V. Alternatives

1. Introduction

Under California Environmental Quality Act (CEQA), and as indicated in California Public Resources Code (PRC) Section 21002.1(a), the identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process and is required to ensure the consideration of ways to mitigate or avoid the significant environmental effects of a project. Specifically, PRC Section 21001 states, in part, that the environmental review process is intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives which will avoid or substantially lessen such significant effects.

Guidance regarding the definition of project alternatives is provided in CEQA Guidelines Section 15126.6(a) as follows:

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

The *CEQA Guidelines* emphasize that the selection of project alternatives should be based primarily on the ability to reduce significant impacts relative to the project, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."[1] The State *CEQA Guidelines* further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are analyzed.[2]

In selecting Project alternatives for analysis, potential alternatives should be feasible. The State *CEQA Guidelines* Section 15126.6(f)(1) explains that:

> *Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent*

1 CEQA Guidelines Section 15126.6(b).

2 CEQA Guidelines Section 15126.6(f).

can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).

The CEQA Guidelines require the analysis of a "no Project" alternative and, depending on the circumstances, evaluation of alternative location(s) for the Project, if feasible. An environmentally superior alternative is to be identified from among the alternatives evaluated. In general, the environmentally superior alternative is the alternative with the least adverse impacts on the environment. If the environmentally superior alternative is the "no Project" alternative, the EIR shall also identify another environmentally superior alternative among the other alternatives.[3]

Section 15126.6(d) of the CEQA Guidelines states that alternatives analysis need not be presented to the same level of detail as the assessment of the Project. Rather, the EIR is required to provide sufficient information to allow meaningful evaluation, analysis and comparison with the Project. If an alternative would cause one or more significant impacts in addition to those of the Project, analysis of those impacts is to be discussed, but in less detail than for the Project.

2. Objectives of the Project

Chapter II, *Project Description*, of this Draft EIR sets forth the Project Objectives defined by the Applicant and the Lead Agency. Section 15124(b) of the CEQA Guidelines states that a project description shall contain "a statement of the objectives sought by the proposed project," and further states that "the statement of objectives should include the underlying purpose of the project."

The underlying purpose of the Project is to redevelop the underutilized Project Site with a high-quality mixed-use development that includes new multi-family housing at varying income levels, office, retail, hotel and restaurant uses, as well as publicly-accessible open spaces, that would revitalize the Project Site and the surrounding neighborhood, promote walkability and use of public transit, and enhance the City's economic base. The Project's specific Project Objectives are as follows:

Objective 1: Provide a mixed-use development that introduces an array of new residential, office, hotel, and commercial opportunities to the Central City neighborhood.

Objective 2: Create a significant new source of much-needed housing by providing a diverse range of housing options that includes a mix of different unit types at varying sizes and affordability levels.

Objective 3: Improve the physical identity of the Central City Community Plan area by redeveloping an underutilized industrial site with an integrated mix of uses to promote revitalization of the surrounding urban context.

[3] CEQA Guidelines, Section 15126.6(e)(2).

Objective 4: Provide a variety of new job-producing uses on the Project Site to further strengthen the commercial viability of the Central City neighborhood.

Objective 5: Design a project that embodies diversity in height, size and architecture that blends the development into the existing urban fabric.

Objective 6: Enhance the overall pedestrian experience in the Central City area by creating new pedestrian connections and expansive publicly-accessible open spaces to transform the Project Site into a walkable part of the neighborhood.

Objective 7: Create a pedestrian friendly project by providing a variety of ground-floor commercial uses that create an inviting and active experience for visitors and pedestrians.

Objective 8: Support local and regional mobility objectives and reduce vehicle miles traveled by redeveloping an infill site near a growing hub of urban activity with a mix of uses in proximity to major public transit infrastructure.

Objective 9: Construct a sustainably designed project that is consistent with smart growth principles and promotes resource conservation by providing LEED-Gold equivalent or better buildings and placing additional housing and job opportunities within proximity to transit.

Objective 10: Develop an economically feasible project that supports and grows the City's economic base through construction of a development that attracts a diverse range of residents, commercial tenants and visitors, which will generate local tax revenue and create construction and permanent jobs.

3. Overview of Selected Alternatives

As presented in Chapter II, *Project Description*, of this Draft EIR, the Project would include a mix of residential, office, restaurant/retail, and hotel uses within 10 distinct buildings over the three Sites. The buildings would have a total floor area of 2,318,534 sf, and a floor area ratio (FAR) of 7.13:1. The Project would include: 1,521 residential units, including affordable housing units, totaling 1,731,849 sf. Non-residential uses include 411,113 sf of office uses, 101,088 sf[4] of restaurant/retail uses, and 68 hotel rooms (74,484 sf of hotel floor area). The Project would provide 163,325 sf of LAMC code-required usable open space for residential uses, which would consist of 105,218 sf of common outdoor space, 25,838 sf of recreational/indoor amenity space, and 32,269 sf of private open space in the form of balconies. Additionally, the Project would provide 90,113 sf of publicly-accessible open space throughout the Project Site. The publicly-accessible open space would include

[4] The 101,088 square feet restaurant/retail floor area includes floor area for purposes of calculating floor area per LAMC requirements. An additional potential 12,477 square feet of outdoor dining/patio space may be incorporated into the Project, which does not count towards the LAMC calculation of floor area. To provide a conservative analysis of environmental impacts associated with the Projects retail/restaurant uses, the environmental analyses included in Chapter 4, *Environmental Impact Analysis*, of this Draft EIR, evaluates a total of 113,565 square feet of restaurant/retail uses. It is assumed there would be 45,266 square feet of retail uses and 68,299 square feet of restaurant uses (indoor and outdoor uses combined).

paseos connecting Central Avenue and Alameda Street, plazas, and pocket parks on the North and South Sites. The proposed buildings would range in height from 2 to 44 stories, with a maximum height for the 44-story building of 497 feet. The Project would provide 2,475 vehicle parking spaces within subterranean parking (up to 4 levels) and 6 levels of podium parking in Building 2 and 4 levels of podium parking in Building 9. The Project would also provide a total of 146 short-term bicycle parking spaces and 596 long-term bicycle parking spaces.

The Project would demolish the existing surface parking and cold storage facility uses on the West and South Sites, respectively. The Project intends to adaptively reuse in accordance with code-approved structural engineering practice, a portion of a six-story cold storage warehouse building located on the North Site, while demolishing the remaining attached single-story warehouse building on the North Site. However, because the currently operating six-story cold storage warehouse building has been "frozen" for over 100 years, a confirmation of its structural integrity cannot be made until the existing operations cease (when and if the Project is approved) and the building is "unfrozen." Accordingly, for purposes of this Draft EIR and to provide a worst-case, conservative assessment of potential environmental impacts, the Project is assumed to demolish the entire six-story cold storage warehouse building and attached single-story warehouse on the North Site. Whether a portion of the six-story cold storage warehouse building is adaptively reused or not, the development programming on the North Site (and Project) would remain similar under either development scenario.

As described above, according to State CEQA Guidelines Section 15126.6(a) the purpose of analyzing project alternatives is to identify alternatives that "…would avoid or substantially lessen any of the significant effects of the project…" As shown in Chapter IV, *Environmental Analyses*, of this Draft EIR, the Project would not have significant long-term impacts due to Project operations that would require consideration of alternatives that would reduce such impacts. However, the Project would have significant and unavoidable air quality, historic resources, and noise impacts during the Project's construction phases that cannot be fully mitigated through feasible air quality, noise control, and historic preservation measures. The following alternatives to the Project were selected to inform evaluation of the Project and to address the Project's significant and unavoidable environmental impacts, to evaluate the relationship of the Alternatives to the Objectives established for the Project, the feasibility of the evaluated alternatives, and public input received during the scoping period:

- **Alternative 1 - No Project/No Build Alternative:** In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development Project on an identifiable property would be the circumstance under which the Project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states that, "in certain instances, the No Project/No Build Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, the No Project/No Build Alternative (Alternative 1) assumes that the existing uses,

including industrial, parking, and office, would continue in operation at the Project Site as under existing conditions and the Project would not be developed.

- **Alternative 2 – Above Grade Parking Alternative:** The purpose of Alternative 2 is to reduce the Project's excavation volumes and, thus, reduce the Project's significant and unavoidable construction-related air quality and noise impacts associated with excavation, grading, and hauling. As with the Project, Alternative 2 would remove all the existing buildings and associated surface parking from the Project Site. However, as with the Project, a portion of the Los Angeles Cold Storage Building on the North Site would be retained, if feasible. Alternative 2 would eliminate the Project's subterranean parking garages; reduce the Project's 2,475 parking spaces to 990 spaces, a reduction of 60 percent; and locate all parking in above-grade, enclosed parking podiums within the building footprints. Excavation would be reduced from 651,000 cubic yards (CY) to 36,286 CY, an approximate 94 percent reduction. Alternative 2 would provide the same number of buildings and LAMC calculated floor area (2,318,534 sf) as the Project. However, the Project's hotel would be removed from the scope of the Project and the Project's residential uses would be increased from 1,521 units to 1,589 units. With the inclusion of parking podiums in the lower stories, the heights of some of the buildings would be greater than under the Project. The configuration of the buildings, including the size of the building footprints and the relative location of the buildings within the Project Site, would be similar to the Project. As with the Project, Alternative 2 would provide 113,565 sf of retail and restaurant uses (indoor and outdoor spaces) and 90,113 sf of landscaped and publicly-accessible open space and paseos at ground level.
- **Alternative 3 – Historic Preservation/Reduced Density Alternative:** Alternative 3 would preserve the North Site in its existing condition and industrial function by eliminating the North Site component from the scope of the Project. Alternative 3 was selected to eliminate the significant and unavoidable historical resources impact on the historic, six-story Los Angeles Cold Storage (LACS) Building on the North Site. Alternative 3 would also reduce the scale of the Project's construction activities and, thus, reduce the Project's respective significant and unavoidable construction emissions, noise, and vibration impacts. The South Site would be developed with 1,559,533 sf of building floor area and the West Site would be developed with 63,422 sf of building floor area for a total of 1,622,975 sf. Similar to Alternative 2, the Project's hotel would be removed under Alternative 3. Alternative 3 represents a 30 percent reduction in the Project's 2,318,534 sf of new building floor area and would reduce the Project's FAR from 7.13:1 to 5.90:1. Alternative 3 would retain the Project's open space and paseos on the South Site. Parking would be reduced from the Project's 2,475 spaces to 990 spaces, a 60 percent reduction compared to the Project. Alternative 3 would reduce the Project's grading, excavation, and soils export from 651,000 CY to 321,365 CY, a reduction of approximately 51 percent.
- **Alternative 4 - Historic Preservation/Office Use Alternative:** Alternative 4 would retain the Project Site's existing M2 (Light Industrial) zoning designation.

The North Site would not be redeveloped and the existing historical LACS Building on the North Site would be maintained in its current condition. As such, Alternative 4 would avoid the Project's significant and unavoidable historical resources impact on the LACS Building. The existing industrial uses on the South and West Sites would be removed and these sites would be developed with office buildings in accordance with the underlying M2 zone. Parking would be reduced from 2,475 spaces to 928 spaces, a 62.5 percent reduction compared to the Project. The South Site would be developed with three, nine-story office buildings totaling 1,125,207 sf and a six-level parking structure, and the West Site would be developed with a three-story office building totaling 34,060 sf. Total new floor area, which would be located on the South and West Sites only, would be 1,159,267 sf. Alternative 4 would reduce the Project's 7.13:1 FAR to 4.22:1. Because the existing Height District 2D limits the underlying non-residential FAR to 3:1, a Height District/Zone Change would be required. However, Alternative 4 would not require a change in land use designation for development of the Project Site. Alternative 4 would reduce the Project's grading, excavation, and soils export from 651,000 CY to 40,532 CY, a reduction of approximately 93.8 percent.

The four Alternatives are summarized and compared to the Project in **Table V-1**, *Overview of the Project Alternatives,* below. The four Alternatives are described in greater detail in Subsection 6, *Analysis of Alternatives*, below.

4. Alternatives Considered and Rejected

CEQA Guidelines Section 15126.6(c) recommends that an EIR identify alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the *CEQA Guidelines*, the following factors may be used to eliminate alternatives from detailed consideration: the alternative's failure to meet most of the basic Project Objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts, such as the Project's significant and unavoidable construction noise impacts. Alternatives to the Project that have been considered and rejected as infeasible or unable to reduce the Project's environmental impacts are discussed below.

Alternative Design or Construction Duration to Reduce the Project's Significant and Unavoidable Construction-related Impacts. As discussed in Sections IV.A, *Air Quality,* and IV.G, *Noise*, the Project would result in significant and unavoidable air emissions and noise and vibration impacts during the Project's construction phase.

TABLE V-1
OVERVIEW OF THE ANALYZED ALTERNATIVES

Component	Project	Alternative 1: No Project/ No Build	Alternative 2:	Alternative 3:	Alternative 4:
Industrial Floor Area	0 sf	360,734 sf	0 sf	167,596 sf (existing to remain on North Site)	167,596 sf (existing to remain on North Site)
Total Residential Units	1,521 units	0 units	1,589 units	1,049 units	0 units
Affordable Housing Units (part of total)	144 units	0 units	144 units	0 units	0 units
Office Floor Area	411,113 sf	0 sf	411,113 sf	282,005 sf	1,159,267 sf
Hotel Rooms	68 rooms	0 rooms	0 rooms	0 rooms	0 rooms
Retail/Restaurant Floor Area	101,088 sf (indoor) + 12,477 (outdoor) = 113,565	0 sf	101,088 sf (indoor) + 12,477 (outdoor) = 113,565	74,993 sf (indoor) + 9,174 sf (outdoor) = 84,167 sf	0 sf
Total New Construction Floor Area (excludes outdoor area)	2,318,534 sf	0 sf	2,318,534 sf	1,613,801 sf	1,159,267 sf
Total Floor Area	2,318,534 sf	0 sf	2,318,534 sf	1,781,397 sf	1,326,863 sf
Floor Area Ratio (FAR)	7.13:1	1.09:1	7.13:1	5.34:1	3.98:1
Publicly-accessible Open Space	90,113 sf	0	90,113 sf	81,146 sf	0
Subterranean, Surface, and/or Podium Parking	2,475 spaces	72 spaces plus 67 loading docks (existing)	990 spaces (Podium Only)	990 spaces (subterranean and surface)	928 spaces (parking structure only)
Excavated Materials for Export	651,000 CY	0 CY	36,286 CY	321,364 CY	40,532 CY

CY = cubic yards

SOURCE: ESA, 2023.

Air Emissions:

Construction of the Project would result in significant and unavoidable impacts related to NO_X and CO emissions during construction of foundations and overlapping construction activities for other on-site buildings. There are no feasible mitigation measures that would reduce the NOX and CO emissions from the concrete trucks during foundation construction to below the applicable SCAQMD regional emissions significance threshold. It is not possible to reduce the number of concrete trucks needed to complete the concrete pouring activities without compromising the integrity of the building foundations and building structural needs. Similarly, the Project would require grading/excavation primarily for subterranean parking and haul trucks would be required to transport excavated soil to appropriate regional disposal sites. There are no feasible mitigation measures that would reduce the NOx and CO emissions from the haul trucks to below the regional significance threshold. Therefore, impacts related to regional NOx and CO construction emissions would be significant primarily because of the concrete pours required for the Project building foundations, parking garage construction, and building construction and the hauling required to transport and dispose of excavated soil. An alternative construction option would be to delay construction duration. Although this would reduce maximum daily emissions from haul trucks, because of time constraints on concrete hauling for foundations, a delay in construction activities would not reduce emissions of NOx and CO to less than significant levels. For this reason, the delay of construction duration to eliminate significant and unavoidable air quality impacts was not considered to be a feasible Project Alternative.

Noise:

On-Site construction noise would not exceed ambient noise standards at off-site, ground-level sensitive receptors with incorporation of mitigation. Mitigation Measures NOI-MM-1 through NOI-MM-4 require temporary noise barriers, restrictions on generators and compressors, muffling and shielding of haul trucks and other measures. Although these measures would reduce noise levels to below ambient noise thresholds at ground-level receptors, such noise barriers are not capable of blocking noise at noise-sensitive receptors in the area that are elevated above a construction work site's noise barrier. It is not feasible to install noise barriers with height sufficient to block the line-of-sight for all noise-sensitive receptors located on the upper levels of a mid-rise or high-rise residential or hotel building due to barrier foundation and wind load restrictions. Because there would be receptors elevated above the construction work sites throughout the Project area (receptor locations R2 through R6), construction noise would represent a temporary noise increase in excess of threshold standards for these receptors. Because the significant noise impact would be the result of the relative elevation and proximity of off-site receptors and because these locations cannot be changed or shielded, no alterations of the Project's design or duration are available to reduce impacts to a less than significant levels. As such, changes in duration or design

of the Project is not considered to be a feasible Project Alternative to reduce or avoid the significant and unavoidable construction noise impacts.

Vibration:

Regarding vibration impacts, an Alternative to increase the duration of the construction phase would reduce the overlapping of construction activity. However, a longer duration would not reduce vibration impacts to below a level of significance. For instance, each of the primary vibration sources (large bulldozers, caisson drilling, loaded truck hauling, and jackhammer use, would exceed inch/second (PPV) threshold standards, whether these sources are used in combination or individually. In addition, Mitigation Measures NOI-MM-6 and NOI-MM-7, would reduce vibration to less than significant levels for all receptor sites, including the very near receptor V-3. The impact issue is not the efficacy of mitigation measures, but the willingness of receptor V-3 to accept vibration mitigation. Because receptor V3 includes privately-owned structures, inspections and repairs pursuant to Mitigation Measure NOI-MM-7 would require the consent of the property owner, who may not agree. Because agreement by the owner cannot be assured, impacts to receptor V3 would be significant and unavoidable. For this reason, an Alternative that would alter construction duration or provide additional mitigation features is not considered to be necessary to reduce or avoid the significant and unavoidable construction vibration impacts.

DTLA 2040 Compliant Alternative. The same amount of retail, office and hotel uses could be developed under an Alternative consistent with the specific policies of the approved but not-currently adopted Downtown Los Angeles Community Plan (DTLA 2040) as under the Project. The primary difference is that the Project would provide 103 more residential units than the DTLA 2040 Compliant Alternative. However, housing is a priority in the City and the comparative 8 percent increase in housing relative to the DTLA 2040 near transit facilities is consistent with the City's DTLA 2040 and Transit Priority Area (TPA) policies and the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS) policies. In addition, the Project's open spaces are in line with DTLA 2040 goals and policies related to open space/pedestrian-oriented development. Overall, a DTLA 2040 Compliant Alternative would be similar in scale to the Project and would result in a similar range of impacts. Because the DTLA 2040 would not reduce or avoid the Project's significant and unavoidable environmental impacts, it was considered, but rejected as a feasible Alternative to the Project.

Alternative Project Site. State *CEQA Guidelines* Section 15126.6(f)(2) provides guidance regarding consideration of one or more alternative location(s) for a proposed project, stating that putting the project in another location should be considered if doing so would allow significant effects of the project to be avoided or substantially lessened; and if no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion. The factors that may be considered when addressing the feasibility of an alternative site are suitability, economic viability, availability of infrastructure, general plan

consistency, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site.

In order for the Project to satisfy the Project Objectives, a property would need to be of sufficient size to accommodate the scale of the Project's buildings, paseos, and landscaped open space and parks. The topography would also need to be suitable to accommodate the relatively large-scale development. In this regard, a flat site, such as the Project Site, would allow the development of a large number of buildings and uses, as well as providing open space, plazas, and paseos that are accessible from and seamlessly interface with surrounding streets and uses. A development site would also need to be adequately close to transit to meet some of the basic objectives of the Project.

Another important factor in the proposed use of the Project Site is that an alternative site must be available to the developer. The developer does not own, control or have access to another suitable site within the TPA. In addition, the development of a similar site within the area would result in the same significant and unavoidable construction impacts because of similar proximity to sensitive uses. For instance, even if there were an available development site meeting the Project's size and topography parameters, an alternative location would also likely be near other existing buildings in a dense urban setting with nearby sensitive receptors (i.e., residential, church, schools, hospitals, libraries, nursing homes, etc.), thus, result in similar significant and unavoidable construction-related air quality and noise/vibration impacts as anticipated at the Project Site. Therefore, it is unlikely that an alternative location would avoid or reduce the Project's significant and unavoidable construction-related air quality and noise/vibration impacts to less than significant levels.

Regarding the Project's potentially significant and unavoidable impacts to the LACS Building, because of the age of buildings in Central Los Angeles, the numerous individual historical resources, and the designated historic districts in Central Los Angeles,[5] there is a strong potential that other suitable, multi-acre alternative locations in Central Los Angeles would also include a historically sensitive structure or structures as does the Project Site and that, therefore, potential historical resource impact could also occur. Therefore, this alternative was considered, but rejected as a feasible Alternative to the Project.

Single Use (Non-Employment Center) Alternative. In the adoption of the Sustainable Communities and Climate Protection Act of 2008 (SB 375), the State signaled its commitment to encourage land uses that reduce vehicle miles traveled (VMT) and, thereby, contribute to the reduction of greenhouse gas emissions, as required by the California Global Warming Solutions Act of 2006 (AB 32). Senate Bill (SB) 743 further identified TPA policies as a step in reducing VMT which, in conjunction with the City of Los Angeles ZI 2452, specifically identify mixed-use residential projects and large

5 Historic Resources Group, Historical Resources Technical Report 4th and Central Project, pages 81-95, November 2022, provided in Appendix C-1 of this Draft EIR.

employment centers as qualifying uses within the established TPAs. Single-use alternatives, such as all-residential development or all-commercial (retail) uses that would not be large employment centers are, therefore, not further considered or evaluated as potential Alternatives to the Project. Such uses would not be consistent with SCAG's 2020-2045 RTP/SCS, which supports density increases within the Project Site's designated High Quality Transit Area (HQTA), or General Plan Elements, including the Framework Element supporting housing with mixed uses and development that reduces VMT. This Alternative would also not be consistent with the Transportation Element (Mobility Plan 2035) and other plans and policies calling for mixed use, open space and reduction in dependency on single occupancy vehicle use. These uses would not provide for integration of a variety of uses and would not meet any of the Project Objectives. Therefore, this alternative was considered, but rejected as a feasible Alternative to the Project.

5. Analysis Format

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

1. A description of the alternative.
2. The net environmental impacts of the alternative before and after implementation of feasible mitigation measures for each environmental topic area analyzed in Chapter IV of this Draft EIR are described. Where appropriate, the evaluation is divided between temporary impacts that would occur during the Project's construction phase and impacts that would occur during the Project's operation phase.
3. Post-mitigation and non-significant environmental impacts of the alternative and the Project are compared for each environmental topic area. Where the impact of the alternative would be clearly less than the impact of the Project, the comparative impact is said to be "less." Where the alternative's net impact would clearly be more than the Project, the comparative impact is said to be "greater." Where the impacts of the alternative and the Project would be roughly equivalent, the comparative impact is said to be "similar." The evaluation also documents whether compared to the Project an impact would be entirely avoided, whether a significant impact could be reduced to a less than significant level, or whether a significant unavoidable impact would be feasible to mitigate to a less than significant level.
4. The comparative analysis of the impacts is followed by a general discussion of the extent to which the underlying purpose and Project Objectives are attained by the alternative.

At the end of the section a relative comparison of the alternative's impacts and consistency with Project Objectives is provided. Pursuant to CEQA Guidelines Section 15126.6(e)(2) an "Environmentally Superior Alternative" is identified.

6. Alternatives Analysis

a) Alternative 1: No Project/No Build Alternative

(1) Description of the Alternative

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development Project on an identifiable property consists of the circumstance under which the Project does not proceed. Section 15126.6(e)(3)(B) of the Guidelines states that, "in certain instances, the No Project/No Build Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for the purpose of this analysis, the No Project/No Build Alternative (Alternative 1) assumes that no new development would occur within the Project Site. The existing warehouses, warehouse offices, surface parking, loading docks, and historic LACS Building would remain as under the existing uses and condition. No street dedications or sidewalk improvements would be implemented.

(2) Environmental Impacts

(a) Air Quality

(i) Consistency with Air Quality Management Plan

(a) Construction

Alternative 1 would not involve any new construction or generate any new pollutants that would exceed South Coast Air Quality Management District (SCAQMD) or California Air Resources Board (CARB) standards. As such, Alternative 1 would have no impact with respect to emissions or other criteria and SCAQMD's Air Quality Management Plan (AQMP) standards. The Project would implement Project Design Feature AIR-PDF-1 (Construction Power Pole Usage) and Mitigation Measures AQ-MM-1 (Construction Equipment Features) and AQ-MM-2 (Concrete Truck Features) to reduce construction emissions of volatile organic compounds (VOC), nitrogen oxides (NO_X), carbon monoxide (CO), PM10 and PM2.5 (particulate matter). With mitigation, the Project would not conflict with or obstruct the implementation of the AQMP. However, because no new impacts related to conflicts with the AQMP would occur under Alternative 1, impacts would be less than the Project's less than significant impact (with mitigation).

(b) Operation

Alternative 1 would not involve any new or additional uses or occupation of the Project Site compared to existing conditions. As such, Alternative 1 would have no new impact

with respect to emissions or other criteria and SCAQMD's AQMP standards. The Project would implement Mitigation Measure AQ-MM-3 (Emergency Generator Maintenance and Testing), AQ-MM-4 (Electric Landscaping Equipment) and AQ-MM-5 (Use of Super-compliant VOC Paints) to reduce operational emissions. With mitigation, the Project would not conflict with or obstruct the implementation of the AQMP. However, because no new impacts related to conflicts with the AQMP would occur under Alternative 1, impacts would be less than the Project's less than significant impact (with mitigation).

(ii) Cumulatively Considerable Increase in Criteria Pollutants

(a) Construction

Alternative 1 would not involve any new construction or generate any new criteria pollutants. As such, Alternative 1 would have no impact regarding a cumulatively considerable increase in criteria pollutants. The Project would implement Project Design Feature AIR-PDF-1 (Construction Power Pole Usage) and Mitigation Measures AQ-MM-1 (Construction Equipment Features) and AQ-MM-2 (Concrete Truck Features) to reduce construction emissions of VOC, NO_X, CO, PM10 and PM2.5. Construction of the Project would result in significant and unavoidable impacts related to NO_X and CO emissions. Because no new impacts related to criteria pollutants would occur under Alternative 1, impacts would be less than the Project's significant and unavoidable impacts (with mitigation).

(b) Operation

Alternative 1 would not involve any new or additional occupancy or use of the Project Site compared to existing conditions. As such, Alternative 1 would have no new impact regarding a cumulatively considerable increase in criteria pollutants. Operation of the Project would result in an interim CO significant and unavoidable impact during concurrent construction activities and interim operations. The Project would implement AQ-MM-3 (Emergency Generator Maintenance and Testing) and AQ-MM-4 (Electric Landscaping Equipment) and AQ-MM-5 (Use of Super-compliant VOC Paints) to reduce regional emissions. Project operational air quality impacts would be mitigated to a less than significant level. However, because no new impacts related to criteria pollutants would occur under Alternative 1, impacts would be less than the Project's less than significant impact (with mitigation) during full operation.

(iii) Exposure of Sensitive Receptors to Pollutant Concentrations – Localized Emissions

(a) Construction

Alternative 1 would not involve any new construction or generate any new localized construction emissions. As such, Alternative 1 would have no new impact relative to localized emission threshold standards. The Project would implement Project Design

Feature AIR-PDF-1 (Construction Power Pole Usage) and Mitigation Measures AQ-MM-1 (Construction Equipment Features) and AQ-MM-2 (Concrete Truck Features) to reduce construction emissions Construction of the Project would result in less than significant impacts after mitigation. However, because no new impacts related to localized emissions would occur under Alternative 1, impacts would be less than the Project's less than significant impacts (with mitigation).

(b) Operation

Alternative 1 would not involve any new or additional occupancy or use of the Project Site compared to existing conditions. As such, Alternative 1 would result in no new operational localized emissions impacts to sensitive receptors. The Project would implement AQ-MM-3 (Emergency Generator Maintenance and Testing) and AQ-MM-4 (Electric Landscaping Equipment) to reduce localized emissions. Operation of the Project would result in less than significant impacts after mitigation. However, because no new impacts related to localized emissions would occur under Alternative 1, impacts would be less than the Project 's less than significant impact (with mitigation).

(iv) Carbon Monoxide Hotspots

Alternative 1 would not involve any new or additional occupancy or use of the Project Site compared to existing conditions. As such, Alternative 1 would not generate any new vehicle trips and would not contribute additional emissions to CO hotspots in the area's street intersections. Thus, no new CO hotspot impacts would occur. The Project would result in less than significant impacts regarding CO hotspots. However, because new no impacts related to CO hotspots would occur under Alternative 1, impacts would be less than the Project's less than significant impact.

(v) Toxic Air Contaminants

(a) Construction

Alternative 1 would not involve any new construction or demolition activity. As such, there would be no impacts associated with construction toxic air contaminants (TACs) emissions. The Project would implement Mitigation Measure AQ-MM-1 (Construction Equipment Features). With mitigation, construction of the Project would result in less than significant impacts. However, because no new impacts related to TACs emissions would occur under Alternative 1, impacts would be less than the Project's less than significant impact (with mitigation).

(b) Operation

Alternative 1 would not involve any new or additional occupancy or use of the Project Site compared to existing conditions. Under Alternative 1, the existing cold storage facilities would continue in operation and continue to generate TAC emissions from mobile source diesel emissions (diesel particulate matter or DPM). The Project would not include any truck stop or warehouse distribution uses, and, as such, operations would generate only minor

amounts of diesel emissions from mobile sources, such as delivery trucks and occasional maintenance. Project impacts regarding TAC emissions would be less than significant (with mitigation). Because the Project would remove the existing sources of DPM associated with the trucking activities, impacts related to TAC emissions would be greater under Alternative 1 than the Project's less than significant impacts (with mitigation).

(b) Cultural Resources

(i) Historical Resources

Alternative 1 would not involve any changes on the Project Site, including direct or indirect modifications to the historic LACS Building. Under the Project, the historic building's West Volume is intended to be adaptively reused (pending confirmation of its structural integrity) and the East Volume would be demolished. Should only a portion of the LACS Building be adaptively reused, this represents a loss of approximately 50 percent of the historic square footage and the corresponding historic fabric of the LACS Building. The Project would implement Mitigation Measures CUL-MM-1 through CUL-MM-8, which would require documentation, a historical interpretative report, thawing plan, structural analysis, a historic structure report prepared by a historical architect, a mothballing plan, and a protection plan). Regardless, at a minimum, due to the removal of the East Volume, impacts would be significant and unavoidable even after implementation of the Project mitigation measures. Because Alternative 1 would not require the demolition of any part of the historic LACS Building, it would avoid the Project's significant and unavoidable historical resources impacts and, as such, impacts to historical resources would be less than the Project's significant and unavoidable impact (with mitigation). It is noted that any discontinuation of existing operation of the LACS Building resulting in a thaw, has the potential to significantly impact the LACS Building.

(ii) Archaeological Resources

Alternative 1 would not require any ground disturbance or excavation activities that could potentially encounter previously undiscovered archaeological resources and, as such, would have no impact related to archaeological resources. Excavation for the Project would be required for subterranean parking and building foundations. The Project would implement Mitigation Measures CUL-MM-9 (retaining a qualified archaeologist for monitoring), CUL-MM-10 (sensitivity training for construction personnel), CUL-MM-11 (halting of activities in the event of a previously undiscovered resource), and CUL-MM-12 (archaeologist technical report). Potentially significant impacts related to archaeological resources during Project construction would be reduced to less than significant with mitigation. However, because Alternative 1 would have no impact related to archaeological resources, impacts would be less than the Project's less than significant impact (with mitigation).

(iii) Human Remains

Alternative 1 would not require any ground disturbance or excavation activities that could potentially encounter human remains and, as such, would have no impact related to human remains. Excavation for the Project would be required for subterranean parking and building foundations, which have the potential to encounter human remains. With compliance with the PRC Section 5097.98 and the California Health and Safety Code Section 7050 related to human remains, the Project's impacts would be less than significant. However, because Alternative 1 would have no impact related to human remains, impacts would be less than the Project's less than significant impact.

(c) Energy

(i) Construction

Alternative 1 would not involve any construction at the Project Site and, as such, would have no impact relative to construction-related energy resources such as diesel, gasoline, and electricity. Construction of the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy, nor conflict with energy related plans and, as such, energy impacts would be less than significant. However, because Alternative 1 would have no impact related to construction-related energy demand, impacts would be less under Alternative 1 than the Project's less than significant impact.

(ii) Operation

Alternative 1 would not involve any new or additional occupancy or use of the Project Site compared to existing conditions and, as such, would have no impact relative to energy resources. Operation of the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy, nor conflict with energy-related plans and, as such, energy impacts would be less than significant. Although Alternative 1 would continue to generate a higher demand for diesel fuel than the Project, because no new development would occur under Alternative 1, impacts would be less under Alternative 1 than the Project's less than significant impact.

(d) Geology and Soils

(i) Paleontological Resources

Alternative 1 would not require any ground disturbance or excavation activities that could potentially encounter previously undiscovered paleontological resources, and, as such, would have no impact on these resources. Project construction could potentially encounter previously unknown buried paleontological resources. The Project would implement Mitigation Measures PALEO-MM-1 (retaining a Qualified Paleontologist), PALEO-MM-2 (providing paleontological monitoring), and PALEO-MM-3 (identifying and curating any found paleontological resources). Potentially significant impacts under the Project would be reduced to less than significant with mitigation. However, because

Alternative 1 would have no impact related to paleontological resources, impacts would be less than the Project's less than significant impacts (with mitigation).

(e) Greenhouse Gas Emissions

Alternative 1 would not include the construction of any new buildings or provide for any changes in on-site occupancy of the Project Site. The Project/No Build Alternative represents an absence of new development and would neither conflict with nor not conflict with applicable GHG reduction plans and policies. Alternative 1 would not provide for any increase or new use that would generate additional GHG emissions and, as such, would have no new GHG emissions impact. As such, impacts related to GHG emissions under Alternative 1 would be less than the Project's less than significant impact.

(f) Land Use and Planning

Alternative 1 would not involve any new or additional occupancy or use of the Project Site compared to existing conditions and, as such, would not conflict with or implement any objectives related to applicable land use plans. No land use permits or approvals would be required and Alternative 1 would not result in any conflicts with land use plans and policies adopted to avoid or mitigate an environmental impact. Alternative 1 would neither implement nor conflict with any applicable land use plans, polices or regulations and, as such, would have no impact with respect to CEQA's land use threshold of significance. Land use impacts under Alternative 1 would be less than the Project's less than significant impact.

