I. Executive Summary

I. Executive Summary

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this section of this Draft Environmental Impact Report (EIR) contains a brief summary of the proposed Buena Vista Project (Project) and its potential environmental effects. More detailed information regarding the Project and its potential environmental effects is provided in the following sections of this Draft EIR. Also included in this section is an overview of the purpose and focus of this Draft EIR, a description of the organization of this Draft EIR, a general description of the Project, a general description of areas of controversy, a description of the public review process for this Draft EIR, a list of the Project design features and mitigation measures to be implemented as part of the Project, and a summary of the alternatives to the Project evaluated in this Draft EIR, including identification of the Environmentally Superior Alternative.

1. Purpose of this Draft EIR

As described in CEQA Guidelines Section 15121, an EIR is an informational document that will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. Therefore, the purpose of this Draft EIR is to focus the discussion on the Project's potential environmental effects that the City of Los Angeles (City), as the Lead Agency, has determined to be, or potentially may be significant. Feasible mitigation measures are recommended, when applicable, that could reduce or avoid the Project's significant environmental impacts.

This Draft EIR serves as the environmental document for all actions associated with the Project. This Draft EIR is a "Project EIR," as defined by CEQA Guidelines Section 15161. Furthermore, this Draft EIR complies with CEQA Guidelines Section 15064, which discusses determining the significance of the environmental effects caused by a project.

2. Draft EIR Focus and Effects Found Not to Be Significant

In accordance with CEQA Guidelines Section 15128, an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the Draft EIR. An Initial Study

was prepared for the Project and a Notice of Preparation (NOP) was distributed for public comment to the State Clearinghouse, Governor's Office of Planning and Research, responsible agencies, and other interested parties on August 2, 2021, for a 30-day review period. In addition, a public scoping meeting for the Project was held on August 18, 2021. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. However, after completion of the Initial Study, it was determined a portion of the North Parcel is located farther than one-half mile from the closest major transit stop and more than 10 percent of the residential units in the Project are farther than one-half mile from the major transit stop. Thus, per ZI 2452, the Project does not meet the one-half mile requirement for a TPA project under SB 743. Therefore, aesthetics was further analyzed in the Draft EIR. Further, on March 24, 2025, CAL FIRE issued the Recommended Very High Fire Hazard Severity Zones (VHFHSZ) maps for Southern California, including the City of Los Angeles. The Project Site lies within an area recently mapped as a primarily VHFHSZ with a very small portion in the South Parcel mapped as High Fire Hazard Severity Zone (HFHSZ), as designated by CAL FIRE.[1] Therefore, wildfire was further analyzed in the Draft EIR.

The City determined the potential for significant impacts in the following environmental issue areas:

- Aesthetics
- Air Quality
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise

[1] *CAL FIRE, Fire Hazard Severity Zones, https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones, accessed June 25, 2025*

- Population and Housing
- Public Services (Fire Protection, Police Protection, and Libraries)
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems (Water Supply, Wastewater, Solid Waste, and Energy infrastructure)
- Wildfire

The City of Los Angeles determined that the Project would not have the potential to cause significant impacts related to agriculture and forestry resources; biological resources; cultural resources (human remains); geology and soils (the ability of soils to support the use of septic tanks); hazards and hazardous materials (airport hazards and emergency response plan); hydrology and water quality (flood flows and inundation by seiche, tsunami, or mudflow); land use and planning (division of an established community); mineral resources; noise (airport or airstrip-related noise); population and housing (displacement of people or housing); public services (schools and parks); recreation; and transportation (hazardous geometric design features). Therefore, these topics are not further analyzed in this Draft EIR. The Initial Study, which is included in Appendix A of this Draft EIR, demonstrates that no significant impacts would occur relative to these environmental areas.

3. Draft EIR Organization

This Draft EIR is comprised of the following sections:

I. Executive Summary. This section describes the purpose of this Draft EIR, Draft EIR focus and effects found not to be significant, Draft EIR organization, thresholds of significance, Project Site background and existing conditions, description of the proposed Project, areas of controversy, public review process, summary of environmental impacts, Project design features (PDFs), mitigation measures, and summary of alternatives.

II. Project Description. This section describes the Project location, existing conditions, Project objectives, characteristics of the Project, and requested permits and approvals.

III. Environmental Setting. This section contains a description of the existing physical and built environment and a list of related projects in the vicinity of the Project Site.

IV. Environmental Impact Analysis. This section contains the environmental setting, PDFs, Project and cumulative impact analyses, mitigation measures (where necessary), and conclusions regarding the level of significance after mitigation for each of the following environmental issues: aesthetics; air quality; cultural resources; energy; geology and soils; greenhouse gas (GHG) emissions; hazards and hazardous materials; hydrology and water quality; land use and planning; noise; public services (fire protection, police protection, and libraries); transportation; tribal cultural resources; utilities and service systems (water supply and infrastructure, wastewater, solid waste, and energy infrastructure); and wildfire.

V. Alternatives. This section provides an analysis of a reasonable range of alternatives to the Project, including: Alternative 1, No Project/No Build Alternative; Alternative 2, Development in Accordance with Existing Community Plan and Zoning/Industrial/Limited Grading Alternative; Alternative 3, 20 Percent Reduced Intensity with Associated Reduced Grading Alternative; Alternative 4, 30 Percent Reduced Intensity with Associated Reduced Grading Alternative; and Alternative 5, Downtown Los Angeles (DTLA) 2040 Alternative.

VI. Other CEQA Considerations. This section provides a discussion of significant unavoidable impacts that would result from the Project and the reasons why the Project is being proposed notwithstanding the significant unavoidable impacts. An analysis of the significant irreversible changes in the environment and potential secondary effects that would result from the Project is also included. This section also analyzes potential growth-inducing impacts of the Project and potential secondary effects caused by the implementation of the mitigation measures for the Project. Lastly, a summary of the possible effects of the Project that were determined not to be significant within the Initial Study is provided.

VII. References. This section lists the references and sources used in the preparation of this Draft EIR.

VIII. Acronyms and Abbreviations. This section provides a list of acronyms and abbreviations used in this Draft EIR.

IX. List of Preparers. This section lists the persons, public agencies, and organizations that were consulted or contributed to the preparation of this Draft EIR.

This Draft EIR includes the following appendices to support the environmental analyses prepared for the Project:

- Appendix A—Initial Study, NOP, and NOP Comment Letters
  - Appendix A.1—Initial Study
  - Appendix A.2—NOP
  - Appendix A.3—NOP Comment Letters
- Appendix B—Air Quality and Greenhouse Gas
- Appendix C—Cultural Resources
  - Appendix C.1—Historical Report
  - Appendix C.2—Cultural Resource Assessment
- Appendix D—Energy Calculations
- Appendix E—Geology and Soils
  - Appendix E.1—Geotechnical Investigation
  - Appendix E.2—CEQA Report Approval Letter
  - Appendix E.3—Paleontological Resources Assessment
- Appendix F—Hazardous Materials Report
- Appendix G—Water Resources Technical Report
- Appendix H—Land Use Tables
- Appendix I—Noise and Vibration Calculation Worksheets
- Appendix J—Public Service Letters
  - Appendix J.1—LAFD Service Letter
  - Appendix J.2—LAPD Service Letter
  - Appendix J.3—LAPL Service Letter
- Appendix K—Transportation
  - Appendix K.1—Transportation Assessment
  - Appendix K.2—Supplemental Transportation Assessment
  - Appendix K.3—LADOT Transportation Assessment Letter

  - Appendix K.4—LADOT Transportation Assessment Letter—Supplemental Transportation Assessment
- Appendix L—Tribal Cultural Resources Report
- Appendix M—Utilities and Service Systems
  - Appendix M.1—Water and Sewer Report
  - Appendix M.2—LADWP Will Serve Letter
  - Appendix M.3—SoCalGas Will Serve Letter
- Appendix N—Wildfire Evaluation
- Appendix O—Alternatives
  - Appendix O.1—Impacts of Project Alternative and Zanja Madre
  - Appendix O.2—Transportation Analysis of Project Alternatives
  - Appendix O.3—Historical Resources Memorandum for the Alternatives
  - Appendix O.4—Zanja Madre Memorandum for the Alternatives
  - Appendix O.5—Alternatives Air Quality Calculations

4. Thresholds of Significance

In 2006, the City published the L.A. CEQA Thresholds Guide (Thresholds Guide) as a guidance document for preparing CEQA analyses for projects within the City. The Thresholds Guide includes two sets of criteria to evaluate project impacts: screening criteria, which provide direction in determining the appropriate environmental document required for a project; and significance thresholds, which assist in determining whether a project's impacts generally would be significant under normal circumstances and would therefore require mitigation. Although intended as a voluntary tool, the Thresholds Guide offers a consistent set of evaluation criteria applicable to most discretionary projects in the City, and the Los Angeles Department of City Planning has typically used both the screening criteria and significance thresholds as the basis for project analyses in its CEQA documents. However, the Thresholds Guide clearly indicates that the Lead Agency—in this case, the Department of City Planning—retains the authority to determine significance thresholds on a case-by-case basis, dependent upon unique environments, evolving regulatory requirements, and the nature of each project. In addition, the Thresholds Guide states it is not intended as a substitute for the use of independent judgment to determine significance or the evaluation of the evidence in the record. Moreover, it states "[b]ecause evaluation practices continue to evolve due to changing regulations, scientific methods, and court

decisions, the project evaluator and lead City agency should always use the best information and evaluation methods available, including those from sources other than the Thresholds Guide."[2]

In light of an evolving regulatory environment, recent case law, new topics such as GHG emissions and tribal cultural resources that are now addressed in Appendix G of the CEQA Guidelines (Appendix G), and the age of the Thresholds Guide, the Department of City Planning has begun to update its CEQA guidance. At this point in time, the Department of City Planning has chosen to rely on the Appendix G questions as thresholds of significance. As noted above, the City has discretion in choosing appropriate significance thresholds. Therefore, throughout this Draft EIR, the thresholds contained in Appendix G are used. The factors and considerations set forth in the Thresholds Guide are utilized where appropriate to assist in answering the Appendix G threshold questions.

