

V. Alternatives

V. Alternatives

1. Introduction

The identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process under CEQA. Specifically, Public Resources Code (PRC) Section 21001 states, in part, that the environmental review process is intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives which will avoid or substantially lessen such significant effects. In addition, PRC Section 21002.1(a) states, in part, that the purpose of an environmental impact report is to identify the significant effects on the environment of a project, identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.

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

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

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

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

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

2. Overview of Selected Alternatives

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

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

- **Alternative 1, No Project Alternative:** Alternative 1 assumes that the Project would not be implemented, no new permanent development would occur within the Project Site, and the existing environment would be maintained. Thus, the physical conditions of the Project Site would remain as they are today. Specifically, the 31,833 square feet of existing buildings comprised of an automotive dealership for Toyota inclusive of a showroom, parts storage structure, auto repair facility with five service bays, and surface parking would remain on the Project Site, and no new construction would occur.
- **Alternative 2, No Below-Grade Parking Alternative:** Alternative 2 would include the same uses and vehicle parking spaces as the Project but would eliminate the three subterranean parking levels. All parking for the proposed uses would be provided with three above-grade levels and one level of surface parking. The

remaining Project components, and the floor area ratio (FAR), would be the same as the Project. Additionally, as with the Project, Alternative 2 would remove 31,833 square feet of existing commercial uses and parking.

- **Alternative 3, Reduced Development Alternative:** Alternative 3 would develop the same mix of uses as the Project but would reduce the total amount of new floor area by approximately 20 percent. Specifically, the Reduced Development Alternative includes the development of 201 residential units, 136,000 square feet of office uses, and 22,042 square feet of commercial uses. Upon completion, Alternative 3 would comprise 364,394 square feet of floor area (compared to the Project's 501,185 square feet of new floor area) with an FAR of 2.25:1. A total of 732 vehicle parking spaces would be provided with two subterranean parking levels (a reduction of one level compared to the Project) and one level of surface parking. Additionally, as with the Project, Alternative 3 would remove 31,833 square feet of existing commercial uses and parking.
- **Alternative 4, All Residential Use Alternative:** Alternative 4 would replace the office uses proposed under the Project with residential uses. Specifically, Alternative 4 would include the development of a 500,414 square-foot mixed-use project consisting of 500 residential units and 1,000 square feet of commercial uses. Upon completion, Alternative 4 would comprise 500,414 square feet of floor area (compared to the Project's 501,185 square feet of new floor area) with an FAR of 3.08:1. A total of 753 vehicle parking spaces would be provided with two subterranean parking levels (a reduction of one level compared to the Project) and one level of surface parking. Additionally, as with the Project, Alternative 4 would remove approximately 31,833 square feet of existing commercial uses and parking.

Table V-1 on page V-4 provides a comparison of the Project and the four alternatives being considered. Each of these alternatives is described further in the sections that follow. In addition, CEQA Guidelines Section 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible, and such rejected alternatives are described below.

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

	Project	Alternative 1: No Project	Alternative 2: No Below-Grade Parking	Alternative 3: Reduced Development	Alternative 4: All Residential Use
Residential	342,643 sf (350 du)	—	342,643 sf (350 du)	205,853 sf (201 du)	498,914 sf (500 du)
Office	136,000 sf		136,000 sf	136,000 sf	—
Commercial (Retail/Restaurant)	22,042 sf	—	22,042 sf	22,042 sf	1,000 sf
Support	500 sf	—	500 sf	500 sf	500 sf
Total Floor Area	501,185 sf	—	501,185 sf	364,394 sf	500,414 sf
Net Floor Area Upon Completion	469,352 sf	—	469,352 sf	332,561 sf	468,581 sf
Total FAR	3.08:1	—	3.08:1	2.25:1	3.08:1
Total Parking	894 sp	—	894 sp	732 sp	753 sp
Heights	up to 404 ft (up to 35 stories)	—	up to 434 ft (up to 38 stories)	up to 316 ft (up to 27 stories)	up to 404 ft (up to 35 stories)
Excavation Depth	40 ft bgs		6 ft bgs	30 ft bgs	30 ft bgs
Soil Export	210,000 cy	—	46,000 cy	160,000 cy	160,000 cy
<i>bgs = below ground surface</i> <i>cy = cubic yards</i> <i>du = dwelling units</i> <i>sp = spaces</i> <i>Source: Eyestone Environmental, 2024.</i>					

3. Alternatives Considered and Rejected as Infeasible

As set forth in CEQA Guidelines Section 15126.6(c), the range of potential alternatives to a proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant impacts. As further set forth in CEQA Guidelines Section 15126.6(c), the EIR should briefly describe the rationale for selecting the alternatives to be discussed as well as identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate an alternative from detailed consideration are the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Based on the CEQA Guidelines, the alternatives that have been considered and rejected include the following:

