking, which would reduce VMT and associated fuel usage and GHG emissions. With compliance with applicable regulations and with implementation of comparable sustainability features as the Project, Alternative 3 would be consistent with the GHG reduction goals and objectives included in adopted State, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

d. Energy

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

(a) Construction

Similar to the Project, construction activities under Alternative 3 would consume electricity to convey water for dust control and to power lighting, electronic equipment, and other construction activities, and petroleum-based fuels for heavy construction equipment, delivery and haul trucks, and construction worker traffic. As with the Project, construction activities associated with Alternative 3 would not involve the consumption of natural gas. As with the Project, Alternative 3 would also generate a demand for transportation energy associated with on- and off-road vehicles. However, the energy consumed during construction of Alternative 3 would be reduced compared to the Project due to the reduction in excavation activities. As with the Project, the use of construction equipment/vehicles during construction of Alternative 3 would comply with Title 24 standards and other applicable energy conservation requirements, CARB anti-idling and In-Use Off-Road Diesel-Fueled Fleet regulations, federal fuel efficiency standards, and other applicable requirements. Alternative 3 would also implement design features similar to the Project to reduce energy usage and fuel consumption during construction. Specifically, as with the Project, Alternative 3 would implement Project Design Feature AIR-PDF-1, which would require the use of electricity from power poles rather than temporary diesel or gasoline powered generators where available. Therefore, as with the Project, Alternative 3 construction activities would require energy demand that is not wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 3 and

less when compared to the Project's less-than-significant impacts due to the reduction in excavation activities.

(b) Operation

As with the Project, Alternative 3 operations would generate an increased demand for electricity and natural gas. As indicated in Section IV.J.3, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR, LADWP and SoCalGas have confirmed that the Project's electricity and natural gas demand would be able to be adequately served by the existing electricity and natural gas infrastructure in the Project area. Since Alternative 3 would develop the same uses as the Project, it is anticipated that LADWP and SoCalGas would be able to adequately serve the operations-related electricity and natural gas demand under Alternative 3. In addition, as with the Project, Alternative 3 would be developed in accordance with applicable energy conservation requirements, including those in Title 24 standards, CALGreen Code, and the Green Building Code; implement additional energy conservation requirements (such as those required to achieve LEED Gold certification); as well as provide LAMC-required bicycle parking and EV/EVA-ready parking. Therefore, as with the Project, Alternative 3 operation would not result in an increase in energy demand that exceeds available supplies or distribution infrastructure capabilities. As with the Project, operation of Alternative 3 would not involve the wasteful, inefficient, or unnecessary consumption of energy resources. As such, Alternative 3 would result in less-than-significant impacts during operation, which would be similar to the less-than-significant impacts of the Project.

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

As discussed in Section IV.C, Energy, of this Draft EIR, the energy conservation policies and plans relevant to the Project include the Title 24 energy standards, the 2019 CALGreen Code, the City's Green Building Code, City's Green New Deal, and the 2020–2045 RTP/SCS. As these conservation policies are mandatory under the City's Building Code, Alternative 3, as with the Project, would not conflict with applicable plans for renewable energy or energy efficiency. As with the Project, Alternative 3 would also represent urban infill development within a TPA and HQTA in close proximity to transit, which would reduce vehicle trips, VMT, per capita VMT, and associated fuel usage in accordance with SB 375 and SCAG's 2020–2045 RTP/SCS. Alternative 3 would also be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction which would save transportation energy, as with the Project. Therefore, Alternative 3, as with the Project, would not conflict with plans for renewable energy or energy efficiency. The impacts of Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

e. Land Use and Planning

As previously described, Alternative 3 would develop the same uses as the Project. Specifically, as with the Project, Alternative 3 would develop 445,218 square feet consisting of 431,032 square feet of office space and 14,186 square feet of ground floor restaurant space. As with the Project, following approval of the proposed land use entitlements, Alternative 3 would be consistent with the overall intent of the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site and that were adopted to avoid or mitigate an environmental effect, including but not limited to the City's General Plan Framework Element, Hollywood Community Plan and LAMC, and SCAG's 2020–2045 RTP/SCS. Therefore, the impacts of Alternative 3 related to potential conflicts with applicable land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant and similar to the less-than-significant impacts of the Project.

f. Noise

(1) Noise

(a) Construction

The types of construction activities under Alternative 3 would be similar to the Project; however, the amount of construction activities and duration would be reduced due to the reduction in required excavations depths. As with the Project, construction of Alternative 3 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Under Alternative 3, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to that of the Project during maximum activity days during the excavation and mat foundation phases (i.e., there would be no change to the intensity for days in which the maximum construction activity is required). However, as previously noted, the excavation phase under Alternative 3 would be shortened by approximately 90 percent. As such, the impact experienced during this peak construction phase would occur over a shorter period as compared to the Project. Noise levels during maximum activity days, which are one metric used for measuring impact significance, would be similar to those of the Project, however the duration of noise levels, another metric used for measuring impact significance would be substantially less than compared to the Project. As with the Project, Alternative 3 would implement similar project design features and mitigation, which would minimize construction noise. Thus, the Project's on-site and off-site construction noise (both Project-level and cumulative) would be significant and unavoidable under Alternative 3, as the noise levels during maximum activity days would be similar to the Project, however, as Alternative 3's construction duration would be substantially less for excavation as compared to the Project, the significant and unavoidable on-site and off-site noise impact would be substantially less under Alternative 3.

(b) Operation

As discussed in Section IV.F, Noise, of this Draft EIR, sources of operational noise under the Project would include (a) on-site stationary noise sources, including mechanical equipment and the LADWP equipment area, activities within the proposed outdoor spaces (i.e., outdoor dining and terraces), parking facilities and loading dock; and (b) off-site mobile (roadway traffic) noise sources. Regarding on-site operational noise, Alternative 3 would introduce noise from similar on-site noise sources. Alternative 3 would implement project design features similar to the Project, including regarding acoustic screening of loading areas from off-site noise receptors and controls on amplified sound, which would minimize on-site operational noise. As with the Project, Alternative 3 would also comply with the regulations under LAMC Section 112.02 which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. Thus, operational on-site noise impacts under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

With regard to operational off-site (i.e., traffic) noise, Alternative 3 would generate the same level of operational traffic when compared to the Project. Therefore, as with the Project, off-site noise impacts under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 3 would be similar to the Project, although the amount of excavation activities and construction duration would be substantially reduced. As with the Project, construction of Alternative 3 would generate on- and off-site vibration from the use of heavy-duty construction equipment and from truck trips. In addition, as with the Project, Alternative 3 would implement similar mitigation as the Project regarding construction vibration monitoring to minimize construction vibration impacts on the existing single-story commercial building adjacent to the Project Site to the south. While the overall amount of excavation activities would be reduced under Alternative 3, on- and off-site construction activities and the associated construction on- and off-site vibration levels would be expected to be similar to those of the Project as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment (i.e., there would be no change to the intensity for the days in which the maximum construction activity is required). However, as previously noted, the evacuation phase under Alternative 3 would be shortened by 90 percent. The impact experienced during this peak construction phase would occur over a shorter period as compared to the Project. As such, peak vibration levels generated by construction equipment and construction truck trips under Alternative 3

would be similar to those of the Project. Accordingly, as with the Project, construction activities under Alternative 3 would result in significant and unavoidable on-site vibration impacts (both building damage and human annoyance), significant unavoidable off-site vibration impacts (human annoyance), and less-than-significant off-site vibration impacts (building damage). However, as Alternative 3's construction duration would be substantially less for evacuation as compared to the Project, the significant and unavoidable on-site and off-site construction vibration impact would be substantially less under Alternative 3.

(b) Operation

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

g. Public Services

(1) Fire Protection

(a) Construction

The types of construction activities required for Alternative 3 would be similar to those of the Project, although the amount of excavation activities and construction traffic would be reduced due to the elimination of the subterranean parking proposed by the Project. As with the Project, construction under Alternative 3 would occur in compliance with all applicable federal, State, and local requirements concerning fire prevention and hazardous materials which would effectively reduce the potential for construction-related fire and explosion. Additionally, as with the Project, Alternative 3 would maintain travel lanes on all streets around the Project Site throughout the construction period and would implement a construction management plan, which would include provisions for maintaining emergency access during construction. Furthermore, emergency vehicles have the ability to avoid traffic delays through the use of sirens to clear paths of travel in accordance with the CVC. Therefore, construction of Alternative 3, as with the Project,

would not result in the need for new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. As Alternative 3 would reduce the amount of excavation activities and construction traffic, there would also be reduced risk for construction-related fire and explosion, further reducing the need for new or altered government facilities compared to the Project. Impacts under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 3 would construct similar uses as the Project, and as with the Project, would generate new employment opportunities within the Project Site. As Alternative 3 would construct the same uses and floor area as the Project, the number of new employees would be the same as the Project. As such, this alternative would generate a similar demand for LAFD fire protection services on a daily basis when compared to the Project. 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, life safety features (e.g., automatic fire sprinkler systems, fire service access elevators, etc.), and would undergo LAFD fire/life safety plan review to ensure compliance with the above, which would reduce the demand for fire protection and also ensure adequate emergency access. Furthermore, as with the Project, traffic generated by Alternative 3 would not significantly impact emergency vehicle response to the Project Site and surrounding area as the drivers of emergency vehicles have the ability to bypass traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. The driveways and internal circulation under Alternative 3 would also be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. As with the Project, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for Alternative 3. Therefore, similar to the Project, Alternative 3 would not necessitate the construction of new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. As such, impacts with regard to fire protection services during operation of Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Police Protection

(a) Construction

As discussed above, construction activities under Alternative 3 would be similar to those of the Project; however, the overall amount of construction activities would be reduced compared to the Project due to the reduced subterranean parking levels. Similar

to the Project, construction would not generate a permanent population on the Project Site that would substantially increase the police service population of the Hollywood Division. The existing commercial uses on the Project Site currently generate a daytime population that may require police protection services. The demand for police protection services during construction of Alternative 3 would be offset by the removal of the existing commercial buildings on the Project Site. However, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. Additionally due to the reduction of construction activities, the small temporary demand for police services would be shorter compared to the Project. As such, Alternative 3 would not generate a new residential population on the Project Site or in the area during construction, which would result in the need for additional police protection services. Furthermore, as with the Project, Alternative 3 would incorporate Project Design Feature POL-PDF-1 to implement temporary security measures, including security fencing, lighting, and locked entry to secure the Project Site during construction, which would serve to reduce demand on LAPD facilities.

Furthermore, as with the Project, Alternative 3 would implement a construction traffic management plan that would ensure continued provision of emergency access during construction. Lastly, pursuant to CVC Section 21806, emergency vehicles would use their sirens to clear a path of travel or drive in the lanes of opposing traffic during an emergency to avoid or bypass traffic. Therefore, as with 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 would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduced excavation activities.

(b) Operation

As previously discussed, Alternative 3 would construct similar uses as the Project. As with the Project, Alternative 3 would provide 431,032 square feet of office space and 14,186 square feet of ground floor restaurant space, which would generate the same number of employees as the Project. Alternative 3 would not include any residential uses; therefore, Alternative 3 would not generate a direct demand for police protection services such that the officer to population ratio within the Hollywood Division would be affected. Similar to the Project, Alternative 3 would implement similar project design features as the Project during operation, which would help reduce the demand for police services and, as with the Project, Alternative 3 would generate General Fund tax revenues for the City which could be used to expand law enforcement resources in the Hollywood Division. Therefore, Alternative 3, as with the Project, would not result in the need for new or altered government facilities (i.e., police stations), the construction of which would cause significant

environmental impacts, in order to maintain service. As such, impacts related to police services under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(3) Libraries

(a) Construction

Similar to the Project, construction of Alternative 3 would result in a temporary increase of construction workers on the Project Site. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by Alternative 3. Therefore, construction workers would not result in a notable increase in the resident population within the service area of the LAPL library branches serving the Project Site. Also, it is unlikely that construction workers would visit library facilities in the vicinity of the Project Site on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Similarly, it is unlikely that construction workers would utilize library facilities at the end of the workday and would likely use library facilities near their places of residence. Therefore, as with the Project, any increase in library usage associated with construction workers under Alternative 3 would be negligible and less than significant. Consequently, as with the Project, Alternative 3 construction would not necessitate the construction of a new or expanded library facilities, the construction of which would cause significant environmental impacts, in order to maintain service. As such, impacts related to libraries would be less than significant under Alternative 3 and similar to the less-than-significant impacts of the Project.

(b) Operation

Residents are considered the primary users of library facilities. As with the Project, Alternative 3 would not generate a residential population on the Project Site which could create a direct demand for library facilities. In addition, while on-site employees could generate some indirect demand for LAPL library facilities under Alternative 3, this demand would be expected to be negligible since on-site employees would be more likely to use library facilities near their homes during non-work hours. Furthermore, employees at the Project Site would have internet access which would provide information and research capabilities and reduce library demand. Therefore, as with the Project, Alternative 3 operation would not necessitate the construction of a new or expanded library facilities, the construction of which would cause significant environmental impacts, in order to maintain

service. As such, impacts related to libraries under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

h. Transportation

As previously described, Alternative 3 would be developed within the same Project Site as the Project. As such, the plans, policies, and programs applicable to the Project would also apply to Alternative 3. As with the Project, this alternative would not interfere with the complete streets balanced transportation network (i.e., Transit-Enhanced Network, Bicycle Enhanced Network, and Pedestrian-Enhanced Districts) concept of the Mobility Plan and would enhance pedestrian access within and around the Project Site as called for by the Mobility Plan and the Hollywood Community Plan; prioritize safety and access for all individuals utilizing the Project Site by complying with all American with Disabilities Act (ADA) requirements as required by the LAMC; include sidewalk and driveway design, vehicular parking, bicycle parking, etc., in accordance with LAMC requirements; design parking facilities to promote public safety and prevent unsightly or barren appearance as call for by the Hollywood Redevelopment Plan; and represent urban infill development within a TPA and HQTA in close proximity to transit which would encourage alternative transportation use as called for by the Mobility Plan, Hollywood Redevelopment Plan and 2020–2045 RTP/SCS. Alternative 3 would support these transportation plans for the same reasons as the Project (e.g., would include similar roadway and sidewalk improvements, would comply with LAMC driveway and parking standards, etc.). Since Alternative 3 would develop the same uses as the Project, Alternative 3 would support the applicable transportation plans for the same reasons and to the same extent as the Project. Alternative 3 would also reduce per capita VMT, including through the implementation of TDM measures under Project Design Feature TR-PDF-1 as called for by the Mobility Plan, Hollywood Community Plan, 2020–2045 RTP/SCS, and the City's TDM Ordinance. Furthermore, while Sunset Boulevard along the Project Site's northern boundary is identified as part of the Vision Zero's High Injury Network, no specific Vision Zero projects are planned for this roadway segment, and Alternative 3 would not conflict with the implementation of future Vision Zero projects along this roadway segment. Therefore, as with the Project, Alternative 3 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be less than significant. The degree of the impacts would be similar to the less-than-significant impacts of the Project.