5. Project Site Background and Existing Conditions

The Project Site is comprised of approximately 8.08 acres and is partially developed, with portions of the Project Site currently used for transportation operations and maintenance-related facilities, bus parking and construction staging.[3] The Project Site's topography consists of a south-facing vegetated sloped area that spans from the North Parcel to the South Parcel until reaching the vicinity of Mandarin Plaza, at which point the South Parcel becomes mostly paved. The sloped area faces towards Metro A Line tracks and the Los Angeles State Historic Park and consists mainly of bare ground with limited vegetation, containing remnants of concrete foundations/footings, and retaining walls. Chain link fencing is located along the perimeter of the Project Site between North Broadway and the Metro A Line tracks. The Project Site includes 20 existing on-site trees consisting of Canary Island date palm (*Phoenix canariensis*), Mexican fan palm (*Washingtonia robusta*), and desert fan palm (*Washingtonia filifera*) and three street trees consisting of jacaranda trees (*jacaranda mimosafolia*), none of which are protected under the City's Protected Tree and Shrubs Ordinance No. 186,873.[4] Further, the Project Site has 13 static billboard structures along North Broadway including 3 billboards on the South Parcel and 10 billboards on the North Parcel.

Existing access to the South Parcel is located via a gated driveway on North Broadway across from St. Peter's Italian Catholic Church as well as an existing easement from North

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[2] *City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, p. 3.*

[3] *The Project involves the dedication of a three-foot-wide strip along North Broadway to the City resulting in a net acreage of approximately 7.87 acres.*

[4] *The Tree Resource, 2016 Tree Report, 2020 Tree Survey and Update Memorandum, and 2021 Tree Survey Update Memorandum. See Appendix A of this Draft EIR.*

Spring Street, which crosses under the elevated Metro A Line tracks at the southeastern corner of the South Parcel.[5] The South Parcel is largely paved and partially developed with structures associated with transportation operations and maintenance-related facilities including an approximately 12,800-square-foot rectangular one-story metal auto repair building located in the southern portion of the South Parcel, with vehicle bays and roll-up doors, as well as a vehicle shelter/wash bay, trash enclosure, paved surface parking areas, paved outdoor storage yard, utility infrastructure, retaining walls, concrete foundations/ footings, and fencing. Additionally, an approximately 2,132-square-foot addition to the rear of an existing off-site restaurant (the Golden Dragon Restaurant) and associated parking that encroaches onto the Project Site is located in the southwestern portion of the South Parcel. As further analyzed in Section IV.G, Hazards and Hazardous Materials, two existing groundwater monitoring wells are located on the South Parcel for ongoing monitoring of the adjacent Union Pacific Railroad Cornfield Site under regulatory oversight by the Los Angeles Regional Water Quality Control Board. An abandoned oil well has also been previously mapped within the South Parcel.

Access to the North Parcel is currently provided via two gated entryways along North Broadway, with one across from Solano Avenue and the other at the northeastern corner of the North Parcel. The North Parcel includes foundation remnants and graded areas, and is generally used for construction staging and bus parking. There are no existing buildings on the North Parcel. As further evaluated in Section IV.G, Hazards and Hazardous Materials, records from CALGEM indicate the presence of two inactive abandoned oil wells on the North Parcel. One inactive oil well has been confirmed on the North Parcel (Southern Pacific Corehole No. 1). Although records indicate the presence of a second abandoned oil well on the North Parcel (Freight Depot No. 1), the precise location of a second well has not yet been confirmed.

6. Description of the Proposed Project

The Project proposes a mixed-use residential and commercial development consisting of 986 residential units including 200 affordable units; 15,000 square feet of retail uses; 23,800 square feet of restaurant uses; and 116,610 square feet of outdoor trellis/overhang areas (circulation and balconies).[6] The Project would include the subdivision of a curvilinear shaped Project Site that runs parallel to the Metro A Line tracks and the Los Angeles State Historic Park that are located generally to the southeast, and North Broadway that is located generally to the northwest, into four master ground lots as well as air space

[5] *Access to the South Parcel from North Spring Street is provided via existing access easements (Inst. No. 03-3736225, December 10, 2003, and Inst. No. 03-3736226, December 10, 2003).*

[6] *The Los Angeles Department of Building and Safety may count the Project Site's approximately 116,610 square feet of outdoor trellis/overhang areas (circulation and balconies) as floor area. As such, these areas have been included in the total floor area for the Project.*

lots. The southern two master ground lots are herein referred to as the South Parcel, and the northern two master ground lots are herein referred to as the North Parcel. The South Parcel would provide 631 residential units comprised of two live-work units, 106 studio units, 293 1-bedroom units, 195 2-bedroom units, and 35 3-bedroom units. The North Parcel would provide 355 residential units comprised of five live-work units, 38 studio units, 175 1-bedroom units, 112 2-bedroom units, and 25 3-bedroom units. In total, the Project would include up to 1,245,536 square feet of floor area on a 342,678-square-foot Project Site, resulting in a floor area ratio (FAR) of 3.63:1.

The South Parcel would be developed with a six-story podium connecting two buildings, Building 1, a 26-story building up to 343 feet 8 inches in height, and Building 2, a 22-story building up to 301 feet in height. The North Parcel would be developed with a two-story podium connecting three buildings, the North Building, a 15-story building up to 209 feet 4 inches, the Courtyard Building, a six-story building up to 108 feet 8 inches in height, and the Retail Block Building, a three-story building up to 72 feet 4 inches in height. Further, the Project would provide up to 931 parking spaces (including standard, compact, and stacked spaces) within a three-level partial subterranean garage on the South Parcel, and up to 546 parking spaces within three-level partial subterranean parking garage on the North Parcel, for a total of up to 1,477 vehicular parking spaces. Additionally, the Project would provide 80 short-term and 722 long-term bicycle parking spaces. The Project would include a total of 132,949 square feet of open space within the Project Site of which 45,377 square feet would be publicly accessible, privately operated and maintained. The Project would include the demolition of 14,932 square feet of existing uses including an auto repair building and the rear addition of an encroaching off-site restaurant.[7]

Refer to Section II, Project Description, of this Draft EIR for a detailed description of the Project, including the requested permits and approvals.

7. Areas of Controversy

Based on the NOP comment letters provided in Appendix A of this Draft EIR, issues known to be of concern include, but are not limited to, Project impacts associated with aesthetics, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation,

[7] *Since the issuance of the NOP for the Project, structures associated with Metro operations on the South Parcel have been removed. These includes an approximately 48 square-foot guard house and 4,920 square-foot modular office. The existing buildings to be removed as a result of the Project are now limited to a 12,800 square-foot auto repair building and 2,132 square-foot addition to the rear of an existing off-site encroaching restaurant (the Golden Dragon Restaurant). No existing buildings are located on the North Parcel.*

transportation, tribal cultural resources, utilities and service systems. Based on the analyses provided in the Draft EIR, the Project would result in significant and unavoidable impacts with respect to: project-level and cumulative construction noise and vibration. Refer to Appendix A of this Draft EIR for copies of the NOP comment letters.

8. Public Review Process

The City prepared an Initial Study and circulated an NOP for public comment to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties on August 2, 2021, for a 30-day review period. In addition, a public scoping meeting for the Project was held on August 18, 2021. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR.

This Draft EIR is being circulated for a 45-day public comment period. Following the public comment period, a Final EIR will be prepared that will include responses to the comments raised regarding this Draft EIR.

9. Summary of Environmental Impacts

Table I-1 on page I-11 provides a summary of the environmental impacts of the Project evaluated in this Draft EIR. Based on the analysis in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with respect to: construction noise associated with on-site construction activities during daytime hours, and on-site and off-site (trucks) construction activities associated with the concrete mat pour during nighttime hours and vibration from off-site (trucks) construction with respect to human annoyance. With regard to cumulative impacts, implementation of the Project together with the related projects would result in significant impacts that cannot be feasibly mitigated with respect to: construction noise from on-site construction activities, off-site construction activities associated with off-site improvements, and off site construction activities (associated with trucks; and vibration from off-site construction activities (trucks) with respect to human annoyance.

Table I-1
Summary of Impacts Under the Project

Environmental Area	Project Impact
A. AESTHETICS	
Scenic Vistas	Less Than Significant
Scenic Resources within a State-Designated Scenic Highway	No Impact
Conflict with Applicable Regulations Governing Scenic Quality	Less Than Significant
Light and Glare	Less Than Significant
B. AIR QUALITY	
Conflicts with Plans	Less Than Significant
Regional Emissions	
Construction	Less Than Significant
Operation	Less Than Significant
Localized Emissions	
Construction	Less Than Significant
Operation	Less Than Significant
Toxic Air Contaminants	
Construction	Less Than Significant
Operation	Less Than Significant
C. CULTURAL RESOURCES	
Historical Resources	Less Than Significant with Mitigation
Archaeological Resources	Less Than Significant with Mitigation
D. ENERGY	
Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources	
Construction	Less Than Significant
Operation	Less Than Significant
Conflict with Plans for Renewable Energy or Energy Efficiency	Less Than Significant
E. GEOLOGY AND SOILS	
Geologic Hazards	Less Than Significant
Paleontological Resources	Less Than Significant with Mitigation
F. GREENHOUSE GAS EMISSIONS	
Construction	Less Than Significant
Operation	Less Than Significant
G. HAZARDS AND HAZARDOUS MATERIALS	
Construction	Less Than Significant with Mitigation
Operation	Less Than Significant
H. HYDROLOGY AND WATER QUALITY	
Surface Water Quality	
Construction	Less Than Significant