(g) Noise and Vibration

(i) Construction

Alternative 1 would not involve any construction activities and, therefore, would not generate construction noise or groundborne vibration impacts. As such, Alternative 1 would have no impact with respect to construction noise and vibration. The Project would generate construction noise and vibration (building damage) levels above threshold of significance standards. The Project would implement Mitigation Measures NOI-MM-1 (Temporary Noise Barriers), NOI-MM-2 (Compressors and Generators), NOI-MM- -3 (Construction Equipment Muffling and Shielding Devices), and NOI-MM-4 (Foundation Concrete Trucks) to reduce noise levels in excess of ambient noise standards. Even with mitigation, the Project would exceed established standards and would result in a significant and unavoidable construction noise impact. The Project would also implement Mitigation Measure NOI-MM-6 (Construction Vibration – Except Shorting), which would limit use of equipment that generates high levels of vibration and Mitigation Measure NOI-MM-7 which would require inspection of adjacent vibration sensitive buildings and repair if any damage is found to have occurred even with implementation of Mitigation Measure NOI-MM-6. With implementation of these mitigation measures, potential structural vibration impacts would be mitigated to a less than significant level. However, because off-site vibration receptor near the West Site includes privately-owned structures, inspections and repair pursuant to Mitigation Measure NOI-MM-7 would require the consent of the

property owner, who may not agree. Thus, impacts to these vibration receptors would be significant and unavoidable should damage to the building(s) occur. Alternative 1, which would not involve any new construction would avoid the Project's significant and unavoidable construction noise and vibration impacts. Since Alternative 1 would have no impact with respect to construction noise and vibration, impacts under Alternative 1 would be less than the Project's significant and unavoidable construction noise and vibration impacts (with mitigation).

(ii) Operation

Alternative 1 would not involve any new development that would introduce new stationary or mobile noise sources to the Project Site. The Project would result in an increase in operational noise that would be mitigated to a less than significant level with implementation of Mitigation Measure NOI-MM-5 (limitation on amplified speakers and special events). Since Alternative 1 would not involve any change in the existing noise environment, noise and vibration impacts under Alternative 1 would be less than the Project's less than significant impact (with mitigation).

(h) Population and Housing

Alternative 1 would not involve any new construction or additional occupancy or employment opportunities compared to existing conditions, would have no impact related to population and housing, and would not contribute to SCAG or City housing growth objectives. Project impacts related to unplanned population growth under the Project during long-term operation would be less than significant. However, because Alternative 1 would result in no direct or indirect population growth, impacts would be less than the Project's less than significant impacts.

(i) Public Services

(i) Fire Protection

Alternative 1 would not involve any construction activity or new occupancy that would generate a demand for fire protection and emergency medical services. Alternative 1 would not necessitate the addition of a new fire station or the expansion of an existing fire station in order to maintain service and no impacts would occur. The Project, by introducing new residents, employees, and visitors to the Project Site, would require an increased need for LAFD services. However, the Project's impacts would be less than significant (with mitigation). Because Alternative 1 would generate no new construction or operational demand for fire protection and emergency medical services, impacts would be less than the Project's less than significant impact.

(ii) Police Protection

Alternative 1 would not involve any construction activity or new occupancy that would generate a demand for police protection services. Alternative 1 would not necessitate the addition of a new police station or the expansion of an existing police station in order to

maintain service and no impacts would occur. The Project, by introducing new residents, employees, and visitors to the Project Site, would require an increased need for LAPD services. However, the Project's impacts would be less than significant. Nonetheless, because Alternative 1 would generate no new construction or operational demand for police protection services, impacts would be less than the Project's less than significant impact.

(iii) Schools

Alternative 1 would not involve any new or additional occupancy or use of the Project Site compared to existing conditions and would not increase student enrollments in the area. The Project, which would increase enrollments at the serving schools, would be required to pay development fees for schools to LAUSD prior to issuance of building permits. Under Government Code section 65995 and 65996, the payment of these fees is considered full and complete mitigation of Project-related school impacts. Therefore, the Project's impact on schools would be less than significant. However, because Alternative 1 would not result in any new student enrollment, impacts associated with schools would be less than the Project's less than significant impact.

(iv) Parks and Recreation

Alternative 1 would not involve any new construction or additional occupancy or use of the Project Site compared to existing conditions and would not increase residential population or increase use of parks and recreational facilities. Alterative 1 would have no impacts on parks and recreation facilities. Under the Project, with the provision of on-site open space and recreational facilities, in addition to the required payment of applicable fees to the City, the Project would meet LAMC open space and parkland requirements and would result in less than significant impacts on parks and recreational facilities. However, because Alternative 1 would not result in any changes to current parks usage, impacts would be less than the Project's less than significant impact.

(v) Libraries

Alternative 1 would not involve any new or additional occupancy or use of the Project Site compared to existing conditions and would not increase residential population or increase use of libraries. The Project would generate new residents and employees that would increase the demand for library services. However, the Project would not create the need for new or physically altered library facilities and impacts would be less than significant. Nonetheless, because Alternative 1 would not result in any increased use of libraries, impacts would be less than the Project's less than significant impact.

(j) Transportation

(i) Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities

Alternative 1 would not involve any new or additional occupancy or use of the Project Site compared to existing conditions and, as such, would have no impact regarding conflicts with programs, plans, ordinances or policies addressing the circulation system, transit, roadways, bicycle and pedestrian facilities. While the Project would introduce new uses that would generate new sources of traffic and provide new transportation features in and around the Project Site, the Project would not result in any substantial conflicts with programs, plans, ordinances or policies addressing transportation issues and, therefore, impacts would be less than significant. However, because Alternative 1 would have no impact in this regard as it neither implements nor conflicts with any mobility plan objectives, impacts would be less than the Project's less than significant impact.

(ii) Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)

Alternative 1 would not involve any new or additional occupancy or use of the Project Site compared to existing conditions. Thus, no impacts regarding VMT would occur under Alternative 1. The Project's daily per capita resident and employee VMT would be below the City's thresholds and, therefore, impacts would be less than significant. However, because Alternative 1 would not generate any new vehicle trips or VMT, impacts would be less than the Project's less than significant impact.

(iii) Geometric Design Hazards

Alternative 1 would not generate any new vehicle trips or change the transportation design features in and around the Project Site. Alternative 1 would result no impacts regarding geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses, as well as impacts to freeway safety. The Project is projected to add additional vehicles to freeway off-ramps during the morning or afternoon peak hours. Queue lengths would not extend onto the freeway mainline and, as such, the Project would not result in a safety impact. As such, Project impacts on freeway safety would be less than significant. However, because Alternative 1 would have no impact with respect to geometric design hazards or freeway off-ramp queues, impacts would be less than the Project's less than significant impact.

(k) Tribal Cultural Resources

Alternative 1 would not involve any ground disturbance or excavation activities that would potentially encounter previously undiscovered tribal cultural resources and, as such, would have no impact related to such resources. Excavation for the Project would be required for subterranean parking and building foundations. Potentially significant impacts

related to tribal cultural resources during Project construction would be reduced to less than significant with Mitigation Measures TCR-MM-1 (Native American Monitor), TCR-MM-2 (monitoring logs), and TCR-MM-3 (halting of construction activity In the event that a prehistoric/Native American resource is unearthed). However, because Alternative 1 would have no impact related to tribal cultural resources, impacts would be less than the Project's less than significant impact (with mitigation).

(l) Utilities and Service Systems – Water Supply, Wastewater, and Solid Waste

(i) Water Supply and Infrastructure

Alternative 1 would not involve any new or additional occupancy or use of the Project Site compared to existing conditions. No new impacts to water infrastructure or supply would occur under Alternative 1. Under the Project, infrastructure upgrades required via mitigation would reduce potentially significant water infrastructure impacts to a less than significant level. LADWP has sufficient water supplies to serve the Project and, therefore, Project water supply impacts would be less than significant. Because no infrastructure upgrades would be necessary and no change or increase in water demand over existing conditions would occur under Alternative 1, water infrastructure and supply impacts would be less than the Project's less than significant impact.

(ii) Wastewater

Alternative 1 would not involve any new or additional occupancy or use of the Project Site compared to existing conditions. No new impacts to wastewater infrastructure or services would occur under Alternative 1. Under the Project, the existing infrastructure and wastewater services would adequately serve the Project. Project wastewater impacts would be less than significant. However, because no change or increase in wastewater generation would occur over existing conditions under Alternative 1, wastewater impacts would be less than the Project's less than significant impact.

(iii) Solid Waste

Alternative 1 would not involve any new construction activity or occupancy of the Project Site and as such, would not generate construction or operation-related solid waste. No new solid waste impacts would occur under Alternative 1. The Project would involve demolition, export of excavated materials and a high occupancy that would generate solid waste. The Project's solid waste generation would be accommodated by landfills with adequate capacity to serve the Project and, as such, impacts would be less than significant. However, because Alternative 1 would not change existing conditions or generate new sources of solid waste, impacts would be less than the Project's less than significant impact on solid waste storage capacity.

(iv) Electricity and Natural Gas Infrastructure

Alternative 1 would not involve any new development that would increase existing electricity and natural gas demand or require additional energy infrastructure. Thus, no new impacts to electricity and natural gas infrastructure would occur under Alternative 1. The Project would not use natural gas on-site, although would generate a mobile-source related natural gas demand, and would result in an increase in operational electricity demand. The Project's electrical demand would be within LADWP's projected electricity supplies. The Project would not require the construction of new energy facilities or the expansion of existing facilities. Under Alternative 1, the Project Site's existing on-site electrical and natural gas demands would continue. However, because Alternative 1 would not change existing conditions and would not result in any new electrical power or natural gas demand, impacts related to electricity supply and infrastructure would be less than the Project 's less than significant impact with respect to the wasteful, inefficient, and unnecessary consumption of energy.

(3) Relationship of the Alternative to Project Objectives

As described above, Alternative 1 assumes that no new development would occur on the Project Site. As Alternative 1 would not include a new development program, it would not achieve any of the Project's Objectives as listed below:

Objective 1: Provide a mixed-use development that introduces an array of new residential, office, hotel, and commercial opportunities to the Central City neighborhood.

Objective 2: Create a significant new source of much-needed housing by providing a diverse range of housing options that includes a mix of different unit types at varying sizes and affordability levels.

Objective 3: Improve the physical identity of the Central City Community Plan area by redeveloping an underutilized industrial site with an integrated mix of uses to promote revitalization of the surrounding urban context.

Objective 4: Provide a variety of new job-producing uses on the Project Site to further strengthen the commercial viability of the Central City neighborhood.

Objective 5: Design a project that embodies diversity in height, size and architecture that blends the development into the existing urban fabric.

Objective 6: Enhance the overall pedestrian experience in the Central City area by creating new pedestrian connections and expansive publicly-accessible open spaces to transform the Project Site into a walkable part of the neighborhood.

Objective 7: Create a pedestrian friendly project by providing a variety of ground-floor commercial uses that create an inviting and active experience for visitors and pedestrians.

Objective 8: Support local and regional mobility objectives and reduce vehicle miles traveled by redeveloping an infill site near a growing hub of urban activity with a mix of uses in proximity to major public transit infrastructure.

Objective 9: Construct a sustainably designed project that is consistent with smart growth principles and promotes resource conservation by providing LEED-Gold equivalent or better buildings and placing additional housing and job opportunities within proximity to transit.

Objective 10: Develop an economically feasible project that supports and grows the City's economic base through construction of a development that attracts a diverse range of residents, commercial tenants and visitors, which will generate local tax revenue and create construction and permanent jobs.

b) Alternative 2: At Grade Parking Alternative

(1) Description of the Alternative

The purpose of the At Grade Parking Alternative (Alternative 2) is to reduce the Project's excavation volumes and, thus, reduce the Project's significant and unavoidable construction-related air quality and noise impacts associated with grading. To achieve the reduction in grading, Alternative 2 would eliminate the Project's subterranean garages and locate all parking in above-grade, enclosed parking podiums within the building footprints. Alternative 2 would provide the same number of buildings, the same building configuration (layout and locations) as under the Project, and the same publicly-accessible open space, including 90,113 sf of plazas, paseos, and parks as under the Project. Because of the elimination of subterranean parking and the location of all parking within podiums inside the building footprints, Buildings 2 through 9 would increase by 3 or 4 stories and Building 10 would increase by one story.

Assembly Bill (AB) 2097, effective January 1, 2023, provides that a jurisdiction shall not impose minimum parking requirements on residential and commercial projects within 0.5 miles of public transit. Consistent with the provisions of AB 2097, Alternative 2 would include 990 parking spaces which is a reduction of 60 percent from the Project's 2,475 spaces. The purpose of AB 2097 is to reduce vehicle use and to increase use of transit and alternative transportation modes, such as cycling. Alternative 2 would provide short-term and long-term bicycle parking in accordance with LAMC requirements at the South and West Sites. Driveways and vehicle access would be the same as under the Project.

Table V-2, *Alternative 2 and Uses Compared to the Project*, illustrates the changes in Alternative 2 compared to the Project. As shown in Table V-2, Alternative 2 would remove the hotel from the scope of the development and ascribe the additional space floor area to residential uses, thus, increasing residential units from 1,521 units to 1,589 units. Restaurant/retail floor area and office floor area would remain the same as under the Project. Ground level retail uses would be located in level one of the parking podiums. The overall floor area (2,318,534 sf) and FAR (7.13:1) would be the same as under the Project.

TABLE V-2
ALTERNATIVE 2 USES COMPARED TO THE PROJECT

Uses/Features	Project	Alternative 2
Residential Units:	1,521 units	1,589 units
Office Floor Area:	411,113 sf	411,113 sf
Restaurant/Retail Floor Area:	101,088 sf	101,088 sf
Hotel Rooms:	68 rooms	0 rooms (No Hotel)
Parking Spaces:	2,475 spaces	990 spaces
Public Use Open Space	90,113 sf	90,113 sf
Total Floor Area:	2,318,534 sf	2,318,534 sf
Floor Area Ratio:	7.13:1	7.13:1
Total Excavated Soil for Export:	651,000 CY	36,286 CY

SOURCE: Studio One Eleven, 2023

As shown in Table V-2, Alternative 2 would substantially reduce the Project's excavation volumes and soils that would need to be exported from the Project Site. With the elimination of subterranean parking, excavation depths across the Project Site would be approximately 5 feet below ground surface (bgs). The total excavation volume would be 36,286 CY compared to 651,000 CY that would need to be excavated and exported under the Project. As such, compared to the Project, Alternative 2 would reduce the volume of excavated soils that would need to be excavated and hauled by approximately 94 percent.

(2) Environmental Impacts

(a) Air Quality

(i) Consistency with Air Quality Management Plan

(a) Construction

Alternative 2, which would eliminate the construction activities required for excavation of subterranean garages across the Project Site would, thus, reduce the Project's overall construction emissions by reducing emissions from construction equipment and haul trucks. As the total amount of excavated material would be reduced by approximately 94 percent to 36,286 CY, a corresponding reduction of truck trips would also occur. Under Alternative 2, the grading/excavation phase for each portion of the Project Site with subterranean garages would be considerably shorter compared to the Project. Further, the number of days with haul truck trips would be substantially reduced from approximately 379 days to approximately 24 days. Since Alternative 2 would greatly

reduce the total number of truck trips required to haul excavated material and shorten the number of days with haul truck trips, the Alternative 2 duration of emissions during the grading/excavation phase would be substantially reduced. Additionally, Alternative 2 would reduce the duration of overlapping emissions scenarios that include grading/excavation activities due to the reduced number of grading/excavation days.

During the construction phase, as with the Project, Alternative 2 could potentially exceed State and federal emission standards and potentially delay timely attainment of air quality standards or interim emission reductions specified in the AQMP because Alternative 2 emissions for the worst-case day would be similar to those of the Project. As with the Project, Alternative 2 would comply with CARB's requirements to minimize short-term emissions, with SCAQMD's regulations for controlling VOC emissions and incorporation of Project Design Feature AIR-PDF-1 (Construction Power Pole Usage). Both the Project and Alternative 2 would implement Mitigation Measures AQ-MM-1 (Construction Equipment Features) and AQ-MM-2 (Concrete Truck Features) to reduce construction emissions of VOC, NO_X, CO, PM10 and PM2.5. With implementation of these mitigation measures and compliance with CARB and SCAQMD regulatory control measures, both the Project and Alternative 2 would be consistent with AQMP consistency criteria. However, because Alternative 2 would substantially reduce the scale of grading activities, it would result in lower emission levels and result in less delay in the timely attainment of air quality standards specified in the AQMP. Therefore, Alternative 2's impacts related to consistency with the AQMP would be less than the Project's less than significant impact (with mitigation).

(b) Operation

Similar to the Project, Alternative 2 would include new development on the Project Site that would generate new criteria pollutant emissions. As with the Project, Alternative 2 would be consistent with the goals of SCAG's 2016-2040 RTP/SCS and growth projections in the AQMP, since the growth would occur in a HQTA and a TPA. Alternative 2 would also be consistent with applicable goals, objectives, and policies of the Air Quality Element of the General Plan (Air Quality Element) that support and encourage pedestrian activity. With location of the Project Site within a designated TPA, both the Project and Alternative 2 would reduce vehicle trips and VMT. As with the Project, Alternative 2 would implement Mitigation Measure AQ-MM-3 (Emergency Generator Maintenance & Testing), AQ-MM-4 (Electric Landscaping Equipment) and AQ-MM-5 (Use of Super-compliant VOC Paints). As such, both the Project and Alternative 2 would be consistent with the Air Quality Element and would not obstruct implementation of the AQMP. The reduction in VMT from the parking reduction under Alternative 2 would result in lower total emissions and, as such, would even more closely meet the policies of the Air Quality Element and the AQMP and impacts from Alternative 2 would be less than the Project's less than significant impact (with mitigation).

(ii) Cumulatively Considerable Increase in Criteria Pollutants

(a) Construction

As with the Project, Alternative 2's construction activities have the potential to generate temporary regional criteria pollutant emissions through the use of construction equipment, vehicle trips generated by workers, and haul trucks traveling to and from the Project Site. Construction-related daily emissions of VOC, NO_X, and CO under both the Project and Alternative 2, would exceed the SCAQMD thresholds of significance prior to mitigation. Alternative 2 would reduce construction-related emissions of NO_X and CO emissions, resulting primarily from heavy-duty trucks required for on-road soil hauling. The number of days with haul truck trips would be substantially reduced from approximately 379 days to approximately 24 days. Since Alternative 2 would reduce the total number of haul truck trips required to haul excavated material and reduce the number of days with haul truck trips, the duration of emissions during the grading/excavation phase would be reduced but could still exceed the SCAQMD daily thresholds of significance.

Under both the Project and Alternative 2, implementation of Mitigation Measures AQ-MM-1 (Construction Equipment Features) and AQ-MM-2 (Concrete Truck Features) would reduce short-term and temporary VOC and NO_X emissions but would increase CO emissions due to the use of Tier 4 Final equipment and compressed natural gas (CNG) trucks. As with the Project, even with implementation of Mitigation Measures AQ-MM-1 and AQ-MM-2, Alternative 2's construction NO_X and CO emissions could exceed SCAQMD's daily significance thresholds since the maximum number, type and use of construction equipment would be similar to the Project. However, because Alternative 2 would substantially reduce grading activities and hauling, it would contribute fewer days of grading/excavation emissions and fewer days of overlapping construction emissions than the Project. Therefore, Alternative 2's construction emission impacts would be less than the Project's significant and unavoidable impact (with mitigation).

(b) Operation

During operation, similar to the Project, Alternative 2 would generate emissions associated with vehicle trips, heating, lighting, other electric power requirements, emergency generators, and architectural coatings. However, on-site parking would be reduced by 60 percent under Alternative 2. Because of the length of the construction phases for both the Project and Alternative 2, overlapping interim operation and construction emissions would occur. Both the Project and Alternative 2 are expected to be partially operational by the year 2027 with continued construction of the remaining buildings. The net concurrent operations-related daily emissions under either the Project or Alternative 2 would exceed the SCAQMD thresholds of significance for VOC and NO_X. The exceedance in NO_X is primarily from mobile sources and from emergency generator testing emissions, as well as concurrent construction activities emissions during interim operations. Under both the Project and Alternative 2, implementation of Mitigation

Measure AQ-MM-1 (Construction Equipment Features) and AQ-MM-2 (Concrete Truck Features) would minimize regional VOC and NO_X emissions from construction activities that would overlap with the interim operations. In addition, under both the Project and Alternative 2, implementation of Mitigation Measures AQ-MM-3 (Emergency Generator Maintenance & Testing), AQ-MM-4 (Electric Landscaping Equipment) and AQ-MM-5 (Use of Super-Compliant VOC Paints) would minimize regional VOC and NO_X emissions associated with the testing of the emergency generators, landscaping equipment and architectural coating activities, respectively, and net regional operational emissions for full operation. Thus, under both the Project and Alternative 2, NO_X would be reduced to below the SCAQMD regional significance threshold from construction activities that would overlap with the interim operations. However, CO emissions from construction activities that would overlap with the interim operations during the Project or Alternative 2 would exceed the SCAQMD regional significance threshold with implementation of Mitigation Measures AQ-MM-1 and AQ-MM-2 and impacts would be significant and unavoidable.

With the substantial reduction in grading activities and the reduced on-site parking and VMT under Alternative 2, the duration of overlapping emissions would be reduced compared to the Project. However, maximum daily emissions would be generally similar to the Project since the maximum daily number, type and use of construction equipment would be similar. As with the Project, maximum daily CO emissions under Alternative 2 from construction activities that would overlap with the interim operations would still be significant and unavoidable. Under both the Project and Alternative 2, net regional operational emissions for full operation of either would be mitigated to below the SCAQMD significance thresholds. However, because Alternative 2 would reduce the duration of overlapping emissions during the interim operation period and reduce VMT (mobile source emissions) during operation compared to the Project, Alternative 2's impacts related to criteria pollutants would be less than the Project's significant and unavoidable impact (with mitigation).

(iii) Exposure of Sensitive Receptors to Pollutant Concentrations –Localized Emissions

(a) Construction

Alternative 2, which would eliminate excavation for subterranean garages, would reduce the Project's grading and the use of heavy equipment and export (hauling) of removed soils by approximately 94 percent. Unlike regional emissions, localized emissions are specific to sensitive receptors in the local project area. As with the Project, Alternative 2's maximum daily localized emissions from construction would exceed the SCAQMD localized significance thresholds for NO_X, PM10, and PM2.5. Under both the Project and Alternative 2, with implementation of Mitigation Measure AQ-MM-1 (Construction Equipment Features), impacts would be reduced to less than significant levels. Even with the reduction in overall grading activities under Alternative 2, maximum daily emissions of NO_X, PM10, and PM2.5 would be similar to the Project. However, the duration of grading/excavation related emissions would be substantially reduced under Alternative 2.

Thus, Alternative 2's impacts related to exposure of sensitive receptors to localized pollutant concentrations would be less than the Project's less than significant impact (with mitigation).

(b) Operation

Alternative 2 would result in a similar floor area, layout, and occupancy of the Project Site as under the Project. The Project's daily localized emissions of NO_X and PM2.5 related to energy use, emergency generators, charbroilers, cooling towners, and use of coatings, consumer products, and landscaping equipment would exceed the SCAQMD's significance thresholds (see Table IV.B-12, *Estimated Maximum Regional Operational Emissions – Project (Pounds per Day),* of this Draft EIR. However, under both the Project and Alternative 2, with implementation of Mitigation Measures AQ-MM-3 (Emergency Generator Maintenance & Testing) and AQ-MM-4 (Electric Landscaping Equipment), impacts would be reduced to less than significant levels. Alternative 2 would have a similar mix of uses as the Project, except it would not include a hotel, and would have the same amount of overall floor area. Therefore, Alternative 2's impacts related to exposure of sensitive receptors to localized concentration of pollutants would be similar to the Project's less than significant impact (with mitigation).

(iv) Carbon Monoxide Hotspots

Alternative 2 would reduce the Project's vehicle parking spaces by 60 percent and would reduce the Project's vehicle trips. The most heavily impacted intersection in the area with the potential to result in CO hotspots is Alameda Street at Fourth Street. During operation, CO concentrations from the Project's maximum operational traffic volume at this intersection plus the measured background level in the Project Site area are expected to be approximately 4.7 parts per million (ppm)(one-hour average) and 3.6 ppm (eight-hour average). These levels would not exceed the numerical thresholds of significance and, therefore, Project impacts related to CO hotspots would be less than significant. However, because Alternative 2 would result in lower traffic volumes than the Project, Alternative 2's impacts related to CO hotspots would be the less than the Project's less than significant impact.

(v) Toxic Air Contaminants

(a) Construction

Alternative 2 would eliminate construction activities associated with excavation of subterranean garages, however, excavation would be required for foundation construction. As such, the use of heavy equipment for grading and haul trucks for exporting excavated soils would be reduced by approximately 94 percent. Alternative 2 would still involve substantial construction processes. Under both the Project and Alternative 2, TAC emissions associated with DPM emissions from heavy construction equipment would occur during the construction phase. Both the Project and Alternative 2 would comply with the CARB Air Toxics Control Measure that limits diesel powered

equipment and vehicle idling to no more than 5 minutes at a location and the CARB In-Use Off-Road Diesel Vehicle Regulation. Compliance with these CARB regulations would minimize emissions of TACs during construction. Further, implementation of Mitigation Measures AQ-MM-1 (Construction Equipment Features) and AQ-MM-2 (Concrete Truck Features) to reduce regional NO_X emissions, would provide the co-benefits of reducing emissions of PM10 and PM2.5 from heavy-duty diesel construction equipment TAC emissions during construction. Under Alternative 2, maximum daily TAC emissions would be generally similar to the Project since the maximum daily number, type and use of construction equipment would be similar. Under both the Project and Alternative 2, construction TAC impacts for would be less than significant with mitigation. However, because Alternative 2 would reduce the extent and duration of excavation activities, the use of heavy equipment (loaders, excavators), and haul truck activity, it would result in fewer overall TAC emissions compared to the Project. As such, Alternative 2's TAC impacts would be less than the Project's less than significant impact (with mitigation).

(b) Operation

As with the Project, Alternative 2 would generate emissions from architectural coatings, restaurant charbroiling, truck deliveries, and emergency generators. Restaurants in the Air Basin are required to comply with SCAQMD Rule 1138 emission controls. Delivery trucks are required to comply with the applicable provisions of 13 CCR, Section 2025 to minimize and reduce PM10, PM2.5, and NO_X emissions. Any emergency generators for either the Project or Alternative 2 would be certified to the most stringent CARB and SCAQMD Rule 1470 standards to reduce emissions to the lowest technically feasible level and incorporate Mitigation Measure AQ-MM-3 (scheduling of routine maintenance and testing of the emergency generators installed on the Project Site on different days). Both the Project and Alternative 2 would remove the existing cold storage facilities and, thus, remove the DPM emissions from the approximately 144 trucks and equipped transportation refrigeration units (TRUs) that currently visit the Project Site daily. With existing regulations, operation of either the Project or Alternative 2 would not be considered a substantial source of DPM or other TACs and TAC emissions (with implementation of Mitigation Measure AQ-MM-3). Alternative 2's TAC impacts would be similar to the Project's less than significant impact.

(b) Cultural Resources

(i) Historic Resources

As with the Project, Alternative 2 would adaptively reuse the LACS Building's West Volume if this portion of the building is determined to be structurally sound, while the East Volume of the LACS Building would be demolished. Both the Project and Alternative 2 would implement the same mitigation measures (Mitigation Measures CUL-MM-1 through CUL-MM-8), which would require documentation, a historical interpretative report, thawing plan, structural analysis, a historic structure report prepared by a historical architect, a mothballing plan, and a protection plan) to minimize impacts to the historic

resources, to the extent feasible. Similar to the Project, these mitigation measures under Alternative 2 would not reduce the impact to a less than significant level. Therefore, whether the LACS Building is demolished in whole or in part, Alternative 2 and the Project would result in the same direct significant and unavoidable adverse impact to a historical resource. The differences in building heights on the Project Site between the Project and Alternative 2 would not affect the indirect impacts to the LACS Building should the West Volume be retained. It is also noted that any discontinuation of existing operation of the LACS Building resulting in a thaw, has the potential to significantly impact the historic building. However, since the mitigation measures would not reduce the impacts to a less than significant level, the Project and Alternative 2's impacts on historical resources would be similar and significant and unavoidable (with mitigation).

(ii) Archaeological Resources

Alternative 2 would not include any occupied building levels or parking levels below grade and thus, would eliminate the Project's construction activities required for excavation of subterranean garages. To account for any earthwork needed for foundations, it is assumed that the overall depth of excavation would be approximately five feet. The Project would result in the excavation of 651,000 CY of grading (cut), with excavations depths to approximately 57 feet bgs for the lowest foundations and approximately 64 bgs in isolated areas for elevator pits. Alternative 2's reduced excavation depth would reduce the Project's total grading by approximately 94 percent. Although some foundational features, such as pilings, could be deeper, the majority of excavation and construction activities would conservatively occur within five feet or less of the surface. Under both the Project and Alternative 2, earthwork or excavation into native soils (beneath the upper fill soils) has the potential to expose previously undiscovered subsurface archaeological resources. Both the Project and Alternative 2 would implement Mitigation Measures CUL-MM-9 (retaining a qualified archaeologist for monitoring), CUL-MM-10 (sensitivity training for construction personnel), CUL-MM-11 (halting of activities in the event of a previously undiscovered resource), and CUL-MM-12 (archaeologist technical report consistent with ARMR). With implementation of the mitigation measures, construction activities would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines, and impacts would be less than significant under both the Project and Alternative 2. However, because construction of Alternative 2 would reduce the Project's depth and extent of excavation, impacts to archaeological resources would be less than the Project's less than significant impact (with mitigation).

(iii) Human Remains

As with the Project, excavation activities under Alternative 2 have the potential to expose human remains. If any human remains are encountered, notification of the County Coroner and other entities per California Health and Safety Code Section 7050.5 would be required prior to resumption of construction activities. In addition, disposition of human remains and any associated grave goods would be required to comply with PRC Section

5097.98 and CEQA Guidelines Section 15064.5. With compliance with regulatory requirements, the Project's and Alternative 2's impacts related to human remains would be less than significant. However, because construction of Alternative 2 would require less excavation than the Project, impacts to human remains would be less than the Project's less than significant impact.

(c) Energy

(i) Construction

As with the Project, Alternative 2 would involve an approximately five-year period of construction activity. However, Alternative 2 would result in an approximate 94 percent reduction in grading and hauling activity. Construction energy consumption would result primarily from transportation fuels (e.g., diesel and gasoline) used for haul trucks, heavy-duty construction equipment, and construction workers traveling to and from the Project Site. Neither the Project nor Alternative 2 is expected to consume natural gas during construction but would use electricity for an on-site office as well as gasoline and diesel fuels associated with on- and off-road construction vehicles. Demand for electricity, diesel, and gasoline would be within the handling capacity of suppliers. Construction would utilize energy only for necessary on-site activities and to transport construction materials and demolition debris to and from the Project Site. The Project would not increase demand for electricity, diesel, or gasoline that would exceed available supply or distribution infrastructure capabilities or result in the broad construction of new energy facilities or expansion of existing facilities. Since Alternative 2 would reduce construction activity related to hauling compared to the Project, construction of Alternative 2, as with the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy. As such, similar to the Project, energy impacts would be less than significant. Although Alternative 2 would require the construction of taller buildings to accommodate relocated (above-grade) parking facilities, the substantial decrease in grading would reduce the use of heavy equipment, such as loaders, graders, and haul trucks and would result in a reduction in diesel fuel use. In the overall balance, Alternative 2 would result in less energy demand during construction than the Project. Impacts to energy supplies under Alternative 2 would be less than the Project's less than significant impact.

(ii) Operation

The Project and Alternative 2 would the same amount include development of same amount of new LAMC-defined floor area for residential, office, and restaurant/retail uses. The Project would result in a net reduction in natural gas demand compared to existing conditions inclusive of Project operation activities related to transportation sources (i.e., natural gas-fueled vehicles). With the 60 percent reduction in on-site parking, Alternative 2 would reduce the Project's VMT and demand for gasoline. Demand under either the Project or Alternative 2 would be within the handling capacity of suppliers. Operation of both the Project and Alternative 2 would comply with the CALGreen Code's energy saving measures. In addition, the Project and Alternative 2 would comply with other energy-

saving measures to achieve a minimum LEED Gold Certification, tree landscaping to provide solar shading, and use of cool roof/pavement coatings to reduce the urban island effect. Other building features would include installation of energy-efficient heating, ventilation, and HVAC systems that utilize ozone-friendly refrigerants, and dedicated on-site recycling areas. The Project and Alternative 2 would both include water sustainability features, which would include, but not be limited to, low flow/efficient water fixtures, rainwater capture systems, drought-tolerant/California native plant species selection, landscape contouring to minimize precipitation runoff, irrigation system efficiency, smart irrigation systems (e.g., weather-based controls), and water-saving pool equipment. Operation of the Project and Alternative 2 would not result in the wasteful, inefficient, and unnecessary consumption of energy and, as such, energy impacts would be less than significant. However, because of the 60 percent reduction in on-site parking under Alternative 2, impacts on overall energy demand would be less under Alternative 2 than the Project's less than significant impact.

(d) Geology and Soils

(i) Paleontological Resources

Alternative 2 would not include any occupied or parking levels below grade and would, thus, eliminate the Project's construction activities required for excavation of subterranean garages. To account for any earthwork needed for foundations, it is assumed that the overall depth of excavation would be approximately five feet. The Project would result in the excavation of 651,000 CY of grading (cut), with excavations depths to approximately 57 feet bgs for the lowest foundations and approximately 64 bgs in isolated areas for elevator pits. Alternative 2's reduced excavation depth would reduce the Project's total grading by approximately 94 percent. Although some foundational features, such as pilings, could be deeper, the majority of excavation and construction activities would conservatively occur within five feet or less of the surface. Under both the Project and Alternative 2, earthwork or excavation into native soils (beneath the upper fill soils) have the potential to encounter previously unknown buried paleontological resources. As with the Project, Alternative 2 would implement Mitigation Measures PALEO-MM-1 (retaining a Qualified Paleontologist), PALEO-MM-2 (providing paleontological monitoring), and PALEO-MM-3 (identifying and curating any found paleontological resources). As with the Project, potentially significant impacts under Alternative 2 would be reduced to a less than significant level with mitigation. Similar to the Project, with implementation of mitigation under Alternative 2, construction activities would not cause a substantial adverse impact to paleontological resources, and impacts would be less than significant. However, because construction of Alternative 2 would reduce excavation, impacts to paleontological resources would be less than the Project's less than significant impact (with mitigation).

(e) Greenhouse Gas Emissions

Compared to the Project, Alternative 2 would result in an approximately 94 percent reduction in grading and hauling activity. Construction activities under either the Project

or Alternative 2 would not conflict with SCAQMD air quality control measures that reduce GHG emissions as well as CARB's improved engine efficiency regulations and reduced idling times. As such, the Project and Alternative 2's construction GHG emissions would be less than significant. During operation, Alternative 2 would reduce parking by 60 percent across the Project Site and would reduce the Project's VMT, therefore, substantially reducing the Project's GHG emissions related to vehicle use. As with the Project, Alternative 2 would be constructed to LEED Gold Standards and, as with the Project, would not conflict with the applicable GHG emission reduction plans and policies including the CARB's Climate Change Scoping Plan, the 2020–2045 RTP/SCS, City's Green New Deal, and the Los Angeles Green Building Code. As with the Project, Alternative 2 would not result in significant GHG impacts. However, with reduced excavation and VMT, GHG impacts associated with Alternative 2 would be less than the Project's less than significant impact.