Regarding VMT, as Alternative 3 would include the same uses and floor area as the Project, Alternative 3 would result in the same daily work VMT per employee as the Project. As such, Alternative 3 would also be below the work VMT per employee significance threshold for the Central APC of 7.6. Additionally, Alternative 3 also would not include any residential uses and, therefore, would not result in a household VMT impact. Therefore, as with the Project, Alternative 3 would not conflict or be inconsistent with CEQA Guidelines

Section 15064.3, Subdivision (b), regarding VMT, and impacts would be less than significant. The degree of the impacts would be similar under Alternative 3.

With respect to freeway safety, as discussed in Section IV.H, Transportation, of this Draft EIR, queuing distances at the US-101 Northbound Off-ramp to Sunset Boulevard would exceed ramp capacity in the A.M. peak hour in the Future Base scenario and the Future plus Project scenario resulting in a significant freeway safety impact at this off-ramp. With implementation of Mitigation Measure TR-MM-1 requiring the addition of a protected/permitted left-turn phase with reoptimized signal timing for westbound Sunset Boulevard at Van Ness Avenue, it is concluded in Section IV.H, Transportation, of this Draft EIR, that this impact would be reduced to a less-than-significant level. As Alternative 3 would develop the same uses as the Project, it would generate the same operational traffic and would have the same significant impact at the US-101 Northbound Off-ramp to Sunset Boulevard. Therefore, with implementation of Mitigation Measure TR-MM-1, as with the Project, this impact would be reduced to a less-than-significant level for Alternative 3. The degree of the impact would be similar under Alternative 3.

i. Tribal Cultural Resources

As previously discussed, Alternative 3 would not construct the subterranean parking proposed by the Project and would result in reduced excavation activities. However, as tribal cultural resources are typically found in the first six to ten feet of excavation, the potential for Alternative 3 to uncover subsurface tribal cultural resources would be similar compared to that of the Project. As discussed in Section IV.I, Tribal Cultural Resources, of this Draft EIR, no tribal cultural resources have been previously recorded at the Project Site or identified during consultations with the applicable California Native American Tribes conducted in accordance with AB 52. Nonetheless, Alternative 3 would also implement the City's standard condition of approval for the inadvertent discovery of tribal cultural resources, which would mitigate impacts to any tribal cultural resources that may be encountered during construction. Therefore, Alternative 3 would result in less-than-significant impacts to tribal cultural resources, which would be similar when compared to the less-than-significant impacts of the Project.

j. 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 dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. Construction-related water use under Alternative 3 would be less due

to the overall reduced amount of excavation activities. Furthermore, while Alternative 3 would require trenching for connection to the existing water mains in the adjacent streets similar to the Project, Alternative 3 would similarly implement a Construction Traffic Management Plan (Project Design Feature TR-PDF-1 included in Section IV.H, Transportation, of this Draft EIR) to ensure the safe and efficient flow of pedestrian and vehicular traffic around the construction sites during construction. As such, as with the Project, Alternative 3 would not result in construction activities that 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. Alternative 3 would result in less-than-significant impacts that are less when compared to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 3 would result in an increase in long-term water demand. As discussed above, Alternative 3 would develop the same uses and floor area as the Project. As such, water demand for Alternative 3 would be similar to the Project's estimated increase in water demand. Thus, as with the Project, the estimated water demand under Alternative 3 would similarly be met by the available supplies projected by LADWP. Therefore, the estimated water demand under Alternative 3 would also be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040. In addition, the existing water distribution infrastructure would be adequate to serve Alternative 3 since the water demand would be similar to the water demand generated by the Project. Furthermore, similar to the Project, Alternative 3 would construct the necessary water infrastructure and connections to the LADWP water system pursuant to applicable City requirements to accommodate the new development. Thus, impacts to water supply under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, the existing sewer laterals would be capped during construction of Alternative 3. As such, no new sewage would enter the public sewer system. As with the Project, temporary facilities, such as portable toilet and hand wash areas, would be provided by the construction contractor; however, any sewage generated from these facilities would be collected and hauled off-site and would not be discharged into the public sewer system. In addition, while no new wastewater would enter the public sewer system during construction, Alternative 3, as with the Project, would remove the existing on-site buildings thereby resulting in a net reduction in the existing sewage entering the sewer system from the Project Site. Lastly, as with the Project, no new off-site sewer lines would be required for Alternative 3, and construction impacts associated with

new wastewater infrastructure would primarily be confined to trenching for the placement of pipe and connection into the existing sewer wyes or laterals, and any off-site work that could potentially affect existing sewer service to adjacent properties would be coordinated with the BOE. As such, Alternative 3, as with the Project, would not require or result in the relocation or construction of new or expanded wastewater facilities, the construction or relocation of which could cause significant environmental effects during the construction period. Therefore, Alternative 3 would result in less than-significant impacts, which would be similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 3 would generate a net increase in wastewater flows from the Project Site. As discussed above, Alternative 3 would develop the same uses and floor area as the Project. As provided in Section IV.J.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the wastewater generated during Project operation would be able to be accommodated by the existing remaining capacity of the HWRP. As operational wastewater generation under Alternative 3 would be the same as under the Project, the existing remaining capacity and projected future remaining capacity of the HWRP would also be adequate to serve Alternative 3.

Regarding wastewater conveyance (sewer) capacity, as discussed in Section IV.J.2, Utilities and Service Systems—Wastewater, of this Draft EIR, sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing off-site sewer lines in the adjacent streets. According to the SCAR prepared by LASAN for the Project, the sewer lines serving the Project Site have adequate capacity to serve the Project. Since Alternative 3 would generate the same operational wastewater as the Project, these sewer lines would also have adequate capacity to serve Alternative 3. Also, as with the Project, additional detailed gauging and evaluation would be conducted for Alternative 3, as required by LAMC Section 64.14, to obtain final approval of sewer capacity and connection permit during the permitting process. Furthermore, as with the Project, all sanitary sewer connections and on-site infrastructure under Alternative 3 would be designed and constructed in accordance with applicable standards.

Based on the above, operation of Alternative 3, as with the Project, would not 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. Therefore, Alternative 3 would result in less-than-significant operational wastewater impacts, which would be similar to the less-than-significant impacts of the Project.

(3) Energy Infrastructure

(a) Construction

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

(b) Operation

As with the Project, operation of Alternative 3 would generate an increased consumption of electricity and natural gas relative to existing conditions. As Alternative 3 would develop the same uses and floor area as the Project, the total energy consumption of Alternative 3 would be similar to the total energy consumption of the Project, and Alternative 3's electricity and natural gas demand can be served by facilities in the vicinity of the Project Site. Therefore, impacts to infrastructure capacity under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

3. Comparison of Impacts

Based on the analysis above, Alternative 3 would not avoid the Project's significant unavoidable noise and vibration impacts, including those related to on- and off-site noise sources during construction; on- and off-site vibration during construction (pursuant to the significance threshold for human annoyance); and on-site vibration during construction (pursuant to the significance threshold for building damage). Alternative 3 would also not avoid the Project's significant and unavoidable cumulative noise and vibration impacts related to off-site noise during construction and off-site vibration during construction (pursuant to the significance threshold for human annoyance). However, Alternative 3 would reduce the duration of the excavation phase of the Project such that these impacts would occur for a shorter duration during this phase. In addition, Alternative 3 would reduce the Project's significant and unavoidable impacts and several of the construction-related less-than-significant impacts and less-than-significant impacts with mitigation associated with the Project (i.e., TACs during construction, energy efficiency during construction, police and fire protection services during construction, tribal cultural resources, water and energy infrastructure during construction) due to the reduction in excavation activities. All other impacts would be similar to those of the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 3 would develop the same uses and floor area as the Project. Specifically, Alternative 3 would develop 431,032 square feet of office space and 14,186 square feet of ground floor restaurant space. As such, Alternative 3 would meet the underlying purpose of the Project, which is to revitalize the underutilized infill Project Site by developing an integrated high-density commercial development that would generate new economic opportunities for the Hollywood area.

Regarding the Project objectives, Alternative 3 would meet the following Project objectives as effectively as the Project:

- To support the Hollywood Community Plan's Objective 1 to further the development of Hollywood as a major center of population, employment, retail services, and entertainment;

- To support the Hollywood Community Plan's Objective 4(a) to promote economic well-being and public convenience through allocating and distributing commercial lands for office, retail, service, and residential uses in quantities and patterns based on accepted planning principles and standards;

- Maximize the value of the underutilized site through replacement of existing low intensity commercial uses with a modern structure and a mix of uses consistent with anticipated market demands;

- Provide office space with large open floor plates, high ceilings, and a combination of indoor and outdoor spaces to meet the demand for creative work spaces that encourage collaboration and productivity;

- Locate employment opportunities and residential opportunities near one another along a major transit corridor within a high activity area to promote sustainability and reduce vehicle miles traveled, with associated reductions in air quality and greenhouse gas emissions to create a dynamic and economically viable commercial project with sufficient density to facilitate a healthy jobs-housing balance in the Hollywood area;

- To create a pedestrian-friendly project by creating a street-level identity for the Project Site and improving the pedestrian experience through the introduction of commercial uses on the ground level; and

- Revitalize the Project Site by creating a commercial project with proximity to existing and future transit lines, employment opportunities, housing, shops, and restaurants while incorporating the principles of smart growth and environmental sustainability by capitalizing on the Project Site's location within an employment

hub, proximity to transit and walkable streets, and the presence of existing infrastructure needed to service the proposed uses, while incorporating sustainable design components that emphasize resource conservation and efficiency.

V. Alternatives

D. Alternative 4: Development in Accordance with Community Plan Update Alternative

1. Description of the Alternative

Alternative 4, the Development in Accordance with Community Plan Update Alternative, considers development of the Project Site in accordance with the parameters set forth by the land use designation on the Project Site proposed by the Hollywood Community Plan Update, which is Regional Center (RC1B).[4] Under this proposed land use designation, multi-family residential, commercial (retail, restaurants), and office uses are permitted with a base FAR of 4:1. Accordingly, Alternative 4 would include the development of a commercial building with a total floor area of 297,412 square feet consisting of 283,226 square feet of office space and 14,186 square feet of ground floor restaurant space (inclusive of the proposed outdoor covered dining area). These proposed uses would be provided in one 11-story building with an approximate height of 216 feet. As with the Project, Alternative 4 would also include the construction of the LADWP equipment area on the De Longpre Lot. The area proposed for the LADWP use would not constitute floor area as defined by LAMC Section 12.03. Alternative 4 would include 903 vehicular parking spaces. Parking would be provided within two subterranean levels extending to a depth of approximately 28 feet, at-grade parking, a small parking mezzanine, and one full floor fully enclosed, mechanically ventilated above-grade levels. Five vehicular parking spaces would be provided in a small surface parking area adjacent to the LADWP equipment area. It is estimated that approximately 66,030 cubic yards of export would be hauled from the Project Site as part of this alternative.

As with the Project, the existing office and retail uses comprising 26,261 square feet, as well as the associated surface parking currently on the Project Site, would be removed. Upon completion, Alternative 4 would result in a net floor area of 271,151 square feet on the Project Site (inclusive of the proposed outdoor covered dining area) and an FAR of 3:1. A conceptual site plan for Alternative 4 is provided in Figure V-3 on page V-69.

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[4] *The Los Angeles Department of City Planning is currently preparing the Hollywood Community Plan Update (https://planning.lacity.org/plans-policies/community-plan-update/hollywood-community-plan-update). For purposes of this Draft EIR, the analysis is limited to the land use designations under the currently adopted Hollywood Community Plan.*

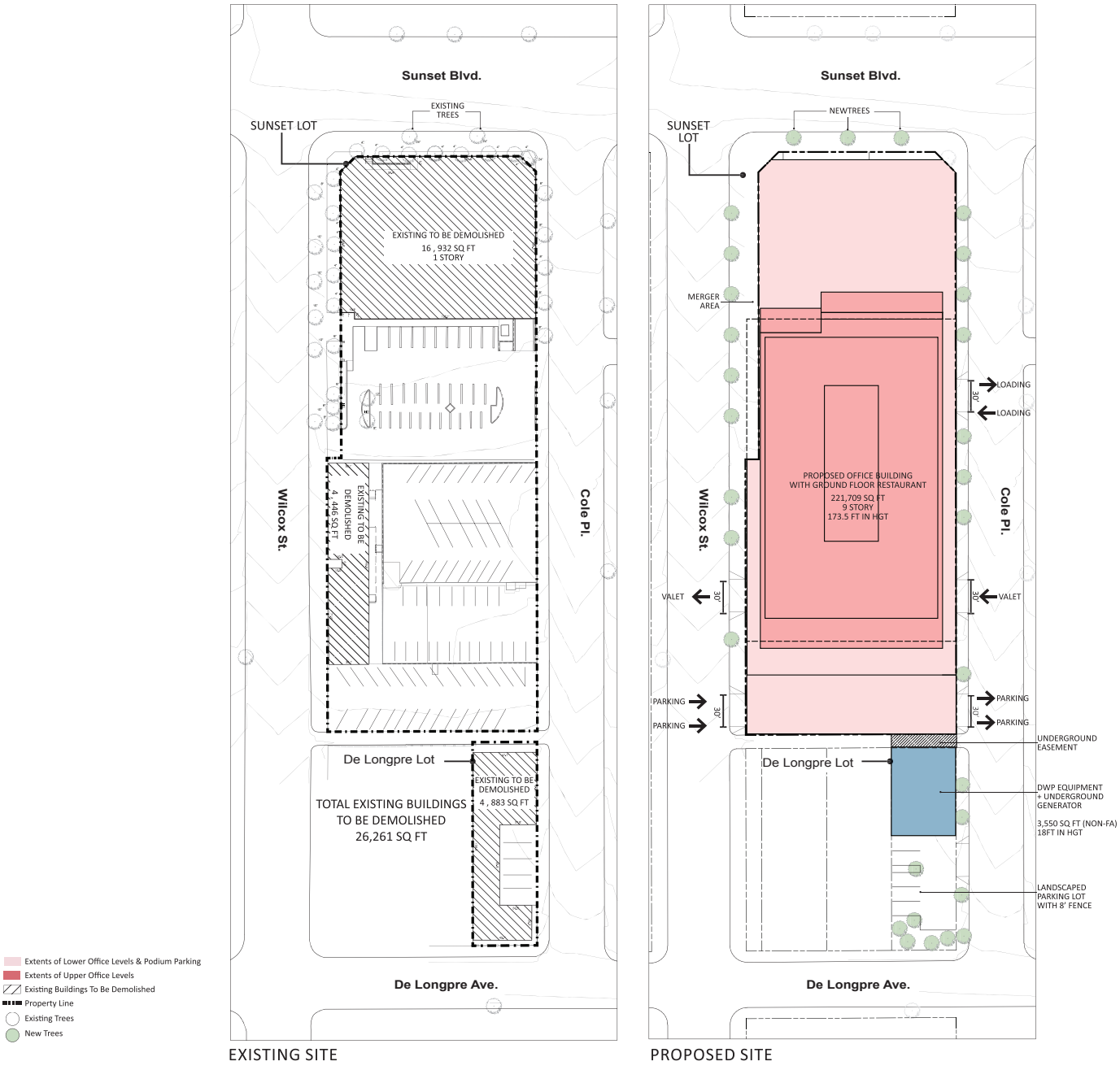

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Figure V-3
Alternative 4 Conceptual Site Plan

Source: Gensler, April 12, 2021.