- **Alternatives to Eliminate Significant Noise and Vibration Impacts During Construction:** As discussed in Section IV.H, Noise, of this Draft EIR, the Project would result in short-term significant and unavoidable construction-related noise and vibration (human annoyance) impacts. Specifically, Project construction activities would result in significant and unavoidable construction-related noise impacts related to on-site and off-site construction activities and significant and unavoidable vibration (human annoyance) impacts related to both on-site construction activities and off-site construction traffic. The following potential alternatives were considered to avoid or substantially lessen these impacts:
 - **Approach (a)—Extended Construction Duration:** An approach that extends the construction period, thus reducing the amount of daily construction activity that would occur under the Project was reviewed and rejected as infeasible for the following reasons:
 - Even with a 50 percent reduction in daily construction activity, construction noise impacts would remain significant. Further, this approach would inefficiently increase the number of days for construction noise impacts. Construction noise levels are dependent on the type and number of pieces of construction equipment operating simultaneously (on-site equipment). It is anticipated the daily number of on-site construction equipment and off-site construction trips would be reduced under this approach. Typically, a reduction of 50 percent in the number of pieces of construction equipment would be required to reduce the construction-related noise levels by 3 dBA (just perceptible). For example, a reduction from 26 pieces to 13 pieces of construction equipment (a 50-percent reduction) for the building construction phase would reduce the construction noise level at the off-site receptors by 0.1 dBA L_{eq} at receptor location R3, 0.3 dBA L_{eq} at receptor locations R1, R2 and R7, 1.8 dBA L_{eq} at receptor location R8, 2.1 dBA at receptor locations R4 and R6, and 2.2 dBA at receptor locations R5

and R9 (as compared to the Project).¹ However, the estimated construction noise levels with a 50-percent reduction in the number of pieces of construction equipment would still exceed the significance threshold by up to 0.9 dBA L_{eq} at receptor location R9, 4.1 dBA L_{eq} at receptor location R8, 25.6 dBA L_{eq} at receptor location R1, 26.9 dBA L_{eq} at receptor location R3, 27.1 dBA L_{eq} at receptor location R7, and 27.8 dBA L_{eq} at receptor location R2 during the building construction phase. Therefore, the construction noise levels under this approach would be less than the Project (depending on the amount of reduction) but would still exceed the significance threshold. In addition, this approach would be inefficient and would increase the number of days that sensitive receptors would be impacted by construction activities. Furthermore, due to the proximity of the off-site noise sensitive receptors and the building heights (i.e., receptor locations R1, R2, R3 and R7, it would not be practical to reduce the construction noise levels to below the significance threshold by further extending the duration of construction (and reducing the number of pieces of construction equipment) as even a single piece of equipment would result in noise levels above the significance threshold. For example, a single piece of construction equipment would generate a noise level up to 97.0 dBA L_{eq} at receptor location R3, which would exceed the significance threshold by 26.8 dBA. Even with the mitigation measure (temporary noise barrier), the construction noise level of a single piece of equipment at receptor locations R1, R2, R3 and R7 would still exceed the significance threshold, due to the limitation of the temporary construction noise barrier and that the temporary noise barrier would not be effective in reducing the construction-related noise levels for the upper levels of receptor locations R1 and R7. In addition, the estimated noise reduction provided with the 50-percent reduction (0.1 dBA to 2.2 dBA) is not considered a substantial reduction. As such, the on-site construction noise impacts under this approach would be less but would remain significant.

- The off-site construction noise impacts associated with off-site construction trucks (during the nighttime concrete mat foundation pour) would be significant, as concrete mat foundation pour would require a continuous pour with similar number of concrete trucks). In addition, construction noise associated with the off-site utility improvements would be significant at receptor locations R1, R2 and R7, due to the limitation of the temporary construction noise barrier.
- The on-site construction vibration impacts (human annoyance) would be significant, similar to the Project, as the vibration impact analysis is based on the peak vibration level generated by individual construction equipment, and the extended construction duration approach would utilize similar construction equipment to the Project (e.g., drill rig and large bulldozer) as

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

the site grading/excavation phase). Since similar construction equipment would be used, vibration levels would be similar to the Project. In addition, because the haul routes would be the same, off-site construction vibration impacts (human annoyance), due to heavy trucks traveling by sensitive receptors, would also continue to be significant similar to the Project.

- Approach (b)—Central Location of Development: An approach where the proposed construction activities and development is moved closer to the center of the Project Site, thus pulling back the proposed development and associated construction activities from the off-site sensitive receptors, was reviewed and rejected as infeasible for the following reasons:
 - Under Approach (b), on-site construction noise levels would remain significant because of a lack of meaningful buffer space between the Project Site and adjacent sensitive receptors. Construction noise levels can be reduced by providing additional distance between the receptor and the construction equipment. Noise levels from construction equipment would attenuate approximately 6 dBA per doubling of distance. The construction noise levels associated with the building phases for the proposed development placed closer to the center of the site would be lower than the Project. The noise level reduction, depending on the setback from the property line, would be limited due to the size of the Project Site and the line of sight to adjacent noise sensitive receptors. Due to the close proximity of the sensitive receptors (i.e., receptor locations R1, R2, R3 and R7 are adjacent to the Project Site) and a constrained Project Site that does not have the space to create a meaningful buffer zone, it would not be practical to substantially mitigate the on-site construction noise impacts of the Project. In addition, noise levels during the site demolition, site preparation and grading would be similar to the Project, as construction activities for these phases would be similar on peak days. As such, the on-site construction noise impacts under this approach would remain significant similar to the Project.
 - Because the haul routes would remain the same, the off-site construction vibration impacts (human annoyance), due to heavy trucks traveling by sensitive receptors, would be significant similar to the Project.