(f) Land Use and Planning

The Project and Alternative 2 would have a relatively similar mix of uses (except Alternative 2 would not have a hotel component), the same floor area, and the same FARs of 7.13:1. As with the Project, Alternative 2 would not conflict with land use plans and policies adopted to eliminate or mitigation significant impacts, including SCAG's 2020-2045 RTP/SCS, the City of Los Angeles General Plan, the Central Industrial District Redevelopment Project, or the Adaptive Reuse Ordinance to develop a live/work and residential community in downtown Los Angeles or with policies of the Adaptive Reuse Ordinance to revitalize and facilitate the development of a "24-hour city" and to encourage mixed commercial and residential uses that improve air quality and reduce vehicle trips and vehicle miles traveled by locating residents, jobs, hotels, and transit services near each other. Both the Project and Alternative 2 would result in the same significant and unavoidable impacts to a historic resource, and thus, would result in the same land use consistency determinations. Although both the Project and Alternative 2 would potentially conflict with the objectives of the Adaptive Reuse Ordinance to facilitate the conversion of older, economically distressed, or historically significant buildings to apartments, live/work units or visitor-serving facilities, a purpose of the Ordinance is to encourage mixed commercial and residential uses to improve air quality and reduce vehicle trips and vehicle miles traveled by locating residents, jobs, hotels and transit services near each other. Because the physical effects of the removal of the LACS Building are evaluated and disclosed in full in Section IV.B, *Cultural Resources*, of this Draft EIR, as well as accounted for in other sections of the Draft EIR, and because the Project and Alternative 2 would be consistent with the Adaptive Reuse Ordinance to locate residents, jobs, and transit services near each other, both would not result in a significant land use impact. Overall, as with the Project, Alternative 2 would not result in a substantial conflict with applicable land use plans, policies, or regulations. Land use impacts under Alternative 2 would be similar to the Project's less than significant land use impact.

(g) Noise and Vibration

(i) Noise

(a) Construction

Alternative 2 would reduce the Project's construction activities by eliminating subterranean parking garages. Overall grading activities would be reduced by approximately 94 percent, which would substantially reduce noise associated with grading and hauling of removed materials. Construction for the Project and Alternative 2 would generally include demolition, site grading, and building construction. Alternative 2 would reduce the duration of grading/excavation activities and reduce the total number of haul trucks required to transport excavated material compared to the Project. However, maximum daily grading/excavation activities and haul truck trips would be similar to or less than the Project. Similar to the Project, Alternative 2 would implement Mitigation Measures NOI-MM-1 (temporary noise barriers), NOI-MM-2 (location of compressors and generators 100 feet from sensitive land uses) and NOI-MM-3 (construction equipment muffling and shielding devices), as applicable, to reduce on-site construction noise levels in excess of ambient noise standards. Even so, with implementation of all feasible mitigation measures, the Project and Alternative 2's maximum daily construction noise impacts would continue to exceed threshold levels at upper levels (stories) at residential receptor locations R2 through R6 and impacts would be significant and unavoidable. Because the scale of excavation and hauling activities would be reduced by 94 percent under Alternative 2 compared to the Project, the duration of high noise level construction activities (which include excavation and hauling) would be reduced.

Impacts between haul trucks and concrete foundation trucks are discussed separately because as stated in Section IV.G, *Noise*, of this Draft EIR, haul trucks are subject to the City-approved haul truck route as discussed in the section, whereas concrete trucks are not. Therefore, concrete trucks could travel along a variety of roadway segments and impacts from haul trucks and concrete trucks are discussed separately (see Section IV.G, *Noise*, of this Draft EIR for additional details about the specific routes for both haul trucks and concrete trucks for the Project and Project Alternatives).

For the Project, under the assumption that grading and excavation activities for the three parcels would occur at the same time, there would be a total of 1,224 haul truck trips and 240 worker trips per day over an 8-hour timespan (equal to approximately 153 haul truck trips and 30 worker trips per hour). The Project's increase in truck and vehicle trips would increase existing traffic noise levels by a maximum of 2.9 dBA CNEL which would not exceed the noise significance threshold. Under Alternative 2, the total amount of excavated material would be reduced by approximately 94 percent to 36,286 CY and a corresponding reduction of truck trips would occur. Under Alternative 2, the grading/excavation phase for each portion of the Project Site with subterranean garages (under the Project) would be reduced in duration. The number of days with haul truck trips would be substantially reduced from approximately 379 days to 24 days. Since Alternative

2 would reduce the number of truck trips required to haul excavated material and reduce the number of days with truck trips, the duration of off-site roadway noise during the grading/excavation phase would be reduced. The Project and Alternative 2 impacts related to off-site construction traffic noise would be less than significant, however because of the reduced number of days with truck trips, impacts would be less under Alternative 2 than under the Project.

The peak period (i.e., daily number of truck trips) of construction with the highest number of construction trucks would occur during the foundations and concrete pour phases for the South Site, building construction of buildings 3 through 9, architectural coating for the North Site, and paving for the West Site. For the Project and Alternative 2 foundation pours, there would be an estimated maximum of up to 2,016 concrete trucks into and out of the Project Site per day over a continuous 24-hour timespan (equal to 84 trips per hour). In addition, during these phases there would be a total of 360 haul trucks, 736 vendor trucks, and 3,464 worker trips per day over an 8-hour timespan (equal to approximately 45 haul trucks, 92 vendor trucks, and 433 worker trips per hour). The Project and Alternative 2's foundations concrete pour truck trips and worker vehicle trips would increase existing traffic noise levels by a maximum of 4.8 dBA CNEL along Central Avenue between 1st Street and 2nd Street, where noise-sensitive uses (e.g., residential uses) are located. The noise would also be increased by more than 3 dBA CNEL on roadway segments with noise-sensitive uses (e.g., residential uses) and include Central Avenue between 2nd Street and 3rd Street and 4th Street between Alameda Street and Hewitt Street. These increases represent an exceedance of the significance threshold and a potentially significant impact. Similar to the Project, Alternative 2 would implement Mitigation Measure NOI-MM-4 (prohibition of foundation concrete trucks on sections of Central Avenue near residential uses), which would eliminate the significant noise impact from concrete trucks. As with the Project, Alternative 2's noise impact related to off-site construction concrete truck traffic would be reduced to less than significant (with mitigation). As such, construction concrete truck, vendor truck and worker trip traffic noise impacts would be similar under both the Project and Alternative 2.

(b) Operation

As with the Project, Alternative 2 would include ground level open space, paseos, and outdoor activities and events. The Project's special event noise and composite noise, which would be similar under Alternative 2, could exceed the ambient noise levels by 5 dBA at the receptor location R2. As with the Project, Alternative 2 would implement Mitigation Measure NOISE-MM-5 which would limit all amplified sound systems used for special events to sound levels equivalent to 90 dBA measured at a distance of 25 feet from the amplified speaker sound system. With implementation of Mitigation Measure NOI-MM-5, noise from human conversation, applause, and amplified music during special events and combined operation of open spaces during daytime and evening hours would not exceed the significance threshold of a 5 dBA increase over ambient conditions**.** Additionally, with implementation of Mitigation Measure NOI-MM-5 under both the Project

and Alternative 2, impacts related to on-site composite noise (mechanical equipment, loading dock/refuse collection activity, emergency generator, parking structure noise, and off-site traffic noise) would be less than significant. Overall, operational noise impacts under Alternative 2 would be similar to the Project's less than significant noise impacts (with mitigation).

(ii) Vibration

(a) Construction

Construction activities can generate varying degrees of ground vibration, depending on the construction procedures and the type of construction equipment used. The operation of construction equipment generates vibrations that travel through the ground and diminish in amplitude with distance from the source. With regard to potential building damage, the Project and Alternative 2 would generate groundborne construction vibration forces during building demolition and excavation/grading activities when heavy construction equipment, such as large bulldozers, drill rigs, and loaded trucks, would be used. Per Project Design Feature NOI-PDF-1, both the Project and Alternative 2 will not require or allow the use of impact pile drivers; however, augured, drilled, or vibratory piles are permitted. The estimated vibration velocity levels from all construction equipment would be below the building damage significance criteria at all off-site building structures except for Location V3 (commercial buildings to the south, west, and southwest of Project's West Site) which would experience vibration levels greater than the FTA Category III threshold for non-engineered timber and masonry buildings. As such, both the Project and Alternative 2 could result in the generation of excessive groundborne vibration. Vibration impacts associated with structural damage from on-site construction activities would be potentially significant. As with Project, Alternative 2 would implement Mitigation Measure NOI-MM-6 which would limit use of equipment, such as large bulldozer, caisson drills and loaded trucks, that generate high levels of vibration to specified distances from vibration location V3, which are the commercial buildings to the south, west, and southwest of Project's West Site, and Mitigation Measure NOI-MM-7, which would require inspection of vibration receptor V3 and repair if any damage is found to have occurred even with implementation of Mitigation Measure NOI-MM-6. With implementation of these mitigation measures, potential structural vibration impacts on receptor V3 could be mitigated to a less than significant level for the Project and Alternative 2. However, because vibration receptor V3 includes privately-owned structures, inspections and repair pursuant to Mitigation Measure NOI-MM-7 would require the consent of the property owner, who may not agree. Thus, if damage to receptor V3 were to occur, and consent to repair is not given, impacts would be significant and unavoidable and similar for both the Project and Alternative 2.

In addition to the on-site construction equipment, heavy-duty construction trucks would generate groundborne vibration as they travel along the Project and Alternative 2's anticipated haul routes. Although the Project and Alternative 2 would not result in

significant vibration impacts from construction trucks along haul routes, these impacts would be less under Alternative 2 than the Project. Alternative 2 would reduce the depths of excavation and amount of hauling for subterranean garages throughout the Project Site, thereby reducing the number of trucks utilizing the haul routes during the grading/excavation phase. As such, groundborne vibration impacts along these haul routes would be reduced under Alternative 2. Since Alternative 2 would reduce the Project's grading activities and the use of heavy construction equipment, such as large bulldozers and loaded trucks, vibration impacts for Alternative 2 would be less than the Project's less than significant impacts.

(b) Operation

As with the Project, Alternative 2 would include typical commercial-grade, stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce vibration at low levels that would not cause damage or annoyance impacts to Project buildings or on-site occupants and would not cause vibration impacts to the off-site environment. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the above-ground parking areas. Groundborne vibration generated by equipment or vehicle circulation would generate approximately up to 0.005 in/sec PPV (less than approximately 68 VdB) adjacent to the Project Site and potential vibration levels from all operational sources at the nearest existing sensitive receptor locations would be a less than the significance threshold of 0.3 in/sec PPV for potential Category III building damage and less than the human annoyance threshold of 72 VdB. As such, under both the Project and Alternative 2, vibration impacts associated with human annoyance or building damage would be less than significant and similar.

(h) Population and Housing

(a) Construction

As with the Project, Alternative 2 would increase construction employment opportunities in the area, which could potentially result in increased permanent population and demand for housing in the vicinity of the Project Site. However, the relocation of workers is not highly likely because of the temporary nature of construction and dispersed character of job sites throughout the Los Angeles area. Workers are able to move from site to site without relocating their households. Construction workers travel to different construction work sites upon completion of the particular phase or phases of construction requiring their specific specialties or skillsets. Construction of the Project or Alternative 2 would generate direct (construction jobs at the Project Site), indirect (employment supported by Project construction-related expenditures) and induced (wages paid to construction workers) growth. However, because there is an existing large pool of construction workers in the Los Angeles area, as with the Project, Alternative 2 would not result in substantial direct or indirect unplanned population

growth. Population and housing impacts under Alternative 2 would be similar to the Project's less than significant impacts.

(b) Operation

Alternative 2's proposed 1,589 housing units and reduced commercial floor area, as shown in **Table V-3**, *Alternative 2 Population and Employment Growth Compared to the Project,* would increase the Project's residents from 3,423 to 3,575 and reduce the total net employees from 1,975 to 1,941. Alternative 2 would comprise approximately 1.35 percent of SCAG's year 2030 estimated increase of 117,517 City of Los Angeles households and the Project would comprise approximately 1.30 percent of SCAG's year 2030 estimated increase in households. Both would represent less than 0.5 percent of SCAG's estimated increase of 337,862 households for the City in 2045. This growth would contribute toward the attainment of City and regional goals and policies to encourage housing development in the greater Los Angeles area. The Project Site is located within a TPA and a SCAG-designated HQTA in which higher density growth is encouraged through the City's TPA and SCAG policies. The Project Site's accessibility to transit would help the City increase housing within these transit priority areas, and would contribute to the City's ability to meet its housing obligation under the Regional Housing Needs Allocation (RHNA). In addition, Alternative 2's and the Project's employment projections would represent 2.5 percent and 2.6 percent, respectively, of SCAG's year 2030 estimated increase of 79,337 employees in the City of Los Angeles.

TABLE V-3
ALTERNATIVE 2 POPULATION AND EMPLOYMENT GROWTH COMPARED TO THE PROJECT

Use	Number of Residents and Employees - Project[a]	Number of Residents and Employees - Alternative 2[b]
Total Residential Population	***3,423***	***3,575[c]***
Employees:		
Employees	2,044	2,010
Existing Industrial	69 to be removed	69 to be removed
Net Total Employees	***1,975***	***1,941***

NOTE(S):

[a] Employment for Project uses was taken from Section IV.H, *Population and Housing*, of this Draft EIR.

[b] Employees based on VMT Calculator results provided in Appendix M of this Draft EIR.

[c] Total residents are based 1,589 new residential units x 2.25.

SOURCE: ESA, 2023

Because neither the Project nor Alternative 2 would exceed SCAG growth projections and the projected growth would be very similar on balance, impacts related to unplanned population growth under Alternative 2 during operation would be similar to the Project's less than significant population and housing impacts.

(i) Public Services

(i) Fire Protection

(a) Construction

Construction activities under both the Project and Alternative 2 would potentially increase the demand for or physically impede fire protection and emergency medical services. During construction, the Project and Alternative 2 would implement Project Design Feature TRAF-PDF-1, to provide a City reviewed Construction Management Plan (CMP) to minimize impacts to emergency vehicles during construction. Fire safety during construction would be further addressed by OSHA safety and health provisions. Neither the Project nor Alternative 2 would increase fire services demand to the extent that the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. Therefore, impacts during construction with respect to fire protection under either the Project or Alternative 2 would be less than significant. However, Alternative 2 reduce the overall scale of construction activities and impacts would be less than the Project's less than significant impacts.

(b) Operation

As with the Project, Alternative 2's residential and employment occupants would increase demand on fire protection and emergency medical services. Both the Project and Alternative 2 would comply with all applicable OSHA, Building Code, Fire Code, other LAMC, and LAFD requirements. The Project and Alternative 2 would also meet LAFD recommended fire prevention and protection features including building identification, emergency access lanes, building setbacks, and private roadway widths. Additionally, plans and specifications would be submitted to LAFD prior to the provision of necessary permits. Similar to the Project, Alternative 2 would implement Mitigation Measure PS-1-MM-1, which include water infrastructures upgrades, to address potential impacts on fire protection services due to a shortage in the existing fire hydrant flow. Furthermore, compliance with applicable codes and inclusion of LAFD recommendations, such as incorporation of sprinklers, would result in safe, modern buildings and would reduce demand for LAFD services. Overall, operation of the Project or Alternative 2 would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire station facilities with implementation of mitigation. Therefore, impacts to fire protection and emergency medical services during operation of either the Project or Alternative 2 would be less than significant (with mitigation). Because the overall service population (employees and residents) would be slightly higher under Alternative 2 than the Project, impacts would be greater than the Project's less than significant impacts (with mitigation) on fire protection services.

(ii) Police Protection

(a) Construction

Construction activities under either the Project or Alternative 2 would potentially increase demand for police protection services or physically impede police protection service access on the local roadway network. During construction, both the Project and Alternative 2 would implement Project Design Feature TRAF-PDF-1, a City-reviewed CMP, to ensure that emergency access would be maintained in the vicinity. Both the Project and Alternative 2 would also implement Project Design Feature POL-PDF-1 to limit access to construction areas, including private security, construction fencing, locked entry, and security lighting. Private security personnel would monitor vehicle and pedestrian access to the construction areas and patrol the Project Site. With the implementation the CMP pursuant to Project Design Feature TRAF-PDF-1 and the security features of Project Design Feature POL-PDF-1, neither the Project nor Alternative 2 would increase police services demand to the extent that the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, construction impacts would be less than significant under both the Project and Alternative 2. However, because Alternative 2 would reduce the scale of and duration of construction activities, due to the 94 percent reduction in excavation and hauling of exported soils, impacts would be less than the Project's less than significant impact on police services.

(b) Operation

The increase in residents under the Project and Alternative 2 would increase the Central Community Police Station's resident to officer ratio. The Project would increase residential population from approximately 40,000 to 43,423 and Alternative 2 would increase the residential population from approximately 40,000 to 43,575. With 308 sworn officers, the Central Community Police Station has a resident to officer ratio of 129.8:1. The Project would increase the resident to officer ratio from 129.8:1 to approximately 141:1. With additional residential units, Alternative 2 would incrementally increase the resident to officer ratio from 129.8:1 to 141.5:1 (compared to 141:1 under the Project). Thus, no material difference to the resident to officer ration would occur between the Project and Alternative 2. Under both the Project and Alternative 2, this resident to officer ration increase would still be substantially below the Citywide average of one officer per 423 residents. In addition, both the Project and Alternative 2 would implement Project Design Feature POL-PDF-2, which would include a security program, such controlled access, camera surveillance, and on-site security personnel that would reduce demand on police services. Accordingly, there would be no need for expanded police facilities to accommodate increased demand. Moreover, LAPD correspondence stated that the Project would not result in the need for new or altered police facilities.[6] Given the small increase in the ratio of residents to officers between the Project and Alternative 2, and

6 LAPD, Central Division, Officer Alfonso Velasco, letter to Alan Como, Los Angeles Planning Department, May 24, 2022.

that both the Project and Alternative 2 would implement Project Design Feature POL-PDF-2, the LAPD's determination would be equally applicable to Alternative 2. Thus, neither the Project nor Alternative 2 would result in substantial adverse physical impacts associated with the provision of a new or physically altered police facility, the construction of which would cause significant environmental impacts. As such, impacts relative to police services would be less than significant under both the Project and Alternative 2. However, because the residential service population would be higher under Alternative 2, impacts would be greater than the Project's less than significant impact.

(iii) Schools

(a) Construction

Construction under either the Project or Alternative 2 would generate employees who are anticipated to be hired from a mobile regional construction work force. Given the mobility and temporary duration of work at a particular site, construction employees not residing locally would not be expected to relocate residences (and, therefore, generate a new student population). Therefore, construction of either the Project or Alternative 2 would not result in a notable increase in the resident population or new students needing to attend local schools. With the nearest public school located approximately 0.6 mile southwest of the Project, no public schools would be physically affected by construction activities at the Project Site. Impacts on schools under Alternative 2 would be similar to the Project's less than significant impacts.

(b) Operation

As shown in **Table V-4**, *Estimated Number of Students Generated by Alternative 2*, Alternative 2 would generate a total net increase of 948 students. In comparison, the Project would generate a net increase of 940 students. Similar to the Project, under Alternative 2, th^{e} 9th Street Elementary School and Hollenbeck Middle School would have a potential shortage in seats with Alternative 2, while the Belmont Zone of Choice schools would continue to have a seating overage.

Under either the Project or Alternative 2, pursuant to SB 50, the Project Applicant would be required to pay development fees LAUSD prior to issuance of building permits. Under Government Code section 65995 and 65996, the payment of these fees is considered full and complete mitigation of school impacts. Therefore, neither the Project nor Alternative 2 would result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities and impacts would be less than significant. However, because Alternative 2 would result in a higher generation of students, operational impacts on schools would be greater than the Project's less than significant impacts.

TABLE V-4
ESTIMATED NUMBER OF STUDENTS GENERATED BY ALTERNATIVE 2

Land Use	Use[a,b]	Generation Factors	Elementary School Students	Middle School Students	High School Students	Total[c]
Proposed Uses						
Residential Multi-Family	1,589 units	Elm: 0.1953/unit MS:0.0538/unit HS: 0.1071/unit	310	85	170	565
Retail/Restaurant	113,565 sf	0.467 students/ksf	29	8	16	53
Office	411,113 sf	0.826/ksf	187	51	102	340
Total Students Generated by Proposed Uses			*526*	*144*	*288*	*958*
Existing Uses						
North Site Cold Storage/ Warehouse	167,596 sf	0.010 students/ksf	2	0	1	3
South Site Office	2,871 sf	0.826/ksf	2	1	1	4
South Site Cold Storage/ Warehouse	190,267 sf	0.010 students/ksf	2	0	1	3
Total Students Generated by Existing Uses			*6*	*1*	*3*	*10*
Net Total (Proposed Less Existing)			**520**	**143**	**285**	**948**

NOTE(S): ksf= 1,000 square feet

[a] Student generation rates for residential uses are based on Table 3 of the LAUSD Developer Fee Justification Study, March 2022.

[b] Student generation for the retail/ restaurant uses is based on the Neighborhood Shopping Center student generation rates; student generation for offices is based on Standard Commercial Offices; and student generation for hotel uses is based on Lodging rates as provided in Table 15 of the LAUSD 2022 Developer Fee Justification Study, March 2022. Since the Developer Fee Justification Study does not specify grade levels for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 55 percent elementary school, 15 percent middle school, and 30 percent high school). For the existing dry storage and freezer/cooler uses, the Rental Self Storage factor was used.

[c] Input totals for elementary, middle and high schools have been rounded based on generation factors to equal total number of students.

SOURCE: ESA, 2023.

(iv) Parks and Recreation

(a) Construction

Construction activities under both the Project and Alternative 2 have the potential to affect parks and recreational facilities. A small number of construction workers may visit public parks to eat lunch or for recreational activity after a workday. However, because construction workers are temporary employees with high turnover during various phases of construction, the use of public parks would be uncommon and short-term. In addition, neither the Project nor Alternative 2 would be developed adjacent to or in proximity to a public park and would not directly impact public park facilities. Construction of either the Project or Alternative 2 would not include or require the construction, alteration, or

expansion of recreational facilities that might have an adverse physical effect on the environment. Therefore, Alternative 2 impacts associated with parks and recreational facilities would be similar to the Project's less than significant impacts.

(b) Operation

Both the Project and Alternative 2 would provide approximately two acres of publicly-accessible open space, consisting of plazas and paseos and amenities, as well as recreational facilities for on-site residents. However, open space under either the Project or Alternative 2 would not meet the recommended 2.0 acres of neighborhood recreation sites per 1,000 persons (6.85 acres for the Project's anticipated population increases of 3,423 residents and 7.2 acres for Alternative 2's population increase of 3,575 residents) and 2.0 acres of community recreational sites per 1,000 persons (6.85 acres for the Project and 7.2 acres for Alternative 2) in the amended PRP. The PRP parkland guidelines, however, are Citywide goals and do not constitute requirements for individual development projects. Population increases under both the Project and Alternative 2 would increase demand for recreational facilities. The Project and Alternative 2's publicly-accessible open space and private, common recreational amenities would fulfill some of the Project and Alternative 2's demand on RAP facilities. In addition, LAMC Section 21.10.3 sets a per-capita construction tax of $200 per new eligible residential unit for City acquisition of new park space, with the set-aside or dedication of parkland and recreational facilities and/or payment of in-lieu fees under LAMC Section 12.33H credited against the payment of this tax. With the required payment of in-lieu fees, the Project would meet LAMC open space and parkland requirements. As such, similar to the Project, Alternative 2 would not result in significant impacts associated with the construction of new or physically altered government facilities. However, since Alternative 2 would generate more residential population and therefore result in a higher demand for parkland than under the Project, impacts on parks and recreational facilities would be greater than the Project's less than significant impacts.

(v) Libraries

(a) Construction

Construction of both the Project and Alternative 2 would introduce construction workers to the area. Workers traveling to or from work, or during a work break, may make use of a library in the area. However, such library use would be incidental and typical of workers throughout the region and would not result in a notable increase in libraries in the area. In addition, no libraries are located in the immediate vicinity that would be physically affected by construction activities at the Project Site. There would be no Project-related construction staging or road closures at or adjacent to the Little Tokyo Branch Library, the nearest library to the Project Site. Therefore, construction activities would not adversely affect the operations of nearby libraries. As such, construction activities would not exceed the capacity of local libraries that would result in the need for new or altered facilities.

Alternative 2's impacts on library facilities during construction would be similar to the Project's less than significant impacts.

(b) Operation

The increase in residents and employees at the Project Site would increase demand for library services in the Project area. However, the LAPL has stated there are no planned improvements to add capacity to the two nearest community libraries (the Little Tokyo and the Benjamin Franklin branches). LAPL has determined through its Facilities Plan that a new branch library would not be considered until the service population for a particular branch library has reached 90,000. Alternative 2 would result in a population increase of 3,575 and the Project would result in a residential population increase of 3,423. Since the Little Tokyo Branch Library currently has a service population of 45,796 and the Benjamin Franklin Branch Library currently has a service population of 40,319, neither branch library serving the Project Site would exceed the LAPL's criterion of 90,000 in service population with the addition of either the Project or Alternative 2. Moreover, both the Project and Alternative 2 would generate revenue for the City's General Fund that would help offset the increase in demand for library services. As such, operation of either the Project or Alternative 2 would not create the need for new or physically altered library facilities, the construction of which would result in substantial adverse physical environmental impacts. Impacts to libraries would be less than significant under the Project and Alternative 2. However, since Alternative 2 would generate more residential population and therefore higher demand for libraries than under the Project, impacts would be greater than the Project's less than significant impact.

(j) Transportation

(i) Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities

As with the Project, Alternative 2 would not conflict with the applicable policies of the City's Mobility Plan 2035, Bicycle Parking Ordinance, TDM Ordinance, Central City Community Plan, Vision Zero, Plan for a Healthy Los Angeles, and Citywide Design Guidelines. Consistent with the Mobility Plan 2035, both the Project and Alternative 2 would be pedestrian- oriented and include a mix of uses that support alternative transportation use near transit facilities. The Project and Alternative 2 would include street and sidewalk dedications to widen sidewalks, provide carpool/vanpool loading areas, and bicycle parking. The Project and Alternative 2 would support healthy lifestyles by locating jobs adjacent and near transit and both, through these measures, would support reductions in VMT. Neither the Project nor Alternative 2 would conflict with programs or policies addressing transit, roadway, bicycle and pedestrian facilities, transportation impacts. Impacts under Alternative 2 would be similar to the Project's less than significant impact.

(ii) Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)

The VMT for employees and residents under Alternative 2 was calculated utilizing the City of Los Angeles VMT Calculator and accounting for TDM measures similar to the Project TDM strategies, such as reduced parking, bicycle parking, and shared mobility; and other factors, such as home-based workspace. As shown in Appendix M of this Draft EIR, according to the VMT Calculator, Alternative 2 would generate 12,357 daily trips and 80,730 daily VMT. Alternative 2's per capita household VMT would be 3.6 and per capita employee VMT would be 5.9. As such, Alternative 2 would reduce the Project's 14,405 daily trips, 94,270 daily VMT, per capita household VMT of 3.9 and per capita employee VMT of 6.5. As with the Project, Alternative 2 would not result in VMT impacts that exceed the Central APC threshold per household of 6.0 or Central APC employee VMT threshold of 7.6. Through the Memorandum of Understanding (MOU) process in preparation of the Project's Transportation Assessment (TA),[7] LADOT agreed that the proposed retail and restaurant uses would be locally serving and, as such, neither the Project nor Alternative 2 would be a regional-serving retail use. Impacts regarding VMT under both the Project and Alternative 2 would be consistent with the LADOT's TAG and, thus, consistent with CEQA Guidelines Section 15064.3(b). Therefore, VMT impacts under either the Project and Alternative 2 would be less than significant. However, because Alternative 2 would have a lower household VMT per capita and VMT per employee compared to the Project, Alternative 2's impacts would be less than the Project's less than significant VMT impacts.

(iii) Geometric Design Hazards

Alternative 2 would reduce the Project's daily vehicle trips due to reduced parking and along with its mix of land uses. The Project is projected to add 25 or more trips at nine study freeway off-ramps during the morning and afternoon peak hours and queue lengths would exceed 50 feet during one or more of the peak hours at three of the study off-ramps. While queue lengths would exceed 50 feet during the a.m. or p.m. peak hours, queues at the off-ramps would not extend onto the freeway mainline and, as such, the Project would not result in a safety impact. Because Alternative 2 would reduce daily vehicle trips compared to the Project, Alternative 2 would also not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses and impacts would be less than significant. However, with the reduction in vehicle trips under Alternative 2, impacts related to design hazards (freeway safety) would be less than the Project's less than significant design hazards impact.

7 The base assumptions and technical methodologies were identified as part of the study approach and were outlined in the MOU that was reviewed and approved by LADOT in December 2021. The MOU is provided in Appendix A of the Transportation Assessment (TA) (Gibson, June 2022), provided in Appendix J of this Draft EIR.

(k) Tribal Cultural Resources

Alternative 2 would not include any occupied building levels or parking levels below grade and thus, would eliminate the Project's construction activities required for excavation of subterranean garages. To account for any earthwork needed for foundations, it is assumed that the overall depth of excavation would be approximately five feet. The Project would result in the excavation of 651,000 CY of grading (cut), with excavations depths to approximately 57 feet below the bgs for the lowest foundations and approximately 64 bgs in isolated areas for elevator pits. Alternative 2's reduced excavation depth would reduce the Project's total grading by approximately 94 percent. Although some foundational features, such as pilings, could be deeper, the majority of excavation and construction activities would conservatively occur within five feet or less of the surface. Under both the Project and Alternative 2, excavation into native soils (beneath the upper fills soils) has the potential to encounter previously undiscovered subsurface tribal cultural resources. Both the Project and Alternative 2 would implement Mitigation Measures TCR-MM-1 (Native American Monitor), TCR-MM-2 (monitoring logs), and TCR-MM-3 (halting of construction activity in the event that a prehistoric/Native American resource is unearthed). With implementation of the mitigation measures, construction activities would not cause a substantial adverse impact to tribal cultural resources, and impacts would be less than significant under both the Project and Alternative 2. However, because construction of Alternative 2 would reduce the Project's depth and extent of excavation, impacts to tribal cultural resources would be less than the Project's less than significant impacts (with mitigation).

(l) Utilities and Service Systems – Water Supply, Wastewater, Solid Waste, Electricity, and Natural Gas

(i) Water Supply

(a) Construction

Construction activities under the Project or Alternative 2 would result in an intermittent demand for water, including dust control, cleaning of equipment, removal and re-compaction, and other related activities. Water use for construction of both the Project and Alternative 2 would range from 5,000 to 10,000 gallons per day (gpd).[8] The existing water infrastructure has adequate capacity for existing site conditions (estimated to be 12,700 gpd) and, as such, would have adequate capacity for construction activities. New water distribution lines would be constructed onsite, with minor off-site work associated with connections to the public water main. Impacts on water supply and infrastructure during construction would be less than significant. Impacts under Alternative 2 would be similar to the Project's less than significant impact.

8 KPFF Consulting Engineers, *Infrastructure Report,* p. 12, February 2023.

(b) Operation

The Project Site does not currently have adequate fire flow to serve either the Project or Alternative 2 or demonstrate compliance with Section 57.507.3 of the LAMC. This potentially significant impact would be reduced to a less than significant level with the implementation of Mitigation Measure PS-MM-1, which provides upgrades to the water infrastructure serving the Project Site. Both the Project and Alternative 2 would increase long-term water demand for consumption, operational uses, maintenance, and other activities on the Project Site. Domestic water demand for the Project, subtracting water conservation features, is estimated to be approximately 415,531 gpd or 465 acre-feet per year (AFY) (see Table IV.L.1-7, *Estimated Project Water Demand*, in Section IV.L.1, *Utilities and Service Systems - Water Supply,* of this Draft EIR). Of this total, the Project's hotel rooms would account for 7,928 gpd and the hotel bar would account for 1,094 gpd, for a total of 9,022 gpd. The hotel would not be included as part of Alternative 2. Also, under the Project, the 1,521 residential units would have a water demand of 141,769 gpd. This equates to 93.2 gpd per unit. Thus, under Alternative 2, at 93.2 gpd per unit, 1,589 residential units would generate 148,095 gpd. Accordingly, the residential units under Alternative 2 would generate an additional 6,376 gpd compared to the Project. However, on balance, by removing the hotel use and accounting for the increased number of residential units compared to the Project, Alternative 2 would result in a reduction of 2,646 gpd or 2.97 AFY of water demand.

As with the Project, Alternative 2 would be consistent with the demographic projections for the City in the 2020-2045 SCAG RTP/SCS and, as such, the LADWP would have sufficient water supplies as projected in its latest UWMP to serve the Project and Alternative 2 and reasonably foreseeable future development during normal, dry, and multiple-dry years. Impacts regarding water supply during operation would be less than significant under the Project and Alternative 2. However, because Alternative 2 would have a lower water demand compared to the Project, Alternative 2's impacts would be less than the Project's less than significant water impacts.

(ii) Wastewater

(a) Construction

During construction of either the Project or Alternative 2, a negligible amount of wastewater would be produced by construction workers because it is anticipated that portable toilets that would dispose of the wastewater off-site would be provided. As with the Project, construction of Alternative 2 would include the construction of all necessary on- and off-site sewer pipe improvements and connections to adequately connect to the City's existing sewer system. Construction of the wastewater system would occur onsite and in the immediate vicinity. All construction impacts would be temporary and would cease once the installation is complete. Based on these factors, similar to the Project, Alternative 2's construction activity would not require or result in the relocation or construction of new or expanded wastewater treatment facilities. Alternative 2's impacts

related to wastewater infrastructure and treatment capacity during construction would be similar to the Project's less than significant impact.

(b) Operation

Wastewater generation for the Project was estimated at 588,278 gpd (see Table IV.L.2-1, Wastewater Generation during Project Operation, of this Draft EIR). Of this total, the Project's hotel rooms would account for 8,160 gpd and the hotel bar would account for 555 gpd, for a total of 8,715 gpd. The hotel would not be included as part of Alternative 2. Also, under the Project, the 1,521 residential units would have a total wastewater demand of 168,330 gpd. This equates to 110 gpd per unit. Thus, under Alternative 2, at 110 gpd per unit, 1,589 residential units would generate 174,790 gpd. Accordingly, the residential units under Alternative 2 would generate an additional 6,460 gpd compared to the Project. However, on balance, by removing the hotel use and accounting for the increased number of residential units compared to the Project, Alternative 2 would result in a reduction of 2,255 gpd of wastewater generation.

Since the sewer main lines serving the Project Site have adequate capacity to accommodate the Project, they would also have adequate capacity to accommodate Alternative 2 which would also be served by the existing sewer main lines. Future detailed gauging and evaluation will be needed as part of the standard permit process to identify a specific sewer connection point and confirm the sewer capacity near the time of Project or Alternative 2 development. Although not anticipated, if the public sewer lacks sufficient capacity, then the Project or Alternative 2 would be required to upgrade sewer lines to a point in the sewer system with sufficient capacity. Ultimately, sewage flow under the Project or Alternative 2 would be conveyed to the Hyperion Water Reclamation Plant (HWRP), which has sufficient capacity for the Project and Alternative 2. Sewage flows under the Project or Alternative 2 would represent only a small fraction of the remaining available capacity of 175 mgd at the HWRP. As with the Project, Alternative 2 would not require or result in the relocation or construction of new or expanded wastewater treatment facilities and impacts on wastewater infrastructure and treatment capacity would be less than significant. However, because Alternative 2 would have a lower wastewater generation compared to the Project, Alternative 2's impacts would be less than the Project's less than significant wastewater impacts.