Overall, Alternative 4 would reduce the commercial floor area proposed by the Project by approximately 147,806 square feet from a total of 445,218 square feet to 297,412 square feet (an approximately 33-percent reduction). With the reduced floor area, this alternative would result in a corresponding decrease in the height of the building from 15 stories and a height of 275 feet to 11 stories with a height of 216 feet. This alternative would also reduce the excavation required for the subterranean parking levels and would reduce the estimated amount of export from approximately 93,000 cubic yards to 66,030 cubic yards (a reduction of 26,970 cubic yards, approximately 30 percent). As such, Alternative 4 would result in an overall reduction in the duration of construction.

2. Environmental Impacts

a. Air Quality

(1) Regional Emissions

(a) Construction

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. As with the Project, Alternative 4 would comply with applicable air quality regulations during construction and implement Project Design Feature AIR-PDF-1 requiring the use of existing electrical infrastructure and/or solar generators rather than temporary diesel or gasoline generators during the construction period to minimize stationary source construction emissions.

During Project construction, maximum daily emissions occur during the excavation and mat foundation phases. During these phases, the number of equipment as well as trucks exporting soil and delivering concrete would be greater than other phases of construction (e.g., building construction, architectural coatings).

Under Alternative 4, construction activities would be reduced in comparison to the Project due to the reduction in development (i.e., a reduction in duration of construction activities), and excavation. Specifically, under Alternative 4, total excavation quantities would be reduced by approximately 30 percent in comparison to the Project from approximately 93,000 cubic yards to 66,030 cubic yards (a reduction of 26,970 cubic yards). In addition, under Alternative 4, the thickness of the mat slab foundation would be reduced from approximately 7 feet for the Project to 6 feet (a reduction of 1 foot). However,

the intensity of air emissions and fugitive dust from site preparation and construction activities under Alternative 4 would be similar to the Project on peak construction days because the maximum number of trucks and equipment operating during the excavation and mat foundation phases would be similar to the Project on a daily basis (i.e., there would be no change to the intensity for days in which the maximum construction activity is required). As such, air emissions during maximum activity days, which is one metric used for measuring impact significance, would be similar to those of the Project. It is noted however that with the reduced duration of the excavation phase, which would be shortened by approximately 30 percent (based on the corresponding 30-percent reduction in excavation quantities), and the reduction in the duration of the mat foundation phase, which would be reduced by approximately half a day in comparison to the Project (based on the reduction in mat slab foundation thickness), the Project's significant and unavoidable regional air emissions impact would occur for a shorter duration compared to the Project. Thus, the Project's regional air emissions significant and unavoidable impact would be substantially less under Alternative 4. While regional NOx emissions under Alternative 4 would continue to exceed significance thresholds during the mat foundation phase prior to mitigation, the duration that the NOx emissions significance threshold is exceeded would be reduced by 30 percent under Alternative 4, than compared to the Project. Further, implementation of Mitigation Measure AIR-MM-1 would reduce this impact to less than significant levels, similar to the Project. Thus while the reduction in development and excavation activities would substantially lessen impacts associated with regional daily emissions as compared to the Project prior to implementation of mitigation measures; impacts under Alternative 4, as with the Project, would be less than significant with implementation of Mitigation Measure AIR-MM-1.

(b) Operation

As previously discussed, the development proposed under Alternative 4 would be reduced compared to the Project. Based on the proposed uses, the number of daily trips and daily VMT generated by Alternative 4 would be less than the number of daily trips generated by the Project. As vehicular emissions depend on the number of trips and associated VMT, the overall pollutant emissions generated by this alternative would be less than the emissions generated by the Project because the number of vehicular trips would decrease.

With the reduction in uses and overall floor area, both area sources and stationary sources would result in reduced on-site operational air emissions associated with energy consumption compared to the Project. As a result, the overall pollutant emissions generated by Alternative 4 would be less than the emissions generated by the Project. Therefore, impacts associated with regional air pollutant emissions during operation of Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(2) Localized Emissions

(a) Construction

On-site construction activities under Alternative 4 would be located at similar distances from sensitive receptors as the Project. Although Alternative 4 would result in a reduction in the amount of proposed development (i.e., a reduction in duration of construction activities), excavation, and reduced mat foundation compared to the Project, the intensity of construction activities would be similar on days with maximum construction activities (i.e., there would be no change to the intensity for days in which the maximum construction activity is required). As such, air emissions during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Therefore, while the reduction in development (i.e., a reduction in duration of construction activities), excavation, and reduced mat foundation activities would reduce overall impacts associated with localized emissions as compared to the Project, air emissions under Alternative 4, as with the Project, would continue to exceed the SCAQMD localized screening threshold for NO_X during the concrete mat foundation phase. It is noted, however, that with the reduced duration of the excavation phase, which would be shorted by approximately 30 percent (based on the corresponding 30-percent reduction in excavation quantities), and the reduction in the duration of the mat foundation phase, the Alternative's significant and unavoidable impact would be substantially less in comparison to the Project. Notwithstanding, as with the Project, with incorporation of Mitigation Measure AIR-MM-1 as part of Alternative 4, localized air quality impacts would be reduced to less than significant with implementation of mitigation, with the degree of the impact similar to that of the Project.

(b) Operation

Localized operational impacts are determined primarily by traffic volumes. As provided above, Alternative 4 would reduce the commercial floor area proposed by the Project by approximately 147,806 square feet from a total of 445,218 square feet to 297,412 square feet. As such, this alternative would generate less daily trips compared to the Project; therefore, total vehicular emissions would be less compared to the Project. In addition, the amount of development proposed under Alternative 4 would be reduced compared to the Project; therefore, area and stationary sources would generate less on-site operational air emissions compared to the Project. With the decrease in localized vehicle emissions and on-site emissions, overall localized emissions under Alternative 4 would be less the Project. As such, under Alternative 4, total contributions to localized air pollutant emissions during operation would be less than the Project's contribution. Accordingly, localized air quality impacts under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(3) Toxic Air Contaminants

(a) Construction

As with the Project, construction of Alternative 4 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to construction TAC emissions. Overall construction TAC emissions generated by Alternative 4 would be less than those of the Project. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Operation

As set forth in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential TAC emissions associated with Project operations would include DPM from delivery trucks. Under Alternative 4, the overall increase in the number of deliveries and associated diesel particulate matter emissions would be reduced when compared to the Project due to the reduction in trips generated. In addition, Alternative 4 would result in less operational truck deliveries. Furthermore, similar to the Project, the land uses proposed under Alternative 4 are not considered land uses that generate substantial TAC emissions. Therefore, Alternative 4 would not release substantial amounts of TACs. Impacts due to TAC emissions and the corresponding cancer risk under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project.

b. Cultural Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, there are no listed historical resources on the Project Site, and the existing buildings on the Project Site are not eligible for listing. Therefore, as with the Project, Alternative 4 would not result in direct impacts to historical resources from removal of the existing on-site buildings during construction. Additionally, as with the Project, the height and general character of this alternative would not interfere or conflict with the historic context (i.e., impair the ability to convey significance) of the listed/potential historical resources and historic district in the vicinity of the Project Site as the height of the building proposed under this alternative would be reduced and the building would feature similar design elements as the Project. As with the Project, Alternative 4 would not include the demolition, relocation, rehabilitation, alteration, relocation or conversion of any nearby historical resources, or any contributing or non-contributing building to the De Longpre Park Residential Historic District. All of the existing buildings and sites that comprise the district would remain unchanged and in their

original location after implementation of Alternative 4. Therefore, Alternative 4 would result in less-than-significant impacts to historical resources, and such impacts would be similar when compared to the less than significant impacts of the Project.

c. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily vehicle trips generated and associated VMT, as well as by energy consumption from proposed land uses. As previously noted, due to the reduction in development, the number of daily trips and daily VMT under Alternative 4 would be reduced compared to the Project. In addition, energy and water consumption from the proposed land uses would be reduced compared to the Project due to the reduction in development. Thus, the amount of GHG emissions generated by Alternative 4 would be less than the amount generated by the Project. As with the Project, Alternative 4 would be designed to comply with the requirements of the CALGreen Code and the Los Angeles Green Building Code. As with the Project, Alternative 4 would incorporate design features to reduce GHG emissions such as the sustainability features required to achieve LEED Gold certification per Project Design Feature GHG-PDF-1 and would be designed to comply with the City's Green Building Ordinance, as applicable. Alternative 4, as with the Project, would also increase urban density within a TPA and HQTA in proximity to transit, would include LAMC-required bicycle parking, and would include EV/EVA-ready parking, which would reduce VMT and associated fuel usage and GHG emissions. With compliance with applicable regulations and with implementation of comparable sustainability features as the Project, Alternative 4 would be consistent with the GHG reduction goals and objectives included in adopted State, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project.

d. Energy

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

(a) Construction

Similar to the Project, construction activities under Alternative 4 would consume electricity to convey water for dust control and to power lighting, electronic equipment, and other construction activities, and petroleum-based fuels for heavy construction equipment, delivery and haul trucks, and construction worker traffic. As with the Project, construction activities associated with Alternative 4 would not involve the consumption of natural gas. As with the Project, Alternative 4 would also generate a demand for transportation energy associated with on- and off-road vehicles. However, the energy consumed during

construction of Alternative 4 would be reduced compared to the Project due to the reduction in overall construction activities. As with the Project, the use of construction equipment/vehicles used during construction of Alternative 4 would comply with Title 24 standards and other applicable energy conservation requirements, CARB anti-idling and In-Use Off-Road Diesel-Fueled Fleet regulations, federal fuel efficiency standards, and other applicable requirements. Alternative 4 would also implement design features, similar to the Project, to reduce energy usage and fuel consumption during construction. Specifically, as with the Project, Alternative 4 would implement Project Design Feature AIR-PDF-1 which would require the use of electricity from power poles rather than temporary diesel or gasoline powered generators where available. Therefore, as with the Project, Alternative 4 construction activities would require energy demand that is not wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 4 and less when compared to the less than significant impacts due to the reduction in construction activities and duration.

(b) Operation

As with the Project, operation of Alternative 4 would generate an increased consumption of electricity and natural gas relative to existing conditions. When compared to the Project, Alternative 4 would include less development and, thus, would be expected to generate lower operational energy demand than the Project. Furthermore, as previously discussed, Alternative 4 would result in less daily vehicle trips and daily VMT as compared to the Project. Similar to the Project, Alternative 4 would comply with applicable conservation requirements during operation, including Title 24 standards, CALGreen Code, and the Green Building Code, would implement Project Design Feature GHG-PDF-1 requiring the incorporation of sustainability features required to achieve LEED Gold certification, and would provide LAMC-required bicycle parking and EV/EVA-ready parking, all of which would save energy. Furthermore, as with the Project, Alternative 4 would be developed within an HQTA in close proximity to transit, which would encourage the use of alternative more efficient modes of transportation and minimize fuel consumption. Therefore, as with the Project, operation of Alternative 4 would not involve the wasteful, inefficient, or unnecessary consumption of energy resources. As such, Alternative 4 would result in less-than-significant impacts during operation which would be similar to the less than significant impacts of the Project.

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

As discussed in Section IV.C, Energy, of this Draft EIR, the energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the 2019 CALGreen Code, the City's Green Building Code, City's Green New Deal, and the 2020–2045 RTP/SCS. As these conservation policies are mandatory under the City's Building Code, Alternative 4, as with the Project, would not conflict with applicable plans for

renewable energy or energy efficiency. Furthermore, as discussed previously, Alternative 4, as with the Project, would implement project design features requiring additional sustainability measures to reduce energy use. With regard to transportation related energy usage, as with the Project, Alternative 4 would represent urban infill development within a TPA and HQTA in close proximity to transit, which would reduce vehicle trips, VMT, per capita VMT, and associated fuel usage in accordance with the SB 375 and SCAG's 2020–2045 RTP/SCS. As with the Project, Alternative 4 would also be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction, which would save transportation energy. Therefore, Alternative 4, as with the Project, would not conflict with plans for renewable energy or energy efficiency. The impacts of Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

e. Land Use and Planning

Alternative 4, the Development in Accordance with Community Plan Update Alternative, considers development of the Project Site in accordance with the parameters set forth by the land use designation on the Project Site proposed by the Hollywood Community Plan Update, which is Regional Center (RC1B). Under this proposed land use designation, multi-family residential, commercial (retail, restaurants), and office uses are permitted with a base FAR of 4:1. Accordingly, this alternative would include the development of a commercial building with a total floor area of 297,412 square feet consisting of 283,226 square feet of office space and 14,186 square feet of ground floor restaurant space (inclusive of the proposed outdoor covered dining area).