Table I-1 (Continued)
Summary of Impacts Under the Project

Environmental Area	Project Impact
Operation	Less Than Significant
Groundwater Quality	
Construction	Less Than Significant
Operation	Less Than Significant
Surface Water Hydrology	
Construction	Less Than Significant
Operation	Less Than Significant
Groundwater Hydrology	
Construction	Less Than Significant
Operation	Less Than Significant
I. LAND USE AND PLANNING	
Conflict with Land Use Plans	Less Than Significant
J. NOISE[a]	
Construction	
On-Site Noise	**Significant and Unavoidable**
Off-Site Noise (Haul Trucks)[b]	**Significant and Unavoidable**
Off-Site Noise (Utilities and Staging)	Less Than Significant with Mitigation
On-Site Vibration (Building Damage)	Less Than Significant
On-Site Vibration (Human Annoyance)	Less Than Significant
Off-Site Vibration (Building Damage)	Less Than Significant
Off-Site Vibration (Human Annoyance)[c]	**Significant and Unavoidable**
Operation	
On-Site Noise	Less Than Significant
Off-Site Noise	Less Than Significant
Vibration	Less Than Significant
K. POPULATION AND HOUSING	
Construction	Less Than Significant
Operation	Less Than Significant
L. PUBLIC SERVICES	
Fire Protection	
Construction	Less Than Significant
Operation	Less Than Significant
Police Protection	
Construction	Less Than Significant
Operation	Less Than Significant
Libraries	
Construction	Less Than Significant
Operation	Less Than Significant

Table I-1 (Continued)
Summary of Impacts Under the Project

Environmental Area	Project Impact
M. TRANSPORTATION	
Conflict with Plans	Less Than Significant
Vehicle Miles Traveled	Less Than Significant
Design Hazards	Less Than Significant
Emergency Access	Less Than Significant
N. TRIBAL CULTURAL RESOURCES	
Tribal Cultural Resources	Less Than Significant with Mitigation
O. UTILITIES AND SERVICE SYSTEMS	
Water Supply and Infrastructure	
Construction	Less Than Significant
Operation	Less Than Significant
Wastewater	
Construction	Less Than Significant
Operation	Less Than Significant
Solid Waste	
Construction	Less Than Significant
Operation	Less Than Significant
Energy Infrastructure	
Construction	Less Than Significant
Operation	Less Than Significant
P. WILDIFRE	
Wildfire	Less Than Significant

[a] *Cumulative on-site construction noise, cumulative off-site construction noise impacts associated with trucks, and cumulative off-site construction vibration (human annoyance) would also be significant and unavoidable under the Project.*

[b] *Off-site construction-related noise impacts associated with trucks would be less than significant; off-site construction-related noise associated with trucks would be significant and unavoidable in the event of a nighttime mat pour.*

[c] *Off-site vibration from construction trucks would be significant and unavoidable; off-site improvements construction would be less than significant.*

Source: Eyestone Environmental, 2025.

10. Project Design Features

The following Project Design Features would be implemented as part of the Project:

a. Aesthetics

Project Design Feature AES-PDF-1: Construction fencing will be installed around construction sites that are visible from adjacent public streets and the Los Angeles State Historic Park. Any graffiti that may appear on this construction fencing will be removed on a regular basis.

Project Design Feature AES-PDF-2: Outdoor lighting will be directed away from nearby residential properties, the public right-of-way, and the Los Angeles State Historic Park. However, construction lighting will not be so limited as to compromise the safety of construction workers.

Project Design Feature AES-PDF-3: All landscaped areas will be maintained in accordance with an approved landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect.

Project Design Feature AES-PDF-4: The Project will use non-reflective glass or glass that has been treated with a non-reflective coating in all exterior windows and building surfaces to reduce potential glare from reflected sunlight.

b. Cultural Resources

Project Design Feature CUL-PDF-1: The Project will include an on-site interpretative display commemorating the history of the River Station site. Interpretive displays in these areas may utilize a combination of text, images, perspective drawings, and maps to convey the development history and historical importance of the River Station rail yard and its immediate surroundings over time.

c. Geology and Soils

Project Design Feature GEO-PDF-1: All development activities conducted on the Project Site will incorporate the professional recommendations contained in the Geotechnical Investigation and/or alternative recommendations set forth in site-specific, design-level geologic and geotechnical investigation(s) approved by the City Engineer, provided that such recommendations meet and/or surpass relevant State and City laws, ordinances, and code requirements, including California Geological Survey's Special Publication 117A and the City's Building Code. Such professional recommendations will include, but not limited to, the following and may be revised or superseded in accordance with an approved final geotechnical investigation(s):

- Removal of fill soils and/or use of structural slab-on-grade and pile systems where fill soils will remain;
- Use of cement types that address sulfate exposure, as applicable;

- Design and construction of buildings in accordance with CBC seismic parameters;
- Grading and fill activities, including compaction, in accordance with regulatory requirements;
- Use of mat foundations where the soils are subject to liquefaction or where a structure will be relatively heavy;
- Design of retaining walls to withstand seismic shaking;
- Use of shoring methods for vertical excavations exceeding five feet;
- Use of a temporary dewatering system should finite zones of perched water be encountered locally within the bedrock; and
- Implementation of proper drainage and stormwater disposal systems in accordance with regulatory requirements.

d. Greenhouse Gas Emissions

Project Design Feature GHG-PDF-1: The Project will prohibit the use of natural gas during Project operations, excluding restaurant cooking equipment consistent with the requirements of Ordinance No. 187,714.

e. Noise

Project Design Feature NOI-PDF-1: Outdoor mounted mechanical equipment will be enclosed or screened by the building design (e.g., a roof parapet) from view of off-site noise-sensitive receptors at the street level.

Project Design Feature NOI-PDF-2: All loading docks will be acoustically screened from offsite noise-sensitive receptors.

Project Design Feature NOI-PDF-3: Outdoor amplified sound systems, if any, will be designed so as not to exceed the maximum noise level of 75 dBA (L_{eq-1hr}) at a distance of 15 feet from the amplified speaker sound systems at Level P3 (South Parcel) and Level 1 (North and South Parcels) common outdoor spaces; 80 dBA (L_{eq-1hr}) at Level 3 (North Parcel), Level 5 (South Parcel) and Level 6 (North Parcel) common outdoor spaces; and 85 dBA (L_{eq-1hr}) at Level 15 (North Parcel), Level 22 (South Parcel) and Level 26 (South Parcel) common outdoor spaces. A qualified noise consultant will provide written documentation that the design of the system complies with these maximum noise levels.

f. Police Protection

Project Design Feature POL-PDF-1: During construction, the Applicant and/or its construction contractor, will implement temporary security measures,

including security barriers and fencing (e.g., chain-link fencing), low-level security lighting, locked entry (e.g., padlock gates or guard-restricted access), and regular daily and multiple security patrols during non-construction hours (e.g., nighttime hours, weekends, and holidays) to limit access by the general public, secure construction equipment, and minimize trespassing, vandalism, short-cut attractions, and attractive nuisances. During construction activities, the contractor will document the security measures; and the documentation will be made available to the Construction Monitor.

Project Design Feature POL-PDF-2: During operation, the Project will implement a 24-hour/seven-day security plan incorporating on-site security staff; security cameras; adequate lighting of parking facilities, elevators, pedestrian walkways, building entries, open spaces and lobbies to reduce areas of concealment; design of public spaces to be easily patrolled and accessed by safety personnel; and design of entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites.

Project Design Feature POL-PDF-3: The Applicant will consult with LAPD regarding the incorporation of feasible crime prevention features. Upon completion of construction of the Project and prior to the issuance of a building permit, the Applicant will submit a diagram of the Project Site to the LAPD's Central Division Commanding Officer that includes access routes and any additional information that might facilitate police response.

g. Transportation

Project Design Feature TR-PDF-1: A detailed Construction Traffic Management Plan, including street closure information, a detour plan, haul routes, and a staging plan, would be prepared and submitted to the City for review and approval, prior to commencing construction. The Construction Traffic Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Traffic Management Plan will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and will include, but not be limited to, the following elements, as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including duration and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent streets or in predominantly residential zoned areas.

- Temporary pedestrian, bicycle, and vehicular traffic controls (e.g., flag people) during all construction activities adjacent to North Broadway and Spring Street, to ensure traffic safety on the public right-of-way.
- Scheduling of construction-related activities to reduce the effect on traffic flow and surrounding arterial streets.
- Coordination with Metro and LADOT to address any transit stop modifications or relocations.
- Coordination with LADOT Parking Meter Division to address any potential loss of metered parking spaces, if needed.
- Implementing safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate.
- Scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible.
- Prohibition of construction-related vehicles/equipment staging on adjacent streets, unless specifically approved as a condition of an approved haul route.
- Maintenance of a log, available on the job site at all times, documenting the dates of hauling and the number of trips (i.e., trucks) per day.
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities and posting of the telephone number at the site readily visible to any interested party during site preparation, grading, and construction.

Project Design Feature TR-PDF-2: The Project will implement various TDM strategies that would exceed the requirements established in the current TDM Ordinance. The TDM Program will be subject to review and approval by the City. The following TDM strategies will be implemented as proposed under the TDM Program in addition to the TDM measures required under the TDM ordinance:

- Reduced Parking Supply: The Project will incorporate allowable parking reduction rates from standard LAMC requirements such as LAMC Sections 12.21.A4(x)(3) and LAMC Section 12.21.A4. The Project will provide up to a total of 1,477 parking spaces, including up to 931 spaces on the South Parcel and 546 spaces on the North Parcel, which is less than the standard baseline LAMC requirements of 1,889 total spaces, including 1,207 spaces for the South Parcel and 682 spaces for the North Parcel.

- Pedestrian Amenities: The Project will provide upgraded pedestrian facilities including wider (seven-foot wide) sidewalks and landscape corridors along North Broadway. Furthermore, the Project will implement a pedestrian wayfinding signage system to direct residents, employees, and visitors of the Project to available transit services and other attractions within the vicinity of the Project Site.
- Neighborhood Enhancements: The Project will provide new or updated pedestrian crosswalks at the signalized driveway to the North Parcel, and a new signalized pedestrian beacon for a crosswalk across North Broadway at the northeastern tip of the Project Site to create a connection to the Portola Trail leading to the adjacent Elysian Park.
- Transit Infrastructure Improvements: The Project will coordinate with the appropriate agencies to provide improvements to existing transit infrastructure (e.g., adequate benches, shelters, lighting, light emitting diode displays, signage, etc.) at the bus stops located immediately adjacent to the Project Site along North Broadway, as needed.

h. Utilities and Service Systems—Water Supply and Infrastructure

Project Design Feature WAT-PDF-1: The Project design will incorporate the following water conservation features to support water conservation in addition to those measures required by the City's current codes and ordinances:

Fixtures:

- ENERGY STAR Certified Residential Clothes Washers—Front-loading or Top-loading with Integrated Water Factor of 2.5 or less and capacity of three cubic feet.
- ENERGY STAR Certified Residential Dishwashers—standard with 3.2 gallons/cycle or less.
- High Efficiency Toilets with a flush volume of 1.1 gallons per flush, or less.
- Showerheads with a flow rate of 1.4 gallons per minute, or less.
- Waterless urinals.