As indicated above, none of the above approaches would substantially reduce or avoid the significant construction-related noise and vibration (human annoyance) impacts of the Project. Furthermore, Approaches (a) and (b) would not achieve the Project's underlying purpose and objectives to the same extent as the Project and Approach (a) would extend the construction period, meaning impacts would affect sensitive receptors for a longer period of time, making this approach infeasible. Therefore, an alternative that includes one or more of these approaches has been rejected from further consideration in this Draft EIR.

- **Alternative Project Site:** The results of a search to find an alternative site on which the Project could be built determined that suitable similar locations are not available to meet the underlying purpose of the Project to redevelop an underutilized site with a high-density, mixed-use, transit- and pedestrian-oriented development that provides a mix of new housing opportunities that are integrated with commercial and office uses that provide new employment and commercial opportunities for the surrounding community. The availability of an alternative site is also restricted by the Project's objectives, which include, but are not limited, the following area-specific objectives: locating new housing and employment opportunities near one another and in close proximity to transit stations, along transit corridors, and within high activity areas; focusing housing and employment growth within a High Quality Transit Area (HQTA) consistent with a key element in SCAG's Regional Transportation Plan/Sustainability Communities Strategy RTP/SCS); strengthening viable commercial development in the community and provide additional opportunities for new commercial development and services by providing a variety of commercial uses, including office space, retail and restaurant space; improving the visual character, and maximize the value of an underutilized site through replacement of existing low-intensity uses with higher-density housing and commercial uses, at an in-fill location that is responsive to market demands; providing convenient neighborhood-serving commercial uses and open space within walking distance of existing off-site residential and commercial uses, proposed on-site residential uses and on and off-site office uses.

In addition, an alternative site is not considered feasible as it is not expected, and would be speculative, that the Applicant can reasonably acquire, control, or have access to a suitable alternative site that would provide for the uses and square footage proposed by the Project.

Furthermore, if a suitable alternative site could be found, it is anticipated that the significant and unavoidable impacts with respect to on- and off-site noise and vibration sources during construction would still occur. Specifically, given that an alternative site would also likely be an infill site with nearby noise-sensitive receptors, and since noise levels during peak day construction activities are used for measuring impacts, noise levels from on- and off-site construction activities would be similar to those of the Project. In addition, since construction vibration impacts are evaluated based on the peak vibration levels generated by each type of construction equipment, vibration levels associated with on- and off-site construction activities would be similar to the Project. As a result, an alternative project site is unlikely to avoid or substantially lessen the Project's significant noise effects.

Thus, in accordance with CEQA Guidelines Section 15126.6(f), this alternative was rejected from further consideration.

4. Alternatives Analysis Format

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the project objectives, identified in Section II, Project Description, of this Draft EIR, would be substantially attained by the alternative.² The evaluation of each of the alternatives follows the process described below:

- a. The net environmental impacts of the alternative are determined for each environmental issue area analyzed in Section IV, Environmental Impact Analysis, of this Draft EIR, assuming that the alternative would implement the same project design features and mitigation measures identified in Section IV, Environmental Impact Analysis, of this Draft EIR.
- b. Post-mitigation significant and non-significant environmental impacts of the alternative and the Project are compared for each environmental issue as follows:
 - Less: Where the net impact of the alternative would be clearly less adverse or more beneficial than the impact of the Project, the comparative impact is said to be “less”.
 - Greater: Where the net impact of the alternative would clearly be more adverse or less beneficial than the Project, the comparative impact is said to be “greater”.
 - Similar: Where the impact of the alternative and Project would be roughly equivalent, the comparative impact is said to be “similar”.
- c. The comparative analysis of the impacts is followed by a general discussion of whether the underlying purpose and basic Project objectives are feasibly and substantially attained by the alternative.

A summary matrix that compares the impacts associated with the Project with the impacts of each of the analyzed alternatives is provided in Table V-2 on page V-10.

² *State of California, CEQA Guidelines Section 15126.6 (c).*

**Table V-2
Comparison of Impacts Associated with the Alternatives**

Impact Area	Project	Alternative 1: No Project	Alternative 2: No Below-Grade Parking	Alternative 3: Reduced Development	Alternative 4: All Residential Use
A. AIR QUALITY					
<i>Regional Emissions</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less Than Significant)	Similar (Less than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less than Significant)
<i>Localized Emissions</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less Than Significant)	Similar (Less than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less than Significant)
<i>Toxic Air Contaminants</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less Than Significant)	Less (Less than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less than Significant)
B. CULTURAL RESOURCES (ARCHAEOLOGICAL RESOURCES)					
<i>Archaeological Resources</i>	Less Than Significant w/Mitigation	Less (No Impact)	Less (Less than Significant w/Mitigation)	Less (Less Than Significant w/ Mitigation)	Less (Less than Significant w/Mitigation)
C. ENERGY					
<i>Wasteful, inefficient, or unnecessary consumption of Energy Resources</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less Than Significant)	Less (Less than Significant)