As with the Project, Alternative 4 would be consistent with the overall intent of the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site and that were adopted to avoid or mitigate an environmental effect, including, but not limited to the City's General Plan Framework Element, Hollywood Community Plan and LAMC, and SCAG's 2020–2045 RTP/SCS. Additionally, since Alternative 4 would be developed in accordance with the Community Plan Update, assuming that the City Council, which sets the City's applicable goals, policies, and objectives, adopts the Community Plan Update as currently drafted, Alternative 4 would be more consistent with the applicable goals, policies, and objectives in locals plans since it would not require the same discretionary entitlements as with the Project. For example, this alternative would not require a height district change. Therefore, as this alternative would construct a project consistent with the proposed land use designation of the Project Site, this alternative also would not conflict with the applicable plans that govern development on the Project Site, and the impacts of Alternative 4 related to potential conflicts with applicable land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect would

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

f. Noise

(1) Noise

(a) Construction

The types of construction activities under Alternative 4 would be substantially similar to the Project, although the amount of construction activities and duration would be reduced due to the reduction in total floor area (i.e., 297,412 square feet versus 445,218 square feet under the Project) and the reduction in required excavation activities (a reduction in the amount of export from approximately 93,000 cubic yards to 66,030 cubic yards). As with the Project, construction of Alternative 4 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Under Alternative 4, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to that of the Project during maximum activity days during the excavation and mat foundation phases (i.e., there would be no change to the intensity for days in which the maximum construction activity is required). However, as previously noted, the excavation phase under Alternative 4 would be shortened by 30 percent. The impact experienced during this peak construction phase would occur over a shorter period as compared to the Project. As such, noise levels during maximum activity days, which is one metric used for measuring impact significance, would be similar to those of the Project, however the duration of noise levels, another metric used for measuring impact significance would be substantially less than compared to the Project. As with the Project, Alternative 4 would implement similar project design features and mitigation measures which would minimize construction noise. Thus, the Project's on-site and off-site construction noise (both Project-level and cumulative) would be significant and unavoidable under Alternative 4, as the noise levels during maximum activity days would be similar to the Project, however, as Alternative 4's construction duration would be substantially less as compared to the Project, the significant and unavoidable on-site and off-site noise impact would be substantially less under Alternative 4.

(b) Operation

As discussed in Section IV.F, Noise, of this Draft EIR, sources of operational noise under the Project would include (a) on-site stationary noise sources, including mechanical equipment and the LADWP equipment area, activities within the proposed outdoor spaces (i.e., outdoor dining and terraces), parking facilities and loading dock; and (b) off-site mobile (roadway traffic) noise sources. Regarding on-site operational noise, Alternative 4 would introduce noise from similar on-site noise sources to the Project. However, it is anticipated that with the overall reduction in total floor area and uses under this alternative,

the noise levels from building mechanical equipment, outdoor spaces, and parking facilities would be reduced. In addition, similar to the Project, Alternative 4 would implement project design features similar to the Project which would minimize on-site operational noise. As with the Project, Alternative 4 would also comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. Thus, operational on-site noise impacts under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project.

With regard to operational off-site (i.e., traffic) noise, Alternative 4 would generate less operational traffic than the Project. The reduction in vehicle trips would result in a decrease in off-site operational traffic-related noise levels under Alternative 4. Therefore, as with the Project, off-site noise impacts under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 4 would be similar to the Project, although the amount and duration of construction activities would be reduced. As with the Project, construction of Alternative 4 would generate on- and off-site vibration from the use of heavy-duty construction equipment and from truck trips. Also as with the Project, Alternative 4 would implement similar mitigation as the Project to minimize construction vibration impacts on the existing single-story commercial building adjacent to southern portion of the Project Site to the west. While the overall amount and duration of construction activities (including excavation) would be reduced under Alternative 4, on- and off-site construction activities and the associated construction on- and off-site vibration levels would be expected to be similar to those of the Project as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment (i.e., there would be no change to the intensity for the days in which the maximum construction activity is required). However, as previously noted, the evacuation phase under Alternative 4 would be shortened by 30 percent. The impact experienced during this peak construction phase would occur over a shorter period as compared to the Project. Peak vibration levels generated by construction equipment and construction truck trips under Alternative 4 would be similar to those of the Project. Accordingly, as with the Project, construction activities under Alternative 4 would result in significant unavoidable on-site vibration impacts (both building damage and human annoyance), significant unavoidable off-site vibration impacts (human annoyance), and less than significant off-site vibration impacts (building damage). However, as Alternative 4's construction duration would be substantially less for evacuation as compared to the

Project, the significant and unavoidable on-site and off-site construction vibration impact would be substantially less under Alternative 4.

(b) Operation

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

g. Public Services

(1) Fire Protection

(a) Construction

The types of construction activities required for Alternative 4 would be similar to those of the Project, although the amount of development and associated construction activities and construction traffic would be reduced due to the reduction in development. As with the Project, construction under Alternative 4 would occur in compliance with all applicable federal, State, and local requirements concerning fire prevention and hazardous materials which would effectively reduce the potential for construction-related fire and explosion. Additionally, similar to the Project, Alternative 4 would maintain travel lanes on all streets around the Project Site throughout the construction period and would implement a Construction Traffic Management Plan (Project Design Feature TR-PDF-1 included in Section IV.H, Transportation, of this Draft EIR), which would include provisions for maintaining emergency access and minimizing delays in emergency response during construction. Furthermore, emergency vehicles have the ability to avoid traffic delays through the use of sirens to clear paths of travel in accordance with the CVC. Therefore, construction of Alternative 4, as with the Project, would not result in the need for new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 4

related to fire services would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Operation

As previously discussed, Alternative 4 would construct similar uses to the Project and, as with the Project, would generate additional employment opportunities compared to existing conditions. Nonetheless, this increase in employees would be less than the Project due to the reduction in development. As such, this alternative would generate a smaller demand for LAFD fire protection services on a daily basis when compared to the Project. 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, life safety features (e.g., automatic fire sprinkler systems, fire service access elevators, etc.) and would undergo LAFD fire/life safety plan review to ensure compliance with the above, which would reduce the demand for fire protection and also ensure adequate emergency access. Furthermore, as with the Project, traffic generated by Alternative 4 would not significantly impact emergency vehicle response to the Project Site and surrounding area as the drivers of emergency vehicles have the ability to bypass traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. The driveways and internal circulation under Alternative 4 would also be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. As with the Project, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for Alternative 4. Therefore, similar to the Project, Alternative 4 would not necessitate the construction of new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. As such, impacts with regard to fire protection services during operation of Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in service population.

(2) Police Protection

(a) Construction

As discussed above, construction activities under Alternative 4 would be similar to those of the Project, although the amount of development and associated construction activities and construction traffic would be reduced due to the reduction in development. Similar to the Project, construction would not generate a permanent population on the Project Site that would substantially increase the police service population of the Hollywood Division. The existing commercial uses on the Project Site currently generate a daytime population that may require police protection services. The demand for police protection services during construction of Alternative 4 would be offset by the removal of the existing

commercial buildings on the Project Site. However, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. However, as with the Project, Alternative 4 would incorporate Project Design Feature POL-PDF-1 to implement temporary security measures, including security fencing, lighting, and locked entry to secure the Project Site during construction, which would serve to reduce demand on LAPD services.

Furthermore, Alternative 4 would also implement a Construction Traffic Management Plan (Project Design Feature TR-PDF-1 included in Section IV.H, Transportation, of this Draft EIR) that would ensure continued provision of emergency access during construction. Also, as previously noted, pursuant to CVC Section 21806, emergency vehicles have the ability to bypass traffic by using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, as with 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 would cause significant environmental impacts, in order to maintain service. Impacts to police protection services during construction under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Operation

As previously discussed, Alternative 4 would construct similar uses as the Project. As with the Project, Alternative 4 would generate additional employment opportunities compared to existing conditions. However, the increase in new employees at the Project Site compared to existing conditions would be less than the Project due to the reduction in development. In addition, as with the Project, Alternative 4 would not include residential uses, and would not generate a direct demand for police protection services such that the officer to population ratio within the Hollywood Division would increase. Similar to the Project, Alternative 4 would implement project design features similar to the Project, which would help reduce the demand for police services, and Alternative 4 would also generate General Fund tax revenues for the City which could be used to expand law enforcement resources in the Hollywood Division. Therefore, Alternative 4, as with the Project, would not result in the need for new or altered government facilities (i.e., police stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts to police protection services during operation under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduced service population.

(3) Libraries

(a) Construction

Similar to the Project, construction of Alternative 4 would result in a temporary increase of construction workers on the Project Site. However, due to the employment patterns of construction workers, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by Alternative 4. Therefore, construction workers would not result in a notable increase in the resident population within the service area of the LAPL library branches serving the Project Site. Also, it is unlikely that construction workers would visit library facilities in the vicinity of the Project Site on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Similarly, it is unlikely that construction workers would utilize library facilities at the end of the workday and would likely use library facilities near their places of residence. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. Consequently, as with the Project, construction of Alternative 4 would not necessitate the construction of new or expanded library facilities, the construction of which would cause significant environmental impacts, in order to maintain service. As such, impacts to library facilities during construction would be less than significant under Alternative 4 and similar to the less-than-significant impacts of the Project.

(b) Operation

Residents are considered the primary users of library facilities. As with the Project, Alternative 4 would not generate a residential population on the Project Site which could create a direct demand for library facilities. In addition, while on-site employees could generate some indirect demand for LAPL library facilities under Alternative 4, this demand would be expected to be negligible since on-site employees would be more likely to use library facilities near their homes during non-work hours. Furthermore, employees at the Project Site would have internet access, which would provide information and research capabilities and reduce library demand. Therefore, as with the Project, Alternative 4 operation would not necessitate the construction of a new or expanded library facilities, the construction of which would cause significant environmental impacts, in order to maintain service. As such, impacts to library facilities during operation under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduced amount of development.

h. Transportation

As previously described, Alternative 4 would be developed within the same Project Site as the Project. As such, the plans, policies, and programs applicable to the Project would also apply to Alternative 4. As with the Project, this alternative would not interfere with the complete streets balanced transportation network (i.e., Transit-Enhanced Network, Bicycle Enhanced Network, and Pedestrian-Enhanced Districts) concept of the Mobility Plan and would enhance pedestrian access within and around the Project Site as called for by the Mobility Plan and the Hollywood Community Plan; prioritize safety and access for all individuals utilizing the site by complying with all American with Disabilities Act (ADA) requirements as required by the LAMC; include sidewalk and driveway design, vehicular parking, bicycle parking, etc., in accordance with LAMC requirements; design parking facilities to promote public safety and prevent unsightly or barren appearance as call for by the Hollywood Redevelopment Plan; and represent urban infill development within a TPA and HQTA in close proximity to transit, which would encourage alternative transportation use as called for by the Mobility Plan, Hollywood Redevelopment Plan and RTP/SCS. Alternative 4 would support these transportation plans for the same reasons as the Project (e.g., would include similar roadway and sidewalk improvements, would comply with LAMC driveway and parking standards, etc.). Additionally, Alternative 4 would reduce work VMT per employee, including through the implementation of TDM measures under Project Design Feature TR-PDF-1 as called for by the Mobility Plan, Hollywood Community Plan, RTP/SCS, and the City's TDM Ordinance. Furthermore, while Sunset Boulevard along the Project Site's northern boundary is identified as part of the Vision Zero's High Injury Network, no specific Vision Zero projects are planned for this roadway segment, and the alternative would not conflict with the implementation of future Vision Zero projects along this roadway segment. Therefore, as with the Project, Alternative 4 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be less than significant. The degree of the impacts would be similar between the Alternative 4 and the Project as neither would conflict with an applicable transportation plan.

With respect to VMT, Alternative 4 would result in a daily work VMT per employee of 6.8, while the Project would result in a daily work VMT per employee of 6.1, both of which would be below the work VMT per employee significance threshold for the Central APC of 7.6. Additionally, neither project would include residential uses and, therefore, would not result in a household VMT impact. Therefore, as with the Project, Alternative 4 would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b), regarding VMT, and impacts would be less than significant. The degree of the impacts would be greater under Alternative 4.

As discussed in Section IV.H, Transportation, of this Draft EIR, queuing distances at the US-101 Northbound Off-ramp to Sunset Boulevard would exceed ramp capacity in the

A.M. peak hour in the Future Base scenario and the Future plus Project scenario resulting in a significant freeway safety impact at this off-ramp. Implementation of Mitigation Measure TR-MM-1, which requires the addition of a protected/permitted left-turn phase with reoptimized signal timing for westbound Sunset Boulevard at Van Ness Avenue, would reduce impacts to a less-than-significant level. Alternative 4 would include less development than the Project and would generate an estimated 32 percent less inbound operational traffic during the A.M. peak hour. As previously noted, it is estimated that a reduction of 93 percent would be required to avoid the Project's significant impact at the US-101 Northbound Off-ramp to Sunset Boulevard. Therefore, with an estimated 32-percent reduction in operation traffic, Alternative 4 would also result in a significant impact at the US-101 Northbound Off-ramp to Sunset Boulevard. As for the Project and Alternative 4, implementation of Mitigation Measure TR-MM-1 would reduce this impact to a less-than-significant level. The degree of the impact would be less under Alternative 4 as a result of lower operational traffic and associated vehicle queuing under this alternative when compared to the Project's less-than-significant impact with mitigation.

i. Tribal Cultural Resources

As previously discussed, Alternative 4 would construct fewer subterranean parking levels compared to the Project and would result in reduced excavation activities. However, as tribal cultural resources are typically found in the first six to ten feet of excavation, the potential for Alternative 4 to uncover subsurface tribal cultural resources would be similar compared to that of the Project. As discussed in Section IV.I, Tribal Cultural Resources, of this Draft EIR, no tribal cultural resources have been previously recorded at the Project Site or identified during consultations with the applicable California Native American Tribes conducted in accordance with AB 52. Nonetheless, Alternative 4 would also implement the City's standard condition of approval for the inadvertent discovery of tribal cultural resources, which would mitigate impacts to any tribal cultural resources that may be encountered during construction. Therefore, Alternative 4 would result in less-than-significant impacts to tribal cultural resources, which would be similar when compared to the less-than-significant impacts of the Project.