Landscape and Irrigation:

- California Friendly® plants or native plants.
- Drip/Subsurface Irrigation (Mirco-Irrigation).
- Micro-Spray.

- Proper Hydro-Zoning/Zoned Irrigation (groups plants with similar water requirements together)

Pool

- Install a meter on the pool make-up line or leak detection system so water use can be monitored and leaks can be identified and repaired.
- Pool splash troughs around the perimeter that drain back into the pool.
- Reuse pool backwash water for irrigation.

Utilities

- Individual metering and billing for water use for every commercial unit.
- Leak detection and water monitoring.

i. Wildfire

Project Design Feature WI- PDF-1: requires the area 0–5 feet from a structure to be ember resistant consistent with the following:

- Use hardscape including but not limited to gravel, pavers, or concrete. No combustible bark or mulch shall be permitted within the 0-5 feet from a structure.
- Remove all dead and dying plants, weeds, and debris (leaves, needles, etc.) from the roof, gutter, deck, porch, stairways, and under any areas of the structure. To be maintained twice annually, in early summer after the growing season and fall to eliminate regrowth.
- Limited landscape plantings shall be irrigated and low-growing properly spaced fire-resistant herbaceous (non-woody) plants.

11. Mitigation Measures

The following mitigation measures would be implemented as part of the Project:

a. Cultural Resources

Mitigation Measure CUL-MM-1: Prior to the start of Project ground disturbance, including demolition and vegetation removal, a qualified principal archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archeology shall be retained to prepare and implement a written Cultural Resources Monitoring and Treatment Plan (CRMTP). The CRMTP shall be prepared in coordination with the

Department of City Planning, Office of Historic Resources (OHR) and shall be subject to OHR's review and approval.

The CRMTP shall dictate the process for addressing known archaeological resources as well as un-anticipated archaeological resources that may be unearthed during construction, which would include potential prehistoric and historical-period discoveries. In order to account for any such unanticipated resources, the CRMTP shall include a requirement to develop and implement a Worker Environmental Awareness Program (WEAP) that sets forth protocols to train onsite construction workers to identify and appropriately respond to discovery of potential cultural resources that may be inadvertently encountered during earthmoving activities.

The CRMTP shall include protocols for construction monitoring for buried cultural resources that will occur during all excavation activities unless otherwise specified in the CRMTP. Specifically, the CRMTP will reiterate the varying archaeological sensitivity across the Project Site, and the situations under which monitoring may be reduced or discontinued. The CRMTP will describe monitoring protocols for potential Young alluvial-fan deposits in the South Parcel at depths greater than 3 m and extending to the base of excavation, and for areas near the anticipated alignment of the Zanja Madre. Archaeologically relevant sediments may be present at significant depths (greater than 3 m [10 ft]). At a minimum, the Young alluvial-fan deposits should be considered sensitive for buried cultural resources to the base of proposed excavations within the South Parcel.

The CRMTP shall expand upon existing available historic contexts and cultural contexts, focusing on the themes and research questions that demonstrate the significance of the Zanja Madre and other currently unknown cultural resources that may be present. This shall ensure that baseline information required to effectively document the Zanja Madre and/or evaluate the significance of other cultural resources discoveries that could be made during Project activities are in place prior to initiation of construction activities. The CRMTP shall include the professional qualifications required of key staff, monitoring protocols relative to the varying archaeological sensitivity across the Project Site, provisions for evaluating and treating unanticipated cultural materials discovered during ground-disturbing activities, situations under which monitoring may be reduced or discontinued, and reporting requirements. The CRMTP shall include detailed methods to be taken during stop-work situations, assessment of preservation in place or recovery of potential cultural deposits, and evaluation of resources in terms of CRHR and NRHP eligibility.

The CRMTP shall include specific protocols regarding work in proximity to the exposed sections of the Zanja Madre within the Project Site and the anticipated locations of additional Zanja Madre sections or

fragments that may be buried on-site, including protocols for monitoring, recording, photographing, and artifact collection. The protocols detailed in the CRMTP shall include the three elements detailed below, in a manner commensurate with the significance of the Zanja Madre and adequate for recovering and preserving scientifically consequential information provided by the resource. The CRMTP shall require outreach to local Stakeholders. Stakeholders that shall be contacted include, but are not limited to, local historical societies, museums, and subject matter experts. Prior to the issuance of a grading permit, the Applicant shall organize this Stakeholder Committee, subject to the review and approval of the City, to inform the development, execution, and maintenance of a plan for public interpretation and memorialization of the Zanja Madre. This Zanja Madre Interpretation and Memorialization Plan shall be either a standalone document or included as an independent appendix to the CRMTP, prepared by the Applicant, with input from the Stakeholder Committee, and subject to approval by OHR. A copy of the CRMTP shall be provided to OHR once completed.

The Zanja Madre Interpretation and Memorialization Plan may include any or all of the following, or other interpretive measures: (1) removal, preservation, and relocation of an intact section of the Zanja Madre on the Project Site, if feasible; (2) collection and reuse of bricks from the Zanja Madre in an interpretive installation, such as a water feature on the Project Site; (3) delineation of the Zanja Madre's original alignment through decorative elements on pedestrian paths or walls on the Project Site; (4) installation on the Project Site of murals or other public art-work referencing the Zanja Madre and interpreting its historical significance; (5) a scenic overlook at the Project Site for viewing and interpreting the exposed Zanja Madre section on the Metro A Line ROW; and (6) inclusion of the public through educational programs/curricula, virtual interpretive con-tent, and other methods. This protocol requires preconstruction research and design planning to enhance opportunities for interpreting the important culture history of the area.

The CRMTP shall include specific protocols for exposing any intact portions of the Zanja Madre via archaeological excavation, with recovery of important data, such as evidence of the original open-ditch zanja, construction methods, information about associated artifacts, and collection of bricks for public interpretation. This protocol requires preconstruction research and archaeological excavation as well as construction monitoring and treatment of any additional portions of the Zanja Madre encountered during construction.

The CRMTP shall require the preparation of documentation for an appropriate section of intact zanja meeting the provisions of the Historic American Engineering Record (HAER). This process shall expand upon research and fieldwork to expose segments of the Zanja Madre feature.

Documentation shall include pertinent narrative records, measured drawings, high-accuracy GPS/geographic information system (GIS) recordation, photographs in conformance with HAER standards, and other appropriate documentation ensuring City Guidelines and best practice standards are met. A copy of the HAER shall be provided to OHR once completed.

In locations where the Zanja Madre is anticipated to extend beyond the Project Site onto other properties, efforts shall be made to prevent damage to the feature at those junctures, ensuring that construction activities will not compromise the feature in adjacent parcels using appropriate construction limits marking and other protective measures as feasible from within approved Project limits.

The CRMTP shall also include protocols for construction monitoring for buried cultural resources for those portions of the Project Site that are sensitive for buried cultural resources. As shown in Appendix A of the Cultural Resource Assessment included as Appendix A to the Draft EIR, these areas include soils from Unit 1 of the Young alluvial-fan deposits and are located within the South Parcel.

b. Geology and Soils

Mitigation Measure GEO-MM-1: The services of a Qualified Professional Paleontologist shall be retained prior to ground-disturbing activities associated with the Project, in order to develop a site-specific Paleontological Resource Mitigation and Treatment Plan. The plan shall specify the levels and types of measures to be implemented, based on the types, locations and depths of ground-disturbing activities. The Paleontological Resource Mitigation and Treatment Plan also shall include a description of the professional qualifications required of key staff, communication protocols to be followed during construction, fossil-recovery protocols, sampling protocols for microfossils (if required), laboratory procedures, reporting requirements, and curation provisions for any collected fossil specimens. The Paleontological Resource Mitigation Treatment Plan shall also include a Worker Environmental Awareness Program (WEAP).

Mitigation Measure GEO-MM-2: A Qualified Professional Paleontologist shall attend any preconstruction meetings, to consult with grading and excavation contractors concerning excavation schedules, paleontological field techniques, and safety issues. Communication protocols shall be established to ensure that all relevant ground-disturbing activities are monitored and assessed to comply with the paleontological resource mitigation and treatment plan. The WEAP shall be reviewed at a preconstruction meeting for the Project.

A paleontological monitor shall be on site at all times during the original cutting of previously undisturbed deposits of high paleontological-resource potential (e.g., Puente Formation and Unit 2 of the Young alluvium), to inspect exposures for contained fossils. The paleontological monitor shall work under the direction of a qualified professional paleontologist. As significant microfossil remains (e.g., isolated small-mammal teeth) are known from localities in the immediate vicinity of the Project area, screening of sediments may be required on site at the discretion of the paleontological monitor or qualified professional paleontologist. If artificial fill, significantly disturbed deposits, or younger deposits too recent to contain paleontological resources are encountered during construction, the Qualified Professional Paleontologist may reduce or curtail monitoring in the affected areas, after consultation with the Applicant and the City of Los Angeles.

If paleontological resources are discovered during construction, the paleontological monitor shall have the authority to temporarily divert or direct ground-disturbing activities in the immediate vicinity around the find until the find is assessed for scientific significance and recovered (i.e., collected). While recovery of paleontological resources is ongoing, ground-disturbing activities on other areas of the site outside of the recovery area may continue without interruption.

Mitigation Measure GEO-MM-3: Paleontological resources collected during monitoring shall be prepared in a properly equipped fossil-preparation laboratory. Preparation shall include the removal of rock matrix from fossil materials as well as the stabilization, consolidation, and repair of specimens, as necessary. Fossil preparation shall be done to the point that specimens are ready for curation. Specimens shall be identified to the finest taxonomic level that is reasonably possible before being sorted and cataloged as part of the mitigation program.