(iii) Solid Waste

(a) Construction

As both the Project and Alternative 2 would remove the same existing structures on the Project Site, the construction of either the Project or Alternative 2 would include the demolition of approximately 18,896 cubic yards of existing building materials and approximately 2,175 cubic yards of existing hardscape materials (see Table IV.L.3-2, *Estimated C&D Solid Waste Generation*, of this Draft EIR). The construction of the Project's total 2,318,534 sf floor area would generate 137 tons of construction and demolition (C&D) waste. Taller buildings under Alternative 2 would incrementally increase

the projected 137 tons of construction waste. The Project would also require the export of 651,000 CY of excavated soil, which would be reduced to 36,2886 CY under Alternative 2. The 651,000 CY of excavated soil would generate 976,500 tons of solid waste, or 99.3 percent of the Project's total 983,026 tons of C&D solid waste before diversion. Since excavation for subterranean parking structures would be reduced by approximately 94 percent under Alternative 2, Alternative 2 would reduce the Project's total C&D waste.

As with the Project, C&D waste from Alternative 2 would represent a small fraction of the available capacity of the County's Azusa Land Reclamation landfill or one of the inert debris engineered fill operations in Los Angeles County. Given that the remaining disposal capacity of the Azusa Land Reclamation Facility is approximately 51.71 million cubic yards (64.64 million tons),[9] Alternative 2's and the Project's estimated total solid waste disposal needed during construction after 75 percent diversion (including soils) represent a fraction of one percent of the estimated remaining capacity at the Azusa Facility. Similar to the Project, Alternative 2 would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, impacts would be less than significant under the Project and Alternative 2. However, because Alternative 2 would dispose a lower volume of excavated soils, impacts would be less than the Project's less than significant impact solid waste impact.

(b) Operation

Alternative 2's estimated solid waste generation is illustrated in **Table V-5**, *Alternative 2 Operational Solid Waste Generation*. As shown in Table V-5, Alternative 2 would generate approximately 5,082 net tons of solid waste per year, not taking into account a diversion rate of 65 percent.[10] With required diversion, the Project would produce 1,779 net tons of solid waste per year and Alternative 2 would produce 1,779 net tons of solid waste per year. Both the Project and Alternative 2 would provide on-site recycling collection facilities for occupants. The County expects that approximately 140,074,607 additional tons of the remaining 142.67-million-ton capacity would be used in 2030, the earliest anticipated year of Project buildout.[11] Alternative 2's and the Project's estimated annual solid waste generation would represent a fraction of one percent of the remaining capacity in 2030. As with the Project, Alternative 2's solid waste generation would be accommodated by landfills with adequate capacity and, as such, impacts would be less than significant. Since Alternative 2 would generate a similar amount of solid waste requiring landfill disposal, impacts would be similar to the Project's less than significant impact.

9 County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, page 36.

10 County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, page 41.

11 County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, Appendix E-2, Table 8, Los Angeles County Solid Waste Disposal Capacity Need Projection.

TABLE V-5
ALTERNATIVE 2 OPERATIONAL SOLID WASTE GENERATION

Land Use	Quantity[a]	Daily Generation Factor[b]	Solid Waste Generation (tons/year)	Solid Waste Generation (lbs/day)
Proposed New Uses				
Residential	1,589 units	0.87 tons/unit/year	1,382	7,573
General Retail	45,266 sf (91 emp)	1.96 tons/emp/year	178	975
Restaurant (High Turnover and Quality Restaurant)	68,299 sf (275 emp)	1.92 tons/emp/year	528	2,893
General Office	411,113 sf (1,644 emp)	2.02 tons/emp/year	3,321	18,197
Hotel	-	-	-	-
Proposed Subtotal (pre-diversion)	**—**	**—**	**5,409**	**29,638**
Existing Uses	**69 emp.**		**(327)**	**(1,793)**
Net Increase (Pre diversion)			**5,082**	**27,845**
Net Increase (post-diversion)[c]	**—**	**—**	**1,779**	**9,746**

NOTE(S):

[a] Number of employees per use are based on Table IV.L.3-3, Estimated Operational Solid Waste Generation, in Section IV.L.3, *Utilities and Service Systems – Solid Waste*, of this Draft EIR.

[b] Generation factors are provided by CalRecycle's Disposal and Diversion Rates for Business Groups, https://www2.calrecycle.ca.gov/wastecharacterization/businessgrouprates. Accessed February 24, 2022.

[c] Based on an anticipated diversion rate of 65 percent for operations, which was assumed in the ColWMP 2020 Annual Report. This is conservative as the actual diversion is likely to be higher with increasing compliance with the State's recycling goal of 75 percent.

SOURCE: ESA, 2023.

(iv) Electric Power

(a) Construction

As with the Project, Alternative 2's construction activities would require limited and minor quantities of electricity for watering, lighting, power tools and other support equipment. As existing power lines are located in the vicinity of the Project Site, temporary power poles would be installed to provide electricity during construction. Existing off-site infrastructure would not have to be expanded or newly developed to provide electrical service to the Project Site during construction or demolition. Electricity demand during the construction of either the Project or Alternative 2 would be approximately 11 percent of the existing electricity usage at the Project Site. Construction electricity demand would be

within the supply and infrastructure capabilities of LADWP[12] and, therefore, construction of the either the Project or Alternative 2 would not result in an increase in demand for electricity that would exceed available supply or distribution infrastructure or require the construction of new energy facilities or expansion of existing facilities.

With regard to existing electrical distribution lines, the Project Applicant would be required to coordinate electrical infrastructure removals or relocations with LADWP and comply with site-specific requirements set forth by LADWP, which would ensure that service disruptions, if any, are minimized. Similar to the Project, Alternative 2 would not require the construction of new energy facilities or the expansion of existing facilities. Impacts related to operational electricity demand under Alternative 2 would be similar to the Project's less than significant construction-related electric power impacts.

(b) Operation

Alternative 2 would have the same LAMC-defined total floor area (2,318,534 sf) and result in a largely similar mix of uses as the Project (except it would not include a hotel use). Alternative 2's net increase in operational electricity usage would be generally similar to the Project's approximately 21,093,357 kWh usage as both the Project and Alternative 2 would develop the same amount of new floor area for residential, office, and restaurant/retail uses. The increase in annual electricity consumption under either the Project or Alternative 2 would represent a fraction of one percent of LADWP's projected sales in 2030 and would be within LADWP's projected electricity supplies. During peak conditions, both the Project and Alternative 2 would represent approximately less than 0.1 percent of the LADWP estimated peak load, which is within the total load growth forecast for the City. Similar to the Project, the operational electricity services and supply and infrastructure for Alternative 2 would not require the construction of new energy facilities or the expansion of existing facilities. Impacts related to demand for electricity services for Alternative 2 would be similar to the Project's less than significant electricity services impact.

(v) Natural Gas

(a) Construction

Building energy and appliances for either the Project or Alternative 2 would be provided by all-electric sources, and construction activities at the Project Site would not require or involve installation of new natural gas connections. Therefore, as with the Project, construction of Alternative 2 would not increase demand for, or interrupt the delivery of, natural gas that would affect supply or distribution. Neither the Project nor Alternative 2 would result in the construction of new energy facilities or expansion of existing facilities. Both the Project and Alternative 2 would reduce the consumption of natural gas at the Project Site during construction due to the removal of existing on-site uses. Impacts

[12] The percentage is derived by taking the annual average amount of electricity usage during the construction period (732,476 kWh) and dividing that number by the annual amount of existing electricity usage (6,652,637 kWh) to arrive at 11 percent.

related to the use of natural gas during construction for Alternative 2 would be similar to the Project's less than significant impact.

(b) Operation

The Project and Alternative 2 would utilize electricity as an energy source instead of natural gas. Based on the Project's and Alternative 2's non-consumption of natural gas, neither the Project nor Alternative 2 would have any effect on SoCalGas' existing and planned natural gas supplies and infrastructure from on-site uses. Both the Project and Alternative 2 would have no impact with respect to the use of natural gas during on-site operation and, as such, impacts would be similar and less than significant under the Project and Alternative 2.

(3) Relationship of the Alternative to Project Objectives

Alternative 2 would have the same total floor area and result in a largely similar mix of uses as the Project. However, the Project's hotel use would be eliminated, and the Project's residential uses would be increased from 1,521 to 1,589 units. The Project's 2,475 parking spaces would be reduced to 990 spaces, a reduction of 60 percent. All vehicle parking would be located in above-grade podium structures within the footprint of the respective 10 buildings, thus, eliminating subterranean parking and reducing excavation and hauling activities. The parking podiums would increase the heights of the buildings but would not affect specific Project Objectives. As such Alternative 2 would fully meet the Project's Objectives, all of which are listed below.

Objective 1: Provide a mixed-use development that introduces an array of new residential, office, hotel, and commercial opportunities to the Central City neighborhood.

Objective 2: Create a significant new source of much-needed housing by providing a diverse range of housing options that includes a mix of different unit types at varying sizes and affordability levels.

Objective 3: Improve the physical identity of the Central City Community Plan area by redeveloping an underutilized industrial site with an integrated mix of uses to promote revitalization of the surrounding urban context.

Objective 4: Provide a variety of new job-producing uses on the Project Site to further strengthen the commercial viability of the Central City neighborhood.

Objective 5: Design a project that embodies diversity in height, size and architecture that blends the development into the existing urban fabric.

Objective 6: Enhance the overall pedestrian experience in the Central City area by creating new pedestrian connections and expansive publicly-accessible open spaces to transform the Project Site into a walkable part of the neighborhood.

Objective 7: Create a pedestrian friendly project by providing a variety of ground-floor commercial uses that create an inviting and active experience for visitors and pedestrians.

Objective 8: Support local and regional mobility objectives and reduce vehicle miles traveled by redeveloping an infill site near a growing hub of urban activity with a mix of uses in proximity to major public transit infrastructure.

Objective 9: Construct a sustainably designed project that is consistent with smart growth principles and promotes resource conservation by providing LEED-Gold equivalent or better buildings and placing additional housing and job opportunities within proximity to transit.

Objective 10: Develop an economically feasible project that supports and grows the City's economic base through construction of a development that attracts a diverse range of residents, commercial tenants and visitors, which will generate local tax revenue and create construction and permanent jobs.

c) Alternative 3: Historic Preservation/Reduced Density Alternative

(1) Description of the Alternative

The purpose of the Historic Preservation/Reduced Density Alternative (Alternative 3) is to reduce the overall scale of the Project and to preserve the historical LACS Building on the North Site. To this end, the North Site would be left in its existing condition and function, and the LACS Building (167,596 sf of industrial floor area) would remain in its existing use. Alternative 3 would, thus, avoid the Project's significant and unavoidable historical resources impacts on the historic LACS Building. The elimination of the North Site development from the scope of the Project would further reduce the overall intensity of development across the Project Site. Alternative 3 would result in 1,613,801 sf of new development. Total floor area including the LACS building would be 1,781,397 sf. Compared to the Project's 2,318,534 sf of new development, Alternative 3 would result in a 30 percent reduction in newly constructed floor area.

Another major difference between the Project and Alternative 3 is the reduction from 2,475 parking spaces under the Project to 990 parking spaces under Alternative 3. The proposed parking space reduction is permitted under AB 2097, which has been in effect since January 1, 2023. Under AB 2097, the jurisdiction shall not enforce a minimum parking requirement on residential and commercial uses in a TPA (within 0.5 miles from a transit facility). AB 2097, however, does not prohibit the provision of parking or establish a maximum parking standard on development projects. The reduction in parking spaces under Alternative 3 represents a 60 percent reduction in parking compared to the Project. Long-term and short-term bicycle parking would be provided in accordance with LAMC requirements on the South Site and West Sites.

The reduced parking under Alternative 3 would reduce Alternative 3's overall scale of excavation compared to the Project. Under the Project, subterranean parking structures on the North Site would be four levels below-grade, on the South Sites would be three levels below grade, and on the West Site one level below grade. Under Alternative 3, a two-level below grade parking structure would be developed on the South Site and a one-level below grade parking structure would be developed on the West Site. Excavation depth for the subterranean structure on the South Site would be 35 feet bgs and the excavation depth for the subterranean structure on the West Site would be 16 feet bgs. The reduced scale of the subterranean structures would reduce overall excavation, grading, and hauling of soils from 651,000 CY under the Project to 321,364 CY under Alternative 3. Alternative 3 would reduce the Project's estimated excavated soil by approximately 51 percent. The reduction would result in a respective reduction in the duration of the Project's significant and unavoidable construction-related air quality, noise, and vibration impacts.

To account for the removal of the all-new development from the North Site, Alternative 3 would develop a 44 story, 506-foot-high mixed-use tower on the South Site. The new high-rise building, designated as Building 1 under Alternative 3, would be located at the south side of 4th Street in the approximate location of the Project's designated Building 3. **Table V-6**, *Alternative 3 Uses Compared to the Project*, below, compares the changes in the South Site and West Site buildings compared to the Project. To accommodate the higher floor area on the South Site, adjustments were made in building heights, floor areas, and uses for the South and West Site's other eight buildings, as shown in Table V-6. As further shown in Table V-6, total residential units in the new Building 1 were reduced and office floor area was added as compared to the Project's Building 2. Building 2's restaurant and retail uses were retained and reduced. Similar to Alternative 2, the Project's hotel would be removed under Alternative 3. The 68 hotel rooms in the Project's Building 6 (Alternative 3's Building 4) were changed to 30 residential units and the heights of the remainder of Alternative 3's buildings (Buildings 2, 3, 4, 6, 5, 7, and 8, and 9) were reduced compared to the Project. Overall, residential units were reduced from a total of 1,521 units under the Project to 1,049 units under Alternative 3 (a 31 percent reduction). Office floor area was reduced from a total of 411,113 sf under the Project to a total of 282,005 sf under Alternatives 3 (a 31 percent reduction) and restaurant/retail floor area was reduced from a total of 101,088 sf under the Project to a total of 84,167 sf (including 9,174 sf of outdoor restaurant seating. (a 16.7 percent reduction in restaurant space). Note that the term, "restaurant/retail" is intended as any mix of both restaurant and retail uses, or either restaurant or retail uses. Because of the non-use of the North Site for development and the relocation of the North Site's Building 2 to the location of the Project's Building 3, no new uses or open space would be located on the North Site. The building configuration and layout on the South Site would be similar to the Project. As under the Project, no publicly-accessible open space would be provided on the West Site. Numerous publicly-accessible open space areas would be located throughout the South Site for a total of 81,146 sf of publicly-accessible open space. As with the Project east-west paseos would cross the Project Site between Central Avenue and Alameda Street. In addition, there would be access to the publicly-accessible open space areas via 4th Street and from the south

boundary of the South Site. The South Site would feature three centrally located public open space areas, boutique shop displays and passive gardens. Other publicly-accessible open space areas on the South Site would include open space uses similar to the Project's Makers Alley and the 5th Street Pocket Park. The South Site's residential open space and amenity features would include rooftop terraces, swimming pools, common areas, outdoor seating, and a dog walk.

TABLE V-6
ALTERNATIVE 3 USES COMPARED TO THE PROJECT

Uses/Features	Project	Alternative 3
Total Industrial Uses to Remain (LACS Building)	0 sf	167,596 sf
Total Res. Units	1,521 Units	1,049 Units
Total Restaurant/ Retail (LAMC Floor Area)	101,088 sf	74,993 sf (indoor) + 9,174 (sf outdoor) = 84,167 sf
Total Office	411,113 sf	282,005 sf
Total Hotel	74,484 sf (68 Rooms)	No Hotel
Total Parking	2,475 spaces	990 spaces
Total New Floor Area	2,318,534 sf	1,613,801 sf
Total Floor Area:	2,318,534 sf	1,781,397 sf (incl.167,596 sf existing industrial use)
Total Grading	651,000 CY	321,365 CY
FAR:	7.13:1	5.9:1 (new development only); 6.51:1 (all development across the Project Site including industrial uses to remain)

SOURCE: Studio One Eleven, 2023

(2) Environmental Impacts

(a) Air Quality

(i) Consistency with Air Quality Management Plan

(a) Construction

Alternative 3 would reduce the Project's construction activities, including not providing any new development on the North Site and reducing overall floor area by 30 percent. Under Alternative 2, the Project's parking by would be reduced by 60 percent, and overall excavation for subterranean garages would be reduced by 51 percent. As the total

amount of excavated material would be reduced by 51 percent to 321,365 CY, a corresponding reduction of haul truck trips would also occur. Under Alternative 3, the North Site would not be developed, which would eliminate the approximately 53 days of haul truck trips carrying 2,000 CY per day from the North Site under the Project. Alternative 3 would develop the South Site with one subterranean garage that would have two below-grade levels, instead of two subterranean garages (including the North Site garage) with three below-grade levels as under the Project. Under Alternative 3, the number of days with haul truck trips would be reduced from approximately 307 days to approximately 214 days. Since Alternative 3 would not develop the North Site and reduce the number of haul truck trips required to transport excavated material from the South and West Sites, Alternative 3's duration of grading/excavation phase emissions would be substantially reduced compared to the Project. Additionally, Alternative 3 would reduce the duration of overlapping emissions scenarios that include grading/excavation activities on the South and West Sites due to the reduced number of grading/excavation days.

During the construction phase, as with the Project, Alternative 3 could potentially exceed state and federal emission standards and potentially delay timely attainment of air quality standards or interim emission reductions specified in the AQMP because the worst-case day emissions for Alternative 3 would be similar to those of the Project. As with the Project, Alternative 3 would comply with CARB's requirements to minimize short-term emissions, with SCAQMD's regulations for controlling VOC emissions and incorporation of Project Design Feature, AIR-PDF-1 (Construction Power Pole Usage). Both the Project and Alternative 3 would implement Mitigation Measures AQ-MM-1 (Construction Equipment Features) and AQ-MM-2 (Concrete Truck Features), to reduce construction emissions of VOC, NO_X, CO, PM10 and PM2.5. With implementation these mitigation measures and compliance with CARB and SCAQMD regulatory control measures, both the Project and Alternative 3 would be consistent with AQMP consistency criteria. However, because Alternative 3 would substantially reduce the scale of construction activities, as the North Site would not be developed and excavations volumes would be reduced by approximately 51 percent, it would result in lower overall emission levels and result in less delay in the timely attainment of air quality standards or interim emission reductions specified in the AQMP. Therefore, Alternative 3's impacts related to consistency with the AQMP would be less than the Project's less than significant impact (with mitigation).

(b) Operation

Similar to the Project, Alternative 3 would include new development on the Project Site that would generate new criteria pollutant emissions. As with the Project, Alternative 3 would be consistent with the goals of SCAG's 2016-2040 RTP/SCS and growth projections in the 2016 AQMP, since the growth would occur in a HQTA and a TPA. Alternative 3 would also be consistent with applicable goals, objectives, and policies of the Air Quality Element that support and encourage pedestrian activity. With location of the Project Site within a designated TPA, both the Project and Alternative 3 would reduce vehicle trips and VMT. As with the Project, Alternative 3 would implement Mitigation

Measure AQ-MM-3 (Emergency Generator Maintenance and Testing), AQ-MM-4 (Electric Landscaping Equipment) and AQ-MM-5 (Use of Super-Compliant VOC Paints). As such, both the Project and Alternative 3 would be consistent with the Air Quality Element and would not obstruct implementation of the AQMP. However, because Alternative 3 would reduce floor area by 30 percent, parking by 60 percent, and occupancy by approximately 31 percent compared to the Project, it would result in lower total emissions and, as such, even more closely meet the policies of the Air Quality Element and the AQMP and impacts from Alternative 3 would be less than the Project's less than significant impact (with mitigation).

(ii) Cumulatively Considerable Increase in Criteria Pollutants

(a) Construction

As with the Project, Alternative 3's construction activities have the potential to generate temporary regional criteria pollutant emissions through the use of heavy-duty construction equipment, such as excavators and forklifts, through vehicle trips generated by workers and haul trucks traveling to and from the Project Site, and through building activities. Construction-related daily emissions of VOC, NO_X, and CO under both the Project and Alternative 3 would exceed the SCAQMD thresholds of significance prior to mitigation. Alternative 3 would reduce construction-related emissions of NO_X and CO emissions, resulting primarily from heavy-duty trucks required for on-road soil hauling. Under Alternative 3, the North Site would not be developed, which would eliminate the approximately 53 days of haul truck trips carrying 2,000 CY per day from the North Site under the Project. Alternative 3 would develop the South Site with one subterranean garage that would have two below-grade levels, instead of three below-grade levels as under the Project. Further, this Alternative would eliminate excavation required for the four below-grade levels of subterranean parking proposed on the North Site by the Project. Under Alternative 3, the number of days with haul truck trips would be reduced from approximately 307 days to approximately 214 days. Since Alternative 3 would not develop the North Site and would reduce the number of haul truck trips required to transport excavated material from the South and West Sites, the duration of emissions during the grading/excavation phase for Alternative 3 would be substantially reduced, but could still exceed the SCAQMD daily thresholds of significance since the maximum number, type and use of construction equipment would be similar to the Project. Additionally, Alternative 3 would reduce the duration of overlapping emissions scenarios that include grading/excavation of the South and West Sites and the scenarios that include the North Site. With elimination of all construction activities on the North Site and reduction in subterranean parking on the South and West Sites, the use of heavy grading equipment, hauling of soils, and concrete hauling would be reduced overall compared to the Project.

Under both the Project and Alternative 3, implementation of Mitigation Measures AQ-MM-1 (Construction Equipment Features) and AQ-MM-2 (Concrete Truck Features) would

reduce short-term and temporary VOC and NO_X emissions but would increase CO emissions due to the use of Tier 4 Final equipment and CNG trucks. As with the Project, even with implementation of Mitigation Measures AQ-MM-1 and AQ-MM-2, Alternative 3's construction NO_X and CO emissions could exceed SCAQMD significance thresholds since the maximum number, type and use of construction equipment would be similar to the Project. However, because Alternative 3 would reduce overall construction activities, it would contribute less to overlapping construction emissions associated with the South Site as the days with maximum truck trips during excavation/grading would be reduced from approximately 307 days to approximately 214 days. Therefore, Alternative 3's construction emission impacts would be less than the Project's significant and unavoidable emissions impact (with mitigation).

(b) Operation

Alternative 3 would reduce the Project's residential units, office floor area, and restaurant/retail uses, and would eliminate the hotel use. These changes would reduce overall activity during occupation compared to the Project. Despite its reduced size, Alternative 3, as with the Project, would result in overlapping interim operation and construction activities. The Project is expected to be partially operational by year 2027 with continued construction of the remaining buildings. The net concurrent operations-related daily emissions from construction activities that would overlap with the interim operations under either the Project or Alternative 3 would exceed the SCAQMD thresholds of significance for VOC and NO_X. The exceedance in NO_X is primarily from mobile sources and from emergency generator testing emissions, as well as concurrent construction activities emissions during interim operations. Under both the Project and Alternative 3, implementation of Mitigation Measures AQ-MM-1 (Construction Equipment Features) and AQ-MM-2 (Concrete Truck Features) would minimize regional VOC and NO_X emissions from construction activities that would overlap with the interim operations. In addition, under both the Project and Alternative 3, implementation of Mitigation Measures AQ-MM-3, AQ-MM-4 (Electric Landscaping Equipment) and AQ-MM-5 (Use of Super-Compliant VOC Paints) would reduce regional VOC and NO_X emissions associated with the testing of the emergency generators, landscaping equipment and architectural coatings, respectively, and net regional operational emissions for full operation. Thus, under both the Project and Alternative 3, NO_X would be reduced to below the SCAQMD regional significance threshold from construction activities that would overlap with the interim operations. However, because Alternative 3 would reduce overall construction activities, it would reduce the duration of overlapping construction emissions with interim operations that include the South Site. Additionally, Alternative 3 would eliminate the overlapping construction with interim operations emissions scenarios that include the North Site as no construction would occur on that site. However, CO emissions from construction activities that would overlap with the interim operations during the Project or Alternative 3 would exceed the SCAQMD regional significance threshold with implementation of Mitigation Measures AQ-MM-1 and AQ-MM-2 and impacts would be significant and unavoidable.

The Project's net operations-related daily emissions would also exceed the SCAQMD thresholds of significance for VOC resulting primarily from the architectural coating phases where painting of interior and exteriors of the buildings would occur. Project-level net regional operational emissions for the Project or full Alternative 3 operations would be mitigated to below significant thresholds for VOC. However, CO emissions from construction activities that would overlap with the interim operations of Alternative 3 or the Project would still be significant and unavoidable. Net regional operational emissions for full operation of either the Project or Alternative 3 would be mitigated to below the SCAQMD significance thresholds. However, because Alternative 3 would reduce overall construction activities, it would contribute less to overlapping operational emissions. Therefore, operational emission impacts would be less under Alternative 3 than the Project's significant and unavoidable emissions impact (with mitigation).

(iii) Exposure of Sensitive Receptors to Pollutant Concentrations –Localized Emissions

(a) Construction

Alternative 3 would reduce the Project's construction activities, including not providing any new development on the North Site, reducing parking by 60 percent, reducing overall floor area by 30 percent, and reducing the overall excavation for subterranean garages by approximately 51 percent. Alternative 3 would, thus, reduce overall construction emissions. Alternative 3 would eliminate the localized emissions associated with building construction on the North Site. Alternative 3 would eliminate the Project's maximum daily localized construction emissions for the North Site. Additionally, Alternative 3 would reduce the number of days of haul truck trips during the excavation/grading phase on the South Site. However, similar to the Project, even with the reduced duration of grading/excavation activities, Alternative 3 would exceed the SCAQMD localized significance thresholds for NO_X, PM10, and PM2.5. Under both the Project and Alternative 3, with implementation of Mitigation Measure AQ-MM-1 (Construction Equipment Features), impacts would be reduced to less than significant levels. However, with the substantial reduction in construction activities under Alternative 3, exposure of sensitive receptors to emissions of NO_X, PM10, and PM2.5 would be reduced in duration than under the Project. Thus, impacts under Alternative 3 would be less than the Project's less than significant emissions impact (with mitigation).

(b) Operation

Alternative 3 would reduce the Project's construction activities, including removing the North Site from the scope of the development. However, existing operational emissions from the North Site would continue under Alternative 3. The Project's daily localized emissions of NO_X, PM10, and PM2.5 related to energy use, emergency generators, charbroilers, cooling towners, and use of coatings, consumer products, and landscaping products would exceed the SCAQMD's significance thresholds (see Table IV.B-12, *Estimated Maximum Regional Operational Emissions – Project (Pounds per Day),* of this

Draft EIR. Alternative 3 would result in less emissions because of smaller buildings and less retail/restaurant floor area. Both the Project and Alternative 3 would implement Mitigation Measure AQ-MM-3 (Emergency Generator Maintenance and Testing) and implementation of Mitigation Measures AQ-MM-3 and AQ-MM-4 (Electric Landscaping Equipment) to reduce localized emissions impacts to a less than significant level. Because Alternative 3 would reduce overall development compared to the Project, impacts related to exposure of sensitive receptors to localized concentration of pollutants would be less than the Project's less than significant impact (with mitigation).

(iv) Carbon Monoxide Hotspots

Alternative 3 would reduce occupancy of the Project Site by approximately 31 percent and parking by 60 percent. Both the Project and Alternative 3 would generate the same travel pattern (access to and from the Project Site) as under the Project. However, Alternative 3 would result in fewer vehicle trips and less impact on the area's most heavily impacted intersection at Alameda Street at Fourth Street than under the Project. This intersection has the greatest potential to result in CO hotspots. During operation, CO concentrations from the Project's maximum operational traffic volume at this intersection plus the measured background level in the Project Site area are expected to be approximately 4.7 ppm (one-hour average) and 3.6 ppm (eight-hour average). These levels would not exceed the numerical thresholds of significance. As such, impacts related to CO hotspots would be less than significant under both the Project and Alternative 3. However, because Alternative 3 would reduce vehicle trips and activity at the most impacted intersection compared to the Project, Alternative 3's impacts related to CO hotspots would be less than the Project's less than significant impact.

(v) Toxic Air Contaminants

(a) Construction

Alternative 3 would reduce the Project's construction activities and localized emissions associated with building construction, excavation, and concrete pouring activity. Under both the Project and Alternative 3, TAC emissions associated with DPM emissions from heavy construction equipment would occur during the construction phase. Both the Project and Alternative 3 would comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location and the CARB In-Use Off-Road Diesel Vehicle Regulation. Compliance with these CARB regulations would minimize emissions of TACs during construction. Further, implementation of Mitigation Measures AQ-MM-1 (Construction Equipment Features) and AQ-MM-2 (Concrete Truck Features) to reduce regional NO_X emissions would provide the co-benefits of reducing emissions of PM10 and PM2.5 from heavy-duty diesel construction equipment during construction. Under Alternative 3, maximum daily TAC emissions would be generally similar to the Project since the maximum daily number, type and use of construction equipment would be similar. Under both the Project and Alternative 3, construction TAC impacts for would be less than significant with mitigation.

However, because Alternative 3 would reduce the use of heavy equipment (loaders, excavators), and haul activity, it would result in fewer overall TAC emissions compared to the Project. As such, Alternative 3's TAC impacts would be less than the Project's less than significant impact (with mitigation).

(b) Operation

Alternative 3 would not provide any new development on the North Site, thus retaining the existing LACS Building and cold storage warehouses and loading docks under their existing use and condition. Alternative 3 would continue to generate the exiting site emissions on the North Site including the existing cold storage facilities and the DPM emissions from approximately 35 percent of the existing 144 trucks (or approximately 50 trucks) and equipped transportation refrigeration units (TRUs) that currently visit the existing Project Site on a daily basis, including cold storage facilities on both the West and South Sites. The existing site emissions on the North Site under Alternative 3 would be eliminated under the Project. Alternative 3, as with the Project, would generate emissions from architectural coatings, restaurant charbroiling, delivery trucks, and emergency generators. Restaurants in the Air Basin are required to comply with SCAQMD Rule 1138 emission controls. Delivery trucks are required to comply with the applicable provisions of 13 CCR, Section 2025 to minimize and reduce PM10, PM2.5, and NO_X emissions. Any emergency generators for either the Project or Alternative 3 would be certified to the most stringent CARB and SCAQMD Rule 1470 standards to reduce emissions to the lowest technically feasible level and incorporate Mitigation Measure AQ-MM-3 (scheduling of routine maintenance and testing of the emergency generators installed on the Project Site on different days). With existing regulations, operation of either the Project or Alternative 3 would not be a substantial source of DPM or other TACs, and TAC emissions would be less than significant (with implementation of Mitigation Measure AQ-MM-3). However, because Alternative 3 would retain existing diesel truck activity at the North Site, impacts would be greater than the Project's less than significant impact (with mitigation).

(b) Cultural Resources

(i) Historical Resources

Alternative 3 would preserve the historic LACS Building in its existing condition and use. The Project's Building 2 and other uses would not be constructed on the North Site and the existing industrial (cold storage) use would continue. The Project's partial or full removal of the LACM Building would not occur under Alternative 3. The Project would implement Mitigation Measures CUL-MM-1 through CUL-MM-8, which would require documentation, a historical interpretative report, thawing plan, structural analysis, a historic structure report prepared by a historical architect, a mothballing plan, and a protection plan). Regardless, at a minimum, due to the removal of the East Volume, impacts would be significant and unavoidable even after implementation of the Project mitigation measures. It is noted that any discontinuation of existing operation of the LACS Building resulting in a thaw, has the potential to significantly impact the historic building.

However, Alternative 3, by preserving the historic LACS Building and not constructing any new features or structures on the North Site would avoid the Project's significant and unavoidable impact to historical resources. Thus, Alternative 3's impacts to historical resources would be less than the Project's significant and unavoidable impact (with mitigation).

(ii) Archaeological Resources

Alternative 3 would reduce the Project's construction activities, including eliminating the development of the North Site and reducing excavation depths for subterranean garages on the South and West Sites. Depths of excavation under Alternative 3 would be 35 feet on the South Site and 16 feet on the West Site, which would reduce the maximum depths of excavation for the Project extending to 64 feet bgs. As with the Project, Alternative 3's excavation activities into native soils (beneath the upper fill soils) have the potential to encounter previously undiscovered subsurface archaeological resources. Both the Project and Alternative 3 would implement Mitigation Measures CUL-MM-9 (retaining a qualified archaeologist for monitoring), CUL-MM-10 (sensitivity training for construction personnel), CUL-MM-11 (halting of activities in the event of a previously undiscovered resource, and CUL-MM-12 (archaeologist technical report consistent with ARMR). With implementation of the mitigation measures, construction activities would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines, and impacts would be less than significant under both the Project and Alternative 3. However, because construction of Alternative 3 would reduce the Project's depth and extent of excavation, impacts to archaeological resources would be less than the Project's less than significant impact (with mitigation).

(iii) Human Remains

As with the Project, excavation activities under Alternative 3 have the potential to expose human remains. If any human remains are encountered, notification of the County Coroner and other entities per California Health and Safety Code Section 7050.5 would be required prior to resumption of construction activities. In addition, disposition of human remains and any associated grave goods would be required to comply with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e). With compliance with regulatory requirements, the Project's and Alternative 2's impacts related to human remains would be less than significant. However, because construction of Alternative 3 would require less excavation than the Project, impacts to human remains would be less than the Project's less than significant impact.

(c) Energy

(i) Construction

Compared to the Project, Alternative 3 would reduce the overall extent and duration of construction activities, and include an approximate 51 percent reduction in grading and hauling activity. Construction energy consumption would result primarily from

transportation fuels (e.g., diesel and gasoline) used for haul trucks, heavy-duty construction equipment, and construction workers traveling to and from the Project Site. As with the Project, Alternative 3 is not expected to consume natural gas during construction but would use electricity for an on-site office as well as gasoline and diesel fuels associated with on- and off-road construction vehicles. Demand for electricity, diesel, and gasoline would be within the handling capacity of suppliers. Construction would utilize energy only for necessary on-site activities and to transport construction materials and demolition debris to and from the Project Site. The Project would not increase demand for electricity, diesel, or gasoline that would exceed available supply or distribution infrastructure capabilities or result in the broad construction of new energy facilities or expansion of existing facilities, or the construction of which could cause significant environmental effects. Since Alternative 3 would reduce construction activity, including hauling, compared to the Project, construction of Alternative 3, as with the Project, would not result in the wasteful, inefficient, and unnecessary consumption of energy. As such, similar to the Project, energy impacts would be less than significant. Under Alternative 3, the substantial decrease in grading would reduce the use of heavy equipment, such as loaders, graders, and haul trucks and would result in a reduction in diesel fuel use. In the overall balance, Alternative 3 would result in less energy demand during construction than the Project and, as such, impacts with respect to energy demand would be less than the Project's less than significant impact.