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

Impact Area	Project	Alternative 1: No Project	Alternative 2: No Below-Grade Parking	Alternative 3: Reduced Development	Alternative 4: All Residential Use
<i>Operation</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less than Significant)
<i>Conflict with Plans for Renewable Energy or Energy Efficiency</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less than Significant)
D. GEOLOGY AND SOILS (PALEONTOLOGICAL RESOURCES)					
<i>Paleontological Resources</i>	Less Than Significant w/Mitigation	Less (No Impact)	Less (Less than Significant w/Mitigation)	Less (Less Than Significant w/Mitigation)	Less (Less than Significant w/Mitigation)
E. GREENHOUSE GAS EMISSIONS					
<i>Greenhouse Gas Emissions</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less than Significant)
F. HAZARDS AND HAZARDOUS MATERIALS					
<i>Construction</i>	Less Than Significant w/Mitigation	Less (No Impact)	Less (Less than Significant w/Mitigation)	Less (Less Than Significant w/Mitigation)	Less (Less than Significant w/Mitigation)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Similar (Less than Significant)
G. LAND USE AND PLANNING					
<i>Conflict with Land Use Plans</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less than Significant)
H. NOISE^b					
<i>Construction</i>					
<i>On-Site Noise</i>	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)

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

Impact Area	Project	Alternative 1: No Project	Alternative 2: No Below-Grade Parking	Alternative 3: Reduced Development	Alternative 4: All Residential Use
<i>Off-Site Noise</i>	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
<i>On-Site Vibration (Building Damage)</i>	Less Than Significant w/Mitigation	Less (No Impact)	Similar (Less Than Significant w/Mitigation)	Similar (Less Than Significant w/Mitigation)	Similar (Less than Significant w/Mitigation)
<i>On-Site Vibration (Human Annoyance)</i>	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
<i>Off-Site Vibration (Building Damage)</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less than Significant)
<i>Off-Site Vibration (Human Annoyance)</i>	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
<i>Operation</i>					
<i>On-Site Noise</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Similar (Less than Significant)
<i>Off-Site Noise</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Similar (Less than Significant)
<i>Vibration</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Similar (Less than Significant)
I. PUBLIC SERVICES					
<i>Fire Protection</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less than Significant)

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

Impact Area	Project	Alternative 1: No Project	Alternative 2: No Below-Grade Parking	Alternative 3: Reduced Development	Alternative 4: All Residential Use
<i>Police Protection</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Greater (Less than Significant)
J. TRANSPORTATION					
<i>Conflict with Plans</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less than Significant)
<i>Vehicle Miles Traveled</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Greater (Less than Significant)
<i>Hazardous Geometric Design Features</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less than Significant)
<i>Freeway Safety Analysis</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less than Significant)
K. TRIBAL CULTURAL RESOURCES					
<i>Tribal Cultural Resources</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less than Significant)
L. UTILITIES AND SERVICE SYSTEMS					
<i>Water Supply and Infrastructure</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less than Significant)

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

Impact Area	Project	Alternative 1: No Project	Alternative 2: No Below-Grade Parking	Alternative 3: Reduced Development	Alternative 4: All Residential Use
<i>Wastewater</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less than Significant)
<i>Energy Infrastructure</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less than Significant)
^a <i>Related to the release of hazardous materials into the environment.</i> ^b <i>Cumulative on- and off-site construction noise and cumulative on- and off-site construction vibration (human annoyance) would also be significant and unavoidable under the Project.</i> <i>Source: Eyestone Environmental, 2024.</i>					

V. Alternatives

A. Alternative 1: No Project

1. Description of the Alternative

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

2. Environmental Impacts

a. Air Quality

(1) Regional Emissions

(a) Construction

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

(b) Operation

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

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

(2) Localized Emissions

(a) Construction

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

(b) Operation

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

(3) Toxic Air Contaminants

(a) Construction

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

(b) Operation

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

b. Cultural Resources (Archaeological Resources)

Alternative 1 would not result in new development that would require grading or earthwork activities. As such, Alternative 1 would not result in the potential discovery of archaeological resources. No impacts associated with archaeological resources would occur under Alternative 1, and impacts would be less than the impacts of the Project, which would be less than significant with mitigation.

c. Energy

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

(a) Construction

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

(b) Operation

The No Project Alternative would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the long-term energy demand on the Project Site and would have no potential to result in an increase in the wasteful, inefficient, or unnecessary consumption of energy resources. No operational impacts related to energy would occur under Alternative 1, and impacts would be less than the less than significant impacts of the Project.

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

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

d. Geology and Soils (Paleontological Resources)

The No Project Alternative would not result in new development that would require grading or earthwork activities. As such, Alternative 1 would not result in the potential discovery of paleontological resources. No impacts associated with paleontological

resources would occur under Alternative 1, and impacts would be less than the impacts of the Project, which would be less than significant with mitigation.

e. Greenhouse Gas Emissions

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

f. Hazards and Hazardous Materials

Alternative 1 would not require demolition, excavation, grading, or other construction activities. Therefore, Alternative 1 would not have the potential to uncover subsurface hazards, use or release hazardous materials, or generate hazardous waste during construction. In addition, Alternative 1 would not result in new development or increased operations that would use or generate additional hazardous materials on-site. Furthermore, since Alternative 1 would not result in any changes to the current operation of the Project Site, no impacts related to the implementation of any emergency response or evacuation plans would occur. Accordingly, no significant impacts related to hazards and hazardous materials would occur under Alternative 1, and impacts would be less than the less than significant impacts with mitigation of the Project.