Once prepared, fossils shall be deposited (as a donation) with an appropriate public, nonprofit scientific institution with permanent paleontological collections (such as a natural-history museum), along with copies of all pertinent field notes, photographs, and maps. Any fossils shall be handled and deposited consistent with Paleontological Resource Mitigation and Treatment Plan prepared by the Qualified Professional Paleontologist.

c. Hazards and Hazardous Materials

Mitigation Measure HAZ-MM-1: Waste Characterization, Segregation, Disposal and Reuse Plan—Prior issuance of demolition permits, a hazardous building materials survey shall be conducted on all aboveground structures on the Project Site. The survey shall include testing for asbestos, lead-based paint, polychlorinated biphenyls (PCBs), and

universal wastes at all currently extant structures, subject to the determination of a qualified and licensed environmental contractor (State of California Licensed Contractor, with hazardous material, asbestos, and lead-based paint certifications). Following the results of the hazardous building materials survey and before demolition activities, a licensed contractor shall prepare a Waste Characterization, Segregation, Disposal, and Reuse Plan (Waste Characterization Plan), which shall provide the requirements, in accordance with applicable regulations, for the removal and offsite disposal of any identified hazardous materials. The Waste Characterization Plan shall include requirements for notifications to appropriate federal and state agencies (including, but not limited to U.S. Environmental Protection Agency [USEPA] for PCBs and the South Coast Air Quality Management District [SCAQMD] for asbestos), and shall confirm when asbestos abatement would require air monitoring, in accordance with SCAQMD Rule 1403. All abatement work shall be done in accordance with federal, state, and local regulations, including those of the USEPA, Occupational Safety and Health Administration, California Occupational Safety and Health Administration, and SCAQMD.

Mitigation Measure HAZ-MM-2: Hazardous Materials Contingency Plan—Prior to commencement of any demolition or earthwork activities on the Project Site, the Applicant/Contractor shall prepare a Hazardous Materials Contingency Plan (HMCP) that addresses the potential for discoveries of hazardous releases in soil, soil vapor, and groundwater based on visual and olfactory observations and organic vapor monitor (OVM) readings during short-term construction activities in accordance with Cal OSHA and SCAQMD requirements. The HMCP shall include management protocols responsive to field observations and any subsurface geophysical survey findings at the Project Site (see Mitigation Measure HAZ-MM-3). The HMCP shall include, at a minimum, a Health and Safety Plan (HASP) that provides detailed directions on the training procedures of on-site workers for identification of contamination. All workers and employees that will be involved in earth-moving activities shall be trained to identify and properly manage potentially contaminated materials. The HMCP shall mandate that hazardous materials shall not be disposed of or released on the ground, in the underlying groundwater, or any surface water. The HMCP shall explain or otherwise identify the applicable local, state, and federal regulatory requirements and mandatory procedures for the assessment, characterization, handling, storing, transporting, management, and disposal of hazardous constituents, materials, and wastes during construction activities and demonstrate how compliance with these requirements will be achieved.

A qualified environmental consultant with a minimum of 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) Certification (with current 8-hour refresher), with adept

knowledge of the HMCP, and with experience overseeing contaminated soil removal and disposal, shall be retained prior to commencement of any earthwork. The qualified environmental consultant must be present during all earthwork in areas of known or suspected contamination. Should contamination be identified in an area where contamination was not anticipated, the qualified environmental consultant shall be notified immediately and any recommendations made by the qualified environmental consultant during earthwork shall be checked by the Applicant/Contractor to ensure they are in accordance with the HMCP.

The HASP shall set forth safety requirements to be implemented during the decommissioning and removal of underground storage tanks (USTs) in accordance with all applicable regulations, including the Los Angeles Fire Department (LAFD) abandonment of UST requirements as outlined in Los Angeles Fire Code, Division 5 and 31; California Health and Safety Code Chapter 6.7; California Code of Regulations (CCR) Title 23, Division 3, Chapter 16; and CCR Title 8, Section 5156, 5157, 5158, as well as CCR Title 23, Division 3, Chapter 16, Underground Storage Tank Regulations, as required and under the jurisdiction of the Los Angeles Regional Water Quality Control Board (LARWQCB). All field personnel shall be required to implement the procedures presented in the HASP while conducting the field work.

LAFD mandates (pursuant to any additional permit conditions imposed as part of the UST abandonment permit process) shall be included in the HASP, including but not necessarily limited to: (1) the requirement for the Fire Inspector to witness the evaluation of a UST to confirm the atmosphere inside the tank is below the lower explosive limit; (2) the inspection of the tanks for signs of leakage; (3) the contracting of a licensed hazardous waste transporter for preparation of Uniform Hazardous Waste Manifest, which tracks the shipment of hazardous waste to a disposal facility, and transportation of the tank to a licensed hazardous waste disposal site; (4) completion of the conduct of soil samples surrounding the tank; and (5) the completion of an LAFD Division 5 Permit application package and Clean Certificate from an industrial hygienist. All LAFD mandates shall be included in the permit requirements once obtained.

Compliance with the HASP shall be incorporated into decommissioning and removal procedures included in the contractor's specifications. The removal of any USTs, if present, shall be completed to the satisfaction of the LAFD which will require but not necessarily be limited to periodic work breathing zone monitoring and monitoring for volatile organic compounds using a handheld organic vapor analyzer in the event impacted soils are encountered during excavation activities, as described in SCAQMD Rule 1166. The HMCP shall be implemented during all construction activities for the Project that require ground disturbance activities. Compliance with the HMCP shall be incorporated

into the contractor's specifications and shall be completed to the satisfaction of LAFD and SCAQMD.

Mitigation Measure HAZ-MM-3: Subsurface Geophysical Survey—After completion of the demolition activities within the South Parcel, but prior to any grading, trenching or excavation of soils in the South Parcel, the Applicant/Contractor shall retain a State of California Licensed Contractor that specializes in subsurface geophysical surveys on hazardous material sites to conduct a subsurface survey of the area in proximity to groundwater monitoring well (MW-2) and surrounding areas that could be a possible location for underground storage tanks (USTs). The subsurface survey shall investigate the site to determine the location of any subsurface structures, USTs, or other underground obstructions, if present. Methods may include ground-penetrating radar, magnetometer, or other appropriate technologies to investigate for the location of USTs, piping, and appurtenances. The results of the subsurface survey shall be included in a report, which shall include the results of site reconnaissance, interviews with applicable staff and/or property owners, and any subsurface structures identified. The HMCP required pursuant to Mitigation Measure HAZ-MM-2 shall incorporate the findings of the report, and any subsurface features that are identified shall be addressed in accordance with the protocols established as part of Mitigation Measure HAZ-MM-2.

Mitigation Measure HAZ-MM-4: Groundwater Monitoring Wells—Prior to the issuance of a grading permit for the South Parcel, the Applicant/Contractor shall coordinate with the Los Angeles Regional Water Quality Control Board (LARWQCB) and Union Pacific Railroad to receive confirmation of the status of the Request for Closure submitted to the LARWQCB in September 2013 (Union Pacific Railroad—Cornfield Yard, Cleanup Case No. SL2047T1683). If closure has not been approved and LARWQCB requires groundwater monitoring on the Project Site to be continued, then the Applicant/Contractor shall coordinate with the LARWQCB and Union Pacific Railroad to either maintain or remove and relocate the existing monitoring wells MW-2 and MW-18. If the monitoring wells are to be moved, the relocated wells must be accommodated within the Project Site boundaries, with adequate access for monitoring, as needed, to the satisfaction of the LARWQCB.

Mitigation Measure HAZ-MM-5: Vapor Intrusion Design—Prior to issuance of a building permit, the South Parcel and North Parcel final plans shall incorporate methane vapor design features to address development within the Methane Zone. At a minimum, development within the South Parcel and the North Parcel shall incorporate Los Angeles Municipal Code (LAMC) Site Design Level I requirements.

After completion of Mitigation Measure HAZ-MM-6, which requires the cutting down of the existing "Freight Depot 1" well casing within the

North Parcel to finished elevation, re-abandonment of the well to CalGEM specifications; resetting the casing; and re-testing for leaks, it shall be determined whether a Site Design Level I is appropriate for development on the North Parcel based on final methane readings, or whether a different level is required.

In addition, the methane mitigation features shall also incorporate any additional applicable conditions or requirements with respect to volatile organic compounds (VOC) vapor intrusion set forth by the Los Angeles Regional Water Quality Control Board as part of issuance of its "No Further Action" determination for the Former Cornfield Site (Case ID SL2047T1683) and the oversight agreement.

Mitigation Measure HAZ-MM-6: Oil Well Re-abandonment—Subsequent to the issuance of a grading permit, the following shall be conducted as part of earthwork activities:

At the time of North Parcel development, the location of well "Freight Depot 1" shall be determined in accordance with the Construction Site Well Review Process. The Applicant shall coordinate with California Department of Geologic Energy Management (CalGEM) and the Los Angeles Fire Department (LAFD), which serves as the surrogate for the Los Angeles Department of Building and Safety (LADBS), to facilitate the well investigations and re-abandonment of the previously plugged/ abandoned oil wells on the Project Site. A qualified environmental consultant shall re-attempt to locate and expose the well using a combination of geophysical investigations and pot-holing. Upon location of the well, methane leak testing for methane and fluids shall be conducted on the well, under the supervision of CalGEM and LAFD. The location of the well shall be surveyed to the state plane coordinate system (NAD 83). If the well is determined to be leaking, and if CalGEM and LAFD require re-abandonment of the well, a qualified contractor shall proceed to re-abandonment planning, including applying for appropriate permits, in compliance with CalGEM requirements. The existing well casing shall be cut down to finished elevation; the well shall be re-abandoned to CalGEM specifications, and the well casing shall be reset in accordance with applicable regulatory standards. Management and disposal of wastes generated as part of the well re-abandonment process will be handled in accordance with federal and state requirements.

Upon completion of the re-abandonment, or well closure to the satisfaction of CalGEM, LAFD, and LADBS, the well Freight Depot 1 shall be re-tested for methane and fluid leaks. The results of the subsequent leak testing shall be used to inform whether Methane Site Design Level I, II, or III is required. Upon completion of the well re-abandonment/closure, proof of approvals from LADBS, LADBS/LAFD, and CalGEM shall be obtained.