(ii) Operation

Alternative 3 would reduce occupancy of the Project Site by approximately 31 percent and parking by 60 percent. The Project's net annual average operational electricity demand would be approximately 21,093,357 kWh. The Project would result in a net reduction in natural gas demand of approximately 4,506,825 cubic feet inclusive of Project operation activities related to transportation sources (i.e., natural gas-fueled vehicles) as compared to existing conditions. However, since the current operations at the North Site would continue under Alternative 3, the net reduction in natural gas demand as compared to existing conditions would decrease under Alternative 3 as compared to the Project, but would still result in a net reduction in natural gas demand under Alternative 3 compared to existing conditions. Transportation for the Project would result in a net annual demand of 998,310 gallons of gasoline and the Project would generate a net reduction of 190,414 gallons in the existing demand for diesel fuel (see Table IV.C-2, *Summary of Annual Net New Energy Use During Project Operation – Project*, of this Draft EIR). However, since the current operations at the North Site would continue, diesel fuel usage would increase under Alternative 3 since existing diesel usage across the Project Site is currently 376,917 gallons, and diesel usage for the Project would be 189,305 gallons. Demand under either the Project or Alternative 3 would be within the handling capacity of suppliers. Alternative 3 would reduce the Project's VMT and demand for gasoline as compared to the Project as the existing cold storage facility usage of gasoline is lower than the residential, restaurant/retail uses that would be developed under the Project. Gasoline demand under either the Project or Alternative 3 would be within the handling capacity of suppliers. Operation of both the Project and Alternative 3 would comply with the CALGreen Code's

energy saving measures. In addition, the Project and Alternative 3 would comply with other energy-saving measures to achieve a minimum LEED Gold Certification, incorporate tree landscaping to provide solar shading, and use cool roof/pavement coatings to reduce the urban island effect. Other building features would include installation of energy-efficient heating, ventilation, and HVAC systems that utilize ozone-friendly refrigerants, and dedicated on-site recycling areas. The Project and Alternative 3 would both include water sustainability features, which would include, but not be limited to, low flow/efficient water fixtures, rainwater capture systems, drought-tolerant/California native plant species selection, landscape contouring to minimize precipitation runoff, irrigation system efficiency, smart irrigation systems (e.g., weather-based controls), and water-saving pool equipment. Operation of the Project and Alternative 3 would not result in the wasteful, inefficient, and unnecessary consumption of energy and, as such, energy impacts would be less than significant. However, because of the 60 percent reduction in on-site parking under Alternative 3 and smaller scale of development, impacts on overall energy demand would be less than the Project's less than significant impact.

(d) Geology and Soils

(i) Paleontological Resources

Alternative 3 would reduce the Project's construction activities, including eliminating the development of the North Site and reducing excavation depths for subterranean garages on the South and West Sites. Excavation for the Project would extend to approximately 64 bgs. Depths of excavation under Alternative 3 would be 35 feet on the South Site and 16 feet on the West Site. Under both the Project and Alternative 3, earthwork or excavation into native soils (beneath the upper fill soils) have the potential to encounter previously unknown buried paleontological resources. As with the Project, Alternative 3 would implement Mitigation Measures PALEO-MM-1 (retaining a Qualified Paleontologist), PALEO-MM-2 (providing paleontological monitoring), and PALEO-MM-3 (identifying and curating any found paleontological resources). As with the Project, potentially significant impacts under Alternative 3 would be reduced to a less than significant level with mitigation. Similar to the Project, with implementation of mitigation under Alternative 3, construction activities would not cause a substantial adverse impact to paleontological resources, and impacts would be less than significant. However, because construction of Alternative 3 would reduce the scale and depth excavation, impacts would be less than the Project's less than significant impact (with mitigation).

(e) Greenhouse Gas Emissions

Compared to the Project, Alternative 3 would result in an approximately 51 percent reduction in grading and hauling activity. Construction activities under either the Project or Alternative 3 would not conflict with SCAQMD air quality control measures that reduce GHG emissions as well as CARB's improved engine efficiency regulations and reduced idling times. As such, the Project and Alternative 3's construction GHG emissions would be less than significant. During operation, Alternative 3 would reduce parking by 60 percent across the Project Site and reduce the Project's VMT, therefore, substantially

reducing the Project's GHG emissions related to vehicle use. As with the Project, Alternative 3 would be constructed to LEED Gold Standards and, as with the Project would not conflict with the applicable GHG emission reduction plans and policies, including the CARB's Climate Change Scoping Plan, the 2020–2045 RTP/SCS, City's Green New Deal, and the Los Angeles Green Building Code. As with the Project, Alternative 3 would not result in significant GHG impacts. However, although the North Site would be left in its existing condition and the use would continue to emit GHG emissions, with reduced excavation, VMT, and scale of development (floor area), GHG impacts under Alternative 3 on balance would be similar to the Project's less than significant impacts.

(f) Land Use and Planning

Alternative 3 would not provide any new development on the North Site. Alternative 3, which would provide new uses on the South and West Sites only, would reduce the Project's overall floor area by approximately 30 percent. As with the Project, Alternative 3 would not conflict with land use plans and policies adopted to eliminate or mitigation significant environmental impacts, including SCAG's 2020-2045 RTP/SCS, the City of Los Angeles General Plan, the Central Industrial District Redevelopment Project, or the Adaptive Reuse Ordinance to develop a live/work and residential community in downtown Los Angeles or with policies of the Reuse Ordinance to revitalize and facilitate the development of a "24-hour city" and to encourage mixed commercial and residential uses that improve air quality and reduce vehicle trips and vehicle miles traveled by locating residents, jobs, hotels, and transit services near each other. However, with the reduction in scale and provided residential units, Alternative 3 would not facilitate the implementation of these policies to the same extent as under the Project. In addition, Alternative 3 would not implement the policies of the Housing Element, or the designated Greater Downtown Housing Incentive Area to increase housing opportunities in proximity to transit or in the Downtown; or the policies of the Redevelopment Plan for the Central Industrial Redevelopment Project to provide affordable residences and open space that are accessible to public transportation; or the policies of the 2020-2045 RTP/SCS to co-locate housing, jobs, and transit to the same extent as under the Project. Alternative 3 would retain the historic LACS Building consistent with the Adaptive Reuse Ordinance to retain and reuse the City's older buildings. However, because the physical effects of the removal of the LACS Building are evaluated and disclosed in full in Section IV.B, *Cultural Resources*, of this Draft EIR, as well as accounted for in other sections of the Draft EIR, and because Alternative 3 would be consistent with the Adaptive Reuse Ordinance to locate residents, jobs, hotels and transit services near each other, Alternative 3 would not result in a significant land use impact. Overall, as with the Project, Alternative 3 would not result in a substantial conflict with applicable land use plans, policies, or regulations and land use impacts. However, because Alternative 3 would not meet housing policies to the same extent as the Project, impacts would be greater than the Project's less than significant land use impacts.

(g) Noise and Vibration

(i) Noise

(a) Construction

Alternative 3 would reduce the Project's construction activities, including eliminating the development of the North Site and reducing excavation depths for subterranean garages on the South and West Sites. These changes would reduce the overall scale of construction, as well as grading and hauling activities. Alternative 3's construction program would reduce the Project's excavated soil from 651,000 CY to 321,364 CY (a 51 percent reduction). Construction noise levels under both the Project and Alternative 3 would be a function of the noise generated by construction equipment, the type and location of the equipment, the timing and duration of the noise-generating construction activities, and the relative distance to noise-sensitive receptors. Similar to the Project, Alternative 3 would implement Mitigation Measures NOI-MM-1 (Temporary Noise Barriers), NOI-MM-2 (location of compressors 100 feet from sensitive land uses) and NOI-MM-3 (construction equipment muffling and shielding devices), as applicable, to reduce on-site construction noise levels in excess of ambient noise standards. Even so, with implementation of all feasible mitigation measures, the Project and Alternative 3's maximum daily construction noise impacts would continue to exceed threshold levels at upper levels (stories) at residential receptor locations R2 through R6 and impacts would be significant and unavoidable. Because the scale of excavation and hauling activities would be reduced under Alternative 3 compared to the Project, the duration of high noise level construction activities (which include excavation and hauling) would be reduced.

Impacts between haul trucks and concrete foundation trucks are discussed separately because as stated in Section IV.G, *Noise*, of this Draft EIR, haul trucks are subject to the City-approved haul truck route as discussed in the section, whereas concrete trucks are not. Therefore, concrete trucks could travel along a variety of roadway segments and impacts from haul trucks are concrete trucks are discussed separately (see Section IV.G, *Noise*, of this Draft EIR for additional details about the specific routes for both haul trucks and concrete trucks for the Project and Project Alternatives).

For the Project, under the assumption that grading and excavation activities for the Upper South, Lower South, North and West sites would be occurring at the same time, there would be a total of 1,220 haul truck trips and 240 worker trips per day over an 8-hour timespan (equal to approximately 153 haul truck trips and 30 worker trips per hour). Under Alternative 3, the North Site would not be developed, eliminating the approximately 53 days of haul truck trips associated with grading/excavation of the North Site under the Project. Alternative 3 would develop the South Site with one subterranean garage, that would have two below-grade levels, instead of two subterranean garages with three below-grade levels as under the Project. The number of days with haul truck trips would be reduced from approximately 307 days to 214 days. Since Alternative 3 would not develop the North Site and would reduce the number of truck trips required to haul

excavated material and reduce the number of days with haul truck trips from the South and West Sites, Alternative 3 off-site roadway noise during the grading/excavation phase would be substantially reduced in duration as compared to the Project. Additionally, Alternative 3 would reduce the duration of overlapping noise scenarios that include grading/excavation of the South and West Sites and the overlapping scenarios associated with the North Site. The Project and Alternative 3 impacts related to off-site construction traffic noise would be less than significant and, because of the reduced number of days with truck trips, would be less under Alternative 3 than under the Project.

The peak period (i.e., daily number of truck trips) of construction with the highest number of construction trucks would occur during the foundations and concrete pour phases for the South site, building construction of buildings 3 through 9, architectural coating for the North site, and paving for the West site. For the Project foundation pours, there would be an estimated maximum of up to 2,016 concrete trucks into and out of the Project Site per day over a continuous 24-hour timespan (equal to 84 trips per hour). In addition, during these phases there would be a total of 360 haul trucks, 732 vendor trucks, and 3,458 worker trips per day over an 8-hour timespan (equal to approximately 45 haul trucks, 92 vendor trucks, and 433 worker trips per hour). The Project and Alternative 3's foundation concrete truck trips and worker vehicle trips would increase existing traffic noise levels by a maximum of 4.8 dBA CNEL along Central Avenue between 1st Street and 2nd Street, where noise-sensitive uses (e.g., residential uses) are located. The noise would also be increased by more than 3 dBA CNEL on roadway segments with noise-sensitive uses (e.g., residential uses) and include Central Avenue between 2nd Street and 3rd Street and 4th Street between Alameda Street and Hewitt Street. These increases represent an exceedance of the significance threshold and a potentially significant impact. Similar to the Project, Alternative 3 would implement Mitigation Measure NOI-MM-4 (prohibition of foundation concrete trucks on sections of Central Avenue near residential uses), which would eliminate the significant noise impact from concrete trucks. As with the Project, Alternative 3's noise impacts related to off-site construction concrete truck traffic would be reduced to less than significant (with mitigation). Alternative 3 would not develop the North Site, eliminating concrete pour truck trips from the North Site. Therefore, off-site construction haul truck, concrete pour truck, vendor truck and worker trip noise impacts for Alternative 3 would be less than the Project's less than significant impact (after mitigation).

(b) Operation

As with the Project, Alternative 3 would include ground level open space, paseos, and outdoor activities and events. The Project's special event noise and composite noise, which would be similar under Alternative 3, could exceed the ambient noise levels by 5 dBA at the receptor location R2. With similar open space and paseos as under the Project, Alternative 3 would feature similar types of outdoor special events as under the Project. As with the Project, Alternative 3 would implement Mitigation Measure NOI-MM-5 which would limit all amplified sound systems used for special events to sound levels equivalent to 90 dBA measured at a distance of 25 feet from the amplified speaker sound system.

With implementation of Mitigation Measure NOI-MM-5, noise from human conversation, applause, and amplified music during special events and combined operation of open spaces during daytime and evening hours would not exceed the significance threshold of a 5 dBA increase over ambient conditions. Additionally, with implementation of Mitigation Measure NOI-MM-5 under both the Project and Alternative 3, impacts related to on-site composite noise (mechanical equipment, loading dock/refuse collection activity, emergency generator, parking structure noise, and off-site traffic noise) would be less than significant. Overall, operational noise impacts under Alternative 3 would be similar to the Project's less than significant noise impacts (with mitigation).

(ii) Vibration

(a) Construction

Construction activities can generate varying degrees of ground vibration, depending on the construction procedures and the type of construction equipment used. The operation of construction equipment generates vibrations that travel through the ground and diminish in amplitude with distance from the source. With regard to potential building damage, the Project would generate groundborne construction vibration forces during building demolition and excavation/grading activities when heavy construction equipment, such as large bulldozers, drill rigs, and loaded trucks, would be used. Even though excavation and hauling for subterranean garage construction and concrete foundations for the North Site would be eliminated and depths of excavation and hauling for subterranean garages on the South and West Sites would be reduced, Alternative 3 would still require the construction of sizeable concrete foundations. Per Project Design Feature NOI-PDF-1, as with the Project, Alternative 3 would not require or allow the use of impact pile drivers. However, augured, drilled, or vibratory piles would be permitted. The estimated vibration velocity levels from all construction equipment would be below the building damage significance criteria at all off-site building structures except for Location V3 (commercial buildings to the south, west, and southwest of Project's West Site). Vibration levels at this location would experience vibration levels greater than the FTA Category III threshold for non-engineered timber and masonry buildings. As such, both the Project and Alternative 3 could result in the generation of excessive groundborne vibration. Vibration impacts associated with structural damage from on-site construction activities would still be potentially significant for Location V3 as Alternative 3 still requires grading from the West Site. With implementation of Mitigation Measure NOI-MM-6, which would limit use of equipment, such as large bulldozer, caisson drills and loaded trucks, that generate high levels of vibration to specified distances from vibration location V3, which are the commercial buildings to the south, west, and southwest of Project's West Site, and Mitigation Measure NOI-MM-7 which would require inspection of vibration receptor V3 and repair if any damage is found to have occurred even with implementation of Mitigation Measure NOI-MM-6. With implementation of these mitigation measures, potential structural vibration impacts on receptor V3 could be mitigated to a less than significant level for the Project and Alternative 3. However, because vibration receptor V3

includes privately-owned structures, inspections and repair pursuant to Mitigation Measure NOI-MM-7 would require the consent of the property owner, who may not agree. Thus, if damage to receptor V3 were to occur, and consent to repair is not given, impacts would be significant and unavoidable and similar for both the Project and Alternative 3.

In addition to the on-site construction equipment, heavy-duty construction trucks would generate groundborne vibration as they travel along the Project and Alternative 3's anticipated haul routes. Although the Project and Alternative 3 would not result in significant vibration impacts from construction trucks along haul routes, these impacts would be less under Alternative 3 than the Project. Under Alternative 3, there would be no soil hauling or concrete foundations trucks going to and from the North Site, therefore, no groundborne vibrations from trucks would occur from such trips. Alternative 3 would reduce the depths of excavation and amount of hauling for subterranean garages on the South and West Sites thereby reducing the number of trucks utilizing the haul routes during the grading/excavation phase. As such, groundborne vibration impacts along these haul routes would be reduced under Alternative 3. Alternative 3 (with the elimination of North Site development and reduction in depths of subterranean garages) would reduce the scale of development and overlapping vibration-generating activities. As such, Alternative 3's vibration impacts would be less than the Project's less than significant impact.

(b) Operation

As with the Project, Alternative 3 would include typical commercial-grade, stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce vibration at low levels that would not cause damage or annoyance impacts to Project buildings or on-site occupants and would not cause vibration impacts to the off-site environment. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the parking areas. Groundborne vibration generated by equipment or vehicle circulation would generate approximately up to 0.005 in/sec PPV (less than approximately 68 VdB) adjacent to the Project Site. The potential vibration levels from all operational sources at the closest existing sensitive receptor locations would be less than the significance threshold of 0.3 in/sec PPV for potential Category III building damage and less than the human annoyance threshold of 72 VdB. As such, under both the Project and Alternative 2, vibration impacts associated with human annoyance or building damage would be less than significant and similar.

(h) Population and Housing

(i) Construction

As with the Project, Alternative 3 would increase construction employment opportunities in the area, which could potentially result in increased permanent population and demand for housing in the vicinity of the Project Site. However, the relocation of workers is not highly likely because of the temporary nature of construction and dispersed character of job sites throughout the Los Angeles area. Workers are able to move from site to site without relocating their households. Construction workers travel to different construction

work sites upon completion of the particular phase or phases of construction requiring their specific specialties or skillsets. Construction of the Project or Alternative 3 would generate direct (construction jobs at the Project Site), indirect (employment supported by Project construction-related expenditures) and induced (wages paid to construction workers) growth. However, because there is an existing large pool of construction workers in the Los Angeles area, as with the Project, Alternative 3 would not result in substantial direct or indirect unplanned population growth. Population and housing impacts under Alternative 3 would be similar to the Project's less than significant impacts.

(ii) Operation

Alternative 3 would not provide any new development on the North Site. Alternative 3, which would provide new uses on the South and West Sites only, would reduce the Project's overall floor area by approximately 30 percent. A comparison of both the Project and Alternative 3's estimated housing and employment increases is provided in **Table V-7**, *Alternative 3 Population and Employment Growth Compared to the Project*, below. As shown in Table V-7, Alternative 3 would reduce the Project's total residents from 3,423 to 2,360. With the reduction in restaurant/retail use and office floor area, Alternative 3 would reduce the Project's total new employees from 2,108 to 1,397.

Alternative 3 would comprise approximately 0.9 percent of SCAG's year 2030 estimated increase of 117,517 City of Los Angeles households and the Project would comprise approximately 1.30 percent of SCAG's year 2030 estimated increase in households. Both would represent less than 0.5 percent of SCAG's estimated increase of 337,862 households for the City in 2045. This growth would contribute toward the attainment of City and regional goals and policies to encourage housing development in the greater Los Angeles area. The Project Site is located within a TPA and a SCAG-designated HQTA in which higher density growth is encouraged through the City's TPA and SCAG policies. The Project Site's accessibility to transit would help the City increase housing with these transit priority areas, and would contribute to the City's ability to meet its housing obligation under SCAG's RHNA. In addition, Alternative 3's and the Project's employment projections would represent 1.8 percent and 2.6 percent, respectively, of SCAG's year 2030 estimated increase of 79,337 employees in the City of Los Angeles.

TABLE V-7
ALTERNATIVE 3 POPULATION AND EMPLOYMENT GROWTH COMPARED TO THE PROJECT

Use	Number of Residents and Employees - Project[a]	Number of Residents and Employees - Alternative 3[b]
Total Residential Population	***3,423***	***2,360[c]***
Employees:		
Employees	2,044	1,397
Existing Industrial	69 to be removed	32 to remain

TABLE V-7
ALTERNATIVE 3 POPULATION AND EMPLOYMENT GROWTH COMPARED TO THE PROJECT

Use	Number of Residents and Employees - Project[a]	Number of Residents and Employees - Alternative 3[b]
Net Total Employees	***1,975***	***1,365***

NOTE(S):

[a] Employment for Project uses was taken from Section IV.H, *Population and Housing*, of this Draft EIR.

[b] Employees based on VMT Calculator results provided in Appendix M of this Draft EIR.

[c] Total residents are based 1,049 new residential units x 2.25.

SOURCE: ESA, 2023

Because neither the Project nor Alternative 3 would exceed SCAG growth projections impacts related to unplanned population growth under either the Project or Alternative 3 during operation would be less than significant. However, because Alternative 3 would result in less residential population and fewer new employees than the Project, impacts would be less than the Project's less than significant population and housing impacts.

(i) Public Services

(i) Fire Protection

(a) Construction

Construction activities under both the Project and Alternative 3 would potentially increase the demand for or physically impede fire protection and emergency medical services. During construction, the Project and Alternative 3 would implement Project Design Feature TRAF-PDF-1, to provide a City-reviewed CMP to minimize impacts to emergency vehicles during construction. Fire safety during construction would be further addressed by OSHA safety and health provisions. Compliance with construction site fire safety, such as on-site fire extinguishers, locked entrances, and employee fire safety and evacuation training, would reduce demand on fire protection services during construction. With such features, neither the Project nor Alternative 3 would increase fire services demand to the extent that the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. Therefore, impacts during construction with respect to fire protection under either the Project or Alternative 3 would be less than significant. However, because Alternative 3 would reduce the overall scale of construction activities, impacts would be less than the Project's less than significant impacts.

(b) Operation

As with the Project, Alternative 3's residential and employment occupants would increase demand on fire protection and emergency medical services. Both the Project and Alternative 3 would comply with all applicable OSHA, Building Code, Fire Code, and other

LAMC and LAFD requirements. The Project and Alternative 3 would also meet LAFD recommended fire prevention and protection features including building identification, emergency access lanes, building setbacks, and private roadway widths. Additionally, plans and specifications would be submitted to LAFD prior to the provision of necessary permits. Similar to the Project, Alternative 3 would implement Mitigation Measure PS-1-MM-1, which include water infrastructures upgrades, to address potential impacts on fire protection services due to a shortage in the existing fire hydrant flow. Furthermore, compliance with applicable codes and inclusion of LAFD recommendations, such as incorporation of sprinklers, would result in safe, modern buildings and would reduce demand for LAFD services. Overall, operation of the Project or Alternative 3 would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire station facilities with implementation of mitigation. Therefore, impacts to fire protection and emergency medical services during operation of either the Project or Alternative 3 would be less than significant (with mitigation). Because the overall service population (employees and residents) would be lower under Alternative 3 than the Project, impacts would be less than the Project's less than significant impacts (with mitigation) on fire protection services.

(ii) Police Protection

(a) Construction

Construction activities under either the Project or Alternative 3 would potentially increase demand for police protection services or physically impede police protection service access on the local roadway network. During construction, both the Project and Alternative 3 would implement Project Design Feature TRAF-PDF-1, a City-reviewed CMP, to ensure that emergency access would be maintained in the vicinity. Both the Project and Alternative 3 would also implement Project Design Feature POL-PDF-1 to limit access to construction areas, including private security, construction fencing, locked entry, and security lighting. Private security personnel would monitor vehicle and pedestrian access to the construction areas and patrol the Project Site. With the implementation of the CMP pursuant to Project Design Feature TRAF-PDF-1 and the security features in Project Design Feature POL-PDF-1, neither the Project nor Alternative 3 would increase police services demand to the extent that the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, construction impacts would be less than significant under both the Project and Alternative 3. However, because Alternative 3 would reduce the overall scale and duration of construction activities, impacts would be less than the Project's less than significant impact on police services.

(b) Operation

The increase in residents under the Project and Alternative 3 would increase the Central Community Police Station's resident to officer ratio. The Project would increase residential population from approximately 40,000 to 43,423. Alternative 3 would increase the existing residential population in the LAPD Central Community Station service area from 40,000 to

42,360. With 308 sworn officers in the Central Community Station, existing service ratios are 129.8 residents per officer. Under Alternative 3, the resident to officer ratio would increase from 129.8:1 to 140.7:1[13] and under the Project the resident to officer ratio would increase from 129.8:1 to 141.1. Thus, no material difference to the resident to officer ration would occur between the Project and Alternative 3. Under both the Project and Alternative 3, this increase would still be substantially below the Citywide average of one officer per 423 residents. In addition, both the Project and Alternative 3 would implement Project Design Feature POL-PDF-2, which would include a security program, such controlled access, camera surveillance, and on-site security personnel that would reduce demand on police services. Accordingly, the need for expanded police facilities to accommodate increased demand is not anticipated. Moreover, LAPD correspondence stated that the Project would not result in the need for new or altered police facilities.[14] Given the small increase in the ratio of residents to officers between the Project and Alternative 3, and that both the Project and Alternative 3 would implement Project Design Feature POL-PDF-2, the LAPD's determination would be equally applicable to Alternative 3. Thus, neither the Project nor Alternative 3 would result in substantial adverse physical impacts associated with the provision of a new or physically altered police facility, the construction of which would cause significant environmental impacts. Impacts relative to police services would be less than significant under both the Project and Alternative 3. However, because Alternative 3 would reduce the Project's residential population increase, impacts to police services would be less than the Project's less than significant impact.

(iii) Schools

(a) Construction

Construction under either the Project or Alternative 3 would generate employees who are anticipated to be hired from a mobile regional construction work force. Given the mobility and temporary duration of work at a particular site, construction employees not residing locally would not be expected to relocate residences (and, therefore, generate a new student population). Therefore, construction of either the Project or Alternative 3 would not result in a notable increase in the resident population or new students needing to attend local schools. With the nearest public school located approximately 0.6 mile southwest of the Project, no public schools would be physically affected by construction activities at the Project Site. Impacts on schools under Alternative 3 would be similar to the Project's less than significant impacts.

(b) Operation

As shown in **Table V-8**, *Estimated Number of Students Generated by Alternative 3*, Alternative 3 would generate a total net increase of 638 students. In comparison, the Project would generate a net increase of 940 students. Similar to the Project, under

13 43,323 residents ÷ 309 sworn officers = one officer per 140.7 residents.

14 LAPD, Central Division, Officer Alfonso Velasco, letter to Alan Como, Los Angeles Planning Department, May 24, 2022.

Alternative 3, the 9th Street Elementary School and Hollenbeck Middle School would have a potential shortage in seats with Alternative 3, while the Belmont Zone of Choice schools would continue to have a seating overage.

TABLE V-8
ESTIMATED NUMBER OF STUDENTS GENERATED BY ALTERNATIVE 3

Land Use	Use[a,b]	Generation Factors	Elementary School Students	Middle School Students	High School Students	Total[c]
Proposed Uses						
Residential Multi-Family	1,049 units	Elm: 0.1953/unit MS:0.0538/unit HS: 0.1071/unit	205	56	112	373
Retail/Restaurant	84,167 sf	0.467 students/ksf	22	6	11	39
Office	282,005 sf	0.826/ksf	128	35	70	233
Total Students Generated by Proposed Uses			*355*	*97*	*193*	*645*
Existing Uses						
North Site Cold Storage/ Warehouse	167,596 sf	0.010 students/ksf	-	-	-	-
South Site Office	2,871 sf	0.826/ksf	2	1	1	4
South Site Cold Storage/ Warehouse	190,267 sf	0.010 students/ksf	2	0	1	3
Total Students Generated by Existing Uses			*4*	*1*	*2*	*7*
Net Total (Proposed Less Existing)			**351**	**96**	**191**	**638**

NOTE(S): ksf= 1,000 square feet

[a] Student generation rates for residential uses are based on Table 3 of the LAUSD Developer Fee Justification Study, March 2022.

[b] Student generation for the retail/ restaurant uses is based on the Neighborhood Shopping Center student generation rates; student generation for offices is based on Standard Commercial Offices; and student generation for hotel uses is based on Lodging rates as provided in Table 15 of the LAUSD 2022 Developer Fee Justification Study, March 2022. Since the Developer Fee Justification Study does not specify grade levels for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 55 percent elementary school, 15 percent middle school, and 30 percent high school). For the existing dry storage and freezer/cooler uses, the Rental Self Storage factor was used.

[c] Input totals for elementary, middle and high schools have been rounded based on generation factors to equal total number of students.

SOURCE: ESA, 2023.

Under either the Project or Alternative 3, pursuant to SB 50, the Project Applicant would be required to pay development fees LAUSD prior to issuance of building permits. Under Government Code section 65995 and 65996, the payment of these fees is considered full and complete mitigation of school impacts. Therefore, neither the Project nor Alternative 3 would result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities and impacts would be less than significant. However,

because Alternative 3 would result in a lower generation of students, operational impacts on schools would be less under Alternative 3 than the Project's less than significant impact.

(iv) Parks and Recreation

(a) Construction

Construction activities under both the Project and Alternative 3 have the potential to affect parks and recreational facilities. A small number of construction workers may visit public parks to eat lunch or for recreational activity after a workday. However, because construction workers are temporary employees with high turnover during various phases of construction, the use of public parks would be uncommon and short-term. In addition, neither the Project nor Alternative 3 would be developed adjacent to or in proximity to a public park and would not directly impact public park facilities. Construction of either the Project or Alternative 3 would not include or require the construction, alteration, or expansion of recreational facilities that might have an adverse physical effect on the environment. Therefore, Alternative 3 impacts associated with parks and recreational facilities would be similar to the Project's less than significant impacts.

(b) Operation

Alternative 3 would reduce the Project's estimated residential population from 3,423 to 2,360. Both the Project and Alternative 3 would provide common and private open space consistent with LAMC requirements. However, open space under either the Project or Alternative 3 would not meet the recommended 2.0 acres of neighborhood recreation sites per 1,000 persons (6.85 acres for the Project's anticipated population increases of 3,423 residents and 4.7 acres for Alternative 3's population increase of 2,360 residents) and 2.0 acres of community recreational sites per 1,000 persons (6.85 acres for the Project and 4.7 acres for Alternative 2) in the amended PRP. However, the PRP parkland guidelines are Citywide goals and do not constitute requirements for individual development projects. As with the Project, Alternative 3 would provide a total of 81,146 sf of publicly-accessible open space on the South Site. Population increases under both the Project and Alternative 3 would increase demand for recreational facilities. The Project and Alternative 3's publicly-accessible open space and private, common recreational amenities would fulfill some of the Project and Alternative 3's demand on RAP facilities. In addition, LAMC Section 21.10.3 sets a per-capita construction tax of $200 per new eligible residential unit for City acquisition of new park space, with the set-aside or dedication of parkland and recreational facilities and/or payment of in-lieu fees under LAMC Section 12.33 H credited against the payment of this tax. With the required payment of in-lieu fees, both the Project and Alternative 3 would meet LAMC open space and parkland requirements and impacts would be less than significant. Asus such, similar to the Project, Alternative 3 would not result in significant impacts associated with the construction of new or physically altered government facilities. However, since Alternative 3 would generate less residential population and therefore result in a lower demand for parkland than under the Project, impacts on parks and recreational facilities would be less than the Project's less than significant impacts.

(v) Libraries

(a) Construction

Construction of both the Project and Alternative 3 would introduce construction workers to the area. Workers traveling to or from work, or during a work break, may make use of a library in the area. However, such library use would be incidental and typical of workers throughout the region and would not result in a notable increase in libraries in the area. In addition, no libraries are located in the immediate vicinity that would be physically affected by construction activities at the Project Site. There would be no Project-related construction staging or road closures at or adjacent to the Little Tokyo Branch Library, the nearest library to the Project Site. Therefore, construction activities would not adversely affect the operations of nearby libraries. As such, construction activities would not exceed the capacity of local libraries that would result in the need for new or altered facilities. Alternative 3's impacts on library facilities during construction would be similar to the Project's less than significant impacts.

(b) Operation

The increase in residents and employees at the Project Site would increase demand for library services in the Project area. However, the LAPL has stated there are no planned improvements to add capacity to the two nearest community libraries (the Little Tokyo and the Benjamin Franklin branches). LAPL has determined through its Facilities Plan that a new branch library would not be considered until the service population for a particular branch library has reached 90,000 in order to maintain acceptable service ratios or objectives. The Project would generate 3,423 new residents and 1,975 net new employees and Alternative 3 would generate 2,360 new residents and 1,365 net new employees. Since the Little Tokyo Branch Library currently has a service population of 45,796 and the Benjamin Franklin Branch Library currently has a service population of 40,319, neither branch library serving the Project Site would exceed the LAPL's criterion of 90,000 in service population with the addition of either the Project or Alternative 3. Moreover, both the Project and Alternative 3 would generate revenue for the City's General Fund that would help offset the increase in demand for library services. As such, operation of either the Project or Alternative 3 would not create the need for new or physically altered library facilities, the construction of which would result in substantial adverse physical environmental impacts. Impacts to libraries would be less than significant under the Project and Alternative 3. However, since Alternative 3 would generate less residential population and therefore less demand for libraries than under the Project, impacts would be less than the Project's less than significant impact.

(j) Transportation

(i) Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities

As with the Project, Alternative 3 would not conflict with the applicable policies of the City's Mobility Plan 2035, Bicycle Parking Ordinance, TDM Ordinance, Central City Community Plan, Vision Zero, Plan for a Healthy Los Angeles, and Citywide Design Guidelines. Consistent with the Mobility Plan 2035, both the Project and Alternative 3 would be pedestrian- oriented and include a mix of uses that support alternative transportation use near transit facilities. The Project and Alternative 3 would include street and sidewalk dedications to widen sidewalks, provide carpool/vanpool loading areas, and bicycle parking. The Project and Alternative 3 would support healthy lifestyles by locating jobs adjacent and near transit and both, through these measures, would support reductions in VMT. Neither the Project nor Alternative 3 would conflict with programs or policies addressing transit, roadway, bicycle and pedestrian facilities, transportation impacts in this regard would be less than significant. However, the continuation of industrial uses and delivery trucks entering and exiting the North Site on 4th Street would have a greater potential to impact pedestrian and bicycle traffic along 4th Street than under the Project, impacts with respect to conflict with programs would be greater than the Project's less than significant impact in this regard.

(ii) Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)

The VMT for employees and residents under Alternative 3 was calculated utilizing the City of Los Angeles VMT Calculator and accounting for TDM measures similar to the Project TDM strategies, such as reduced parking, bicycle parking, and shared mobility; and other factors, such as home-based workspace.[15] As shown in Appendix M of this Draft EIR, according to the VMT Calculator, Alternative 3 would generate 8,781 daily trips and 57,537 daily VMT. Alternative 3's per capita household VMT would be 3.6 and per capita employee VMT would be 6.4. As such, Alternative 3 would reduce the Project's 14,405 daily trips, 94,270 daily VMT, household VMT per capita of 3.9 and VMT per employee of 6.5. As with the Project, Alternative 3 would not result in VMT impacts that exceed the Central APC threshold per household of 6.0 or Central APC employee VMT threshold of 7.6. Through the MOU process in preparation of the TA, [16] LADOT agreed that the proposed retail and restaurant uses would be locally serving and, as such, neither the Project nor Alternative 3 would be a regional-serving retail use. Impacts regarding

15 See Appendix M, Alternatives VMT Information, of this Draft EIR, prepared by Gibson Transportation Consulting, Inc., May 2023.

16 The base assumptions and technical methodologies were identified as part of the study approach and were outlined in the MOU that was reviewed and approved by LADOT in December 2021. The MOU is provided in Appendix A of the TA provided in Appendix J of this Draft EIR.

VMT under both the Project and Alternative 3 would be consistent with the LADOT's TAG and, thus, consistent with CEQA Guidelines Section 15064.3(b). Therefore, VMT impacts under the Project and Alternative 3 would be less than significant. However, because Alternative 3 would have a lower household VMT per capita and VMT per employee compared to the Project, Alternative 2's impacts would be less than the Project's less than significant VMT impacts.

(iii) Geometric Design Hazards

Alternative 3 would reduce the Project's daily vehicle trips due to reduced parking and along with its reduction in density. The Project is projected to add 25 or more trips at nine study freeway off-ramps during the morning and afternoon peak hours and queue lengths would exceed 50 feet during one or more of the peak hours at three of the study off-ramps. While queue lengths would exceed 50 feet during the a.m. or p.m. peak hours, queues at the off-ramps would not extend onto the freeway mainline and, as such, the Project would not result in a safety impact. Because Alternative 3 would reduce daily vehicle trips compared to the Project, Alternative 3 would also not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses and impacts would be less than significant. Because the North Site is separated from the South and West Sites by wide roadways, and sidewalks along 4th street would be widened under both the Project and Alternative 3, retention of existing industrial uses on the North Site would not block pedestrians, driveways or turns into and from the Project Site. Thus, the retention of the existing North Site industrial use would not pose a geometric design hazard. However, with the reduction in vehicle trips under Alternative 3, impacts related to design hazards (freeway safety) would be less than the Project's less than significant impacts.