j. 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 dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. Construction-related water use under Alternative 4 would be slightly less due to the reduced amount of development. Furthermore, as with the Project, Alternative 4 would implement a Construction Traffic Management Plan (Project Design

Feature TR-PDF-1 included in Section IV.H, Transportation, of this Draft EIR) to ensure the safe and efficient flow of pedestrian and vehicular traffic around the construction site during installation of any necessary infrastructure improvements, such as connections to the main water lines. As such, Alternative 4 would not result in construction activities that 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. Alternative 4 would result in less-than-significant impacts that are less when compared to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 4 would result in an increase in long-term water demand. However, based on the reduction in total development as compared to the Project, water demand for Alternative 4 would be less than the Project's estimated increase in water demand. Thus, as with the Project, the estimated water demand under Alternative 4 would similarly be met by the available supplies projected by LADWP. Therefore, the estimated water demand under Alternative 4 would also be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040. In addition, the existing water distribution infrastructure would be adequate to serve Alternative 4 since the water demand would be less than the water demand generated by the Project. Furthermore, similar to the Project, Alternative 4 would construct the necessary on-site water infrastructure and off-site connections to the LADWP water system pursuant to applicable City requirements to accommodate the new development. Thus, impacts to water supply under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, the existing sewer laterals would be capped during construction of Alternative 4. As such, no new sewage would enter the public sewer system. As with the Project, temporary facilities, such as portable toilet and hand wash areas, would be provided by the construction contractor; however, any sewage generated from these facilities would be collected and hauled off-site and would not be discharged into the public sewer system. In addition, while no new wastewater would enter the public sewer system during construction, Alternative 4, as with the Project would remove the existing on-site buildings thereby resulting in a net reduction in the existing sewage entering the sewer system from the Project Site. Lastly, as with the Project, no new off-site sewer lines would be required for Alternative 4, and construction impacts associated with new wastewater infrastructure would primarily be confined to trenching for the placement of pipe and connection into the existing sewer wyes or laterals, and any off-site work that could potentially affect existing sewer service to adjacent properties would be coordinated

with the BOE. As such, Alternative 4, as with the Project, would not require or result in the relocation or construction of new or expanded wastewater facilities, the construction or relocation of which could cause significant environmental effects during the construction period. Therefore, Alternative 4 would result in less-than-significant impacts, which would be similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 4 would generate a net increase in wastewater flows from the Project Site. However, based on the reduction in total floor area, operational wastewater generation under Alternative 4 would be less than under the Project. As provided in Section IV.J.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the wastewater generated during Project operation would be able to be accommodated by the existing remaining capacity of the HWRP. As operational wastewater generation under Alternative 4 would be less than under the Project, the existing remaining capacity and projected future remaining capacity of the HWRP would also be adequate to serve Alternative 4.

Regarding wastewater conveyance (sewer) capacity, as discussed in Section IV.J.2, Utilities and Service Systems—Wastewater, of this Draft EIR, sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing off-site sewer lines in the adjacent streets. According to the SCAR prepared by LASAN for the Project, the sewer lines serving the Project Site have adequate capacity to serve the Project. Because Alternative 4 would generate less operational wastewater than the Project, adequate capacity to serve Alternative 4 would also be available. Also, as with the Project, additional detailed gauging and evaluation would be conducted for Alternative 4, as required by LAMC Section 64.14, to obtain final approval of sewer capacity and connection permit during the permitting process. Furthermore, as with the Project, all sanitary sewer connections and on-site infrastructure under Alternative 4 would be designed and constructed in accordance with applicable standards.

Based on the above, operation of Alternative 4, as with the Project, would not 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. Therefore, Alternative 4 would result in less-than-significant operational wastewater impacts, which would be less when compared to the less-than-significant impacts of the Project.

(3) Energy Infrastructure

(a) Construction

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

(b) Operation

As with the Project, operation of Alternative 4 would generate an increased consumption of electricity and natural gas relative to existing conditions. However, based on the uses and the reduced amount of total floor area proposed under Alternative 4, the total energy consumption of Alternative 4 would be less than the total energy consumption of the Project, and Alternative 4's electricity and natural gas demand can be served by existing facilities in the vicinity of the Project Site. Therefore, impacts to infrastructure capacity under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project.

3. Comparison of Impacts

Alternative 4 would not avoid the Project's significant and unavoidable noise and vibration impacts, including those related to on- and off-site noise sources during construction; on- and off-site vibration during construction (pursuant to the significance threshold for human annoyance); and on-site vibration during construction (pursuant to the significance threshold for building damage). Alternative 4 would also not avoid the Project's significant and unavoidable cumulative noise and vibration impacts related to off-site noise during construction and off-site vibration during construction (pursuant to the significance threshold for human annoyance). However, as noted above, Alternative 4 would reduce the peak excavation and mat slab foundation construction phases of the Project such that these impacts occur for a shorter duration. In addition, Alternative 4 would reduce several of the less-than-significant impacts and less-than-significant impacts with mitigation associated with the Project (i.e., regional and localized air quality emissions during operation, TACs during construction and operation, historical resources, energy efficiency during construction, GHG emissions land use consistency, operational noise and vibration, fire and police protection services, libraries during operation, freeway safety, tribal cultural resources, water supply and energy infrastructure, and wastewater during operation). Alternative 4 would yield a higher daily work VMT per employee ratio than the

Project, but less than the significance threshold. All other impacts would be similar to those of the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 4 would develop the Project Site in accordance with the parameters set forth by the RC1B land use designation of the Project Site proposed by the Hollywood Community Plan Update which permits multi-family residential, commercial (retail, restaurants), and office uses at a 4:1 FAR. Accordingly, Alternative 4 would include development of a 297,412 square foot commercial building consisting of 283,226 square feet of office space and 14,186 square feet of ground floor restaurant space, resulting in a 4:1 FAR. As Alternative 4 would develop the same uses as the Project, Alternative 4 would still meet the underlying purpose of the Project which is to revitalize the underutilized infill Project Site by developing an integrated high-density commercial development that would generate new economic opportunities for the Hollywood area. However, Alternative 4 would be less effective than the Project in meeting this underlying purpose owing to the reduced amount of development under this alternative.

Regarding the Project objectives, Alternative 4 would meet the following Project objectives as effectively as the Project:

- To create a pedestrian-friendly project by creating a street-level identity for the Project Site and improving the pedestrian experience through the introduction of commercial uses on the ground level.

- Revitalize the Project Site by creating a commercial project with proximity to existing and future transit lines, employment opportunities, housing, shops, and restaurants while incorporating the principles of smart growth and environmental sustainability by capitalizing on the Project Site's location within an employment hub, proximity to transit and walkable streets, and the presence of existing infrastructure needed to service the proposed uses, while incorporating sustainable design components that emphasize resource conservation and efficiency.

Alternative 4 would also meet the following Project objectives, although it would not do so as effectively as the Project due to the reduced amount of development.

- To support the Hollywood Community Plan's Objective 1 to further the development of Hollywood as a major center of population, employment, retail services, and entertainment.

- To support the Hollywood Community Plan's Objective 4(a) to promote economic well-being and public convenience through allocating and distributing commercial lands for office, retail, service, and residential uses in quantities and patterns based on accepted planning principles and standards.

- Maximize the value of the underutilized site through replacement of existing low intensity commercial uses with a modern structure and a mix of uses consistent with anticipated market demands.

- Provide office space with large open floor plates, high ceilings, and a combination of indoor and outdoor spaces to meet the demand for creative work spaces that encourage collaboration and productivity.

- Locate employment opportunities and residential opportunities near one another along a major transit corridor within a high activity area to promote sustainability and reduce vehicle miles traveled, with associated reductions in air quality and greenhouse gas emissions to create a dynamic and economically viable commercial project with sufficient density to facilitate a healthy jobs-housing balance in the Hollywood area.

V. Alternatives

E. Alternative 5: Residential Alternative

1. Description of the Alternative

Alternative 5, the Residential Alternative, would include the development of a 445,218 square-foot mixed-use project consisting of 500 multi-family residential units and 14,186 square feet of ground floor restaurant space (inclusive of the proposed outdoor covered dining area). Alternative 5 would be developed pursuant to the City's Density Bonus Ordinance (Ordinance No. 179,681), which allows qualifying projects that provide the requisite percentage of affordable housing to request an increase in residential density and certain incentives and waiver or modifications of development standards. As shown in Figure V-4 on page V-91, the proposed uses would be provided in a 28-story building with a height of 355 feet, an increase in height compared to the Project's 15-story building with a height of 275 feet. As with the Project, this alternative would also include the construction of the LADWP equipment area on the De Longpre Lot. The area proposed for the LADWP use would not constitute floor area as defined by LAMC Section 12.03.

Alternative 5 would include 654 vehicular parking spaces provided within two subterranean levels extending to a depth of approximately 38 feet (a reduction of 14 feet, approximately 27 percent), at-grade parking, a small parking mezzanine, and two full floor fully enclosed, mechanically ventilated above-grade levels. Five vehicular parking spaces would be provided in a small surface parking area adjacent to the LADWP equipment area. It is estimated that approximately 68,397 cubic yards of export would be hauled from the Project Site as part of this alternative.

As with the Project, the existing office and retail uses comprising 26,261 square feet, as well as the associated surface parking currently on the Project Site, would be removed. As with the Project, upon completion, this alternative would result in a net floor area of 418,957 square feet on the Project Site (inclusive of the proposed outdoor covered dining area) and an FAR of 6:1.

Overall, this alternative would develop the same amount of floor area as the Project of 445,218 square feet although the height of the building would increase from 15 stories and a height of 275 feet to 28 stories with a height of 355 feet. This alternative would also reduce the excavation required for the subterranean parking levels and would reduce the estimated amount of export from approximately 93,000 cubic yards to 68,397 cubic yards (a reduction of 24,603 cubic yards).

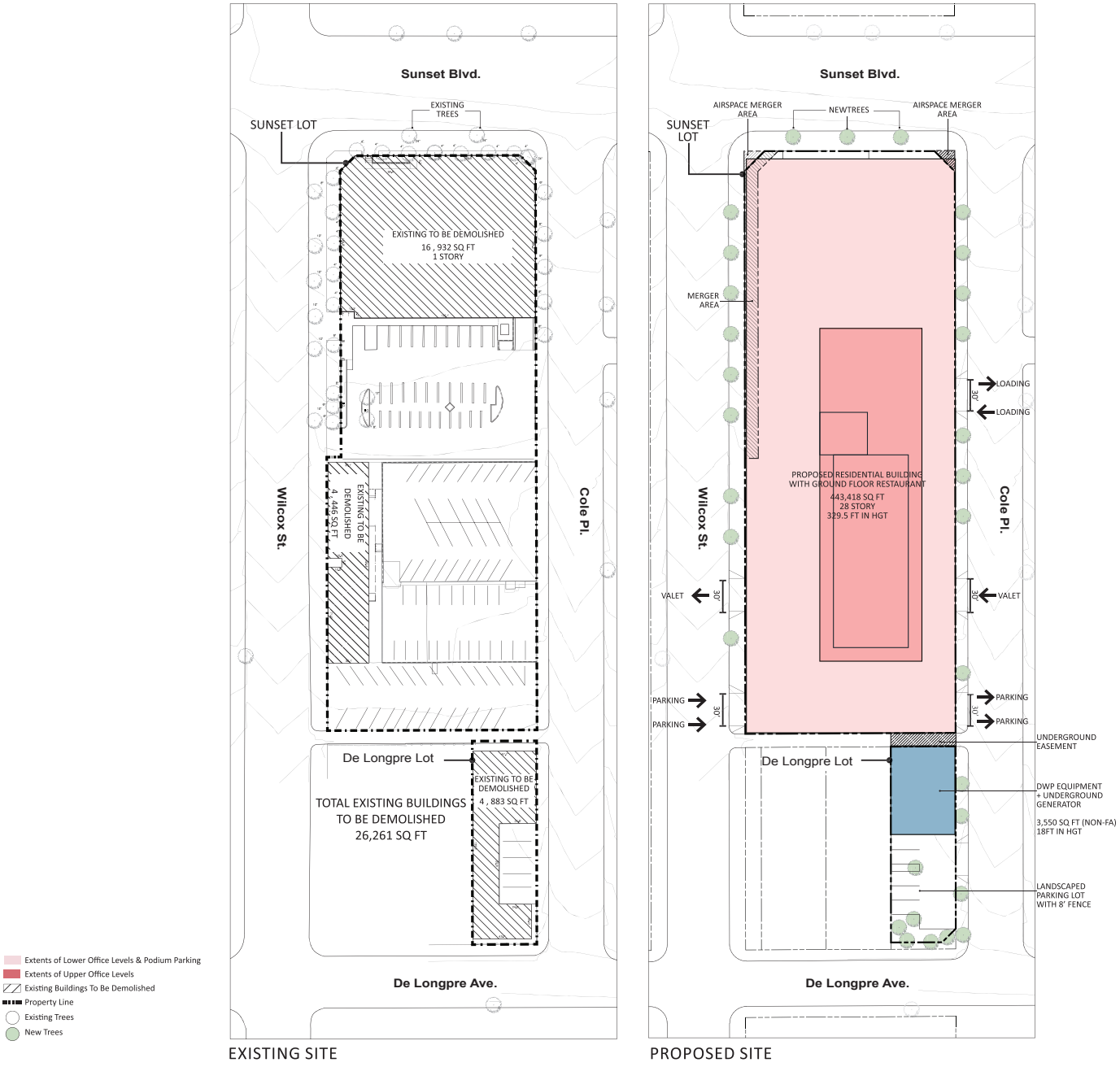

Figure V-4
Alternative 5 Conceptual Site Plan

Source: Gensler, April 12, 2021.

2. Environmental Impacts

a. Air Quality

(1) Regional Emissions

(a) Construction

As with the Project, construction of Alternative 5 has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. As with the Project, Alternative 5 would comply with applicable air quality regulations during construction and implement Project Design Feature AIR-PDF-1 requiring the use of existing electrical infrastructure and/or solar generators rather than temporary diesel or gasoline generators during the construction period to minimize stationary source construction emissions.

During Project construction, maximum daily emissions occur during the excavation and mat foundation phases. During these phases, the number of equipment as well as trucks exporting soil and delivering concrete would be greater than other phases of construction (e.g., building construction, architectural coatings).