For abandoned oil well Southern Pacific Corehole 1, which already has been located, surveyed, and leak-tested, if CalGEM, LAFD, and LADBS require re-abandonment of the well, a qualified contractor shall proceed to re-abandonment planning, including applying for appropriate permits, in compliance with CalGEM requirements. The existing well casing shall be cut down to finished elevation; the well shall be re-abandoned to CalGEM specifications; and the well casing shall be reset in accordance with applicable regulatory standards.

Upon completion of the re-abandonment, or well closure to the satisfaction of CalGEM, LAFD, and LADBS, the Well Southern Pacific Corehole 1 shall be re-tested for methane leaks. The results of the subsequent methane leak testing shall be used to inform whether Methane Design Level I, II or III is required. Upon completion of the well closure, proof of approvals from CalGEM, LAFD, and LADBS shall be obtained.

Disposal of the well casing and other disturbed materials produced by oil well re-abandonment activities will be conducted in accordance with the HMCP required pursuant to Mitigation Measure HAZ-MM-2. This includes but is not limited to hazardous materials and hazardous wastes handling by a licensed contractor and disposal in accordance with applicable regulatory requirements, such as SCAQMD Rule 1403: *Asbestos Emissions from Demolition/Renovation Activities*, and as specified in HAZ-MM-1.

Re-abandonment shall be conducted in accordance with current CalGEM specifications, as set forth in PRC Division 3, Chapter 4.1, Article 3, Section 1723, Los Angeles County Building Code 110.4, Los Angeles Municipal Code 91.7109.2, and Los Angeles Fire Code 57.5706.3 and 57.105.7.1.3.

d. Noise

Mitigation Measure NOI-MM-1: A temporary and impermeable sound barrier shall be erected at the locations listed below, during Phase 1 (South Parcel) construction. At plan check, building plans shall include documentation (including the sound barrier locations and heights) prepared by a noise consultant verifying compliance with this measure.

Phase 1 (South Parcel)

- Along the southeastern property line of the South Parcel between the construction areas and the residential uses (receptor location R1) and the park use (receptor location R4), located east of the Project Site. The temporary sound barrier shall be designed to provide a minimum 3-dBA and 12-dBA noise reduction at the ground level of receptor locations R1 and R4, respectively.

- Along the northwestern property line of the South Parcel between the construction areas and residential use (receptor location R5) and religious use (receptor location R6) along Broadway, north of the Project Site. The temporary sound barrier shall be designed to provide a minimum 3-dBA noise reduction at the ground level of receptor locations R5 and R6.

Mitigation Measure NOI-MM-2: A temporary and impermeable sound barrier shall be erected at the locations listed below during off-site construction. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

- During the off-site water and sewer laterals improvements construction along Broadway—Provide a temporary moveable noise barrier between the construction equipment and receptor locations R4, R5 and R6. The temporary noise barrier shall be designed, located, installed, and implemented to provide a minimum 8-dBA, 5-dBA, and 5-dBA noise reduction at receptor locations R4, R5, and R6, respectively.
- During the off-site 3-foot street dedication construction along Broadway—Provide a temporary moveable noise barrier between the construction equipment and the park uses to the east (represented by receptor location R13). The temporary noise barrier shall be designed, located, installed, and implemented to provide a minimum 5-dBA at receptor location R13.
- During the off-site ADA Ramp improvements construction along Broadway—Provide a temporary movable noise barrier between the construction equipment and receptor locations R4, R5, R7, R13 and R16. The temporary noise barrier shall be designed to provide a minimum 4-dBA, 8-dBA, 9-dBA, 8-dBA, and 7-dBA noise reduction at the receptor locations R4, R5, R7, R13 and R16, respectively.
- During the off-site streetlight construction along Broadway—Provide a temporary movable noise barrier between the construction equipment and receptor locations R4, R5 and R16. The temporary noise barrier shall be designed to provide a minimum 5-dBA, 6-dBA, and 8-dBA noise reduction at receptor locations R4, R5 and R16, respectively.

Mitigation Measure NOI-MM-3:

Phase 1 (South Parcel)

- Prior to the start of construction, the Applicant shall retain the services of a qualified structural engineer to visit the single-story storage building located at 1231 Spring Street (historic structure), to inspect and document (video and/or photographic) the apparent physical condition of the buildings' readily-visible features (i.e., any cracks at the exterior of the noted buildings). In addition, the

structural engineer shall survey the existing foundations and other structural aspects of the building and provide a shoring design to protect the building from potential damage.

- Prior to construction, the Applicant shall retain the services of a qualified acoustical engineer to review proposed construction equipment and develop and implement a vibration monitoring program capable of recording and documenting the construction-related ground vibration levels at the single-story building at 1231 Spring Street during the demolition, shoring, and excavation phases, as described below. In the event that consent is not provided from the property owner, the vibration monitoring shall be made at the Project Site's property line. The vibration monitoring at the Project Site's property line would provide a more conservative reading, because the monitoring equipment would be closer to the construction equipment.

  a) The vibration monitoring system shall measure (in vertical and horizontal directions) and continuously store the peak particle velocity (PPV) in inch/second. The system shall also be programmed for two preset velocity levels: a warning level of 0.10 inch/second (PPV) and a regulatory level of 0.12 inch/ second (PPV). The system shall also provide real-time alert when the vibration levels exceed the two preset levels.

  b) The vibration monitoring program shall be submitted to the Department of Building and Safety, prior to initiating any construction activities.

  c) In the event the warning level (i.e., 0.10 inch/second [PPV]) is triggered, the contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level, including but not limited to staggering concurrent activities (if doing so would not pose a safety risk to personnel or damage risk to buildings) and utilizing lower vibratory techniques.

  d) In the event the regulatory level (i.e., 0.12 inch/second [PPV]) is triggered, the contractor shall halt the construction activities in the vicinity of the building and visually inspect the building for any damage. Results of the inspection must be logged. The contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level. Construction activities may then restart once the vibration level is re-measured and below the warning level.

  e) At the conclusion of vibration-causing construction, the qualified structural engineer shall issue a follow-up letter describing damage, if any, to the single-story building at 1231 Spring Street and recommendations for repair, as may be necessary.

Phase 2 (North Parcel)

- Prior to the start of construction, the Applicant shall retain the services of a qualified structural engineer to visit the retaining wall and guardrail, to inspect and document (video and/or photographic) the apparent physical condition of the retaining wall and guardrail readily-visible features (i.e., any cracks). In addition, the structural engineer shall survey the existing foundations and other structural aspects of the retaining wall and provide a shoring design to protect the building from potential damage.
- Prior to construction, the Applicant shall retain the services of a qualified acoustical engineer to review proposed construction equipment and develop and implement a vibration monitoring program capable of recording and documenting the construction-related ground vibration levels at property line adjacent to the retaining wall during the demolition, shoring, and excavation phases, as described below.

  a) The vibration monitoring system shall measure (in vertical and horizontal directions) and continuously store the peak particle velocity (PPV) in inch/second. The system shall also be programmed for two preset velocity levels: a warning level of 0.10 inch/second (PPV) and a regulatory level of 0.12 inch/ second (PPV). The system shall also provide real-time alert when the vibration levels exceed the two preset levels.

  b) The vibration monitoring program shall be submitted to the Department of Building and Safety, prior to initiating any construction activities.

  c) In the event the warning level (i.e., 0.10 inch/second [PPV]) is triggered, the contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level, including but not limited to staggering concurrent activities (if doing so would not pose a safety risk to personnel or damage risk to buildings) and utilizing lower vibratory techniques.

  d) In the event the regulatory level (i.e., 0.12 inch/second [PPV]) is triggered, the contractor shall halt the construction activities in the vicinity of the building and visually inspect the building for any damage. Results of the inspection must be logged. The contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level. Construction activities may then restart once the vibration level is re-measured and below the warning level.

  e) At the conclusion of vibration-causing construction, the qualified structural engineer shall issue a follow-up letter describing damage, if any, to the retaining wall and guardrail and recommendations for repair, as may be necessary.

Mitigation Measure NOI-MM-4: In the event any off-site Zanja Madre segments are identified and exposed adjacent to the Project Site during construction, the following buffer zone shall be provided:

- The use of large construction (i.e., large bulldoze, caisson drill rig, and/or loaded trucks) shall be a minimum of 28 feet from any exposed off-site Zanja Madre segments.
- The use of jackhammer shall be a minimum of 13 feet from any exposed off-site Zanja Madre segments.
- The use of a small bulldozer shall be a minimum of 2 feet from any exposed off-site Zanja Madre segments

e. Tribal Cultural Resources

Mitigation Measure TCR-MM-1: Mitigation Measure TCR-MM-1 shall be implemented in coordination with Mitigation Measure CUL-MM-1 in Section IV.C, Cultural Resources, of this Draft EIR.

Monitor Retention. Prior to commencing any Ground Disturbance Activities (as defined below) at the Project Site, the Applicant, or its successor, shall retain a qualified tribal monitor from and approved by the Gabrieleño Band of Mission Indians—Kizh Nation (Tribe) and a qualified archaeological monitor. Ground Disturbance Activities shall include demolition, excavating, digging, trenching, plowing, drilling, grading, leveling, removing peat, clearing, driving posts, augering, backfilling potholing, pavement removal, grubbing, tree removals or a similar activity at the Project Site. A qualified archaeological monitor shall be identified as principal personnel who must meet the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation, have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in Southern California, and shall ensure that all other personnel associated with and hired for the archaeological monitoring are appropriately trained and qualified. The Applicant, or its successor, the archaeological monitor, and the tribal monitor shall execute a monitoring agreement prior to the earlier of the commencement of any ground disturbance activities, or the issuance of any permit necessary to commence aground disturbance activity.