g. Land Use and Planning

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

h. Noise

(1) Noise

(a) Construction

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

(b) Operation

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

(2) Vibration

(a) Construction

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

(b) Operation

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

i. Public Services

(1) Fire Protection

(a) Construction

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

(b) Operation

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

(2) Police Protection

(a) Construction

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

(b) Operation

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

j. Transportation

Since Alternative 1 would not develop new or additional land uses on the Project Site, Alternative 1 would not generate any additional vehicle trips or alter existing access or circulation within the Project Site during operation. Therefore, no transportation impacts would occur with respect to construction or operation, including conflicts with programs, plans, ordinances, or policies addressing the circulation system; vehicle miles traveled (VMT); and emergency access. Therefore, impacts under Alternative 1 would be less than the Project, which would be less than significant.

k. Tribal Cultural Resources

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

I. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

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

(b) Operation

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

(2) Wastewater

(a) Construction

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

(b) Operation

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

(3) Energy Infrastructure

(a) Construction

Construction activities would not occur under Alternative 1. Therefore, Alternative 1 would not generate a short-term demand for energy during construction, and construction-related impacts to energy infrastructure would not occur. As such, impacts related to energy

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

(b) Operation

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

3. Comparison of Impacts

Alternative 1 would eliminate the Project's significant and unavoidable impacts with respect to on- and off-site noise sources during construction and on- and off-site vibration during construction (pursuant to the significance threshold for human annoyance). Alternative 1 would also avoid the Project's significant and unavoidable cumulative impacts with respect to off-site noise during construction and off-site vibration during construction (pursuant to the significance threshold for human annoyance). In addition, Alternative 1 would avoid the Project's less than significant impacts with mitigation. Impacts associated with the remaining environmental issues would be less than those of the Project.

4. Relationship of the Alternative to Project Objectives

Under Alternative 1, the existing buildings and associated surface parking would remain on the Project Site, and no new development would occur. As such, Alternative 1 would not meet the underlying purpose of the Project, which is to redevelop an underutilized site with a high-density, mixed-use, transit and pedestrian-oriented development that provides a mix of new housing opportunities that are integrated with commercial and office uses that provide new employment and commercial opportunities for the surrounding community. Furthermore, Alternative 1 would not meet any of the Project basic objectives as listed below:

- Provide for the development of new housing units to support the high or significant demand for a mix of housing in the City and to meet the diverse economic and physical needs of both existing and future residents.
- To provide high-density multi-family housing in furtherance of the goals of the City's Housing Element and the City's Regional Housing Needs Assessment.
- Locate new housing and employment opportunities near one another and in close proximity to transit stations, along transit corridors, and within high activity areas.

- Create a range of housing types and scales with access to open space and outdoor amenities to accommodate varied household sizes and needs in a village-like setting.
- Focus housing and employment growth within a High Quality Transit Area consistent with a key element in SCAG's Regional Transportation Plan/Sustainability Communities Strategy.
- Promote local and regional mobility objectives by providing a mix of higher density housing and commercial uses that are in close proximity to a range of mobility options including public transportation, rideshare pickup and drop off locations, and convenient on-site parking for vehicle-dependent residents and visitors.
- Strengthen viable commercial development in the community and provide additional opportunities for new commercial development and services by providing a variety of commercial uses, including office space and retail and restaurant space.
- Improve the visual character and maximize the value of an underutilized site replacing existing low-intensity uses with higher-density housing and commercial uses at an in-fill location that is responsive to market demands.
- Provide upgraded neighborhood-serving commercial uses to provide a strong and competitive commercial sector that promotes economic vitality and job creation and serves the needs of project residents, visitors, and the surrounding community.
- Provide convenient neighborhood-serving commercial uses and open space within walking distance of existing off-site residential and commercial uses, proposed on-site residential uses and on and off-site office uses.
- Create a pedestrian-friendly project by providing publicly accessible open space and activating streetscapes around the Project Site through use of outdoor dining, greenspace, and varied elevations.

V. Alternatives

B. Alternative 2: No Below-Grade Parking Alternative

1. Description of the Alternative

Alternative 2, the No Below-Grade Parking Alternative, would include the same uses and the same number of vehicle parking spaces (i.e., 894 spaces) as the Project. However, this alternative would eliminate the subterranean parking proposed by the Project and would instead provide parking in three above-grade parking levels and in a surface parking area. With the addition of the above-grade parking levels, the maximum building height would be increased compared to the Project from 35 floors to 38 floors (i.e., from 404 feet to 434 feet). As with the Project, Alternative 2 would include commercial uses and publicly accessible landscaped open space areas on the ground floor of the Project Site. The excavation depth would be reduced from 40 feet below ground surface to 6 feet below ground surface, and the associated soil export would be reduced from 210,000 cubic yards to 46,000 cubic yards. Additionally, as with the Project, Alternative 2 would remove 31,833 square feet of existing commercial uses and parking. A conceptual site plan for Alternative 2 is provided in Figure V-1 on page V-25.