Under Alternative 5, construction activities would be reduced in comparison to the Project due to the reduction in excavation. Specifically, under Alternative 5, total excavation quantities would be reduced by approximately 25 percent in comparison to the Project from approximately 93,000 cubic yards to 68,397 cubic yards (a reduction of 24,603 cubic yards). Alternative 5 would require the same mat slab foundation as the Project. As such, there would be no reduction in activities during this peak phase of construction; however, there would be a reduction in the duration of the activities by approximately 27 percent. In addition, building construction activities could occur for a longer duration due to the additional floors included in this alternative (28 stories versus 15 stories under the Project). Notwithstanding, the intensity of air emissions and fugitive dust from site preparation and construction activities under Alternative 5 would be similar to the Project on peak construction days because the maximum number of trucks and equipment operating during the excavation and mat foundation phases would be similar to the Project on a daily basis (i.e., there would be no change to the intensity for days in which the maximum construction activity is required). As such, air emissions during maximum activity days, which is one measure used for measuring impact significance, would be similar to those of the Project. It is noted, however, that with the reduced duration of the

evacuation phase which would be substantially shortened by approximately 27 percent in comparison to the Project, air emissions during this peak construction phase would be similar to those of the Project. While regional NOx emissions under Alternative 5 would continue to exceed significance thresholds during the mat foundation phase prior to mitigation, the duration that the NOx emissions significance threshold is exceeded would be reduced by 27 percent under Alternative 5 compared to the Project. Furthermore, implementation of Mitigation Measure AIR-MM-1 would reduce this impact to less than significant levels, similar to the Project. Thus, while the reduction in excavation activities would be substantially less, the impacts associated with regional emissions as compared to the Project, impacts under Alternative 5, as with the Project, would be less than significant with implementation of Mitigation Measure AIR-MM-1.

(b) Operation

As previously discussed, Alternative 5 would construct 500 multi-family residential units and 14,186 square feet of ground floor restaurant space. Based on the proposed uses, the number of daily trips and daily VMT generated by Alternative 5 would be less than the number of daily trips generated by the Project. Specifically, as provided in Appendix O of this Draft EIR, Alternative 5 would result in a total of 2,684 daily vehicle trips and 16,532 daily VMT as compared to the Project's 3,402 daily vehicle trips and 24,534 VMT.[5] As vehicular emissions depend on the number of trips and associated VMT, the overall pollutant emissions generated by this alternative would be less than the emissions generated by the Project because the number of vehicular trips and VMT would decrease.

As discussed above, Alternative 5 would result in the same floor area as the Project but would include residential uses instead of the office uses proposed by the Project. While office uses require more electricity compared to residential uses, residential uses require more natural gas usage compared to office uses.[6] Therefore, this alternative would be anticipated to generate similar on-site operational air emissions associated with energy consumption as the Project.

Based on the above, the overall pollutant emissions generated by Alternative 5 would be less than the emissions generated by the Project due to the reduction in vehicle trips. Therefore, impacts associated with regional air pollutant emissions during operation of Alternative 5 would be less than significant and less when compared to the less-than-significant impacts of the Project.

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[5] *Fehr and Peers, VMT Calculator Runs for the Alternatives, 2021. See Appendix O of this Draft EIR.*

[6] *CalEEMod Users Guide. Appendix D: Default Data Tables. Table 8.1 Energy Use by Climate Zone and Land Use Type.*

(2) Localized Emissions

(a) Construction

On-site construction activities under Alternative 5 would be located at similar distances from sensitive receptors as the Project. Although Alternative 5 would reduce the duration and depth of excavation and associated excavation-related construction activities when compared to the Project, Alternative 5 would include additional floors compared to the Project and could result in a slightly longer construction period due to the increased construction activities associated with construction additional floors. However, as previously noted above, the intensity of construction activities would be similar on days with maximum (peak) construction activities (i.e., there would be no change to the intensity for days in which the maximum construction activity for excavation is required). As such, air emissions during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Therefore, as with the Project, air emissions under Alternative 5 would continue to exceed the SCAQMD localized screening threshold for NO_X during the concrete mat foundation phase. It is noted, however, that with the reduced duration of the excavation phase, which would be shortened by approximately 27 percent (based upon the corresponding 27-percent reduction in excavation quantities), the Project's significant and unavoidable localized air emissions impact would occur for a shorter duration and be substantially less as compared to the Project. As with the Project, with incorporation of Mitigation Measure AIR-MM-1 as part of Alternative 5, localized air quality impacts would be reduced to less than significant with implementation of mitigation, with the degree of the impact similar to that of the Project during peak construction activities.

(b) Operation

Localized operational impacts are determined primarily by traffic volumes. As provided in Appendix O of this Draft EIR, Alternative 5 would result in a total of 2,684 daily vehicle trips. As such, this alternative would generate less daily trips compared to the Project. As discussed above, area and stationary sources would generate similar on-site operational air emissions as the Project. Nevertheless, with the decrease in localized vehicle emissions, overall localized emissions under Alternative 5 would be less the Project. As such, under Alternative 5, total contributions to localized air pollutant emissions during operation would be less than the Project's contribution. Accordingly, localized air quality impacts under Alternative 5 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(3) Toxic Air Contaminants

(a) Construction

As with the Project, construction of Alternative 5 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. Under Alternative 5, construction activities would be reduced in comparison to the Project due to the reduction in excavation. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to construction TAC emissions. While overall excavation activities would be reduced, grading and excavation activities would be similar on maximum construction activity days. Therefore, overall construction TAC emissions generated by Alternative 5 would be similar to those of the Project; however, the overall duration would be less given the reduction in excavation activities. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 5 would be similar to the less-than-significant impacts of the Project.

(b) Operation

As set forth in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential TAC emissions associated with Project operations would include DPM from delivery trucks. Under Alternative 5, the number of deliveries and associated diesel particulate matter emissions would be reduced compared to the Project due to the decrease in the number of trips generated under this alternative. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, and a petroleum refinery). Similar to the Project, the land uses proposed under Alternative 5 are not considered land uses that generate substantial TAC emissions. Therefore, Alternative 5 would not release substantial amounts of TACs. Impacts due to TAC emissions and the corresponding cancer risk under Alternative 5 would be less than significant and less when compared to the less-than-significant impacts of the Project.

b. Cultural Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, there are no listed historical resources on the Project Site, and the existing buildings on the Project Site are not eligible for listing. Therefore, as with the Project, Alternative 5 would not result in direct impacts to historical resources due to removal of the existing on-site buildings during construction. Additionally, as with the Project, Alternative 5 would not include the demolition, relocation, rehabilitation, alteration, relocation or conversion of any nearby historical resources or contributing or non-contributing building to the De Longpre Park Residential Historic District. All of the existing buildings and sites that comprise the district would remain unchanged and in their original location after implementation of Alternative 5.

Despite introducing a taller building compared to the Project (i.e., 350 feet versus 275 feet under the Project), the proposed development would not result in a significant adverse effect to the De Longpre Park Residential Historic District. Features important to the significance of the De Longpre Park Residential Historic District are largely contained within the district boundaries and are best experienced from within the district itself. The new construction associated with Alternative 5 would not interrupt the configuration of buildings and sites, their spatial relationships to each other, and their relationship to the street that characterize the district as it is experienced from the public right-of-way. Overall, Alternative 5 would result in less-than-significant impacts to historical resources, and such impacts would be similar to the less-than-significant impacts of the Project.

c. Energy

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

(a) Construction

Similar to the Project, construction activities under Alternative 5 would consume electricity to convey water for dust control and to power lighting, electronic equipment, and other construction activities, and petroleum-based fuels for heavy construction equipment, delivery and haul trucks, and construction worker traffic. As with the Project, construction activities associated with Alternative 5 would not involve the consumption of natural gas. As with the Project, Alternative 5 would also generate a demand for transportation energy associated with on- and off-road vehicles. Although the amount of excavation required under Alternative 5 would be reduced compared to the Project, the building height would be greater in comparison to the Project, resulting in a longer construction duration and, potentially, increased energy use compared to the Project. However, as with the Project, the use of construction equipment/vehicles used during construction of Alternative 5 would comply with Title 24 standards and other applicable energy conservation requirements, CARB anti-idling and In-Use Off-Road Diesel-Fueled Fleet regulations, federal fuel efficiency standards, and other applicable requirements. Alternative 5 would also implement design features, similar to the Project, to reduce energy usage and fuel consumption during construction. Specifically, as with the Project, Alternative 5 would implement Project Design Feature AIR-PDF-1 which would require the use of electricity from power poles rather than temporary diesel or gasoline powered generators where available. Therefore, as with the Project, Alternative 5 construction activities would require energy demand that is not wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 5 and similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 5 would generate an increased consumption of electricity and natural gas relative to existing conditions. As previously discussed, Alternative 5 would construct 500 multi-family residential units and 14,186 square feet of ground floor restaurant space, and, thus, would be expected to generate a similar operational energy demand compared to the Project. As provided in Appendix O of this Draft EIR, Alternative 5 would result in a total of 2,684 daily vehicle trips and 16,532 daily VMT as compared to the Project's 3,402 daily vehicle trips and 24,534 VMT.[7] Similar to the Project, Alternative 5 would comply with applicable emergency conservation requirements during operation, including Title 24 standards, CALGreen Code, and the Green Building Code, would implement Project Design Feature GHG-PDF-1, requiring the incorporation of sustainability features required to achieve LEED Gold certification, and would provide LAMC-required bicycle parking and EV-ready parking, all of which would save energy. Furthermore, as with the Project, Alternative 5 would be developed within a TPA and HQTA in close proximity to transit, which would encourage the use of alternative more efficient alternative modes of transportation and minimize fuel consumption. Therefore, as with the Project, operation of Alternative 5 would not involve the wasteful, inefficient, or unnecessary consumption of energy resources. As such, Alternative 5 would result in less- than- significant impacts during operation, which would be similar to the less-than-significant impacts of the Project.

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

As discussed in Section IV.C, Energy, of this Draft EIR, the energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the 2019 CALGreen Code, the City's Green Building Code, City's Green New Deal, and the 2020–2045 RTP/SCS. As these conservation policies are mandatory under the City's Building Code, Alternative 5, would not conflict with applicable plans for renewable energy or energy efficiency. Furthermore, as discussed previously, Alternative 5, as with the Project, would implement project design features requiring additional sustainability measures to reduce energy use. With regard to transportation related energy usage, as with the Project, Alternative 5 would represent urban infill development within a TPA and HQTA in close proximity to transit which would reduce vehicle trips, VMT, per capita VMT, and associated fuel usage in accordance with the SB 375 and SCAG's RTP/SCS.[8] As with the Project, Alternative 5 would also be required to comply with CARB anti-idling

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[7] *Fehr and Peers, VMT Calculator Runs for the Alternatives, July 16, 2021. See Appendix O of this Draft EIR.*

[8] *As indicated in the VMT Calculator runs for the alternatives, included as Appendix O of this Draft EIR, Alternative 5 would result in a daily household VMT per capita of 4.2, which would both be below the average daily household VMT capita threshold of significance for the Central APC of 6.0.*

regulations and the In-Use Off-Road Diesel Fleet regulations during construction, which would save transportation energy. Therefore, Alternative 5, as with the Project, would not conflict with plans for renewable energy or energy efficiency. The impacts of Alternative 5 would be less than significant and similar to the less-than-significant impacts of the Project.

d. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily vehicle trips generated and associated VMT, as well as by energy consumption from proposed land uses. As previously discussed, the number of daily trips and daily VMT under Alternative 5 would be reduced compared to the Project. The amount of energy consumed would be anticipated to be similar, and the amount of water consumed would be anticipated to be greater compared to the Project. The amount of GHG emissions generated by Alternative 5 would be less than the amount generated by the Project as vehicle emissions are a greater contributor to GHG emissions. As with the Project, Alternative 5 would be designed to comply with the requirements of the CALGreen Code and the Los Angeles Green Building Code. As with the Project, Alternative 5 would also incorporate design features to reduce GHG emissions such as the sustainability features required to achieve LEED Gold certification per Project Design Feature GHG-PDF-1 and would be designed to comply with the City's Green Building Ordinance, as applicable. Alternative 5, as with the Project, would also increase urban density within a TPA and HQTA in proximity to transit, would include LAMC-required bicycle parking, and would include EV/EVA-ready parking, which would reduce VMT and associated fuel usage and GHG emissions. With compliance with applicable regulations and with implementation of comparable sustainability features as the Project, Alternative 5 would be consistent with the GHG reduction goals and objectives included in adopted State, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 5 would be less than significant and less when compared to the less-than-significant impacts of the Project.

e. Land Use and Planning

As previously discussed, Alternative 5 would include the development of 500 multi-family residential units and 14,186 square feet of ground floor restaurant space. Alternative 5 would be developed pursuant to the City's Density Bonus Ordinance (Ordinance No. 179,681), which allows qualifying projects that provide the requisite percentage of affordable housing to request an increase in residential density and certain incentives and waiver or modifications of development standards.

As with the Project, following approval of different proposed land use entitlements, Alternative 5 would be consistent with the overall intent of the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site and

that were adopted to avoid or mitigate an environmental effect, including, but not limited to, the City's General Plan Framework Element, Hollywood Community Plan and LAMC, and SCAG's 2020–2045 RTP/SCS. For example, Alternative 5 would redevelop the Project Site with higher density mixed-use residential and employment-generating uses within a TPA and HQTA in close proximity to transit, which would support the goals of SCAG's 2020–2045 RTP/SCS. Therefore, the impacts of Alternative 5 related to potential conflicts with applicable land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant and similar to the less-than-significant impacts of the Project.

f. Noise

(1) Noise

(a) Construction

The types of construction activities under Alternative 5 would be substantially similar to the Project. In addition, although the amount of construction activities and duration during site grading would be substantially reduced due to the reduction in required excavation activities, the construction activities associated with building construction could increase due to the additional floors proposed as part of this alternative. As with the Project, construction of Alternative 5 would generate noise from the use of heavy-duty construction equipment, as well as from haul truck and construction worker trips. Under Alternative 5, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to that of the Project during maximum activity days during the excavation and mat foundation phases since the daily intensity of construction activities during these phases would be expected to be similar under Alternative 5 when compared to the Project. As such, noise levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Also, as with the Project, Alternative 5 would implement project design features and mitigation to minimize construction noise. Nevertheless, similar to the Project, on-site and off-site construction noise would be significant and unavoidable under Alternative 5. Although the duration of the impacts could occur for a longer duration due to the additional construction activities associated with the increased number of floors under Alternative 5, the overall level of impact would be similar to the Project. However, as previously noted, the excavation phase under Alternative 5 would be substantially shortened. As such, the impact experienced during this peak construction phase would occur over a shorter period as compared to the Project.