(k) Tribal Cultural Resources

Alternative 3 would reduce the extent of Project's construction activities, including eliminating the development of the North Site and reducing excavation depths for subterranean garages on the South and West Sites. Excavation for the Project would extend to approximately 57 feet bgs for building foundations to approximately 64 bgs for elevator pits. Depths of excavation under Alternative 3 would be 35 feet on the South Site and 16 feet on the West Site. Under both the Project and Alternative 3, excavation into native soils (beneath the upper fills soils) has the potential to encounter previously undiscovered subsurface tribal cultural resources. Both the Project and Alternative 3 would implement Mitigation MeasuresTCR-MM-1 (Native American Monitor), TCR-MM-2 (monitoring logs), and TCR-MM-3 (halting of construction activity in the event that a prehistoric/Native American resource is unearthed). With implementation of the mitigation measures, construction activities would not cause a substantial adverse impact to tribal cultural resources, and impacts would be less than significant under both the Project and Alternative 3. However, because construction of Alternative 3 would reduce the Project's depth and extent of excavation across the Project Site, impacts to tribal cultural resources would be less than the Project's less than significant impacts (with mitigation).

(l) Utilities and Service Systems – Water Supply, Wastewater, Solid Waste, Electricity, and Natural Gas

(i) Water Supply

(a) Construction

Construction activities under the Project or Alternative 3 would result in an intermittent demand for water, including dust control, cleaning of equipment, removal and re-compaction, and other related activities. Water use for construction of both the Project and Alternative 3 would range from 5,000 to 10,000 gpd.[17] The existing water infrastructure has adequate capacity for existing site conditions (estimated to be 12,700 gpd) and, as such, would have adequate capacity for construction activities. New water distribution lines would be constructed onsite, with minor off-site work associated with connections to the public water main. Impacts on water supply and infrastructure during construction would be less than significant and similar under Alternative 3 and the Project.

(b) Operation

The Project Site does not currently have adequate fire flow to serve either the Project or Alternative 3 or demonstrate compliance with Section 57.507.3 of the LAMC. This potentially significant impact would be reduced to a less than significant level with the implementation of Mitigation Measure PS-MM-1, which provides upgrades to the water infrastructure serving the Project Site. Both the Project and Alternative 3 would increase long-term water demand for consumption, operational uses, maintenance, and other activities on the Project Site. Domestic water demand for the Project, subtracting water conservation features, is estimated to be approximately 415,531 gpd or 465 AFY (see Table IV.L.1-7, *Estimated Project Water Demand*, in Section IV.L.1, *Utilities and Service Systems - Water Supply,* of this Draft EIR). Of this total, the Project's hotel rooms would account for 7,928 gpd and the hotel bar would account for 1,094 gpd, for a total of 9,022 gpd. The hotel would not be included as part of Alternative 3. Also, under the Project, the 1,521 residential units would have a water demand of 141,769 gpd. This equates to 93.2 gpd per unit. Thus, under Alternative 3, at 93.2 gpd per unit, 1,049 residential units would generate 97,767 gpd. Accordingly, the residential units under Alternative 3 would generate 44,002 gpd less than the Project. Utilizing the base water demand factors in Table IV.L.1-7, *Estimated Project Water Demand*, of this Draft EIR, Alternative 3's retail uses would result in a demand of 841 gpd (291 gpd less than the Project); the office uses would result in a demand of 33,840 gpd (15,494 gpd less than the Project); and the restaurant uses with 3,366 seats would result in a demand of 100,980 gpd (35,618 gpd less than the Project). Collectively, Alternative 3's retail, office and restaurant uses would result in a decrease of the Project's base demand by 51,403 gpd for these uses. Based on these reductions without accounting for minor savings resulting from compliance with required regulations, while assuming other components of the Project as shown in Table

[17] KPFF Consulting Engineers, *Infrastructure Report,* p. 12, February 2023.

IV.L.1-7 remain generally similar to the Project, Alternative 3's new uses would result in a water demand of roughly 311,104 gpd.[18]

According to the WSA prepared for the Project, the estimated existing water demand for the entire Project Site is approximately 12,700 gpd.[19] For purposes of this analysis, the WSA estimated the North Site accounts for 45 percent of the existing overall demand, or 5,715 gpd. Thus, Alternative 3 would have an overall water demand on the order of 316,819 gpd with the North Site remaining.

As with the Project, Alternative 3 would be consistent with the demographic projections for the City in the 2020-2045 SCAG RTP/SCS and, as such, the LADWP has sufficient water supplies as projected in its latest UWMP to serve the Project and Alternative 3 and the reasonably foreseeable future development during normal, dry, and multiple-dry years. Impacts regarding water supply during operation would be less than significant under the Project and Alternative 3. However, because Alternative 3 would have a lower water demand compared to the Project, Alternative 3's impacts would be less than the Project's less than significant water impacts.

(ii) Wastewater

(a) Construction

During construction of either the Project or Alternative 3, a negligible amount of wastewater would be produced by construction workers because it is anticipated that portable toilets that would dispose of the wastewater off-site would be provided. As with the Project, construction of Alternative 3 would include the construction of all necessary on- and off-site sewer pipe improvements and connections to adequately connect to the City's existing sewer system. Construction of the wastewater system would occur onsite and in the immediate vicinity. All construction impacts would be temporary and would cease once the installation is complete. Based on these factors, similar to the Project, Alternative 3's construction activity would not require or result in the relocation or construction of new or expanded wastewater treatment facilities. Alternative 3's impacts related to wastewater infrastructure and treatment during construction would be similar to the Project's less than significant impact.

(b) Operation

Wastewater generation for the Project was estimated at 588,278 gpd (see Table IV.L.2-1, Wastewater Generation during Project Operation, of this Draft EIR). Of this total, the Project's hotel rooms would account for 8,160 gpd and the hotel bar would account for

[18] Per Table IV.L.1-7, *Estimated Project Water Demand*, in Section IV.L.1, *Utilities and Service Systems - Water Supply, of this Draft EIR*, the Project's net water demand would be 415,531 gpd. Thus, 415,531 – (9,022 + 44,002 + 51,403) = 311,104 gpd.

[19] LADWP, Water Supply Assessment, Fourth and Central Project, Table 1 – Fourth and Central Project Calculated Total Additional Water Demand, September 2022.

555 gpd, for a total of 8,715 gpd. The hotel would not be included as part of Alternative 3. Also, under the Project, the 1,521 residential units would have a total wastewater demand of 168,330 gpd. This equates to 110 gpd per unit. Thus, under Alternative 3, at 110 gpd per unit, 1,049 residential units would generate 115,390 gpd. Accordingly, the residential units under Alternative 3 would generate 52,940 less gpd compared to the Project. Utilizing the wastewater generation factors in Table IV.L.2-1, Alternative 3's retail uses (33,667 sf) would result in a wastewater generation of 842 gpd (290 gpd less than the Project); the office uses (282,005 sf) would result in a generation of 47,941 gpd (20,691 gpd less than the Project); and the restaurant uses with 3,366 seats would result in a wastewater generation of 100,980 gpd (35,670 gpd less than the Project) (see Table IV.L.2-1, *Wastewater Generation during Project Operation,* of this Draft EIR). Collectively, Alternative 3's retail, office and restaurant uses would result in a decrease of the Project's wastewater generation by 56,651 gpd for these uses. Based on these reductions, while assuming other components of the Project as shown in Table IV.L.2-1 remain generally similar to the Project, Alternative 3's new uses would result in a wastewater generation of roughly 458,891 gpd.[20]

Under Alternative 3, the North Site would remain in operation. With 167,596 sf of existing cold storage facilities located on the North Site, the North Site generated 5,028 gpd of wastewater, based on a generation rate of 30 gpd/1,000 sf. Thus, Alternative 3 would have an overall wastewater generation of approximately 463,919 gpd with the North Site included. Since the Project would generate 588,278 gpd, this represents a reduction of 124,359 gpd compared to the Project.

Since the sewer main lines serving the Project Site have adequate capacity to accommodate the Project, they would have adequate capacity to accommodate Alternative 3 which would also be served by the existing sewer main lines. Future detailed gauging and evaluation will be needed as part of the standard permit process to identify a specific sewer connection point and confirm the sewer capacity near the time of Project or Alternative 3 development. Although not anticipated, if the public sewer lacks sufficient capacity, then the Project or Alternative 3 would be required to upgrade sewer lines to a point in the sewer system with sufficient capacity. Ultimately, sewage flow under the Project or Alternative 3 would be conveyed to the HWRP, which has sufficient capacity for the Project and Alternative 3. Sewage flows under the Project or Alternative 3 would represent only a small fraction of the remaining available capacity of 175 mgd at the HWRP. As with the Project, Alternative 3 would not require or result in the relocation or construction of new or expanded wastewater treatment facilities and impacts on wastewater infrastructure and treatment capacity would be less than significant. However, because Alternative 3 would have a lower wastewater generation compared to the Project, Alternative 3's impacts would be less than the Project's less than significant wastewater impacts.

[20] Per Table IV.L.2-1, *Wastewater Generation during Project Operation,* in Section IV.L.2, *Utilities and Service Systems – Wastewater*, of this Draft EIR, the Project's net wastewater generation would be 577,197 gpd. Thus, 577,197 – (8,715 + 52,940 + 56,651) = 458,891 gpd.

(iii) Solid Waste

(a) Construction

The construction of the Project would include the demolition of approximately 18,896 cubic yards (3,779 tons) of existing building materials and approximately 2,175 cubic yards of existing hardscape materials. By preserving the North Site, the amount of demolition would be reduced by approximately 45 percent to approximately 2,078 tons. Alternative 3 would reduce the total construction site from 7.65 acres to 6.3 acres and, thus, would reduce the Project's hardscape demolition waste of 2,610 tons by approximately 17.6 percent to 2,150 tons. The construction of the Project's total 2,318,534 sf floor area would generate 137 tons of C&D waste, which would be reduced by approximately 30 percent to 96 tons under Alternative 3's reduced building floor area. With the 51 percent reduction in excavated materials from 651,000 CY under the Project to 321,365 CY under Alternative 3, the volume of excavated and potentially landfilled soils under Alternative 3 would be reduced.

As with the Project, C&D waste from Alternative 3 would represent a small fraction of the available capacity of the County's Azusa Land Reclamation landfill or one of the inert debris engineered fill operations in Los Angeles County. Given that the remaining disposal capacity of the Azusa Land Reclamation Facility is approximately 51.71 million cubic yards (64.64 million tons),[21] Alternative 3's and the Project's estimated total solid waste disposal needed during construction after 75 percent diversion (including soils) represent a fraction of one percent of the estimated remaining capacity at the Azusa Facility. Similar to the Project, Alternative 3 would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, impacts would be less than significant under the Project and Alternative 3. However, because Alternative 3 would dispose a lower volume of C&D waste materials and soils, impacts would be less than the Project's less than significant solid waste impact.

(b) Operation

Alternative 3's estimated solid waste generation is illustrated in **Table V-9**, *Alternative 3 Operational Solid Waste Generation*, below. As shown in Table V-9, Alternative 3 would generate approximately 1,126 net tons of solid waste per year or 6,172 pounds per day, taking into account a diversion rate of 65 percent.[22] This total accounts for the removal of the South Site solid waste generation. With required diversion, the Project would produce 1,779 net tons of solid waste per year or 9,748 pounds per day. The County expects that approximately 140,074,607 additional tons of the remaining 142.67-million-ton capacity would be used in 2030, the earliest anticipated year of Project buildout.[23] Alternative 3's and the Project's estimated annual solid waste generation would represent

21 County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, page 36.

22 County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, page 41.

23 County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, Appendix E-2, Table 8, Los Angeles County Solid Waste Disposal Capacity Need Projection.

a fraction of one percent of the remaining capacity in 2030. As with the Project, Alternative 3's solid waste generation would be accommodated by landfills with adequate capacity and, as such, impacts would be less than significant. However, since Alternative 3 would generate less solid waste requiring landfill disposal, impacts would be less than the Project's less than significant impacts.

TABLE V-9
ALTERNATIVE 3 OPERATIONAL SOLID WASTE GENERATION

Land Use	Quantity[a]	Daily Generation Factor[b]	Solid Waste Generation (tons/year)	Solid Waste Generation (lbs/day)
Proposed New Uses				
Residential	1,049 units	0.87 tons/unit/year	913	5,002
Commercial	84,167 sf rest/retail (269)	1.96 tons/emp/year	527	2,888
Office	282,005 sf (1,128 emp)	2.02 tons/emp/year	2,279	12,488
Hotel	-	-	-	-
Proposed Subtotal (pre-diversion)	**—**	**—**	**3,719**	**20,378**
Proposed Total (post-diversion)[e]	**—**	**—**	**1,301**	**7,132**
Existing Uses – South Site (Pre-Diversion)	193,138	1.42 lbs/100/sf/day	500	2,742
Existing Uses – South Site (post-diversion)			**(175)**	**(960)**
Alternative 3 (post-diversion) Net Increase[c]			**1,126**	**6,172**

NOTE(S):

[a] Number of employees per use are based on factors in Table IV.L.3-3, Estimated Operational Solid Waste Generation, in Section IV.L.3, *Utilities and Service Systems – Solid Waste*, of this Draft EIR.

[b] Generation factors are provided by CalRecycle's Disposal and Diversion Rates for Business Groups, https://www2.calrecycle.ca.gov/wastecharacterization/businessgrouprates. Accessed February 24, 2022.

[c] Based on an anticipated diversion rate of 65 percent for operations, which was assumed in the ColWMP 2020 Annual Report. This is conservative as the actual diversion is likely to be higher with increasing compliance with the State's recycling goal of 75 percent.

SOURCE: ESA, 2023.

(iv) Electric Power

(a) Construction

As with the Project, Alternative 3's construction activities would require limited and minor quantities of electricity for watering, lighting, power tools and other support equipment. As existing power lines are located in the vicinity of the Project Site, temporary power poles would be installed to provide electricity during construction. Existing off-site infrastructure would not have to be expanded or newly developed to provide electrical service to the Project Site during construction or demolition. With the reduction in new floor area, under Alternative 3 new construction would be approximately 30 percent less than under the Project. Electricity demand during the construction of the Project would be approximately 11 percent of the existing electricity usage at the Project Site. With the reduction in floor area, Alternative 3 would reduce the Project's electricity demand during construction. Therefore, both the Project and Alternative 3 would be within the supply and infrastructure capabilities of LADWP[24] and, as such, construction of either the Project or Alternative 3 would not result in an increase in demand for electricity that would exceed available supply or distribution infrastructure. Neither the Project nor Alternative 3 would require the construction of new energy facilities or expansion of existing facilities. With regard to existing electrical distribution lines, the Project Applicant would be required to coordinate electrical infrastructure removals or relocations with LADWP and comply with site-specific requirements set forth by LADWP, which would ensure that service disruptions, if any, are minimized. Similar to the Project, Alternative 3 would not require the construction of new energy facilities or the expansion of existing facilities. Impacts related to construction electricity demand under Alternative 3 would be similar to the Project's less than significant construction-related electric power impacts.

(b) Operation

Alternative 3 would reduce the Project's overall 2,318,534 sf of floor area and occupancy by approximately 30 percent. The Project's hotel use would not be developed, but Alternative 3 would include an otherwise similar mix of uses. The Project's annual net increase in operational electricity usage would be approximately 21,093,357 kWh. With the 30 percent reduction in Alternative 3's floor area, including residential, office, and restaurant/retail uses, the Project's demand would be respectively reduced. The increase in annual electricity under the Project and Alternative 3 would represent a fraction of one percent of LADWP's projected sales in 2030 and would be within LADWP's projected electricity supplies. During peak conditions, both the Project and Alternative 3 would represent approximately less than 0.1 percent of the LADWP estimated peak load, which is within the total load growth forecast for the City. Similar to the Project, the operational electricity services and supply and infrastructure for Alternative 3 would not require the construction of new energy facilities or the expansion of existing facilities. Impacts related

[24] The percentage is derived by taking the annual average amount of electricity usage during the construction period (732,476 kWh) and dividing that number by the annual amount of existing electricity usage (6,652,637 kWh) to arrive at 11 percent.

to demand for electricity services would be less than significant under both the Project and Alternative 3. However, because Alternative 3 would result in lower demand for electricity services, impacts would be less than the Project's less than significant impact.

(v) Natural Gas

(a) Construction

Building energy and appliances for either the Project or Alternative 3 would be provided by all-electric sources, and construction activities at the Project Site would not require or involve installation of new natural gas connections. Therefore, construction of either the Project or Alternative 3 would not increase demand for, or interrupt the delivery of, natural gas that would affect supply or distribution. Neither the Project nor Alternative 3 would result in the construction of new energy facilities or expansion of existing facilities. Both the Project and Alternative 3 would reduce the consumption of natural gas at the Project Site during construction due to the removal of existing on-site uses. Impacts related to the use of natural gas during construction for Alternative 3 would be similar to the Project's less than significant impact.

(b) Operation

The Project and Alternative 3 would utilize electricity as an energy source instead of natural gas. Based on the Project or Alternative 3's non-consumption of natural gas neither the Project nor Alternative 3 would have a significant impact on natural gas. As such, impacts with respect to natural gas would be similar and less than significant under the Project and Alternative 3.

(3) Relationship of the Alternative to Project Objectives

Alternative 3 would not develop the North Site. In addition, the overall floor area and occupancy would be reduced by approximately 30 percent. The Project's hotel would not be constructed. However, the Project's Building 2, a 44-story mixed-use high-rise formerly located on the North Site, would be constructed on the South Site. Alternative 3 would reduce the overall scale of the Project and meet the intent of the Project with respect to diverse uses, jobs, housing, open space, and upgrade of the Project Site. However, because of the reduction in residential units and elimination of new uses on the North Site, Alternative 3 would substantially, but to a lesser extent than under the Project, meet the Objectives of the Project listed below.

Objective 1: Provide a mixed-use development that introduces an array of new residential, office, hotel, and commercial opportunities to the Central City neighborhood.

Objective 2: Create a significant new source of much-needed housing by providing a diverse range of housing options that includes a mix of different unit types at varying sizes and affordability levels.

Objective 4: Provide a variety of new job-producing uses on the Project Site to further strengthen the commercial viability of the Central City neighborhood.

Objective 8: Support local and regional mobility objectives and reduce vehicle miles traveled by redeveloping an infill site near a growing hub of urban activity with a mix of uses in proximity to major public transit infrastructure.

Objective 9: Construct a sustainably designed project that is consistent with smart growth principles and promotes resource conservation by providing LEED-Gold equivalent or better buildings and placing additional housing and job opportunities within proximity to transit.

Objective 10: Develop an economically feasible project that supports and grows the City's economic base through construction of a development that attracts a diverse range of residents, commercial tenants and visitors, which will generate local tax revenue and create construction and permanent jobs.

The retention of the industrial uses at the North Site and elimination of the 4th Street Plaza at the north side of 4th Street, the loss of other open space amenities on the North Site, and the active loading docks and trucks moving in and out of the North Site directly across from the South Site's section of the 4th Street Plaza would interfere with the visual and pedestrian connection between the North and South Sites. Such visual and safety contrast could impact the pedestrian experience along 4th Street. Alternative 4 would also remove the North Site's 7,611 sf plaza, which would have had direct access from 4th Street to restaurants and retail shops on the North Site. In addition, the loss of the north section of the 4th Street Plaza would remove the cohesive visual connection between landscaped parks along both sides of 4th Street (under the Project) and remove the proposed bicycle mobility hub that connected the whole Project Site to the 4th Street bike paths. In addition, the interfacing older, industrial uses would potentially reduce pedestrian use of both sides of 4th Street and, with the retention of the industrial use, would not blend the whole project into the existing urban environment to the same extent as the Project. As such, Alternative 3 would only partially meet the following objectives.

Objective 3: Improve the physical identity of the Central City Community Plan area by redeveloping an underutilized industrial site with an integrated mix of uses to promote revitalization of the surrounding urban context.

Objective 5: Design a project that embodies diversity in height, size and architecture that blends the development into the existing urban fabric.

Objective 6: Enhance the overall pedestrian experience in the Central City area by creating new pedestrian connections and expansive publicly-accessible open spaces to transform the Project Site into a walkable part of the neighborhood.

Objective 7: Create a pedestrian friendly project by providing a variety of ground-floor commercial uses that create an inviting and active experience for visitors and pedestrians.

d) Alternative 4: Historic Preservation/ Office Use Alternative

(1) Description of the Alternative

Alternative 4 would retain the Project Site's M2-2D zone and develop office uses as provided under the existing M2-2D zoning designation. No changes would be made to the North Site, an existing industrial use. Alternative 4 would retain and continue to use 167,596 sf of existing cold storage warehouse space on the North Site. As such, Alternative 4 would avoid the Project's significant and unavoidable historic resources impacts on the historic LACS Building. The retained space represents approximately 46 percent of the total 360,734 sf of existing industrial uses of primarily warehouses and storage facilities over the Project Site. All existing industrial uses on the South and West Sites would be removed and replaced by office uses consistent with the underlying M2-2D zone.

Alternative 4 proposes to develop three office buildings on the South Site (Buildings 1, 2, and 3) and one office building on the West Site (Building 4). Buildings 1, 2, and 3 would be nine stories (135 feet) in height and Building 4 would be three stories and have a height of 45 feet. Buildings 1, 2, and 3 would provide a total floor area of 1,125,207 sf and Building 4 on the West Site would provide a floor area of 34,060 sf, for a total floor area of new development of 1,159,267 sf. This represents a 50 percent reduction in floor area compared to the Project's 2,318,534 sf of new development. Based on the area of the South and West Sites (274,958 sf), the FAR would be 4.22:1. Alternative 4 is compared to the Project in **Table V-10**, *Alternative 4 Uses Compared to the Project*, below. Alternative 4's proposed office uses are allowed use in the M2 zone. The existing "2D" designation indicates Height District 2D. Although the 2D designation does not limit the height of buildings, in accordance with Ordinance 165,307 (D Limitation), development within the Project Site is limited to a floor area ratio (FAR) of 3:1. In this regard, the Project would require a zone change entitlements, such as a height district change for the FAR. However, Alternative 4's office use would be allowable within the existing zoning and land use designation.

Alternative 4's office floor area is anticipated to generate 4,637 new employees compared to 1,644 new office employees under the Project.[25] Unlike the Project, Alternative 4 would not provide any residential, restaurant/retail, or hotel uses and would not generate any new residential population or restaurant/retail employees.

[25] Alternative 4's employees are based on VMT Calculator results included Appendix M of this Draft EIR.

TABLE V-10
ALTERNATIVE 4 USES COMPARED TO THE PROJECT

Uses/Features	Project	Alternative 4
Total Industrial Uses to Remain (LACS Building)	0 sf	167,596 sf
Total Res. Units	1,521 Units	No Housing - 0 units
Total Restaurant/ Retail	101,088 sf	0 sf
Total Office	411,113 sf	1,159,267 sf
Total Hotel	74,484 sf (68 Rooms)	No Hotel – 0 sf (0 rooms)
Total Parking	2,475 spaces	928 spaces
Total New Floor Area	2,318,534 sf	1,159,267 sf
Total Floor Area:	2,318,534 sf	1,326,863 sf (incl.167,596 sf existing industrial use)
Total Grading	651,000 CY	40,532 CY
FAR:	7.13:1	4.22:1 (new development only); 4.8:1 (all development across the Project Site including industrial uses to remain)

SOURCE: Studio One Eleven, 2023

Alternative 4 would also incorporate a six-level, above-grade parking structure to accommodate 928 vehicles. The parking, which would reduce the Project's 2,475 spaces by 62.5 percent, would be consistent with AB 2097 (effective January 1, 2023) which provides that a jurisdiction shall not impose minimum parking requirements on residential or commercial projects within 0.5 miles of a transit station. The purpose of AB 2097 is to increase transit efficiency and to reduce VMT in areas served by transit. Short-term and long-term bicycle parking would be provided in accordance with LAMC requirements in the South and West Sites. The parking structure would be available to office occupants and visitors to both the South and West Sites. With four buildings on the South Site (including the parking structure), adequate space would be available for landscaped plazas and open space. Although open space is not required under the LAMC for non-residential uses, Alternative 4 would present itself as an office park in which employees would have access to outdoor space throughout the Project Site. Because of open space around the office buildings, Alternative 3 would allow for visual access across the Project Site from the adjacent 4th Street, Central Avenue, and Alameda Street. Street trees along the south side of 4th Street, the east and west sides of Central Avenue, and the west side of Alameda Avenue adjacent to the Project Site would enhance the comfort and aesthetic experience of passers-by.

The reduction in parking and the location of parking within an above-grade structure would eliminate the need for subterranean parking structures on the South and West Sites and no construction activity on the North Site would eliminate any need for grading and excavation on the North Site. With the above-grade development, excavation depths on the South and West Sites would be 5 feet bgs. The total excavation volume would be 40,532 CY compared to 651,000 CY under the Project (a reduction of 93.7 percent in grading volume). The lower grading volume and export of excavated soils would substantially reduce the scale of grading, excavation, and hauling activity compared to the Project. It is anticipated that reduced construction activity would reduce the duration of the Project's significant and unavoidable construction air quality (emissions) and construction noise impacts and eliminate the impact to historical resources.

(2) Environmental Impacts

(a) Air Quality

(i) Consistency with Air Quality Management Plan

(a) Construction

Alternative 4 would y reduce the Project's construction activities by not providing any new development on the North Site, eliminating subterranean parking and reducing overall floor area. Alternative 4 would reduce the Project's overall excavation from 651,000 CY to approximately 40,532 CY, an approximately 94 percent reduction. Excavation depths would be 5 feet on the South and West Site and needed primarily for development of foundation structures. As the total amount of excavated material would be reduced by approximately 94 percent to 40,532 CY, a corresponding reduction of truck trips would also occur. Under Alternative 4, grading/excavation for the South and West Sites would be considerably shorter given the reduction in excavation volumes and elimination of grading on the North Site. Under Alternative 4, the number of days with haul truck trips would be substantially reduced from the Project's approximately 327 days to approximately 27 days. Since Alternative 4 would reduce the number of truck trips required to haul excavated material and shorten the number of days with haul truck trips, the duration of emissions during the grading/excavation phase under Alternative 4 would be substantially reduced. Additionally, Alternative 4 would reduce the duration of overlapping emissions scenarios that include grading/excavation activities due to the reduced number of grading/excavation days. Alternative 4 would replace the Project's nine high-rise buildings with four three-story office buildings on the South and West Sites, which would also reduce the duration of building construction activities as fewer days of building construction would occur and reduced number of days with overlapping building construction activities as compared to the Project.

During the construction phase, as with the Project, Alternative 4 could potentially exceed State and federal emission standards and potentially delay timely attainment of air quality standards or interim emission reductions specified in the AQMP because the worst-case

day emissions of Alternative 4 would be similar to those of the Project. As with the Project, Alternative 4 would comply with CARB's requirements to minimize short-term emissions, with SCAQMD's regulations for controlling VOC emissions and incorporation of Project Design Feature, AIR-PDF-1 (Construction Power Pole Usage). Both the Project and Alternative 4 would implement Mitigation Measures AQ-MM-1 (Construction Equipment Features) and AQ-MM-2 (Concrete Truck Features) to reduce construction emissions of VOC, NO_X, CO, PM10 and PM2.5. With implementation of these mitigation measures and compliance with CARB and SCAQMD regulatory control measures, both the Project Alternative 4 and the Project would be consistent with AQMP consistency criteria. However, because Alternative 4 would substantially reduce the scale of construction activities, as the North Site would not be developed and excavations volumes would be reduced by approximately 94 percent, it would result in lower overall emission levels and result in less delay in the timely attainment of air quality standards or interim emission reductions specified in the AQMP. Therefore, Alternative 4's impacts related to consistency with the AQMP would be less than the Project's less than significant impact (with mitigation).

(b) Operation

Similar to the Project, Alternative 4 would include new development on the Project Site that would generate new criteria pollutant emissions. As with the Project, Alternative 4 would be consistent with the goals of SCAG's 2016-2040 RTP/SCS and growth projections in the 2016 AQMP, since the growth would occur in a HQTA and a TPA. Alternative 4 would also be consistent with applicable goals, objectives, and policies of the Air Quality Element that support and encourage pedestrian activity. With location of the Project Site within a designated TPA, both Alternative 4 and the Project would reduce vehicle trips and VMT. Both the Project and Alternative 4 would implement Mitigation Measures AQ-MM-3 (Emergency Generator Maintenance and Testing), AQ-MM-4 (Electric Landscaping Equipment) and AQ-MM-5 (Use of Super-Compliant VOC Paints). As such, both the Project and Alternative 4 would be consistent with the Air Quality Element and would not obstruct implementation of the AQMP. However, because Alternative 4 would substantially reduce the Project's floor area and parking, it would result in lower total emissions and, as such, would have less impact relative to air emissions than the Project's less than significant impacts (with mitigation).

(ii) Cumulatively Considerable Increase in Criteria Pollutants

(a) Construction

As with the Project, construction activities for Alternative 4 have the potential to generate temporary regional criteria pollutant emissions through the use of heavy-duty construction equipment, such as excavators and forklifts, through vehicle trips generated by workers and haul trucks traveling to and from the Project Site, and through building activities, such as the application of paint and other surface coatings. Construction-related daily

emissions of VOC, NO_X, and CO under both the Project and Alternative 4 would exceed the SCAQMD thresholds of significance prior to mitigation. As the total amount of excavated material would be reduced by approximately 94 percent to 40,532 CY, a corresponding reduction of truck trips would also occur. Under Alternative 4, the number of days with haul truck trips for soil hauling from grading/excavation would be substantially reduced from approximately 379 days to approximately 27 days. Since Alternative 4 would greatly reduce the number of haul truck trips required to transport excavated material and reduce the number of days with haul truck trips, the duration of emissions during the grading/excavation phase under Alternative 4 would be substantially reduced but could still exceed the SCAQMD daily thresholds of significance since the maximum number, type and use of construction equipment would be similar to the Project. Additionally, Alternative 4 would reduce the duration of overlapping emissions scenarios that include grading/excavation of the North Site. Alternative 4 would replace the Project's nine high-rise buildings with four three-story office buildings on the South and West Sites, which would also reduce the duration of building construction activities as fewer days of building construction would occur and reduced number of days with overlapping building construction activities as compared to the Project.

Under both the Project and Alternative 4, implementation of Mitigation Measures AQ-MM-1 (Construction Equipment Features) and AQ-MM-2 (Concrete Truck Features) would reduce short-term and temporary VOC and NO_X emissions but would increase CO emissions due to the use of Tier 4 Final equipment and CNG trucks. As with the Project, even with implementation of Mitigation Measures AQ-MM-1 and AQ-MM-2, Alternative 4's construction NO_X and CO emissions could exceed SCAQMD significance thresholds since the maximum number, type and use of construction equipment would be similar to the Project. However, because Alternative 4 would substantially reduce overall construction activities, it would contribute fewer days of maximum construction emissions and reduce overlapping construction emissions. Therefore, Alternative 4's construction emission impacts would be less than the Project's significant and unavoidable emissions impact (with mitigation).

(b) Operation

With its reduction in size and scale, overlapping interim operation and construction is not anticipated under Alternative 4. In addition, implementation of Mitigation Measures AQ-MM-3, AQ-MM-4 (Electric Landscaping Equipment) and AQ-MM-5 (Use of Super-Compliant VOC Paints) would reduce regional VOC and NO_X emissions associated with the testing of any on-site emergency generators, landscaping equipment and architectural coating. Therefore, emissions would be mitigated to below SCAQMD significance thresholds for VOC as Alternative 4 would develop only four buildings with reduced total floor area compared to ten buildings under the Project. Net regional operational emissions for full operation of either the Project or Alternative 4 would be mitigated to below the SCAQMD significance thresholds. However, because Alternative 4 would substantially reduce the Project's overall construction activities, as mentioned above, overlapping interim operation and construction is not anticipated and would not contribute to

operational emissions. Therefore, operational emission impacts would be less under Alternative 4 than the Project's less than significant impacts (with mitigation).

(iii) Exposure of Sensitive Receptors to Pollutant Concentrations – Localized Emissions

(a) Construction

Unlike regional emissions, localized emissions are specific to a smaller source receptor area (SRA) and proximity to sensitive receptors. Alternative 4 would eliminate the Project's maximum daily localized construction emissions for the North Site. Additionally, Alternative 4 would reduce the number of days of haul truck trips during the excavation/grading phase for the South and West Sites from the Projects approximately 327 days to approximately 27 days. However, similar to the Project, even with the reduced durations, Alternative 4 would result in maximum daily localized construction emissions that would exceed the SCAQMD localized significance thresholds for NO_X, PM10, and PM2.5. Under both the Project and Alternative 4, with implementation of Mitigation Measure AQ-MM-1 (Construction Equipment Features), impacts would be reduced to less than significant levels. However, with the substantial reduction in construction activities under Alternative 4, exposure of sensitive receptors to emissions of NO_X, PM10, and PM2.5 would be less than the Project's less than significant impacts (with mitigation).

(b) Operation

Alternative 4 would reduce the overall Project by eliminating the Project's proposed uses on the North Site from the scope of the development and reducing overall floor area by 50 percent. However, existing occupation and operational emissions from the existing North Site industrial use would continue. The Project's daily localized emissions of NO_X, PM10, and PM2.5 related to energy use, emergency generators, cooling towers, and use of coatings, consumer products, and landscaping products would exceed the SCAQMD's significance thresholds (see Table IV.B-12, *Estimated Maximum Regional Operational Emissions – Project (Pounds per Day),* of this Draft EIR. These emissions would be reduced under Alternative 4, which would not include any restaurant uses and occur from a smaller scale office development. Both the Project and Alternative 4 would implement Mitigation Measures AQ-MM-3 (Emergency Generator Maintenance and Testing) and AQ-MM-4 (Electric Landscaping Equipment) to reduce localized emissions impacts to a less than significant level. Because Alternative 4 would reduce overall development compared to the Project, impacts related to exposure of sensitive receptors to localized concentration of pollutants would be less than the Project's less than significant impact (with mitigation).

(iv) Carbon Monoxide Hotspots

Alternative 4 would reduce the overall Project by eliminating the Project's North Site component and reduction in the number and sizes of buildings on the South and West Sites. With reduced VMT, Alternative 4 would reduce the Project's CO emissions at the

area's most heavily impacted intersection with greatest risk of CO hotspots (Alameda Street at Fourth Street). During operation, CO concentrations from the Project's maximum operational traffic volume at this intersection plus the measured background level in the Project Site area are expected to be approximately 4.7 ppm (one-hour average) and 3.6 ppm (eight-hour average). These levels would not exceed the numerical thresholds of significance under the Project and would be reduced under Alternative 4. Because Alternative 4 would reduce vehicle traffic and CO emissions compared to the Project, impacts related to CO hotspots would be less than the Project's less than significant impact.