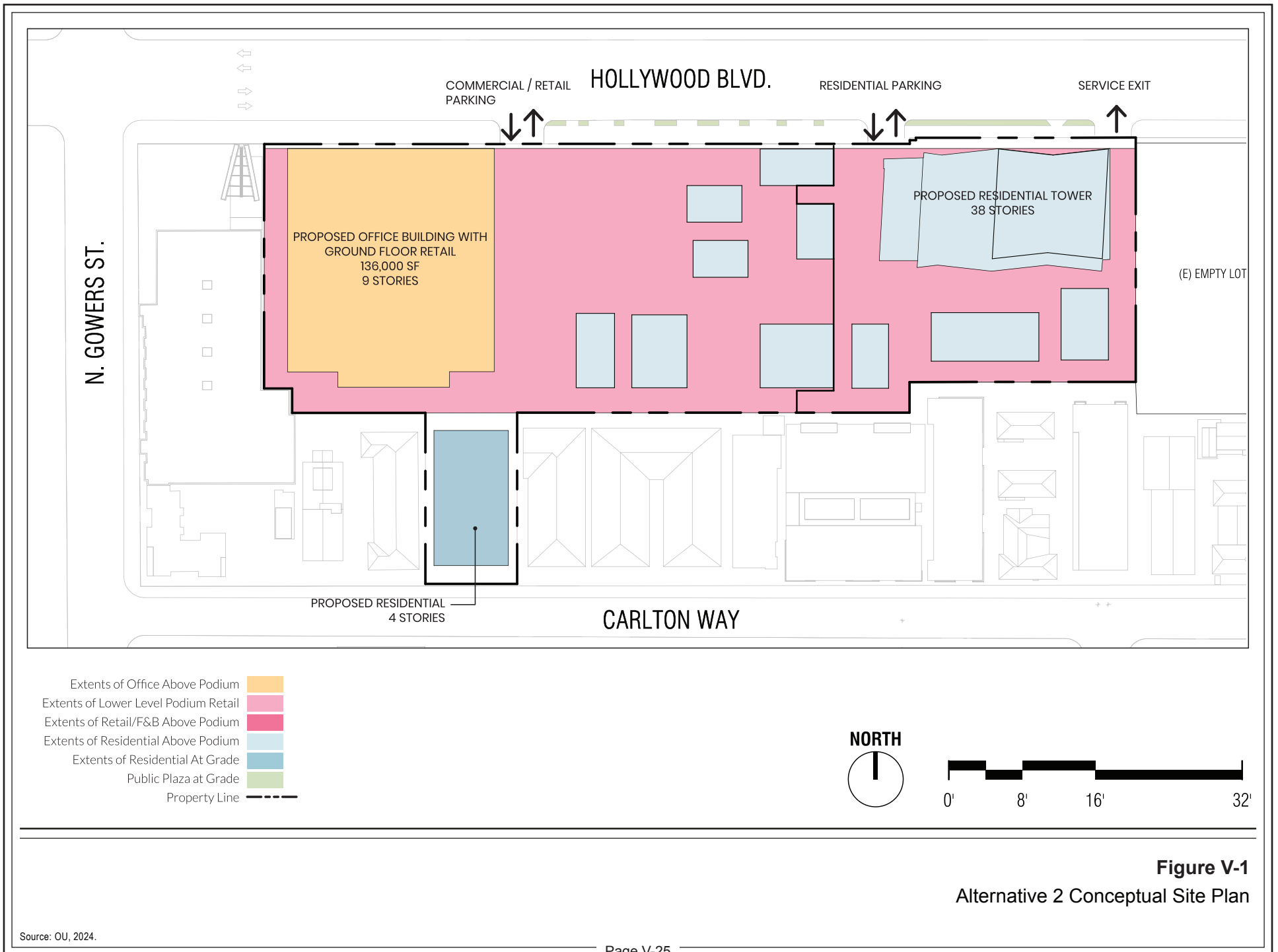


Figure V-1
Alternative 2 Conceptual Site Plan

2. Environmental Impacts

a. Air Quality

(1) Regional Emissions

(a) Construction

As with the Project, construction of Alternative 2 has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. As with the Project, Alternative 2 would comply with applicable air quality regulations during construction to minimize stationary source construction emissions.

During Project construction, maximum daily emissions occur during the grading, excavation, and foundation phases. During these phases, the number of equipment as well as trucks exporting soil and delivering concrete would be greater than other phases of construction (e.g., building construction, architectural coatings phases). As detailed in Section IV.A, Air Quality, of this Draft EIR, Project construction-related daily maximum regional construction emissions (i.e., combined on-site and off-site emissions) without mitigation would not exceed the SCAQMD daily significance thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5} during any of the four years of Project construction (i.e., 2026–2029).