(b) Operation

As discussed in Section IV.F, Noise, of this Draft EIR, sources of operational noise under the Project would include (a) on-site stationary noise sources, including mechanical

equipment and the LADWP equipment area, activities within the proposed outdoor spaces (i.e., outdoor dining and terraces), parking facilities, loading dock and trash compactor areas; and (b) off-site mobile (roadway traffic) noise sources. Regarding on-site operational noise, Alternative 5 would introduce noise from similar on-site noise sources, although given the LAMC open space requirements for residential uses, it is anticipated that noise generated from outdoor areas could increase compared to the Project. However, noise levels from building mechanical equipment and parking facilities would be similar to the Project. In addition, similar to the Project, Alternative 5 would implement project design features to minimize on-site operational noise. As with the Project, Alternative 5 would also comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. Thus, operational on-site noise impacts under Alternative 5 would be less than significant and greater than the less-than-significant impacts of the Project.

With regard to operational off-site (i.e., traffic) noise, Alternative 5 would generate less operational traffic than the Project. As provided in Appendix O of this Draft EIR, Alternative 5 would result in a total of 2,684 daily vehicle trips as compared to the Project's 3,402 daily vehicle trips. The reduction in vehicle trips would result in a decrease in off-site operational traffic-related noise levels under Alternative 5. Therefore, as with the Project, off-site noise impacts under Alternative 5 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 5 would be similar to the Project. While the construction activities associated with building construction could increase due to the additional floors proposed, the amount and duration of construction activities during site grading would be significantly reduced due to the reduction in excavation activities as part of Alternative 5. As with the Project, construction of Alternative 5 would generate on- and off-site vibration from the use of heavy-duty construction equipment and from truck trips. Also as with the Project, Alternative 5 would implement mitigation to minimize construction vibration impacts on the existing single-story commercial building adjacent to the southern portion of the Project Site to the west. As with the Project, on- and off-site construction activities and the associated construction on- and off-site vibration levels would be expected to be similar under Alternative 5 compared 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 (i.e., there would be no change to the intensity for the days in which the maximum construction activity is required). However, as previously noted, the evacuation phase under Alternative 5 would be shortened by 27 percent. The impact experienced during this

peak construction phase would occur over a shorter period as compared to the Project. As such, peak vibration levels generated by construction equipment and construction truck trips under Alternative 5 would be similar to those of the Project. Accordingly, as with the Project, construction activities under Alternative 5 would result in significant unavoidable on-site vibration impacts (both building damage and human annoyance), significant unavoidable off-site vibration impacts (human annoyance), and less-than-significant off-site vibration impacts (building damage). However, as Alternative 5's construction duration would be substantially less for evacuation as compared to the Project, the significant and unavoidable on-site and off-site construction vibration impact would be substantially less under Alternative 5 as compared to the Project..

(b) Operation

As described in Section IV.F, Noise, of this Draft EIR, sources of vibration related to operation of the Project would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under Alternative 5. As with the Project, vehicular-induced vibration from Alternative 5, including vehicle circulation within the subterranean parking area, would not generate perceptible vibration levels at off-site sensitive uses. In addition, as with the Project, building mechanical equipment installed as part of Alternative 5 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration transmission such that the vibration would not be perceptible at the off-site sensitive receptors. Therefore, as with the Project, operation of Alternative 5 would not increase the existing vibration levels in the immediate vicinity of the Project Site. As such, vibration impacts associated with operation of Alternative 5 would also be less than significant. However, such impacts would be less than those of the Project due to the reduction in vehicle trips under this alternative.

g. Public Services

(1) Fire Protection

(a) Construction

As previously discussed, the types of construction activities required for Alternative 5 would be similar to those of the Project. While the overall amount and duration of construction activities during site grading would be reduced compared to the Project due to the reduced subterranean parking, construction activities during building construction could occur for a longer duration due to the increased number of floors proposed by Alternative 5. As with the Project, construction under Alternative 5 would occur in compliance with all applicable federal, State, and local requirements concerning fire prevention and hazardous materials which would effectively reduce the potential for construction-related fire and

explosion. Additionally, similar to the Project, Alternative 5 would maintain travel lanes on all streets around the Project Site throughout the construction period and implement a Construction Traffic Management Plan (Project Design Feature TR-PDF-1 included in Section IV.H, Transportation, of this Draft EIR), which would include provisions for maintaining emergency access and minimizing delays in emergency response during construction. Furthermore, emergency vehicles have the ability to avoid traffic delays through the use of sirens to clear paths of travel in accordance with the CVC. Therefore, construction of Alternative 5, as with the Project, would not result in the need for new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 5 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

Alternative 5 would generate a new residential population, as well as a new visitor and employee population on the Project Site that would contribute to an increased demand for LAFD fire protection services. Alternative 5 would result in a greater residential service population when compared to the Project since no residential uses are proposed as part of the Project. In addition, as with the Project, Alternative 5 would provide ground floor restaurant space, which would generate new employment opportunities. Alternative 5 would generate approximately 1,125 new residents and 57 new employees,[9] creating a total service population of 1,182, which is less than the Project's service population of 1,781 employees.[10] Thus, although Alternative 5 would increase the residential service population, an overall reduction would occur to the service population when compared to the Project. As such, similar to the Project, the service population as part of Alternative 5 would not necessitate the construction of new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. Therefore, the overall increased demand for LAFD fire protection services would be less when compared to that of the Project.

Similar to the Project, Alternative 5 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site

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[9] *Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the "Multi-Family Residential" rate of 2.25 persons per unit applied to the proposed 500 units and the "High-Turnover-Sit-Down Restaurant" employee generation rate of 4 employees per 1,000 square foot applied to the proposed restaurant uses (14,186 square feet).*

[10] *Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the "General Office" employee generation rate of 4 employees per 1,000 square foot applied to the proposed (431,032 square feet) office uses and the "High-Turnover-Sit-Down Restaurant" employee generation rate of 4 employees per 1,000 square foot applied to the proposed restaurant uses (14,186 square feet).*

access, fire flow, storage and management of hazardous materials, alarm and communications systems, life safety features (e.g., automatic fire sprinkler systems, fire service access elevators, etc.) and would undergo LAFD fire/life safety plan review to ensure compliance with the above, which would reduce the demand for fire protection and also ensure adequate emergency access. Furthermore, as with the Project, traffic generated by Alternative 5 would not significantly impact emergency vehicle response to the Project Site and surrounding area as the drivers of emergency vehicles have the ability to bypass traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. The driveways and internal circulation under Alternative 5 would also be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. As with the Project, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for Alternative 5 since this alternative would include the same floor area and would be constructed within the same site as the Project. Therefore, similar to the Project, this alternative would not necessitate the construction of new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. As such, impacts with regard to fire protection services during operation of Alternative 5 would be less than significant and less when compared to the less than significant impacts of the Project due to the reduced service population.

(2) Police Protection

(a) Construction

As discussed above, construction activities under Alternative 5 would be similar to those of the Project. While the overall amount of construction activities and duration of construction during site grading would be reduced compared to the Project due to the reduced subterranean parking, construction activities during building construction could occur for a longer duration due to the increased number of floors proposed by Alternative 5. Similar to the Project, construction would not generate a permanent population on the Project Site that would substantially increase the police service population of the Hollywood Division. The existing commercial uses on the Project Site currently generate a daytime population that may require police protection services. The demand for police protection services during construction of Alternative 5 would be offset by the removal of the existing commercial buildings on the Project Site. However, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. However, as with the Project, Alternative 5 would incorporate Project Design Feature POL-PDF-1 to implement temporary security measures, including security fencing, lighting, and locked entry to secure the Project Site during construction, which would serve to reduce demand on LAPD services.

Furthermore, as with the Project, Alternative 5 would implement a Construction Traffic Management Plan (Project Design Feature TR-PDF-1 included in Section IV.H, Transportation, of this Draft EIR) that would ensure continued provision of emergency access during construction. Also, as previously noted, pursuant to CVC Section 21806, emergency vehicles are able to bypass traffic by using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, as with 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 would cause significant environmental impacts, in order to maintain service. Overall, impacts under Alternative 5 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

Alternative 5 would generate a new residential population, as well as a new visitor and employee population on the Project Site that would contribute to an increased demand for police protection services. Alternative 5 would generate approximately 1,125 new residents and 57 new employees,[11] creating a total service population of 1,182, which is less than the Project's service population of 1,781 employees.[12] Due to the introduction of residential uses, Alternative 5 would generate a greater overall demand on LAPD services when compared to the Project since LAPD evaluates demand based on a resident to police officer ratio. Similar to the Project, Alternative 5 would implement project design features which would help reduce the demand for police services. Alternative 5 also would generate General Fund tax revenues for the City which could be used to expand law enforcement resources in the Hollywood Division. Therefore, even with a greater overall demand on LAPD services when compared to the Project, Alternative 5 operation, as with the Project, would not result in the need for new or altered government facilities (i.e., police stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 5 would be less than significant and greater than the less-than-significant impacts of the Project due to the increase in residential population.

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[11] *Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the "Multi-Family Residential" rate of 2.25 persons per unit applied to the proposed 500 units and the "High-Turnover-Sit-Down Restaurant" employee generation rate of 4 employees per 1,000 square foot applied to the proposed restaurant uses (14,186 square feet).*

[12] *Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the "General Office" employee generation rate of 4 employees per 1,000 square foot applied to the proposed (431,032 square feet) office uses and the "High-Turnover-Sit-Down Restaurant" employee generation rate of 4 employees per 1,000 square foot applied to the proposed restaurant uses (14,186 square feet).*

(3) Libraries

(a) Construction

Similar to the Project, construction of Alternative 5 would result in a temporary increase of construction workers on the Project Site. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by Alternative 5. Therefore, construction workers would not result in a notable increase in the resident population within the service area of the LAPL library branches serving the Project Site. Also, it is unlikely that construction workers would visit library facilities in the vicinity of the Project Site on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Similarly, it is unlikely that construction workers would utilize library facilities at the end of the workday and would likely use library facilities near their places of residence. Therefore, as with the Project, any increase in library usage associated with construction workers under Alternative 5 would be negligible and less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

Residents are considered the primary users of library facilities. As discussed above, Alternative 5 would develop 500 multi-family residential units; therefore, this alternative could create a direct demand for library facilities, while the Project could create an indirect demand for such services. Alternative 5's residential units would be equipped to receive individual internet service, which provides information and research capabilities that studies have shown to reduce demand at physical library locations. Furthermore, Alternative 5 would generate revenues to the City's General Fund (in the form of property taxes, sales tax, and business tax, etc.) that could be applied toward the provision of new library facilities and related staffing for any one of the libraries serving the Project Site and vicinity, as deemed appropriate. Alternative 5's revenue to the General Fund would help offset the Project-related increase in demand for library services.

In addition, while on-site employees could generate some indirect demand for LAPL library facilities under Alternative 5, this demand would be expected to be negligible since on-site employees would be more likely to use library facilities near their homes during non-work hours. Furthermore, employees at the Project Site would have internet access, which would provide information and research capabilities and reduce library demand.

Therefore, as with the Project, Alternative 5 operation would not necessitate the construction of a new or expanded library facilities, the construction of which would cause significant environmental impacts, in order to maintain service. Impacts related to library services under Alternative 5 would be less than significant but greater than the less-than-significant impacts of the Project due to the introduction of a new residential population to the Project Site.

h. Transportation

As previously described, Alternative 5 would be developed within the same Project Site as the Project. As such, the plans, policies, and programs applicable to the Project would also apply to Alternative 5. As with the Project, this alternative would not interfere with the complete streets balanced transportation network (i.e., Transit-Enhanced Network, Bicycle Enhanced Network, and Pedestrian-Enhanced Districts) concept of the Mobility Plan and would enhance pedestrian access within and around the Project Site as called for by the Mobility Plan and the Hollywood Community Plan; prioritize safety and access for all individuals utilizing the site by complying with all ADA requirements as required by the LAMC; include sidewalk and driveway design, vehicular parking, bicycle parking, etc., in accordance with LAMC requirements; design parking facilities to promote public safety and prevent unsightly or barren appearance as call for by the Hollywood Redevelopment Plan; and represent urban infill development within a TPA and HQTA in close proximity to transit, which would encourage alternative transportation use as called for by the Mobility Plan, Hollywood Redevelopment Plan and 2020–2045 RTP/SCS. Alternative 5 would support these transportation plans for the same reasons as the Project (e.g., would include similar roadway and sidewalk improvements, would comply with LAMC driveway and parking standards, etc.). Additionally, Alternative 5 would reduce per capita VMT, including through the implementation of TDM measures as called for by the Mobility Plan, Hollywood Community Plan, 2020–2045 RTP/SCS, and the City's TDM Ordinance.[13] Furthermore, while Sunset Boulevard along the Project Site's northern boundary is identified as part of the Vision Zero's High Injury Network, no specific Vision Zero projects are planned for this roadway segment, and Alternative 5 would not conflict with the implementation of future Vision Zero projects along this roadway segment. Therefore, as with 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. The degree of the impacts would be similar between the Alternative 5 and the Project as neither would conflict with an applicable transportation plan.

[13] *Per the VMT Calculator runs for the alternatives included as Appendix O of this Draft EIR, Alternative 5 would result in a daily household VMT per capita of 4.2, which would both be below the average daily household VMT capita threshold of significance for the Central APC of 6.0.*

With respect to VMT, Alternative 5 would generate an average daily household VMT of 4.2 per capita, which would be below the average daily household VMT per capita significance threshold for the Central APC of 6.0. Although Alternative 5 would generate household VMT, Alternative 5 would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b), regarding VMT, and impacts would be less than significant. Because it is a residential alternative, the applicable VMT metrics are different and, therefore, not comparable to those of the Project, which is a commercial office development only.