(v) Toxic Air Contaminants

(a) Construction

Alternative 4 would reduce the Project's construction activities and localized emissions associated with building construction, excavation, and concrete pouring activity. Under both the Project and Alternative 4, TAC emissions associated with DPM emissions from heavy construction equipment would occur during the construction phase. Both the Project and Alternative 4 would comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location and the CARB In-Use Off-Road Diesel Vehicle Regulation. Compliance with these CARB regulations would minimize emissions of TACs during construction. If present, the hazardous materials are required to be managed and disposed of in accordance with applicable laws and regulations. Further, implementation of Mitigation Measures AQ-MM-1 (Construction Equipment Features) and AQ-MM-2 (Concrete Truck Features) to reduce regional NO_X emissions, would provide the co-benefits of reducing emissions of PM10 and PM2.5 from heavy-duty diesel construction equipment during construction. Under Alternative 4, the worst-case maximum daily TAC emissions would be generally similar to the Project since the maximum daily number, type and use of construction equipment would be similar. Under both the Project and Alternative 4, construction TAC impacts for would be less than significant with mitigation. Under both the Project and Alternative 4, construction TAC impacts for would be less than significant with mitigation. However, because Alternative 4 would reduce the use of heavy equipment (loaders, excavators), and haul activity, it would result in fewer overall TAC emissions compared to the Project. As such, Alternative 4's TAC impacts would be less than the Project's less than significant impact (with mitigation).

(b) Operation

Alternative 4 would not provide any new development on the North Site, thus, retaining the existing LACS Building and cold storage warehouses and loading docks under their existing use and condition. Alternative 4 would continue to generate the exiting site emissions on the North Site including the existing cold storage facilities and the DPM emissions from approximately 35 percent of the existing 144 trucks (or approximately 50 trucks) and equipped transportation refrigeration units (TRUs) that currently visit the existing Project Site on a daily basis, including cold storage facilities on both the North and South Sites. The existing site emissions on the North Site under Alternative 4 would

be eliminated under the Project. Alternative 4, as with the Project, would generate emissions from architectural coatings, delivery trucks, and emergency generators. Delivery trucks are required to comply with the applicable provisions of 13 CCR, Section 2025 to minimize and reduce PM10, PM2.5, and NO_X emissions. Any emergency generators for either the Project or Alternative 4 would be certified to the most stringent CARB and SCAQMD Rule 1470 standards to reduce emissions to the lowest technically feasible level and incorporate Mitigation Measure AQ-MM-3 (scheduling of routine maintenance and testing of the emergency generators installed on the Project Site on different days). With existing regulations, operation of the Project or Alternative 4 would not be considered a substantial source of DPM or other TACs and TAC emissions would be less than significant. However, because Alternative 4 would retain existing diesel truck activity at the North Site, impacts would be greater than the Project's less than significant impacts (with mitigation).

(b) Cultural Resources

(i) Historical Resources

Alternative 4 would preserve the historic LACS Building in its existing condition and use. The Project's Building 2 or any other uses would not be constructed on the North Site and the existing industrial (cold storage) use would continue. The Project's partial or full removal of the LACM Building would not occur under Alternative 4. The Project would implement Mitigation Measures CUL-MM-1 through CUL-MM-8, which would require documentation, a historical interpretative report, thawing plan, structural analysis, a historic structure report prepared by a historical architect, a mothballing plan, and a protection plan). Regardless, at a minimum, due to the removal of the East Volume, impacts would be significant and unavoidable even after implementation of the Project mitigation measures. It is noted that any discontinuation of existing operation of the LACS Building resulting in a thaw, has the potential to significantly impact the historic building. However, Alternative 4, by preserving the historic LACS Building and not constructing any new features or structures on the North Site would avoid the Project's significant and unavoidable impact to historical resources. Thus, Alternative 4's impacts to historical resources would be less than the Project's significant and unavoidable impact (with mitigation).

(ii) Archaeological Resources

Alternative 4 would provide no occupied or parking levels below grade and would, thus, eliminate the Project's construction activities required for excavation of subterranean garages. Although some foundational features, such as pilings, could be deeper, the majority of excavation and construction activities under Alternative 4 would occur within five feet or less of the surface. which would reduce the maximum depths of excavation for the Project extending to 64 feet bgs. As with the Project, Alternative 4's excavation activities into native soils (beneath the upper fill soils) have the potential to encounter previously undiscovered subsurface archaeological resources. Both the Project and Alternative 4 would implement Mitigation Measures CUL-MM-9 (retaining a qualified

archaeologist for monitoring), CUL-MM-10 (sensitivity training for construction personnel), CUL-MM-11 (halting of activities in the event of a previously undiscovered resource, and CUL-MM-12 (archaeologist technical report). With implementation of the mitigation measures, construction activities would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines, and impacts would be less than significant under both the Project and Alternative 4. However, because construction of Alternative 4 would reduce the Project's depth and extent of excavation, impacts to archaeological resources would be less than the Project's less than significant impact (with mitigation).

(iii) Human Remains

As with the Project, excavation activities under Alternative 4 have the potential to expose human remains. If any human remains are encountered, notification of the County Coroner and other entities per California Health and Safety Code Section 7050.5 would be required prior to resumption of construction activities. In addition, disposition of human remains and any associated grave goods would be required to comply with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e). With compliance with regulatory requirements, the Project's and Alternative 2's impacts related to human remains would be less than significant. However, because construction of Alternative 4 would require less excavation than the Project, impacts to human remains would be less than the Project's less than significant impact.

(c) Energy

(i) Construction

Compared to the Project, Alternative 4 would reduce the overall extent and duration of construction activities, and include an approximate 94 percent reduction in grading and hauling activity. Construction energy consumption would result primarily from transportation fuels (e.g., diesel and gasoline) used for haul trucks, heavy-duty construction equipment, and construction workers traveling to and from the Project Site. As with Project, Alternative 4 is not expected to consume natural gas during construction but would use electricity for an on-site office as well as gasoline and diesel fuels associated with on- and off-road construction vehicles. Demand for electricity, diesel, and gasoline would be within the handling capacity of suppliers. Construction would utilize energy only for necessary on-site activities and to transport construction materials and demolition debris to and from the Project Site. The Project would not increase demand for electricity, diesel, or gasoline that would exceed available supply or distribution infrastructure capabilities, would not result in the broad construction of new energy facilities or expansion of existing facilities, or the construction of which could cause significant environmental effects. Since Alternative 4 would reduce construction activity, including hauling, compared to the Project, construction of Alternative 4, as with the Project, would not result in the wasteful, inefficient, and unnecessary consumption of energy. As such, similar to the Project, energy impacts would be less than significant.

Under Alternative 4, the substantial decrease in grading would reduce the use of heavy equipment, such as loaders, graders, and haul trucks and would result in a reduction in diesel fuel use. In the overall balance, Alternative 4 would result in less energy demand during construction than the Project and, as such, impacts with respect to energy demand would be less than the Project's less than significant impact.

(ii) Operation

Alternative 4 would eliminate the Project's new proposed uses and structures on the North Site from the scope of the development and reduce the Project's overall new floor area by 50 percent. During Project operations, 21,093,357 kWh of electricity would be consumed on an annual basis. The Project would result in a net reduction in natural gas demand of approximately 4,506,825 cubic feet inclusive of Project operation activities related to transportation sources (i.e., natural gas-fueled vehicles) as compared to existing conditions. However, since the current operations at the North Site would continue under Alternative 4, the net reduction in natural gas demand as compared to existing conditions would decrease under Alternative 4 as compared to the Project, but would still result in a net reduction in natural gas demand under Alternative 4 compared to existing conditions. The Project would also result in 998,310 gallons of gasoline and a net decrease of 190,414 gallons of diesel on an annual basis (see Table IV.C-2, Summary of Annual Net New Energy Use During Project Operation – Project, of this Draft EIR). Alternative 4 would reduce the Project's on-site parking by 62.5 percent. The reduction in parking would increase reliance on transit and other transportation modes (e.g., bicycles) and would, thus, reduce VMT and demand for gasoline compared to the Project. However, since the current operations at the North Site would continue, diesel fuel usage would increase under Alternative 4 since existing diesel usage across the Project Site is currently 376,917 gallons and diesel usage for the Project would be 189,305 gallons. Demand under either the Project or Alternative 4 would be within the handling capacity of suppliers.

Operation of Alternative 4 and the Project would comply with the CALGreen Code's energy saving measures. In addition, the Project and Alternative 4 would comply with other energy-saving measures to achieve a minimum LEED Gold Certification, incorporate tree landscaping to provide solar shading, and use cool roof/pavement coatings to reduce the urban island effect. Other building features would include installation of energy-efficient heating, ventilation, and HVAC systems that utilize ozone-friendly refrigerants, and dedicated on-site recycling areas. The Project and Alternative 4 would both include water sustainability features, which would include, but not be limited to, low flow/efficient water fixtures, rainwater capture systems, drought-tolerant/California native plant species selection, landscape contouring to minimize precipitation runoff, irrigation system efficiency, and smart irrigation systems (e.g., weather-based controls). Operation of the Project and Alternative 4 would not result in the wasteful, inefficient, and unnecessary consumption of energy and, as such, energy impacts would be less than significant. Since Alternative 4 would substantially reduce the scale and occupancy of the Project Site compared to the Project, impacts on overall energy demand under Alternative 4 would be less than the Project's less than significant impact.

(d) Geology and Soils

(i) Paleontological Resources

Alternative 4 would reduce the Project's construction activities by eliminating the North Site from the scope of the Project and eliminating subterranean parking. Under Alternative 4, excavation required for foundation development would extend to 5 feet bgs on the South and West Site and require the removal of 40,532 CY of soils. By comparison, excavation for the Project would reach approximately 64 bgs. Both the Project and Alternative 4 would require earthwork or excavation into native soils (beneath the upper fill soils) that have the potential to encounter previously unknown buried paleontological resources. As with the Project, Alternative 4 would implement Mitigation Measures PALEO-MM-1 (retaining a Qualified Paleontologist), PALEO-MM-2 (providing paleontological monitoring), and PALEO-MM-3 (identifying and curating any found paleontological resources). As with the Project, potentially significant impacts under Alternative 4 would be reduced to less than significant with mitigation. Similar to the Project, with implementation of mitigation under Alternative 4, construction activities would not cause a substantial adverse impact to paleontological resources, and impacts would be less than significant. However, because Alternative 4 would decrease the scale and depth of excavation, impacts would be less than the Project's less than significant impact (with mitigation).

(e) Greenhouse Gas Emissions

Compared to the Project, Alternative 4 would result in an approximately 94 percent reduction in grading and hauling activity. Construction activities under either the Project or Alternative 4 would not conflict with SCAQMD air quality control measures that reduce GHG emissions as well as CARB's improved engine efficiency regulations and reduced idling times. As such, the Project and Alternative 4's construction GHG emissions would be less than significant. During operation, Alternative 4 would reduce parking by 62.5 percent across the Project Site as well as reduce VMT compared to the Project. As such, Alternative 4 would substantially reduce GHG emissions related to vehicle use. As with the Project, Alternative 4 would be constructed to LEED Gold Standards and, as with the Project would not conflict with the applicable GHG emission reduction plans and policies, including the CARB's Climate Change Scoping Plan, the 2020–2045 RTP/SCS, City's Green New Deal, and the Los Angeles Green Building Code. As with the Project, Alternative 4 would not result in significant GHG impacts. However, although the North Site would be left in its existing condition and the use would continue to emit GHG emissions, with reduced excavation, VMT, and scale of development (floor area) GHG impacts under Alternative 4 would be less than the Project's less than significant impact.

(f) Land Use and Planning

Alternative 4 would eliminate the Project's North Site component from the scope of the Project and reduce the Project's floor area by 50 percent. Alternative 4 would include development of all office uses on the South and West Sites. The Project and Alternative

4 and the Project would be similarly located within the Framework Element's Downtown Center and would not conflict with the General Plan designation that supports hotels, professional offices, corporate headquarters, and high-rise residential towers within the Downtown Center. Alternative 4 would avoid any construction activities on the North Site and, as such, would not conflict with policies of the Adaptive Reuse Ordinance to preserve historical buildings. Although neither the Project nor Alternative 4 would conflict with a substantial majority of applicable plan policies and regulations, Alternative 4 would not facilitate policies of several applicable plans and policies to the same extent as the Project. These include the Adaptive Reuse Ordinance to revitalize and facilitate the development of a "24-hour city" and to encourage mixed commercial and residential uses that improve air quality and reduce vehicle trips and vehicle miles traveled by locating residents, jobs, hotels, and transit services near each other. Alternative 4 would also not facilitate policies of the General Plan Housing Chapter, the policies of the Housing Element, or the designated Greater Downtown Housing Incentive Area to increase housing opportunities in proximity to transit or in the Downtown; or the policies of the Redevelopment Plan for the Central Industrial Redevelopment Project to provide affordable residences and open space that are accessible to public transportation; or the policies of the 2020-2045 RTP/SCS to co-locate housing, jobs, and transit. The underlying M2-2D zoning in the Central Industrial District Redevelopment Project restricts the FAR of the Project Site to 3:1 and prohibits residential uses. Because Alternative 4 would be consistent with underlying zoning as it relates to use and height, a zone change would only be required to increase the FAR above 3:1. Overall, as with the Project, Alternative 4 would not substantially conflict with the majority of applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Land use impacts under both the Project and Alternative 4 would be less than significant. However, because Alternative 4 would not facilitate policies related to higher density housing in a TPA or high-density mixed use in the Downtown area, land use impacts would be greater than the Project's less than significant impact.

(g) Noise and Vibration

(i) Noise

(a) Construction

Alternative 4 would reduce the Project's construction activities, including eliminating the development of the North Site and reducing excavation depths for subterranean garages on the South and West Sites. Construction for Alternative 4 and the Project would generally include demolition, site grading, and building construction. Excavation required for foundation development for Alternative 4 would require the removal of 40,532 CY of soils. By comparison, the Project would construct subterranean garages across the Project Site, the construction of which would generate 651,000 CY of excavated materials. Alternative 4 would, thus, reduce grading, excavation, hauling, and concrete pouring activities. Construction noise levels under both the Project and Alternative 4 would be a function of the noise generated by construction equipment, the type and location of

the equipment, the timing and duration of the noise-generating construction activities, and the relative distance to noise-sensitive receptors. Similar to the Project, Alternative 4 would implement Mitigation Measures NOI-MM-1 (Temporary Noise Barriers), NOI-MM-2 (location of compressors and generators 100 feet from sensitive land uses), and NOI-MM-3 (construction equipment muffling and shielding devices), as applicable, to reduce on-site construction noise levels in excess of ambient noise standards. Even so, with implementation of all feasible mitigation measures, the Project and Alternative 4's construction noise impacts would continue to exceed threshold levels at upper levels (stories) at residential receptor locations R2 through R6 and impacts would be significant and unavoidable. Because the scale of excavation and hauling activities would be reduced under Alternative 4 compared to the Project, the duration of high noise level construction activities (which include excavation and hauling) would be reduced.

Impacts between haul trucks and concrete foundation trucks are discussed separately because as stated in Section IV.G, *Noise*, of this Draft EIR, haul trucks are subject to the City-approved haul truck route as discussed in the section, whereas concrete trucks are not. Therefore, concrete trucks could travel along a variety of roadway segments and impacts from haul trucks are concrete trucks are discussed separately (see Section IV.G, *Noise*, of this Draft EIR for additional details about the specific routes for both haul trucks and concrete trucks for the Project and Project Alternatives).

For the Project, under the assumption that grading and excavation activities for the Upper South, Lower South, North and West sites would be occurring at the same time, there would be a total of 1,224 haul truck trips and 240 worker trips per day over an 8-hour timespan (equal to approximately 153 haul truck trips and 30 worker trips per hour). The Project's increase in truck and vehicle trips would increase existing traffic noise levels by a maximum of 2.9 dBA CNEL which does not represent an exceedance of the significance threshold. Under Alternative 4, the North Site would not be developed, eliminating the approximately 53 days of haul truck trips associated with grading/excavation of the North Site under the Project. Alternative 4 would develop the South and West Sites and the number of days with haul truck trips would be reduced from the Project's 327 days to 27 days. Since Alternative 4 would not develop the North Site and reduce the number of days with haul truck trips from the South and West Sites, Alternative 4 off-site roadway noise during the grading/excavation phase would be substantially reduced in duration as compared to the Project. Additionally, Alternative 4 would reduce the duration of overlapping noise scenarios that include grading/excavation of the South and West Sites and the overlapping scenarios associated with the North Site. The Project and Alternative 4 impacts related to off-site construction traffic noise would be less than significant and, because of the reduced number of days with truck trips, would be less under Alternative 4 than under the Project.

The peak period (i.e., daily number of truck trips) of construction with the highest number of construction trucks would occur during the foundations and concrete pour phases for the South site, building construction of buildings 3 through 9, architectural coating for the

North site, and paving for the West site. For the Project foundation pours, there would be an estimated maximum of up to 2,016 concrete trucks into and out of the Project Site per day over a continuous 24-hour timespan (equal to 84 trips per hour). In addition, during these phases there would be a total of 360 haul trucks, 732 vendor trucks, and 3,458 worker trips per day over an 8-hour timespan (equal to approximately 45 haul trucks, 92 vendor trucks, and 433 worker trips per hour). The Project and Alternative 4's foundations concrete pour truck trips and worker vehicle trips would increase existing traffic noise levels by a maximum of 4.8 dBA CNEL along Central Avenue between 1st Street and 2nd Street, where noise-sensitive uses (e.g., residential uses) are located. The noise would also be increased by more than 3 dBA CNEL on roadway segments with noise-sensitive uses (e.g., residential uses) and include Central Avenue between 2nd Street and 3rd Street and 4th Street between Alameda Street and Hewitt Street. These increases represent an exceedance of the significance threshold and a potentially significant impact Similar to the Project, Alternative 4 would implement Mitigation Measure NOI-MM-4 (prohibition of foundation concrete trucks on sections of Central Avenue near residential uses), which would eliminate the significant noise impact from concrete trucks. As with the Project, Alternative 4's noise impacts related to off-site construction concrete truck traffic would be reduced to less than significant (with mitigation). Under Alternative 4, concrete pours would be reduced from ten buildings to four on the South Site and eliminated from the North Site, and therefore the duration of impacts would be further reduced. Therefore, off-site construction haul truck, concrete pour truck, vendor truck and worker trip noise impacts for Alternative 4 would be less than the Project's less than significant impact (after mitigation).

(b) Operation

Alternative 4 would reduce the overall Project by not developing any new uses or structures on the North Site and developing the South Site with three nine-story office buildings and the West Site with one three-story building. The reduction in the number and sizes of buildings on the South and West Sites would reduce the Project's total floor area from 2,318,534 sf to 1,159,267 sf, a reduction of 50 percent. Unlike the Project, Alternative 4 would not provide special event activities that, under the Project, would exceed the ambient noise levels by 5 dBA at the receptor location R2. Under either the Project or Alternative 4, noise from typical operation (human conversation, vehicles entering and leaving the Project Site), would not exceed the significance threshold of a 5 dBA increase over ambient conditions. Additionally, with implementation of Mitigation Measure NOI-MM-5, impacts related to on-site composite noise (mechanical equipment, loading dock/refuse collection activity, emergency generator, parking structure noise, and off-site traffic noise) would be less than significant. However, because Alternative 4 would not support outdoor activities, operational noise impacts would be less than the Project's less than significant impacts (with mitigation).

(ii) Vibration

(a) Construction

Construction activities can generate varying degrees of ground vibration, depending on the construction procedures and the type of construction equipment used. The operation of construction equipment generates vibrations that travel through the ground and diminish in amplitude with distance from the source. With regard to potential building damage, the Project would generate groundborne construction vibration forces during building demolition and excavation/grading activities when heavy construction equipment, such as large bulldozers, drill rigs, and loaded trucks, would be used. Even though excavation and hauling for subterranean garage construction and concrete foundations for the North Site would be eliminated, Alternative 4 would still require the construction of concrete foundations for four buildings on the South and West Sites. Per Project Design Feature NOI-PDF-1, as with the Project, Alternative 4 would not require or allow the use of impact pile drivers. However, augured, drilled, or vibratory piles would be permitted. The estimated vibration velocity levels from all construction equipment would be below the building damage significance criteria at all off-site building structures except for Location V3 (commercial buildings to the south, west, and southwest of Project's West Site) which would experience vibration levels greater than the FTA Category III threshold for non-engineered timber and masonry buildings. As such, the Project and Alternative 4 could result in the generation of excessive groundborne vibration. Vibration impacts associated with structural damage from on-site construction activities would be potentially significant for Location V3 as Alternative 4 still requires grading at the West Site. With implementation of Mitigation Measure NOI-MM-6, which would limit use of equipment, such as large bulldozer, caisson drills and loaded trucks, that generate high levels of vibration to specified distances from vibration location V3, which are the commercial buildings to the south, west, and southwest of Project's West Site, and Mitigation Measure NOI-MM-7 which would require inspection of vibration receptor V3 and repair if any damage is found to have occurred even with implementation of Mitigation Measure NOI-MM-6. With implementation of these mitigation measures, potential structural vibration impacts on receptor V3 could be mitigated to a less than significant level for the Project and Alternative 4. However, because vibration receptor V3 includes privately-owned structures, inspections and repair pursuant to Mitigation Measure NOI-MM-7 would require the consent of the property owner, who may not agree. Thus, if damage to receptor V3 were to occur, and consent to repair is not given, impacts would be significant and unavoidable and similar for both the Project and Alternative 4.

In addition to the on-site construction equipment, heavy-duty construction trucks would generate groundborne vibration as they travel along the Project and Alternative 4's anticipated haul routes. Although the Project and Alternative 4 would not result in significant vibration impacts from construction trucks along haul routes, these impacts would be less under Alternative 4 than the Project. Under Alternative 4, there would be no soil hauling or concrete foundations trucks going to and from the North Site, therefore, no groundborne vibrations from trucks would occur from such trips. Alternative 4 would

eliminate the subterranean garages on the South and West Sites thereby reducing the number of trucks utilizing the haul routes during the grading/excavation phase. As such, groundborne vibration impacts along these haul routes would be reduced under Alternative 4. Alternative 4 (with the elimination of North Site development, subterranean garages, and reduced scale of development) would reduce the scale of development and overlapping vibration-generating activities, and the duration of vibration impacts would be less than those under the Project. As such, Alternative 4's vibration impacts would be less than the Project's less than significant impact.

(b) Operation

As with the Project, Alternative 4 would include typical commercial-grade, stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce vibration at low levels that would not cause damage or annoyance impacts to Project buildings or on-site occupants and would not cause vibration impacts to the off-site environment. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the parking areas. Groundborne vibration generated by equipment or vehicle circulation would generate approximately up to 0.005 in/sec PPV (less than approximately 68 VdB) adjacent to the Project Site. The potential vibration levels from all operational sources at the closest existing sensitive receptor locations would be less than the significance threshold of 0.3 in/sec PPV for potential Category III building damage and less than the human annoyance threshold of 72 VdB As such, under both the Project and Alternative 4, vibration impacts associated with human annoyance or building damage would be less than significant and similar.

(h) Population and Housing

(i) Construction

As with the Project, Alternative 4 would result in increased employment opportunities in the construction field, which could potentially result in increased permanent population and demand for housing in the vicinity of the Project Site. However, the relocation of workers is not highly likely because of the temporary nature of construction work and dispersed job sites throughout the Los Angeles area. Workers are able to move from site to site without relocating their households. Construction workers travel to different construction work sites upon completion of the particular phase or phases of construction requiring their specific specialties or skillsets. Construction of the Project or Alternative 4 would generate direct (construction jobs at the Project Site), indirect (employment supported by Project construction-related expenditures) and induced (wages paid to construction workers) growth. However, because there is a large, existing pool of construction workers in the Los Angeles area, as with the Project, Alternative 4 would not result in substantial direct or indirect unplanned population growth. Population and housing impacts under Alternative 4 would be similar to the Project's less than significant impacts.

(ii) Operation

Alternative 4 would increase the Project's office floor area from 411,113 sf to 1,154,267 sf and eliminate the Project's residential uses, hotel, and restaurant/retail uses from the scope of the Project. Alternative 4 would eliminate the Project's new residential population of 3,423 persons and increase the number of new employees from 2,044 to 4,637 employees (excluding the 32 employees to remain on the North Site).[26] The Project Site is located within a TPA and a SCAG-designated HQTA in which higher density growth is encouraged through the City's TPA and SCAG policies. Both Alternative 4 and the Project would increase employment but only the Project would provide for higher density of housing within a TPA.

Alternative 4 and the Project's contribution to population and/or employee growth would continue an infill growth pattern that is encouraged locally. Neither Alternative 4 nor the Project would exceed projected growth forecasts for the City and region. However, Alternative 4 would not be consistent with regional and local policies that encourage mixed-use and higher density housing within the City and region. The Project Site's accessibility to transit would help the City increase housing within these transit priority areas, and would contribute to the City's ability to meet its housing obligation under SCAG's RHNA and goals of the Housing Element. Alternative 4 would indirectly induce population gain through employment opportunities but would not incorporate housing. As such, Alternative 4 would be less consistent with SCAG and City objectives. However, because Alternative 4 would result in less housing and less direct and indirect demand for housing than under the Project, impacts with respect to induced direct or indirect substantial unplanned population growth would be less than the Project's less than significant population and housing impacts.

(i) Public Services

(i) Fire Protection

(a) Construction

Construction activities under the Project and Alternative 4 would potentially increase the demand for or physically impede fire protection and emergency medical services. During construction, the Project and Alternative 4 would implement Project Design Feature TRAF-PDF-1, to provide a City-reviewed CMP to minimize impacts to emergency vehicles during construction. Fire safety during construction would be further addressed by OSHA safety and health provisions. Compliance with construction site fire safety, such as on-site fire extinguishers, locked entrances, and employee fire safety and evacuation training, would reduce demand on fire protection services during construction. With such features, neither the Project nor Alternative 4 would increase fire services demand to the extent that the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. Therefore, impacts during construction with respect to fire protection under either the Project or Alternative 4 would be less than

[26] Employee are based on VMT Calculator results included in Appendix M of this Draft EIR.

significant. However, because Alternative 4 would reduce the overall scale of construction activities, impacts would be less than the Project's less than significant impacts.

(b) Operation

Alternative 4 would reduce the Project's estimated occupancy from 2,044 employees and 3,423 residents (a total of 5,467 employees and residents) to 4,637 employees, as discussed above. Alternative 4 and the Project's new occupants would increase the demand for fire protection and emergency medical services. Both the Project and Alternative 4 would comply with all applicable OSHA, Building Code, Fire Code, and other LAMC and LAFD requirements. The Project and Alternative 4 would also meet LAFD recommended fire prevention and protection features including building identification, emergency access lanes, building setbacks, and private roadway widths. Additionally, plans and specifications would be submitted to LAFD prior to the provision of necessary permits. Similar to the Project, Alternative 4 would implement Mitigation Measure PS-1-MM-1, if needed, which include water infrastructures upgrades, to address potential impacts on fire protection services due to a shortage in the existing fire hydrant flow. Similarly, Alternative 4 would be required to ensure adequate fire flow is available to serve the Project Site. Furthermore, compliance with applicable codes and inclusion of LAFD recommendations, such as incorporation of sprinklers, would result in safe, modern buildings and would reduce demand for LAFD services. Overall, operation of the Project or Alternative 4 would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire station facilities with implementation of mitigation, as appropriate. Therefore, impacts to fire protection and emergency medical services during operation of either the Project or Alternative 4 would be less than significant. However, because Alternative 4 would reduce the occupancy of the Project Site compared to the Project, impacts would be less than the Project's less than significant impacts (with mitigation) on fire protection services.

(ii) Police Protection

(a) Construction

Construction activities under either the Project or Alternative 4 would potentially increase demand for police protection services or physically impede police protection service access on the local roadway network. During construction, both the Project and Alternative 4 would implement Project Design Feature TRAF-PDF-1, a City-reviewed CMP, to ensure that emergency access would be maintained in the vicinity. Both the Project and Alternative 4 would also implement Project Design Feature POL-PDF-1 to limit access to construction areas, including private security, construction fencing, locked entry, and security lighting. Private security personnel would monitor vehicle and pedestrian access to the construction areas and patrol the Project Site. With the implementation of the CMP pursuant to Project Design Feature TRAF-PDF-1 and security features in Project Design Feature POL-PDF-1, neither the Project nor Alternative 4 would increase police services demand to the extent that the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility would be required to

maintain service. As such, construction impacts would be less than significant under both the Project and Alternative 4. However, because Alternative 4 would reduce the overall scale and duration of construction activities, impacts would be less than the Project's less than significant impacts on police services.

(b) Operation

Alternative 4 would reduce the Project's total floor area by 50 percent. Overall, Alternative 4 would reduce the Project's estimated occupancy from 2,044 employees and 3,423 residents (a total of 5,467 employees and residents) to 4,637 office employees, as discussed above. The Project's and Alternative 4's new occupants would affect the demand for police services. However, impacts to police services are based on an increase in the ratio of officers to residential population. Consequently, since Alternative 4 would not directly increase the existing residential population in the LAPD Central Community Station service area, which has a current population of approximately 40,000, Alternative 4 would not directly impact officer per resident service ratios. With 308 sworn officers in the Central Community Station, existing service ratios are 129.8 residents per officer. The Project would increase the resident to officer ration to 141:1. Even if Alternative 4's non-residential population were taken into consideration, Alternative 4 would generate an increase of 4,887 people requiring police protection services, which would be less than the Project's total 5,462 resident and employee population. As provided in Project Design Feature POL-PDF-2, both Alternative 4 and the Project would incorporate a security program to reduce demand for police services and to ensure the safety of occupants. The security program would reduce the potential for on-site crimes, including loitering, theft, and burglaries and would be reviewed for further suggestions by the LAPD. LAPD correspondence in response to the preparation of the Draft EIR stated that the Project would not result in the need for new or altered police facilities.[27] Given the decrease in total population under Alternative 4, the LAPD's determination is equally applicable to Alternative 4. Thus. neither the Project nor Alternative 4 would result in substantial adverse physical impacts associated with the provision of a new or physically altered police facility, the construction of which would cause significant environmental impacts. Impacts relative to police services would be less than significant under both the Project and Alternative 4. However, because Alternative 4 would remove the Project's residential population increase, impacts to police services would be less than the Project's less than significant impact.

(iii) Schools

(a) Construction

Construction under either the Project or Alternative 4 would generate employees who are anticipated to be hired from a mobile regional construction work force. Given the mobility and temporary duration of work at a particular site, construction employees not residing locally would not be expected to relocate residences (and, therefore, generate a new

[27] LAPD, Central Division, Officer Alfonso Velasco, letter to Alan Como, Los Angeles Planning Department, May 24, 2022.

student population). Therefore, construction of either the Project or Alternative 4 would not result in a notable increase in the resident population or new students needing to attend local schools. With the nearest public school located approximately 0.6 mile southwest of the Project, no public schools would be physically affected by construction activities at the Project Site. Construction impacts on schools under both Alternative 4 and the Project would be less than significant. Impacts on schools under Alternative 4 would be similar to the Project's less than significant impacts.

(b) Operation

As shown in **Table V-11**, *Estimated Number of Students Generated by Alternative 4*, Alternative 4 would generate a total net increase of 946 students. In comparison, the Project would generate a net increase of 940 students. Similar to the Project, under Alternative 4, the 9th Street Elementary School and Hollenbeck Middle School would have a potential shortage in seats with Alternative 4, while the Belmont Zone of Choice schools would continue to have a seating overage.

TABLE V-11
ESTIMATED NUMBER OF STUDENTS GENERATED BY ALTERNATIVE 4

Land Use	Use[a]	Generation Factors	Elementary School Students	Middle School Students	High School Students	Total[b]
Proposed Uses						
Office	1,154,267 sf	0.826/ksf	524	143	286	953
Existing Uses						
North Site Cold Storage/ Warehouse	167,596 sf	0.010 students/ksf	-	-	-	-
South Site Office	2,871 sf	0.826/ksf	2	1	1	4
South Site Cold Storage/ Warehouse	190,267 sf	0.010 students/ksf	2	0	1	3
Total Students Generated by Existing Uses			*4*	*1*	*2*	*7*
Net Total (Proposed Less Existing)			**520**	**141**	**284**	**946**

NOTE(S): ksf= 1,000 square feet

[a] Student generation rates are based on Standard Commercial Offices as provided in Table 15 of the LAUSD 2022 Developer Fee Justification Study, March 2022. Since the Developer Fee Justification Study does not specify grade levels for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 55 percent elementary school, 15 percent middle school, and 30 percent high school). For the existing dry storage and freezer/cooler uses, the Rental Self Storage factor was used.

[b] Input totals for elementary, middle and high schools have been rounded based on generation factors to equal total number of students.

SOURCE: ESA, 2023.

Under either the Project or Alternative 4, pursuant to SB 50, the Project Applicant would be required to pay development fees LAUSD prior to issuance of building permits. Under Government Code section 65995 and 65996, the payment of these fees is considered full and complete mitigation of school impacts. Therefore, neither the Project nor Alternative 4 would result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities and impacts would be less than significant. Because Alternative 4 would result in a lower generation of students, operational impacts on schools would be less than the Project's less than significant impact**.**

(iv) Parks and Recreation

(a) Construction

Construction activities under both the Project and Alternative 4 have the potential to affect parks and recreational facilities. A small number of construction workers may visit public parks to eat lunch or for recreational activity after a workday. However, because construction workers are temporary employees with high turnover during various phases of construction, the use of public parks would be uncommon and short-term. In addition, neither the Project nor Alternative 4 would be developed adjacent to or in proximity to a public park and would not directly impact public park facilities. Construction of either the Project or Alternative 4 would not include or require the construction, alteration, or expansion of recreational facilities that might have an adverse physical effect on the environment. Therefore, Alternative 4's impacts associated with parks and recreational facilities would be similar to the Project's less than significant impacts.

(b) Operation

Alternative 4 would remove the Project's residential component by developing only office uses. Although landscaped open space would be provided in the Alternative 4 business park, it would not be available for public use. Alternative 4's office uses are not anticipated under the City's PRP to generate demand for public recreational uses and, because Alternative 4 would not result in any direct population increase, impacts to public recreational and parks facilities would be less than significant and less than the Project's less than significant impact.

(v) Libraries

(a) Construction

Construction of both the Project and Alternative 4 would introduce construction workers to the area. Workers traveling to or from work, or during a work break, may make use of a library in the area. However, such library use would be incidental and typical of workers throughout the region and would not result in a notable increase in libraries in the area. In addition, no libraries are located in the immediate vicinity that would be physically affected by construction activities at the Project Site. There would be no Project-related construction staging or road closures at or adjacent to the Little Tokyo Branch Library, the

nearest library to the Project Site. Therefore, construction activities would not adversely affect the operations of nearby libraries. As such, construction activities would not exceed the capacity of local libraries that would result in the need for new or altered facilities. Alternative 4's impacts on library facilities during construction would be similar to the Project's less than significant impact.