Under Alternative 2, overall construction activities would be reduced in comparison to the Project during the grading, excavation, and foundation phases as the subterranean parking proposed by the Project would be eliminated under this alternative, resulting in an associated reduction in the excavation depth from 40 feet to 6 feet and an associated reduction in soil export from 210,000 cubic yards to 46,000 cubic yards. Accordingly, the overall amount of grading and excavation and the associated use of construction equipment, number of days of excavation activities, and the overall number of required truck haul trips would be reduced under Alternative 2 thereby shortening the overall construction period. However, the intensity of air emissions and fugitive dust from grading, excavation, and foundation activities under Alternative 2 would be similar to the Project on peak construction days because the maximum number of trucks and equipment operating during the peak construction activity days during the excavation and foundation phases would be similar to the Project on a daily basis (i.e., there would be no change to the intensity for days in which the maximum construction activity is required). As such, air emissions during maximum activity days would be similar to those of the Project. Therefore, as with the Project,

construction-related daily maximum regional construction emissions under Alternative 2 would not exceed SCAQMD daily significance thresholds, and impacts associated with regional air pollutant emissions during construction of Alternative 2 would be less than significant. Therefore, such impacts would be similar to the less than significant impacts of the Project. However, as the overall duration of the maximum activity days would be reduced, these impacts would be experienced for a shorter duration compared to the Project.

(b) Operation

Based on the proposed uses, the number of daily trips and daily VMT generated by Alternative 2 would be the same as under the Project owing to the same development program. As operational vehicular emissions depend on the number of trips and associated VMT, the vehicular operational pollutant emissions generated by Alternative 2 would be the same as under the Project. Because the same development program would be implemented under Alternative 2 as under the Project, the operational stationary source emissions generated by Alternative 2 would also be similar as under the Project. Therefore, impacts associated with regional air pollutant emissions during operation of Alternative 2 would be less than significant and similar to the less than significant impacts of the Project.

(2) Localized Emissions

(a) Construction

On-site construction activities under Alternative 2 would be located at similar distances from sensitive receptors as the Project. As previously discussed above, the intensity of construction activities would be similar on days with maximum construction activities, although Alternative 2 would result in an overall reduction in the amount of the higher emission-generating construction activities (i.e., grading, excavation, and foundation construction) owing to the reduction in the number of subterranean parking levels and associated reductions in grading, excavation, and soil export compared to the Project. However, as previously discussed above, the intensity of air emissions and fugitive dust from grading, excavation, and foundation activities under Alternative 2 would be similar to the Project on peak construction days because the maximum number of trucks and equipment operating during the peak construction activity days during the excavation and foundation phases would be similar to the Project on a daily basis (i.e., there would be no change to the intensity for days in which the maximum construction activity is required). As such, air emissions during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. As evaluated in Section IV.A, Air Quality, of this Draft EIR, localized emissions under the Project would not exceed the SCAQMD localized screening threshold during construction. Therefore, the emissions generated by Alternative 2 would similarly not exceed SCAQMD screening thresholds during construction. As such, impacts associated with localized air pollutant emissions during construction of Alternative 2 would be less than significant and similar to the less significant impacts of the Project.

However, as the overall duration of the maximum activity days would be reduced, these impacts would be experienced for a shorter duration compared to the Project.

(b) Operation

Localized operational impacts are determined primarily by traffic volumes. As provided above, Alternative 2 would result in the same number of trips and same VMT during operation as the Project owing to the same development program and location. Therefore, total vehicular emissions during operation of Alternative 2 would be the same as those of the Project. In addition, the area and stationary sources of localized emissions would be the same as under the Project. Accordingly, operational localized air quality impacts under Alternative 2 would be less than significant and similar to the less than significant impacts of the Project.

(3) Toxic Air Contaminants

(a) Construction

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

(b) Operation

As set forth in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential TAC emissions associated with Project operations would include diesel particulate matter from delivery trucks. Because of the same location and development program, Alternative 2 would result in the same number and types of operational truck deliveries as the Project. Furthermore, similar to the Project, the land uses proposed under Alternative 2 are not considered land uses that generate substantial TAC emissions. Therefore, Alternative 2 operation would not release substantial amounts of TACs. Impacts due to TAC emissions and the corresponding cancer risk under Alternative 2 would be less than significant and similar to the less than significant impacts of the Project.

b. Cultural Resources (Archaeological Resources)

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, no known archaeological sites or resources associated with either Native Americans or historical archaeology have been identified within the Project Site. Thus, neither Alternative 2 nor the Project would impact known archaeological sites.

Alternative 2 would include excavation activities in the same areas of the Project Site as the Project; however, as this alternative would not include the subterranean parking levels proposed by the Project, the depth of excavation and total soil export under this alternative would be less than under the Project. Specifically, the depth of excavation would be reduced from 40 feet below ground surface to 6 feet below ground surface and the associated soil export would be reduced from 210,000 cubic yards to 46,000 cubic yards. Therefore, the potential for Alternative 2 to uncover archaeological deposits or features (i.e., result in inadvertent discovery) during construction would be less than for the Project. Furthermore, like the Project, Alternative 2 would implement Mitigation Measure CUL-MM-1 in order to mitigate potential impacts to archaeological resources. As such, impacts to archaeological resources under Alternative 2 would be less than significant with mitigation and less than the less than significant with mitigation impacts of the Project.

c. Energy

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

(a) Construction

Similar to the Project, construction activities under Alternative 2 would consume electricity to convey water for dust control and to power lighting, electronic equipment, and other construction activities, and petroleum-based fuels for heavy construction equipment, delivery and haul trucks, and construction worker traffic. Similar to the Project, construction activities associated with Alternative 2 would not involve the consumption of natural gas. As with the Project, Alternative 2 would also generate a demand for transportation energy associated with on- and off-road vehicles. The energy consumed during construction of Alternative 2 would be reduced compared to the Project as this alternative would eliminate the subterranean parking levels and would result in an associated reduction in grading and excavation activities. Although Alternative 2 would require energy during the building construction phase compared to the Project due to the three additional stories required to accommodate the above-grade parking, this increased energy consumption during the building construction phase would be expected to be less than that associated with the excavation required for the subterranean parking levels proposed under the Project. As noted above, peak construction activities are generally associated with excavation and grading.