WEAP. Prior to commencing any Ground Disturbance Activities, the archaeological monitor, in consultation with the tribal monitor, shall provide Worker Environmental Awareness Program (WEAP) training to construction crews involved in Ground Disturbance Activities that includes information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover tribal cultural resources during Ground Disturbance

Activities. In addition, workers will be shown examples of the types of resources that would require notification of the archaeological monitor and tribal monitor. The Applicant shall maintain on the Project Site, for potential City inspection, documentation establishing the WEAP training was completed for all members of the construction crew involved in Ground Disturbance Activities.

On-Site Monitoring. The archaeological and tribal monitor shall observe all Ground Disturbance Activities on the Project Site at all times any Ground Disturbance Activities are taking place. If Ground Disturbance Activities are simultaneously occurring at multiple locations on the Project Site that cannot be reasonably monitored by one archaeological monitor and by one tribal monitor, additional monitors shall be assigned as needed to provide adequate coverage as determined by the archaeological monitor in consultation with the tribal monitor. The tribal monitor will complete daily monitoring logs that will provide descriptions and locations of the relevant ground disturbance activities, the type of construction activities performed, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe Monitor logs will identify and describe any discovered "tribal cultural resources" as defined in California Public Resources Code Section 21074, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant and/or the City upon request to the Tribe. If any project scheduled activities require the tribal monitor(s) to leave the Project Site for a period of time and return, confirmation shall be submitted to the Tribes by the Applicant, in writing, upon completion of each set of scheduled activities and five (5) days' notice (if possible) shall be submitted to the Tribe by the Applicant, in writing, prior to the start of each set of scheduled activities. The on-site monitoring shall end when either 1) confirmation is received from the Applicant, in writing, that all scheduled activities pertaining to tribal monitoring and all ground disturbance activities are completed; or 2) the Tribe provides a determination, in writing, that no future, planned construction activity, and/or development/construction phase at the Project Site possesses the potential to impact any tribal cultural resources.

Discovery of Resources. In the event that any objects or artifacts that may be tribal cultural resources are encountered during the course of any Ground Disturbance Activities, all such activities shall temporarily cease within the area of discovery, the radius of which shall be 50 feet or otherwise determined by the archaeological monitor in consultation with the tribal monitor, until the potential "tribal cultural resources" are properly assessed and addressed by the archaeological monitor and the tribal monitor pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all Ground Disturbance Activities within the area of discovery, the radius of which shall be 50 feet or otherwise determined by the archaeological monitor until the find can be assessed by the archaeological monitor and tribal monitor.
2. If the archaeological monitor and tribal monitor determine the resources are Native American in origin, the Tribe will recommend steps for treatment of all discovered tribal cultural resources in the form and/or manner the Tribe deems appropriate, in the Tribe's reasonable discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.
3. The Applicant, or its successor, shall implement the Tribe's recommendations if the archaeological monitor, in consultation with the tribal monitor, conclude that the Tribe's recommendations are reasonable and feasible.
4. In addition to any recommendations from the Tribe, the archaeological monitor shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation.
5. The Applicant, or its successor, may continue Ground Disturbance Activities outside of the specified radius of the discovery site, so long as this radius has been reviewed by both the qualified archaeologist and qualified tribal monitor and determined to be reasonable and appropriate.
6. The Applicant, or its successor, may recommence Ground Disturbance Activities inside of the specified radius of the discovery site only after it has complied with paragraphs 2 through 4 above.
7. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.
8. Notwithstanding Paragraph 7 above, any information that Los Angeles Department of City Planning, in consultation with the Los Angeles City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code (PRC), Section

7927.000, and handled in compliance with the City's AB 52 Confidentiality Protocols.

9. Archaeological and Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken.

Discovery of Human Remains and Funerary Items. Native American human remains are defined in Public Resources Code (PRC) Section 5097.98(d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, also called associated grave goods in PRC Section 5097.98(a), are also to be treated according to this statute, but do not by themselves constitute human remains. If Native American human remains and/or grave goods are discovered or recognized on the Project Site, then PRC Sections 5097.9 et seq. as well as Health and Safety Code Section 7050.5 shall be followed. Human remains and grave/burial goods shall be treated alike per PRC section 5097.98(d)(1) and (2). Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

12. Summary of Alternatives

This Draft EIR examined five alternatives to the Project in detail, which include Alternative 1, No Project/No Build Alternative; Alternative 2, Development in Accordance with Existing Community Plan and Zoning/Industrial/Limited Grading Alternative; Alternative 3, 20 Percent Reduced Intensity with Associated Reduced Grading Alternative; Alternative 4, 30 Percent Reduced Intensity with Associated Reduced Grading Alternative; and Alternative 5, DTLA 2040 Alternative. Refer to Section V, Alternatives, of this Draft EIR for a more detailed description of these alternatives, a comparative analysis of the impacts of these alternatives with those of the Project, and a description of the alternatives considered but rejected as infeasible.

a. Alternative 1: No Project/No Build Alternative

Alternative 1 assumes that the Project would not be approved, no new permanent development would occur within the Project Site, and the existing environmental setting would be maintained. Under Alternative 1, the physical conditions of the Project Site would generally remain as they were at the time the NOP was published for the Project. Specifically, the existing buildings and uses would remain on the Project Site, and no new construction would occur.

Alternative 1 would avoid the Project's significant and unavoidable impacts with respect to Project-level on-site noise during construction, off-site (haul trucks) noise during construction in the event of nighttime mat pour, and off-site (trucks) vibration with respect to human annoyance during construction. Alternative 1 would also avoid cumulative on-site and off-site noise impacts during construction (associated with off-site improvements and trucks) as well as off-site vibration (associated with trucks) with respect to human annoyance during construction. In addition, Alternative 1 would avoid the Project's impacts that were determined to be less than significant with mitigation, including those related to cultural resources (historical and archaeological resources), paleontological resources, hazards and hazardous materials, and tribal cultural resources. Impacts associated with wildfire would be greater. Impacts associated with the remaining environmental issues also would generally be less when compared to Project's less-than-significant impacts.

b. Alternative 2: Development in Accordance with Existing Community Plan and Zoning/Industrial/Limited Grading Alternative

Alternative 2 would involve buildout of the Project Site in accordance with the applicable existing zoning and land use regulations for the Project Site. The Project Site is zoned as MR2-1 (Restricted Light Industrial), which allows for various industrial and manufacturing uses as well as uses permitted under the MR1 zone including commercial manufacturing and limited commercial uses with no height limit and a maximum FAR of 1.5 times the property's buildable area. In addition, the Project Site is designated Light Industrial by the applicable Central City North Community Plan. Alternative 2 would develop approximately 74,400 square feet of industrial uses with a FAR of 0.22:1. Maximum building height would be 20 feet (one-story). A total of approximately 149 vehicular parking spaces would be provided under Alternative 2. As with the Project, approximately 14,932 square feet of existing uses, including an auto repair building and the rear addition of an encroaching off-site restaurant, would be demolished under this alternative. Under Alternative 2, approximately 24,871 cubic yards of cut, and approximately 3,402 cubic yards of fill would occur, resulting in approximately 21,470 cubic yards of export.

Alternative 2 would avoid the following impacts of the Project that were determined to be significant and unavoidable: on-site construction noise; and off-site noise associated with haul trucks. Alternative 2 would also reduce the Project's significant and unavoidable impacts associated with off-site vibration during construction related to human annoyance. However, these impacts would continue to be significant and unavoidable.

Alternative 2 would result in reduced impacts associated with the following environmental topics, where the Project's impacts were concluded to be less than significant with implementation of mitigation measures: historical resources; archaeological resources;

paleontological resources; hazards and hazardous materials (construction); off-site noise from utilities and staging; and tribal cultural resources.

Alternative 2 would reduce several of the less-than-significant impacts associated with the Project, including those related to the following: aesthetics (scenic vistas, light and glare); air quality (local and regional emissions during construction and operation); GHG emissions; energy (construction, operation); surface water quality (construction); ground water quality (construction); surface water hydrology (construction); groundwater hydrology (construction); hazards and hazardous materials (construction); land use; on- and off-site construction vibration associated with building damage; on-site vibration associated with human annoyance; operational noise and vibration; population and housing; fire protection; police protection; libraries; water supply and infrastructure; wastewater; solid waste; transportation (freeway safety); and energy infrastructure.

Alternative 2 would result in similar impacts as the Project with regard to the following topics that were concluded to be less than significant or result in no impact: air quality (conflict with air quality plans and toxic air contaminants during operation); energy (conflict with plans for renewable energy or energy efficiency); geology and soils (geologic hazards); hazards and hazardous materials (operation); groundwater quality (operation); surface water hydrology (operation); groundwater hydrology (operation); aesthetics (scenic resources within a State-designated scenic highway); transportation (conflict with transportation plans, design hazards, and VMT), and wildfire.

Alternative 2 would result in greater impacts related to conflict with applicable regulations governing scenic quality.

c. Alternative 3: 20 Percent Reduced Intensity with Associated Reduced Grading Alternative

Alternative 3 would involve the same uses proposed under the Project, while reducing the amount of total new floor area proposed under the Project by approximately 20 percent. Alternative 3 would include a reduced overall footprint, reduced grading and reduced building heights within certain areas of the Project Site. Alternative 3 would develop 789 residential units, approximately 12,000 square feet of retail uses, 19,040 square feet of restaurant uses, and 93,288 square feet of outdoor trellis/overhang areas (circulation and balconies). As with the Project, approximately 14,932 square feet of existing uses, including an auto repair building and the rear addition of an encroaching off-site restaurant, would be demolished under this alternative. Upon completion, Alternative 3 would include a total of approximately 996,429 square feet of floor area (compared to the Project's 1,245,536 square feet of floor area) with a FAR of 2.91:1. Maximum building height would be reduced to 279 feet and 20 stories (compared to the Project's maximum height of 343 feet 8 inches and 26 stories). A total of approximately 1,182 vehicular parking spaces would be provided under Alternative

3. In addition, under Alternative 3, approximately 137,702 cubic yards of cut, and approximately 15,010 cubic yards of fill would occur, resulting in approximately 122,693 cubic yards of export.

Alternative 3 would result in similar impacts that were concluded to be significant and unavoidable for the Project. These include significant an unavoidable impacts related to on-site construction noise, off-site construction noise associated with haul trucks, and off-site vibration during construction related to human annoyance. Alternative 3 would result in reduced impacts associated with the following environmental topics, where the Project's impacts were concluded to be less than significant with implementation of mitigation measures: archaeological resources; paleontological resources; hazards and hazardous materials (construction); and tribal cultural resources.