(b) Operation

Alternative 4 would remove the Project's residential component by developing only office uses. The Project would result in a residential population increase of 3,423. The Little Tokyo Branch Library currently has a service population of 45,796 and the Benjamin Franklin Branch Library currently has a service population of 40,319. With the addition of the Project's population increase, neither branch library serving the Project Site would exceed the LAPL's criterion of 90,000 in service population. The employee population under Alternative 4 would potentially generate a small increase in library use but would not rise to LAPL's criteria of 90,000 in service population (based on a residential increase) in order to maintain acceptable service ratios or objectives. Impacts on library services under both Alternative 4 and the Project would be less than significant. However, because Alternative 4 would eliminate the Project's residential uses and reduce overall occupancy, impacts on library services and facilities would be less than the Project's less than significant impact.

(j) Transportation

(i) Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities

Alternative 4, as with the Project, would support multimodal transportation options and a reduction in VMT, as well as promote transportation-related safety in the Project area. However, the continuation of industrial uses and delivery trucks entering and exiting the North Site on 4th Street have a greater potential to impact pedestrian and bicycle traffic along 4th Street than under the Project. Alternative 4, as with the Project, would not conflict with any programs, plans, ordinances or policies addressing the circulation system, transit, roadways, bicycle and pedestrian facilities, including those of Mobility Plan 2035, the Community Plan, Vision Zero, the LAMC, the Plan for a Healthy Los Angeles, and the Citywide Design Guidelines. Alternative 4, as with the Project, would coordinate land use densities and promote the use of transit as it would be developed within a TPA. Alternative 4 would increase employment density in close proximity to a major transit stop. Alternative 4, as with the Project, would also provide for access and pedestrian improvements, including multiple pedestrian and vehicle access points throughout the Project Site. Similar to the Project, Alternative 4 would not conflict with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities and, as such, impacts relative to plans and programs would be less than significant. However, because of heavier truck traffic,

impacts with respect to conflict with programs would be greater than the Project's less than significant impact in this regard

(ii) Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)

Utilizing the City of Los Angeles VMT Calculator and accounting for TDM measures similar to the Project TDM strategies, as applicable such as reduced vehicle parking and bicycle parking, the VMT for employees under Alternative 4 was calculated.[28] As shown in Appendix M of this Draft EIR, according to the VMT Calculator, Alternative 4 would generate 5,109 daily trips and 37,943 daily VMT. Alternative 4 would not generate household VMT and Alternative 4's per capita employee VMT would be 4.6. As such, Alternative 4 would reduce the Project's 14,405 daily trips, 94,270 daily VMT, and VMT per employee of 6.5. As with the Project, Alternative 4 would not result in VMT impacts that exceed the Central APC employee VMT threshold of 7.6. Impacts regarding VMT would be consistent with the LADOT's TAG and, thus, consistent with CEQA Guidelines Section 15064.3(b). Therefore, VMT impacts under either the Project or Alternative 4 would be less than significant. Since Alternative 4 would have a lower VMT per employee compared to the Project, impacts would be less than the Project's less than significant VMT impact.

(k) Geometric Design Hazards

Alternative 4 would reduce the Project's daily vehicle trips due to reduced parking and along with its reduction in density. The Project is projected to add 25 or more trips at nine study freeway off-ramps during the morning and afternoon peak hours and queue lengths would exceed 50 feet during one or more of the peak hours at three of the study off-ramps. While queue lengths would exceed 50 feet during the a.m. or p.m. peak hours, queues at the off-ramps would not extend onto the freeway mainline and, as such, the Project would not result in a safety impact. Because Alternative 4 would reduce daily vehicle trips compared to the Project, Alternative 4 would also not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses and impacts would be less than significant. Because the North Site is separated from the South and West Sites by broad roadways, and sidewalks along 4th Street would be widened under both the Project and Alternative 4, retention of existing industrial uses on the North Site would not block pedestrians, driveways or turns into and from the Project Site. Thus, the retention of the existing North Site industrial use would not pose a geometric design hazard. However, with the reduction in vehicle trips under Alternative 4, impacts related to design hazards (freeway safety) would be less than the Project's less than significant impacts.

[28] See Appendix M, Alternatives VMT Information, of this Draft EIR, prepared by Gibson Transportation Consulting, Inc., May 2023.

(l) Tribal Cultural Resources

Alternative 4 would not include any occupied building levels or parking levels below grade and thus, would eliminate the Project's construction activities required for excavation of subterranean garages. To account for any earthwork needed for foundations, it is assumed that the overall depth of excavation would be 5 feet. The Project would result in the excavation of 651,000 CY of grading (cut), with excavations depths to approximately 57 feet bgs for the lowest foundations and approximately 64 bgs in isolated areas for elevator pits. Alternative 4's reduced excavation depth would reduce the Project's total grading by approximately 94 percent. Although under Alternative 4 some foundational features, such as pilings, could be deeper, the majority of excavation and construction activities would occur within five feet or less of the surface. Both the Project and Alternative 4 would implement Mitigation Measures TCR-MM-1 (Native American Monitor), TCR-MM-2 (monitoring logs), and TCR-MM-3 (halting of construction activity In the event that a prehistoric/Native American resource is unearthed). With implementation of the mitigation measures, construction activities would not cause a substantial adverse impact to tribal cultural resources, and impacts would be less than significant under both the Project and Alternative 4. However, because construction of Alternative 4 would reduce the depth and extent of excavation across the Project Site, impacts to tribal cultural resources would be less than the Project's less than significant impact (with mitigation).

(m) Utilities and Service Systems – Water Supply, Wastewater, Solid Waste, Electricity, and Natural Gas

(i) Water Supply

(a) Construction

Construction activities under the Project or Alternative 4 would result in an intermittent demand for water, including dust control, cleaning of equipment, removal and re-compaction, and other related activities. Water use for construction of both the Project and Alternative 4 would range from 5,000 to 10,000 gpd.[29] The existing water infrastructure has adequate capacity for existing site conditions (estimated to be 12,700 gpd) and, as such, would have adequate capacity for construction activities. New water distribution lines would be constructed onsite, with minor off-site work associated with connections to the public water main. Impacts on water supply and infrastructure during construction would be less than significant and similar under Alternative 4 and the Project.

(b) Operation

Alternative 4 would reduce the overall scale the Project, including not providing any new development on the North Site. The Project Site does not currently have adequate fire flow (hydrants) to serve Project or demonstrate compliance with Section 57.507.3 of the LAMC. The reduction in building heights and scale of development under Alternative 4

[29] KPFF Consulting Engineers, *Infrastructure Report,* p. 12, February 2023.

would reduce fire flow requirements. Thus, it is anticipated that greater fire flow over existing conditions would not be required. As such, the Project's mitigation (Mitigation Measure PS-MM-1) requiring infrastructure updates would not be needed under Alternative 4.

Both the Project and Alternative 4 would increase long-term water demand for consumption, operational uses, maintenance, and other activities on the Project Site. Domestic water demand for the Project, subtracting water conservation features, is estimated to be 392,197 gpd and 439 AFY. Using the office water demand factor in Table IV.L-7, *Estimated Project Water Demand*, in Section IV.L.1, *Utilities and Service Systems – Water Supply*, based on a rate of 0.12 gpd/sf, Alternative 4's 1,159,267 sf of office use would have a water demand of 139,112 gpd day.

Both the Project and Alternative 4 would be consistent with the demographic projections for the City in the 2020-2045 SCAG RTP/SCS and, as such, the LADWP has sufficient water supplies as projected in its latest UWMP to serve the Project and Alternative 4 and the reasonably foreseeable future development during normal, dry, and multiple-dry years. Impacts regarding water supply during operation would be less than significant under both the Project and Alternative 4. However, because Alternative 4 would reduce overall water demand compared to the Project, Alternative 4's impacts would be less than the Project's less than significant water impacts.

(ii) Wastewater

(a) Construction

During construction of either the Project or Alternative 4, a negligible amount of wastewater would be produced by construction workers because it is anticipated that portable toilets that would dispose of the wastewater off-site would be provided. As with the Project, construction of the Project or Alternative 4 would include the construction of all necessary on- and off-site sewer pipe improvements and connections to adequately connect to the City's existing sewer system. Construction of the wastewater system would occur onsite and in the immediate vicinity. All construction impacts would be temporary and would cease once the installation is complete. Based on these factors, similar to the Project, Alternative 4's construction activity would not require or result in the relocation or construction of new or expanded wastewater treatment facilities. Alternative 4's impacts related to wastewater infrastructure and treatment during construction would be similar to the Project's less than significant impact.

(b) Operation

Wastewater generation for the Project was estimated at 588,278 gpd (see Table IV.L.2-1, *Wastewater Generation during Project Operation*, of this Draft EIR). Utilizing the office wastewater generation factor of 170 gpd/1,000 sf, Alternative 4's 1,159,267 sf of office space would generate 197,075 gpd of wastewater.

Under Alternative 4, the North Site would remain in operation. With 167,596 sf of existing cold storage facilities located on the North Site, the North Site generated 5,028 gpd of wastewater, based on a generation rate of 30 gpd/1,000 sf. Thus, Alternative 4 would have an overall wastewater generation of approximately 202,103 gpd with the North Site included.

Since the sewer main lines serving the Project Site have adequate capacity to accommodate the Project, there would be adequate capacity to accommodate Alternative 4 which would also be served by the existing sewer main lines. Future detailed gauging and evaluation will be needed as part of the standard permit process to identify a specific sewer connection point and confirm the sewer capacity near the time of Project or Alternative 4 development. Although not anticipated, if the public sewer lacks sufficient capacity, then the Project or Alternative 4 would be required to upgrade sewer lines to a point in the sewer system with sufficient capacity. Ultimately, sewage flow under the Project or Alternative 4 would be conveyed to the HWRP, which has sufficient capacity for the Project and Alternative 4. Sewage flows under the Project or Alternative 4 would represent only a small fraction of the remaining available capacity of 175 mgd at the HWRP. As with the Project, Alternative 4 would not require or result in the relocation or construction of new or expanded wastewater treatment facilities and impacts on wastewater infrastructure and treatment capacity would be less than significant. However, because Alternative 4 would have a lower wastewater generation compared to the Project, Alternative 4's impacts would be less than the Project's less than significant wastewater impacts.

(iii) Solid Waste

(a) Construction

The construction of the Project would include the demolition of approximately 18,896 cubic yards (3,779 tons) of existing building materials and approximately 2,175 cubic yards of existing hardscape materials. By preserving the North Site, the amount of demolition would be reduced by approximately 45 percent to approximately 2,078 tons. Alternative 4 would reduce the total construction site from 7.65 acres to 6.3 acres and, thus, would reduce the Project's hardscape demolition waste of 2,610 tons by approximately 17.6 percent to 2,150 tons. The construction of the Project's total 2,318,534 sf floor area would generate 137 tons of C&D waste, which would be reduced by approximately 50 percent to 69 tons under Alternative 4's reduced building floor area. With the 62 percent reduction in excavated materials from 651,000 CY under the Project to 321,365 CY under Alternative 4, the volume of excavated and potentially landfilled soils under Alternative 4 would be reduced.

As with the Project, C&D waste from Alternative 4 would represent a small fraction of the available capacity of the County's Azusa Land Reclamation landfill or one of the inert debris engineered fill operations in Los Angeles County. Given that the remaining disposal capacity of the Azusa Land Reclamation Facility is approximately 51.71 million

cubic yards (64.64 million tons),[30] Alternative 4 and the Project's C&D waste would represent a small fraction of the available capacity. Based on existing available capacity, similar to the Project, Alternative 4 would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, impacts would be less than significant under the Project and Alternative 4. However, with the reduction in the Project's total C&D waste under Alternative 4, impacts would be less than the Project's less than significant solid waste impacts.

(b) Operation

Alternative 4's estimated solid waste generation is illustrated in **Table V-12**, *Alternative 4 Operational Solid Waste Generation*, below. As shown in Table V-12, Alternative 4 would generate approximately 3,104 net tons of solid waste per year or 17,003 pounds per day taking into account a diversion rate of 65 percent.[31] This total accounts for the removal of the South Site solid waste generation. With required diversion, the Project would produce 1,779 net tons of solid waste per year or 9,748 pounds per day. The County expects that approximately 140,074,607 additional tons of the remaining 142.67-million-ton capacity would be used in 2030, the earliest anticipated year of Project buildout.[32] Alternative 4's and the Project's estimated annual solid waste generation would represent a fraction of one percent of the remaining capacity in 2030. Alternative 4 would substantially increase the proposed office floor area and, and, as such, would generate a higher rate of employees. Because solid waste generation rates per office employee are relatively high (2.02 tons per year/employee) compared to other uses, Alternative 4 would result in greater demand on solid waste disposal facilities.[33] As with the Project, Alternative 4's solid waste generation would be accommodated by landfills with adequate capacity and, as such, impacts would be less than significant. However, since Alternative 4 would generate more solid waste requiring landfill disposal, impacts would be greater than under the Project's less than significant impacts.

30 County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, page 36.

31 County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, page 41.

32 County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, Appendix E-2, Table 8, Los Angeles County Solid Waste Disposal Capacity Need Projection.

33 The Project's office uses would generate 3,321 tons/year of solid waste (pre-diversion) and Alternative 4 would generate 9,872 tons/year.

TABLE V-12
ALTERNATIVE 4 OPERATIONAL SOLID WASTE GENERATION

Land Use	Quantity[a]	Daily Generation Factor[b]	Solid Waste Generation (tons/year)	Solid Waste Generation (lbs/day)
Proposed New Uses				
Office (pre-diversion)	1,154,267 sf (4,637 emp)	2.02 tons/emp/year	9,367	51,326
Proposed Total (post-diversion)[c]	**-**		**3,279**	**17,964**
Existing Uses – South Site (Pre-Diversion)	193,138	1.42 lbs/100/sf/day	500	2,742
Existing Uses – South Site (post-diversion)			**(175)**	**(961)**
Alternative 4 (post-diversion) Net Increase	**-**	**-**	**3,104**	**17,003**

NOTE(S):

[a] Office employees based on VMT Calculator results included in Appendix M of this Draft EIR.

[b] Generation factors are provided by CalRecycle's Disposal and Diversion Rates for Business Groups, https://www2.calrecycle.ca.gov/wastecharacterization/businessgrouprates. Accessed February 24, 2022.

[c] Based on an anticipated diversion rate of 65 percent for operations, which was assumed in the ColWMP 2020 Annual Report. This is conservative as the actual diversion is likely to be higher with increasing compliance with the State's recycling goal of 75 percent.

SOURCE: ESA, 2023.

(iv) Electric Power

(a) Construction

As with the Project, Alternative 4's construction activities would require limited and minor quantities of electricity for watering, lighting, power tools and other support equipment. As existing power lines are located in the vicinity of the Project Site, temporary power poles would be installed to provide electricity during construction. Existing off-site infrastructure would not have to be expanded or newly developed to provide electrical service to the Project Site during construction or demolition. With the reduction in new floor area, under Alternative 4 new construction would be approximately 50 percent less than under the Project. Electricity demand during the construction of the Project would be approximately 11 percent of the existing electricity usage at the Project Site. With the reduction in floor area, Alternative 4 would reduce the Project's electricity demand during construction. Therefore, both the Project and Alternative 4 would be within the supply and infrastructure capabilities of LADWP[34] and, as such, construction of either the Project or

[34] The percentage is derived by taking the annual average amount of electricity usage during the construction period (732,476 kWh) and dividing that number by the annual amount of existing electricity usage (6,652,637 kWh) to arrive at 11 percent.

Alternative 4 would not result in an increase in demand for electricity that would exceed available supply or distribution infrastructure. Neither the Project nor Alternative 4 would require the construction of new energy facilities or expansion of existing facilities. With regard to existing electrical distribution lines, the Project Applicant would be required to coordinate electrical infrastructure removals or relocations with LADWP and comply with site-specific requirements set forth by LADWP, which would ensure that service disruptions, if any, are minimized. Similar to the Project, Alternative 4 would not require the construction of new energy facilities or the expansion of existing facilities. Impacts related to construction electricity demand under Alternative 4 would be similar to the Project's less than significant construction-related electric power impacts.

(b) Operation

Alternative 4 would reduce the Project's overall 2,318,534 sf of floor area by approximately 50 percent. The Project's residential, restaurant/retail and hotel uses would not be developed under Alternative 4. The Project's annual net increase in operational electricity usage would be approximately 21,093,357 kWh. With the 50 percent reduction in Alternative 4's floor area, including elimination of the Project's residential, hotel, and restaurant/retail uses, demand for electricity services would be respectively reduced. The increase in annual electricity under the Project and Alternative 4 would represent a fraction of one percent of LADWP's projected sales in 2030and would be within LADWP's projected electricity supplies. During peak conditions, both the Project and Alternative 4 would represent approximately less than 0.1 percent of the LADWP estimated peak load, which is within the total load growth forecast for the City. Similar to the Project, the operational electricity services and supply and infrastructure for either the Project or Alternative 4 would not require the construction of new energy facilities or the expansion of existing facilities. Impacts related to demand for electricity services would be less than significant under both the Project and Alternative 4. However, because Alternative 4 would result in lower occupancy and lower demand for electricity services, impacts would be less than the Project's less than significant impact.

(v) Natural Gas

(a) Construction

Building energy and appliances for either the Project or Alternative 4 would be provided by all-electric sources, and construction activities at the Project Site would not require or involve installation of new natural gas connections. Therefore, construction of either the Project or Alternative 4 would not increase demand for, or interrupt the delivery of, natural gas that would affect supply or distribution. Neither the Project nor Alternative 4 would result in the construction of new energy facilities or expansion of existing facilities. Both the Project and Alternative 4 would reduce the consumption of natural gas at the Project Site during construction due to the removal of existing on-site uses. Impacts related to the use of natural gas during construction for Alternative 4 would be similar to the Project's less than significant impact

(b) Operation

The Project and Alternative 4 would utilize electricity as an energy source instead of natural gas. Based on the Project or Alternative 4's non-consumption of natural gas, neither the Project nor Alternative 4 would have a significant impact on natural gas. As such, impacts with respect to natural gas would be similar and less than significant under the Project and Alternative 4.

(3) Relationship of the Alternative to Project Objectives

Alternative 4 would not develop the North Site and would replace the Project's seven high-rise buildings on the South and West Sites with three-nine-story office buildings and a six-level parking structure on the South Site and a three-story office building on the West Site. Alternative 4 would reduce the overall scale of the Project and would be consistent with the existing Light Industrial zoning designation of the Project Site. However, because of the elimination of residential units, retail uses, restaurant uses, and the hotel, Alternative 4 would not meet the majority of the Project's Objectives, particularly regarding mixed use and housing. As shown below, Alternative 4 would partially meet Objectives related to reduced vehicle miles, LEED-gold development, and jobs.

Alternative 4 would fully meet the following Project Objective:

Objective 4: Provide a variety of new job-producing uses on the Project Site to further strengthen the commercial viability of the Central City neighborhood.

Alternative 4 would partially meet include the following Project Objectives:

Objective 8: Support local and regional mobility objectives and reduce vehicle miles traveled by redeveloping an infill site near a growing hub of urban activity with a mix of uses in proximity to major public transit infrastructure.

Objective 9: Construct a sustainably designed project that is consistent with smart growth principles and promotes resource conservation by providing LEED-Gold equivalent or better buildings and placing additional housing and job opportunities within proximity to transit.

Objective 10: Develop an economically feasible project that supports and grows the City's economic base through construction of a development that attracts a diverse range of residents, commercial tenants and visitors, which will generate local tax revenue and create construction and permanent jobs.

Alternative 4 would not meet the following Project Objectives:

Objective 1: Provide a mixed-use development that introduces an array of new residential, office, hotel, and commercial opportunities to the Central City neighborhood.

Objective 2: Create a significant new source of much-needed housing by providing a diverse range of housing options that includes a mix of different unit types at varying sizes and affordability levels.

Objective 3: Improve the physical identity of the Central City Community Plan area by redeveloping an underutilized industrial site with an integrated mix of uses to promote revitalization of the surrounding urban context.

Objective 5: Design a project that embodies diversity in height, size and architecture that blends the development into the existing urban fabric.

Objective 6: Enhance the overall pedestrian experience in the Central City area by creating new pedestrian connections and expansive publicly-accessible open spaces to transform the Project Site into a walkable part of the neighborhood.

Objective 7: Create a pedestrian friendly project by providing a variety of ground-floor commercial uses that create an inviting and active experience for visitors and pedestrians.

7. Environmentally Superior Alternative

Section 15126.6(2) of the State *CEQA Guidelines* indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR and that if the "No Project" alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible Alternatives includes (1) the No Project/No Build Alternative, (2) At Grade Parking Alternative, (3) the Historic Preservation\Reduced Density Alternative, and (4) Historic Preservation/ Office Use Alternative.

A summary of the environmental impacts anticipated under each Alternative compared to the Project is provided in **Table V-13,** *Comparison of Impacts Associated with the Alternatives and the Project*. The summary is based on the detailed evaluation of the potential impacts associated with each Alternative provided in the previous analyses. As indicated in Table V-13, the No Project/No Build Alternative would result in no impacts or less than significant impacts on the environment, with the exception operational related TAC since it would retain the North Site in its existing condition that includes cold storage and distribution activities involving diesel fueled trucks. As such, the No Project/No Build Alternative would result in fewer environmental impacts than under the Project or other Alternatives. Further, the No Project/No Build Alternative would avoid the Project's significant and unavoidable impacts on the historic LACS Building and short term significant and unavoidable air quality and construction noise and vibration impacts. Therefore, the No Project/No Build Alternative is considered the overall environmentally superior Alternative.

However, this Alternative would not provide the beneficial effects of the Project and other Alternatives. As shown in **Table V-14**, *Ability of Alternatives to Meet Project Objectives*, the No Project/No Build Alternative would not allow for the underlying purpose of the Project to redevelop the underutilized Project Site with a high-quality mixed-use development that includes new multi-family housing at varying income levels, office, retail, hotel and restaurant uses, as well as provide publicly-accessible open spaces, to revitalize the Project Site and the surrounding neighborhood, promote walkability and use of public transit, or to enhance the City's economic base.

As shown in Table V-13, all of the Project Alternatives would result in a reduction of some of the Project's environmental impacts. Alternative 2 would reduce the Project's parking by 60 percent and locate parking in above-grade podiums. This, in turn, would reduce excavation and hauling activities needed for subterranean structures by approximately 94 percent. As discussed above, Alternative 2 would reduce construction emissions and noise impacts due to substantially reduced excavation and hauling activities. However, due to the scale of development and concrete pours for building podiums and foundations, including overlapping construction/operation phases, Alternative 2 would not reduce construction emissions, noise, and vibration impacts to less than significant levels, although the durations of the significant and unavoidable impacts would be reduced compared to the Project. Moreover, Alternative 2 would include the North Site in the scope of development and would not reduce the Project's significant and unavoidable impact on the historic LACS Building. Although Alternative 2 would eliminate the Project's hotel, the hotel floor area would be ascribed to additional residential units. With increase in residential population compared to the Project, Alternative 2 would result in greater operational Public Service impacts (Fire, Police, Schools, Parks, and Libraries). Alternative 2 offers a similar scale of development and mix of uses to the Project, but without a hotel use. In this way, Alternative 2 would more closely meet the Project's underlying purpose and Project Objectives than Alternatives 3 and 4.

TABLE V-13
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Use or Feature	Project	Alternative 1: No Project/ No Build	Alternative 2: Above Grade Parking	Alternative 3: Historic Preservation/ Reduced Density	Alternative 4: Historic Preservation/ Existing Zoning
Air Quality					
Consistency or Conflict with Air Quality Management Plan					
Construction	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Operation	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Cumulative Increase of Criteria Pollutants					
Construction	Significant and Unavoidable with Mitigation	Less (No Impact)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)
Operation	Significant and Unavoidable with Mitigation	Less (No Impact)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Less (Less than Significant with Mitigation)
Exposure of Sensitive Receptors to Pollutant Concentrations - Localized Emissions					
Construction	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Operation	Less than Significant with Mitigation	Less (No Impact)	Similar (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)

TABLE V-13
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Use or Feature	Project	Alternative 1: No Project/ No Build	Alternative 2: Above Grade Parking	Alternative 3: Historic Preservation/ Reduced Density	Alternative 4: Historic Preservation/ Existing Zoning
Exposure of Sensitive Receptors to Pollutant Concentrations - Carbon Monoxide Hotspots	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Exposure of Sensitive Receptors to Pollutant Concentrations - Toxic Air Contaminants					
Construction	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Operation	Less than Significant with Mitigation	Greater (No Impact)	Less (Less than Significant with Mitigation)	Greater (Less than Significant with Mitigation)	Greater (Less than Significant with Mitigation)
Cultural Resources					
Historical Resources	Significant and Unavoidable with Mitigation	Less (No Impact)	Similar (Significant and Unavoidable with Mitigation)	Less (Less than Significant)	Less (Less than Significant)
Archaeological Resources	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Human Remains	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)

TABLE V-13
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Use or Feature	Project	Alternative 1: No Project/ No Build	Alternative 2: Above Grade Parking	Alternative 3: Historic Preservation/ Reduced Density	Alternative 4: Historic Preservation/ Existing Zoning
Energy					
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Geology and Soils					
Paleontological Resources	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Greenhouse Gas Emissions					
GHG Emissions/Consistency with Plans	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
Land Use and Planning					
Plan Consistency	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Greater (Less than Significant)	Greater (Less than Significant)
Noise					
Construction	Significant and Unavoidable with Mitigation	Less (No Impact)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)
Operation	Less than Significant with Mitigation	Less (No Impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Less (Less than Significant)

TABLE V-13
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Use or Feature	Project	Alternative 1: No Project/ No Build	Alternative 2: Above Grade Parking	Alternative 3: Historic Preservation/ Reduced Density	Alternative 4: Historic Preservation/ Existing Zoning
Vibration					
Construction (Building Damage)	Significant and Unavoidable with Mitigation	Less (No Impact)	Less (Significant and Unavoidable with Mitigation (Building Damage)	Less (Significant and Unavoidable with Mitigation (Building Damage)	Less (Significant and Unavoidable with Mitigation (Building Damage)
Construction (Groundborne Vibration from Trucks)	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less Significant)	Less (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Population and Housing					
Construction	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Public Services					
Fire Protection					
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Operation	Less than Significant with Mitigation	Less (No Impact)	Greater (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant)

TABLE V-13
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Use or Feature	Project	Alternative 1: No Project/ No Build	Alternative 2: Above Grade Parking	Alternative 3: Historic Preservation/ Reduced Density	Alternative 4: Historic Preservation/ Existing Zoning
Police Protection					
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Greater (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Schools					
Construction	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Greater (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Parks and Recreation					
Construction	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Greater (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Libraries					
Construction	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Greater (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)

TABLE V-13
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Use or Feature	Project	Alternative 1: No Project/ No Build	Alternative 2: Above Grade Parking	Alternative 3: Historic Preservation/ Reduced Density	Alternative 4: Historic Preservation/ Existing Zoning
Transportation					
Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Greater (Less than Significant)	Greater (Less than Significant)
Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Geometric Design Hazards	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Tribal Cultural Resources					
Tribal Cultural Resources Impacts	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Utilities and Infrastructure					
Water Supply					
Construction	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant)

TABLE V-13
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Use or Feature	Project	Alternative 1: No Project/ No Build	Alternative 2: Above Grade Parking	Alternative 3: Historic Preservation/ Reduced Density	Alternative 4: Historic Preservation/ Existing Zoning
Wastewater					
Construction	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Solid Waste					
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Operation	Less than Significant	Less (No impact)	Similar (Less than Significant)	Less (Less than Significant)	Greater (Less than Significant)
Electricity					
Construction	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant	Less (No impact)	Similar (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Natural Gas					
Construction	No Impact	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)
Operation	No Impact	Similar (No impact)	Similar (No impact)	Similar (No impact)	Similar (No impact)

SOURCE: ESA. 2023

TABLE V-14
ABILITY OF ALTERNATIVES TO MEET PROJECT OBJECTIVES

Project Objective	Ability to Meet Project Goal/Objective				
	Project	**Alternative 1 No Project/ No Development**	**Alternative 2 Above Grade Parking**	**Alternative 3 Historic Preservation/ Reduced Density**	**Alternative 4 Historic Preservation/ Existing Zoning**
1. Provide a mixed-use development that introduces an array of new residential, office, hotel, and commercial opportunities to the Central City neighborhood.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Substantially Meets Objective (lesser extent than the Project)	Does Not Meet Objective
2. Create a significant new source of much-needed housing by providing a diverse range of housing options that includes a mix of different unit types at varying sizes and affordability levels.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Substantially Meets Objective (lesser extent than the Project)	Does not Meet Objective
3. Improve the physical identity of the Central City Community Plan area by redeveloping an underutilized industrial site with an integrated mix of uses to promote revitalization of the surrounding urban context.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Partially Meets Objective (lesser extent than the Project)	Does Not Meet Objective
4. Provide a variety of new job-producing uses on the Project Site to further strengthen the commercial viability of the Central City neighborhood.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Substantially Meets Objective (lesser extent than the Project)	Fully Meets Objective
5. Design a project that embodies diversity in height, size and architecture that blends the development into the existing urban fabric.	Fully Meets Objective	Does not Meet Objective	Fully Meets Objective	Partially Meets Objective	Does Not Meet Objective
6. Enhance the overall pedestrian experience in the Central City area by creating new pedestrian connections and expansive publicly-accessible open spaces to transform the Project Site into a walkable part of the neighborhood.	Fully Meets Objective	Does not Meet Objective	Fully Meets Objective	Partially Meets Objective	Does Not Meet Objective

TABLE V-14
ABILITY OF ALTERNATIVES TO MEET PROJECT OBJECTIVES

Project Objective	Ability to Meet Project Goal/Objective				
	Project	**Alternative 1 No Project/ No Development**	**Alternative 2 Above Grade Parking**	**Alternative 3 Historic Preservation/ Reduced Density**	**Alternative 4 Historic Preservation/ Existing Zoning**
7. Create a pedestrian friendly project by providing a variety of ground-floor commercial uses that create an inviting and active experience for visitors and pedestrians.	Fully Meets Objective	Does Not Meet Objective	Substantially, but not Fully Meets Objective	Partially Meets Objective	Does Not Meet Objective
8. Support local and regional mobility objectives and reduce vehicle miles traveled by redeveloping an infill site near a growing hub of urban activity with a mix of uses in proximity to major public transit infrastructure.	Fully Meets Objective	Does Not Meet Objective	Partially Meets Objective	Substantially Meets Objective (lesser extent than the Project)	Partially Meets Objective
9. Construct a sustainably designed project that is consistent with smart growth principles and promotes resource conservation by providing LEED-Gold equivalent or better buildings and placing additional housing and job opportunities within proximity to transit.	Fully Meets Objective	Does not Meet Objective	Fully Meets Objective	Substantially Meets Objective (lesser extent than the Project)	Partially Meets Objective
10. Develop an economically feasible project that supports and grows the City's economic base through construction of a development that attracts a diverse range of residents, commercial tenants and visitors, which will generate local tax revenue and create construction and permanent jobs.	Fully Meets Objective	Does not Meet Objective	Fully Meets Objective	Substantially, Meets Objective (lesser extent than the Project)	Partially Meets Objective

SOURCE: ESA, 2023

Alternative 3, the Historic Preservation/Reduced Density Alternative, would reduce the Project's floor area and occupancy by approximately 30 percent. With the exception of the removal of the hotel use from the scope of the Project, Alternative 3 would provide a similar mix of land uses and publicly-accessible open space as under the Project. As with Alternatives 2 and 4, Alternative 3 would reduce the Project's parking by 60 percent, which would reduce the scale of Project's subterranean parking structures. This, in turn, would reduce the Project's excavation, grading, and hauling of soils from 651,000 CY under the Project to 321,364 CY under Alternative 3, a 51 percent reduction. Although Alternative 3 would not reduce the Project's maximum daily levels of construction air emissions, noise, and vibration impacts to less than significant levels, Alternative 3 would reduce the scale and duration of construction activities and, as such, reduce the effects of these short-term significant and unavoidable impacts. Also, because Alternative 3 would not develop the North Site, it would reduce the Project's significant and unavoidable impact on the historic LACS Building to a less than significant level. Alternative 3 would result in an impact greater than the Project in regard to operational related TAC emissions since it would retain the North Site in its existing condition that includes cold storage and distribution activities involving diesel fueled trucks. Alternative 3 would also result in a greater, but less than significant impact with respect to land use since it would not meet the objectives of the Housing Element to the same extent as the Project. Because Alternative 3 would provide a similar mix of residential, office, and restaurant/retail uses and open space as under the Project (South Site only), it would substantially meet the Project's underlying purpose and many of the Project Objectives. However, with respect to Objectives to encourage pedestrian activity and open space, the retention of the existing industrial use and elimination of the north section of the 4th Street Plaza would reduce the pedestrian experience and not meet Project Objectives to the same extent as under Alternative 2.

As further shown in Table V-13, Alternative 4, the Historic Preservation/Office Use Alternative, would broadly reduce the Project's environmental impacts. Alternative 4 would substantially reduce the scale of development by reducing the Project's floor area by 50 percent and would substantially reduce the duration of construction activities and the Project's significant and unavoidable construction emissions and construction noise and vibration impacts. However, as with Alternatives 2 and 3, significant air quality, noise, and vibration impacts would not be reduced to less than significant levels. As with Alternative 3, Alternative 4 would avoid any development of the North Site and, as such, reduce the Project's significant and unavoidable impact on the historic LACS Building to a less than significant level. Alternative 4, however, would generate more operational solid waste than under the Project with impacts in this regard greater than the Project. In addition, as a single use (offices only), Alternative 4 would not meet the policies to the same extent as the Project of several applicable plans and policies, such as the Adaptive Reuse Ordinance to revitalize and facilitate the development of a "24-hour city" or to facilitate policies of the Housing Element or the designated Greater Downtown Housing Incentive Area to increase housing opportunities in proximity to transit or in the Downtown. Alternative 4 would also conflict with policies of the Redevelopment Plan for the Central Industrial Redevelopment Project to provide affordable residences and open space that are accessible to public

transportation; or the policies of the 2020-2045 RTP/SCS to co-locate housing and jobs in proximity to transit. Like Alternative 3, Alternative 4 would only result in a greater impact than the Project in regard to operational related TAC emissions since it would retain the North Site in its existing condition that includes cold storage and distribution activities involving diesel fueled trucks. As also shown in Table V-14, Alternative 4 would only fully meet one of the Project's 10 specific Objectives and would not meet the Project's underlying purpose to redevelop the underutilized Project Site with a high-quality mixed-use development that includes new multi-family housing at varying income levels, office, retail, hotel and restaurant uses, as well as publicly-accessible open spaces, to revitalize the Project Site and the surrounding neighborhood, promote walkability and use of public transit, and enhance the City's economic base.

In accordance with the State *CEQA Guidelines* requirement to identify an environmentally superior Alternative other than the No Project/No Build Alternative, despite not reducing the construction duration and excavation quantity to the largest extent of the Alternatives, because Alternative 3 would reduce the highest number of the Project's significant and less than significant environmental impacts, including reducing long-term operational impacts related to air emissions, as well as avoiding the Project's significant and unavoidable impacts on the historic LACS building. As such, Alternative 3 is selected as the Environmentally Superior Alternative. In addition, Alternative 3 would substantially meet the underlying purpose of the Project to redevelop the underutilized Project Site with a high-quality mixed-use development, provide publicly-accessible open spaces, revitalize the Project Site and the surrounding neighborhood, promote use of public transit, and enhance the City's economic base.

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