As discussed in Section IV.H, Transportation, of this Draft EIR, queuing distances at the US-101 Northbound Off-ramp to Sunset Boulevard would exceed ramp capacity in the A.M. peak hour in the Future Base scenario and the Future plus Project scenario resulting in a significant freeway safety impact at this off-ramp. Implementation of Mitigation Measure TR-MM-1, which requires the addition of a protected/permitted left-turn phase with reoptimized signal timing for westbound Sunset Boulevard at Van Ness Avenue, would reduce this impact to a less-than-significant level. Alternative 5 would generate an estimated 82 percent less inbound operational traffic during the A.M. peak hour than the Project. It is estimated that a reduction of 93 percent would be required to avoid a significant impact, and thus, as with the Project, Alternative 5 would also result in a significant impact at the US-101 Northbound Off-ramp to Sunset Boulevard. As for the Project and Alternative 5, implementation of Mitigation Measure TR-MM-1 would reduce this impact to a less-than-significant level. The degree of the impact would be less under Alternative 5 as a result of lower operational traffic and associated vehicle queuing under this alternative when compared to the Project's less-than-significant impact with mitigation.

i. Tribal Cultural Resources

As previously discussed, Alternative 5 would construct one fewer subterranean parking level compared to the Project and would result in reduced excavation activities. However, as tribal cultural resources are typically found in the first six to ten feet of excavation, the potential for Alternative 5 to uncover subsurface tribal cultural resources would be similar compared to that of the Project. As discussed in Section IV.I, Tribal Cultural Resources, of this Draft EIR, no tribal cultural resources have been previously recorded at the Project Site or identified during consultations with the applicable California Native American Tribes conducted in accordance with AB 52. Nonetheless, Alternative 5 would also implement the City's standard condition of approval for the inadvertent discovery of tribal cultural resources, which would mitigate impacts to any tribal cultural resources that may be encountered during construction. Therefore, Alternative 5 would result in less-than-significant impacts to tribal cultural resources which would be similar when compared to the less-than-significant impacts of the Project.

j. 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 dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. Construction-related water use under Alternative 5 would be less due to the overall reduced amount of required excavation activities. Furthermore, while Alternative 5 would also require trenching for the required on-site water distribution system similar to the Project, and connection to the existing water mains in the adjacent streets, Alternative 5 would implement a Construction Traffic Management Plan (Project Design Feature TR-PDF-1 included in Section IV.H, Transportation, of this Draft EIR) to ensure the safe and efficient flow of pedestrian and vehicular traffic around the construction sites during construction. As such, Alternative 5 would not result in construction activities that 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. Alternative 5 would result in less-than-significant impacts that are less when compared to the less-than-significant impacts of the Project due to the reduction in excavation activities.

(b) Operation

As with the Project, Alternative 5 would result in an increase in long-term water demand. However, based on the proposed land uses, water demand under Alternative 5 would be greater than under the Project. Specifically, based on rates provided by LASAN, Alternative 5 would result in a net water demand of approximately 90,096 gallons per day (gpd),[14] which would be greater than the net water demand of 87,521 for the Project. Similar to the Project, Alternative 5 would incorporate sustainability features consistent with the City's Green Building Ordinance and would be required by LADWP as part of the WSA process to include additional water reduction features agreed to by the Applicant that are beyond LAMC requirements. Therefore, the estimated water demand of Alternative 5 is a conservative calculation as it does not account for water conservation measures, such as the mandatory water reduction rates required by the City's Green Building Code or additional conservation commitments agreed to by the Applicant, and the actual water demand of this alternative may be lower. Thus, as with the Project, it is anticipated that this alternative would fall within LADWP's available and projected water supplies for normal, single-dry, and multiple-dry years through the year 2035 and LADWP would be able to

[14] *Per LASAN Sewage Generation Factors, effective April 6, 2021, a rate of 150 gpd per unit was applied to the 500 residential units and a rate of 30 gpd per seat was applied to the 14,186 square feet of restaurant uses.*

meet the water demands of this alternative. Additionally, similar to the Project, the Applicant would construct the necessary on-site water infrastructure and off-site connections to the LADWP system pursuant to applicable City requirements under this alternative to accommodate the new building. Therefore, as with the Project, operational impacts related to water supply and infrastructure would be less than significant under Alternative 5 and greater when compared to less-than-significant impacts of the Project due to the increased water demand.

(2) Wastewater

(a) Construction

Similar to the Project, the existing sewer laterals would be capped during construction of Alternative 5. As such, no new sewage would enter the public sewer system. As with the Project, temporary facilities, such as portable toilet and hand wash areas, would be provided by the construction contractor; however, any sewage generated from these facilities would be collected and hauled off-site and would not be discharged into the public sewer system. In addition, while no new wastewater would enter the public sewer system during construction, Alternative 5, as with the Project would remove the existing on-site buildings thereby resulting in a net reduction in the existing sewage entering the sewer system from the Project Site. Lastly, as with the Project, no new off-site sewer lines would be required for Alternative 5, and construction impacts associated with new wastewater infrastructure would primarily be confined to trenching for the placement of pipe and connection into the existing sewer wyes or laterals. As with the Project, any off-site work that could potentially affect existing sewer service to adjacent properties would be coordinated with the BOE. As such, Alternative 5, as with the Project, would not require or result in the relocation or construction of new or expanded wastewater facilities, the construction or relocation of which could cause significant environmental effects during the construction period. Therefore, Alternative 5 would result in less-than-significant impacts, which would be similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 5 would generate a net increase in wastewater flows from the Project Site. While Alternative 5 would construct a total floor area similar to the Project, land use changes associated with Alternative 5 would result in a greater wastewater generation as compared to the Project. Based on the proposed land uses, wastewater generation under Alternative 5 would be greater than under the Project. Specifically, based on rates provided by LASAN, Alternative 5 would result in a net

wastewater flow of approximately 90,096 gpd,[15] which would be greater than the net wastewater flow of 87,521 for the Project. Nevertheless, as with the Project, Alternative 5 would comply with all applicable water conservation and wastewater reduction requirements and would implement similar water conservation measures outlined in Project Design Feature WAT-PDF-1, which would also serve to reduce wastewater flows. Although operational wastewater generation under Alternative 5 would be slightly greater than under the Project, the existing remaining capacity and projected future remaining capacity of the HWRP would also be adequate to serve Alternative 5. Specifically, as detailed in Section IV.J.2, Utilities and Service Systems—Wastewater, the HWRP has a capacity of 450 mgd, and the remaining available capacity at the HWRP is approximately 175 mgd.

Regarding wastewater conveyance (sewer) capacity, sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing off-site sewer lines in the adjacent streets. According to the SCAR prepared by LASAN for the Project, the sewer lines serving the Project Site have adequate capacity to serve the Project. Alternative 5 would result in a net wastewater flow of approximately 90,096 gpd, which would be greater than the Project's net wastewater flow of 87,521 gpd. Although Alternative 5 would generate greater operational wastewater than the Project, it is anticipated that these sewer lines would also have adequate capacity to serve Alternative 5 given the slight increase in wastewater generation. Also, as with the Project, additional detailed gauging and evaluation would be conducted for Alternative 5, as required by LAMC Section 64.14, to obtain final approval of sewer capacity and connection permit during the permitting process. Furthermore, as with the Project, all sanitary sewer connections and on-site infrastructure under Alternative 5 would be designed and constructed in accordance with applicable standards.

Based on the above, operation of Alternative 5, as with the Project, would not 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. Therefore, Alternative 5 would result in less than significant operational wastewater impacts which would be greater than the less-than-significant impacts of the Project.

[15] *Per LASAN Sewage Generation Factors, effective April 6, 2021, a rate of 150 gpd per unit was applied to the 500 residential units and a rate of 30 gpd per seat was applied to the 14,186 square feet of restaurant uses.*

(3) Energy Infrastructure

(a) Construction

As previously noted, while Alternative 5 would result in a reduction in construction activities during grading and excavation, construction activities during building construction would occur for a longer duration due to the additional floors to be constructed under this alternative. Therefore, the overall energy consumed during construction of Alternative 5 would be anticipated to be similar when compared to the Project. As LADWP has confirmed that the supply and existing infrastructure in the Project area would have the capacity to serve the Project, the existing infrastructure would similarly have capacity to supply energy for Alternative 5. Therefore, impacts on infrastructure capacity associated with short-term construction activities under Alternative 5 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 5 would generate an increased consumption of electricity and natural gas relative to existing conditions. While Alternative 5 would develop the same total floor area as the Project, the types of uses would differ as Alternative 5 would develop residential uses instead of office uses. As previously noted above under the Energy subsection for this alternative, residential uses typically require less electricity compared to office uses but require more natural gas consumption than office uses.[16] Therefore, it is assumed that the total energy consumption of Alternative 5 would be similar to the total energy consumption of the Project. Therefore, impacts to infrastructure capacity under Alternative 5 would be less than significant and similar to the less-than-significant impacts of the Project.

3. Comparison of Impacts

Alternative 5 would not avoid the Project's significant and unavoidable noise and vibration impacts, including those related to on- and off-site noise sources during construction; on- and off-site vibration during construction (pursuant to the significance threshold for human annoyance); and on-site vibration during construction (pursuant to the significance threshold for building damage). Alternative 5 would also not avoid the Project's significant and unavoidable cumulative noise and vibration impacts related to off-site noise during construction and off-site vibration during construction (pursuant to the

[16] *CalEEMod Users Guide. Appendix D: Default Data Tables. Table 8.1 Energy Use by Climate Zone and Land Use Type.*

significance threshold for human annoyance). Such impacts would be experienced for a shorter duration during the site grading phase as grading and excavation would be reduced due to the reduction in required excavation activities. However, construction activities during building construction would occur for a longer duration compared to the Project due to the increased number of floors compared to the Project. Alternative 5 would reduce several of the less-than-significant impacts and less-than-significant impacts with mitigation associated with the Project (i.e., regional and localized emissions during operation, TACs during operation, greenhouse gas emissions, off-site noise and vibration during operation, fire protection services during operation, freeway safety, tribal cultural resources, and water supply and infrastructure during construction). All other impacts would be similar to or greater than those of the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 5, the Residential Alternative, would include the development of a 445,218 square-foot mixed-use project consisting of 500 multi-family residential units and 14,186 square feet of ground floor restaurant space. Alternative 5 would eliminate the office uses proposed by the Project. Alternative 5 would meet the underlying purpose of the Project to revitalize the underutilized infill Project Site by developing an integrated high-density commercial development that would generate new economic opportunities for the Hollywood area.

Regarding the Project objectives, Alternative 5 would meet the following Project objectives as effectively as the Project:

- To create a pedestrian-friendly project by creating a street-level identity for the Project Site and improving the pedestrian experience through the introduction of commercial uses on the ground level.

- Revitalize the Project Site by creating a commercial project with proximity to existing and future transit lines, employment opportunities, housing, shops, and restaurants while incorporating the principles of smart growth and environmental sustainability by capitalizing on the Project Site's location within an employment hub, proximity to transit and walkable streets, and the presence of existing infrastructure needed to service the proposed uses, while incorporating sustainable design components that emphasize resource conservation and efficiency.

- To support the Hollywood Community Plan's Objective 1 to further the development of Hollywood as a major center of population, employment, retail services, and entertainment.

- To support the Hollywood Community Plan's Objective 4(a) to promote economic well-being and public convenience through allocating and distributing commercial lands for office, retail, service, and residential uses in quantities and patterns based on accepted planning principles and standards.

- Maximize the value of the underutilized site through replacement of existing low intensity commercial uses with a modern structure and a mix of uses consistent with anticipated market demands.

- Locate employment opportunities and residential opportunities near one another along a major transit corridor within a high activity area to promote sustainability and reduce vehicle miles traveled, with associated reductions in air quality and greenhouse gas emissions to create a dynamic and economically viable commercial project with sufficient density to facilitate a healthy jobs-housing balance in the Hollywood area.

Alternative 5 would not meet the following Project objectives, due to the elimination of the office uses proposed under the Project.

- Provide office space with large open floor plates, high ceilings, and a combination of indoor and outdoor spaces to meet the demand for creative work spaces that encourage collaboration and productivity.

V. Alternatives

F. Environmentally Superior Alternative

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

With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible alternatives includes Alternative 1, the No Project Alternative; Alternative 2, the Existing Zoning Compliant Alternative; Alternative 3, the Reduced Excavation Alternative; Alternative 4, the Development in Accordance with Community Plan Alternative; and Alternative 5, the Residential Alternative. Table V-2 on page V-12 provides a comparative summary of the environmental impacts anticipated under each alternative with the environmental impacts associated with the Project. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project Alternative would avoid all of the Project's significant environmental impacts.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative 2, the Existing Zoning Compliant Alternative, would be the Environmentally Superior Alternative. As described above and summarized in Table V-1 on page V-5, Alternative 2 would result in substantially less development compared to the other alternatives, which would result in a corresponding decrease in the overall environmental impact of this alternative. Specifically, Alternative 2 would consist of approximately 104,977 net square feet compared to Alternative 3 at 418,957 net square feet, Alternative 4 at 271,151 net square feet, and Alternative 5 at 418,957 net square feet. In addition, Alterative 2 would reduce the amount of excavation and duration of the two peak phases of construction (excavation and mat foundation phases). As provided in Table V-1, Alternative 2 would require approximately 40,645 cubic yards of export compared to Alternative 4 at 66,030 cubic yards and Alternative 5 at

68,397 cubic yards. Overall, under Alternative 2, total excavation quantities would be reduced by 55 percent in comparison to the Project; under Alternative 4, total excavation quantities would be reduced by approximately 30 percent in comparison to the Project; and under Alternative 5, total excavation quantities would be reduced by approximately 27 percent in comparison to the Project. Additionally, under Alternative 2, the thickness of the mat slab foundation would be reduced from approximately 7 feet for the Project to 5 feet (a reduction of 2 feet), which would result in a corresponding reduction in the duration of the mat foundation phase by one day or approximately 25 percent less than the Project. This would result in the Project's significant and unavoidable regional emissions, local emissions, construction noise and construction vibration impacts being substantially less under Alternative 2, than compared to the Project.

In summary, based on the above and as summarized in Table V-2 on page V-12, while Alternative 2 would not avoid the Project's significant and unavoidable impacts, Alternative 2 would reduce most of the Project's impacts compared to the remaining alternatives and to a greater extent as well as substantially lessen the Project's significant and unavoidable impacts as a result of reducing the amount and duration of the peak construction phases of the Project (the excavation and mat foundation phases). Thus, of the range of alternatives analyzed, Alternative 2, the Zoning Compliant Alternative, would be the Environmentally Superior Alternative.