Alternative 3 would result in similar impacts to the Project for the following impacts that were concluded to be less than significant with mitigation: off-site construction noise (utilities and staging); and historical resources.

Alternative 3 would reduce several of the less-than-significant impacts associated with the Project, including those related to the following: aesthetics (scenic vistas, light and glare); air quality (local and regional emissions during and operation); GHG emissions; energy (construction and operation); surface water quality (construction); surface water hydrology (construction); groundwater hydrology (construction); groundwater quality (construction) hazards and hazardous materials (operation); operational noise and vibration; population and housing; fire protection; police protection; libraries; transportation (freeway safety, and VMT); water supply and infrastructure; wastewater; solid waste; and energy infrastructure.

Alternative 3 would result in similar impacts as the Project with regard to the following topics that were concluded to be less than significant or result in no impact: air quality (conflict with air quality plans and local and regional emissions during construction); energy (conflict with plans for renewal energy or energy efficiency); geology and soils (geologic hazards); surface water quality (operation); groundwater quality (operation); surface water hydrology (operation); groundwater hydrology (operation); land use; on- and off-site vibration associated with building damage during construction; on-site vibration associated with human annoyance during construction; transportation (conflict with plans, and design hazards/access); aesthetics (scenic resources within a State-designated scenic highway and conflict with applicable regulations governing scenic quality); and wildfire.

d. Alternative 4: 30 Percent Reduced Intensity with Associated Reduced Grading Alternative

Alternative 4 would involve the same uses proposed under the Project, while reducing the amount of new floor area proposed under the Project by approximately 30 percent. Alternative 4 would include reduced footprint, reduced grading and reduced building heights within certain areas of the Project Site. Accordingly, Alternative 4 would develop 690 residential units, approximately 10,500 square feet of retail uses, 16,660 square feet of restaurant uses, and 81,627 square feet of outdoor trellis/overhang areas (circulation and balconies). As with the Project, approximately 14,932 square feet of existing uses, including an auto repair building and the rear addition of an encroaching off-site restaurant, would be demolished under this alternative. Upon completion, Alternative 4 would include a total of approximately 871,875 square feet of floor area (compared to the Project's 1,245,536 square feet of floor area) with a FAR of 2.54:1. Maximum building height would be reduced to 134 feet and 18 stories (compared to the Project's maximum height of 343 feet 8 inches and 26 stories). A total of approximately 1,034 vehicular parking spaces would be provided under Alternative 4. In addition, under Alternative 4, approximately 114,163 cubic yards of cut, and approximately 12,700 cubic yards of fill would occur, resulting in approximately 101,463 cubic yards of export.

Alternative 4 would reduce the following impacts of the Project that were determined to be significant and unavoidable: on-site construction noise; off-site noise associated with haul trucks; and off-site vibration during construction related to human annoyance. However, these impacts would continue to be significant and unavoidable.

Alternative 4 would result in reduced impacts associated with the following environmental topics, where the Project's impacts were concluded to be less than significant with implementation of mitigation measures: archaeological resources; paleontological resources; hazards and hazardous materials (construction); and tribal cultural resources.

Alternative 4 would reduce several of the less-than-significant impacts associated with the Project, including those related to the following: aesthetics (scenic vistas, light and glare); air quality (local and regional emissions and toxic air contaminants during construction and operation); GHG emissions; energy (construction and operation); surface water quality (construction); surface water hydrology (construction); groundwater hydrology (construction); hazards and hazardous materials (operation); construction vibration (on and off-site vibration associated with building damage during construction and on-site vibration associated with human annoyance during construction); operational noise and vibration; population and housing; fire protection; police protection; libraries; transportation (VMT and freeway safety); water supply and infrastructure; wastewater; solid waste; and energy infrastructure.

Alternative 4 would result in similar impacts as the Project with regard to the following topics that were concluded to be less than significant or result in no impact: air quality (conflict with air quality plans); energy (conflict with plans for renewable energy or energy efficiency); geology and soils (geologic hazards); groundwater quality (construction), groundwater quality (operation); surface water quality (operation); surface water hydrology (operation); groundwater hydrology (operation); land use; transportation (conflict with plans and design hazards/access); aesthetics (scenic resources within a State-designated scenic highway and conflict with applicable regulations governing scenic quality); and wildfire.

Alternative 4 would also result in similar impacts as the Project associated with historical resources, off-site noise (utilities and staging), which were concluded to be less than significant with mitigation.

e. Alternative 5: DTLA 2040 Alternative

Similar to Alternatives 3 and 4, Alternative 5 would develop the same types of uses as the Project but in accordance with the zoning for the Project Site under the DTLA 2040 Community Plan Update (DTLA 2040 Plan). Under the DTLA 2040 Plan and associated zoning update, the Project Site is designated as Community Center, which has a maximum FAR range of 3.0 to 8.5. In addition, under the DM5 Form District for the Project Site, the base maximum FAR for the Project Site is 6.0:1 and the bonus maximum floor area for the Project Site is 8.5:1. The Project Site's zoning in the DTLA 2040 Plan would allow land uses that include commercial, residential, institutional facilities, cultural and entertainment facilities, and neighborhood-serving uses. Alternative 5 would develop approximately 1,208 residential units, approximately 15,000 square feet of retail uses, and 23,800 square feet of restaurant uses. As with the Project, approximately 14,932 square feet of existing uses, including an auto repair building and the rear addition of an encroaching off-site restaurant, would be demolished under this alternative. Upon completion, Alternative 5 would include a total of approximately 2,056,068 square feet of floor area (compared to the Project's 1,245,536 square feet of floor area) with a FAR of 6:1. Maximum building height would increase to 439 feet and 35 stories (compared to the Project's maximum height of 343 feet 8 inches and 26 stories). A total of approximately 1,789 vehicular parking spaces would be provided under Alternative 5. In addition, under Alternative 5, approximately 237,364 cubic yards of cut, and approximately 28,378 cubic yards of fill would occur, resulting in approximately 208,986 cubic yards of export.

Alternative 5 would result in similar impacts to the Project related to the following environmental topics that were determined to be significant and unavoidable under the Project: on-site construction noise; off-site noise associated with haul trucks; and off-site vibration during construction related to human annoyance. When compared with the Project, Alternative 5 would result in significant and unavoidable impacts that were concluded by the Project to be less than significant: air quality (regional emissions during operation).

Alternative 5 would result in greater but less-than-significant impacts associated with the following environmental topics, where the Project's impacts were concluded to be less than significant: aesthetics (scenic vistas, conflict with regulations governing scenic quality, light and glare—operation), air quality (TACs during construction and operation, localized emissions (operation); energy (construction and operation); greenhouse gas emissions; hazards and hazardous materials (operation); operational noise and vibration; population and housing; public services (fire protection, police protection and libraries); transportation (freeway safety); water (operation); and wastewater (operation); solid waste; energy infrastructure.

Alterantive 5 would result in similar impacts to the Project where Project impacts were concluded to be less than signficant with mitigation: historical resources; arcaheological resources; paleontological resources; hazards and hazardous materials (construction); noise (off-site utlities and staging); and tribal cultural resources.

Alternative 5 would result in similar impacts to the Project associated with the following environmental topics, where the Project's impacts were concluded to be less than significant or result in no impact: aesthetics (scenic resources within a State-designated sceniic highway, light and glare - construction); air quality (conflict with plans,; energy (conflict with plans); geology and soils (geologic hazards); surface water quality; groundwater quality; surface water hydrology; groundwater hydrology; land use; construction noise (on- and off-site vibration associated with building damage, and on-site vibration associated with human annoyance); transportation (conflict with plans, VMT, design hazards/access); water (construction); wastewater (construction); and wildfire.

Like the Project, Alternative 5 would result in less than signficant air quality emissions during construction. Such impacts would be reduced when compared with those of the Project.

f. Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) states 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/No Build 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/No Build Alternative; Alternative 2, the Development in Accordance with Existing Plans and Zoning/Industrial/Limited Grading Alternative; and Alternative 3, the 20 Percent Reduced Intensity with Associated Reduced Grading; Alternative 4, the 30 Percent Reduced

Intensity with Associated Reduced Grading; and Alternative 5, the DTLA 2040 Alternative. Table V-2 in Section V, Alternatives, of this Draft EIR, provides a comparative summary of the environmental impacts anticipated under each alternative with the environmental impacts associated with the Project. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project/No Build Alternative, would avoid all of the Project's significant environmental impacts. However, Alternative 1 would not meet any of the Project's objectives or underlying purpose, which is to develop a high-quality mixed-use development that provides new multi-family housing, including affordable housing, with commercial and open space uses on an underutilized Project Site.

Alternative 2, Development in Accordance with Existing Community Plan and Zoning/Industrial/Limited Grading Alternative would also avoid the Project's significant on- and off-site construction noise impacts and would further reduce many of the Project's impacts that were determined to be less than significant with mitigation or less than significant. Of the build alternatives, Alternative 2 would be the environmentally superior alternative. However, Alternative 2 would not meet any of the Project's objectives or underlying purpose, which is to develop a high-quality mixed-use development that provides new multi-family housing, including affordable housing, with commercial and open space uses on an underutilized Project Site.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project/No Build Alternative (including the No Project/No Build and Development in Accordance with Existing Community Plan and Zoning/Industrial/Limited Grading Alternatives) as discussed under CEQA Guidelines Section 15126.6(e)(3), a comparative evaluation of the remaining alternatives in Table 2 indicates that Alternative 4, the 30 Percent Reduced Intensity with Associated Reduced Grading, would be the Environmentally Superior Alternative. As evaluated above, although Alternative 4 would not avoid the significant and unavoidable impacts of the Project associated with construction noise and vibration, it would reduce these impacts as well as many of the Project impacts that were determined to be less than significant with mitigation or less than significant. While Alternative 4 is the Environmentally Superior Alternative, this alternative would not meet many of the Project objectives to the same extent as the Project due to the reduction of uses, including much-needed housing units within the City.