Therefore, the building construction phase would have less of an impact on energy consumption than activity during the excavation phase. As a result, overall energy consumption for construction would be less under Alternative 2 than the Project. As with the Project, the use of construction equipment/vehicles used during construction of Alternative 2 would comply with Title 24 standards and other applicable energy conservation requirements, CARB anti-idling and In-Use Off-Road Diesel-Fueled Fleet regulations, federal fuel efficiency standards, and other applicable requirements. Therefore, as with the Project, Alternative 2 construction activities would require energy demand that is not wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 2 and less than the less than significant impacts of the Project.

(b) Operation

As with the Project, Alternative 2 operations would generate an increased demand for electricity and natural gas. Because Alternative 2 would include the same development program as the Project, Alternative 2 would be expected to generate the same electricity and natural gas demand during operation as the Project. Furthermore, as with the Project, Alternative 2 would be developed in accordance with applicable energy conservation requirements, including those in California's Building Energy Efficiency Standards (Title 24 standards) and the City's Green Building Code, as well as provide LAMC-required bicycle parking and EV/EVA-ready parking. Therefore, as with the Project, operation of Alternative 2 would not involve the wasteful, inefficient, or unnecessary consumption of energy resources. As such, Alternative 2 would result in less than significant impacts related to energy use during operation which would be similar to the less than significant impacts of the Project.

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

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

d. Geology and Soils (Paleontological Resources)

As discussed in Section IV.D, Geology and Soils (Paleontological Resources), of this Draft EIR, there are no previously encountered fossil vertebrate localities located within the Project Site.

Alternative 2 would include excavation activities in the same areas of the Project Site as the Project; however, this alternative would not include the subterranean levels proposed by the Project. As such, the depth of excavation and total soil export under this alternative would be reduced. Specifically, Alternative 2 would reduce the depth of excavation from 40 feet to 6 feet below ground surface and would result in an associated reduction in soil export from 210,000 cubic yards to 46,000 cubic yards. Therefore, the potential for Alternative 2 to disturb undiscovered paleontological resources during construction would be less than for the Project because Alternative 2 reduces the potential for unearthing paleontological resources. Furthermore, like the Project, Alternative 2 would implement Mitigation Measures GEO-MM-1 through GEO-MM-4 in order to mitigate potential impacts to paleontological resources. As such, impacts to paleontological resources under Alternative 2 would be less than significant with mitigation and less than the less than significant with mitigation impacts of the Project.

e. Greenhouse Gas Emissions

As discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, GHG emissions from a development project are determined in large part by the number of daily vehicle trips generated and associated VMT, as well as by energy consumption from proposed land uses. Based on the proposed uses, the number of daily trips and daily VMT generated by Alternative 2 would be the same as under the Project due to the same development program. Therefore, the number of daily trips, VMT, energy consumption, and water consumption during operation of Alternative 2, and the resultant GHG emissions, would be similar to the Project. In addition, as with the Project, Alternative 2 would be designed to comply with the requirements of Title 24, including the CALGreen Code (Part 11, Title 24), and the Los Angeles Green Building Code. As with the Project, Alternative 2 would incorporate design features to reduce GHG emissions such as the sustainability features required to achieve LEED certification. Like the Project, Alternative 2 would also increase urban density in proximity to transit, would include LAMC-required bicycle parking, and would include electric vehicle (EV)-ready parking, which would reduce VMT and associated fuel usage and GHG emissions. Therefore, with compliance with applicable regulations and with implementation of comparable sustainability features as the Project, Alternative 2 would be consistent with the GHG reduction goals and objectives included in adopted State, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 2 would be less than significant and similar to the less than significant impacts of the Project.

f. Hazards and Hazardous Materials

(a) Construction

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

Like the Project, Alternative 2 would also have the potential to encounter contaminated soils, soil gas, and impacted groundwater during construction. Although no subterranean parking is proposed, Alternative 2 would still require grading and minimal excavation for building footings, basements, and infrastructure. Specifically, excavation under Alternative 2 would extend to a maximum depth of approximately 6 feet below ground surface and would involve approximately 46,000 cubic yards of exported soil (as compared to the Project's excavation depth of 40 feet below ground surface and soil export of 210,000 cubic yards). As with the Project, any contaminated soils, soil gas, or impacted soil and groundwater encountered would be treated and disposed of in accordance with applicable regulations, and Mitigation Measure HAZ-MM-1, which requires a soil management plan, soil gas monitoring, and subsurface gas controls to reduce potential impacts to less than significant levels. However, because Alternative 2 would involve substantially shallower excavations than the Project and an overall reduction in soil export, the potential to encounter contaminated soil and soil gas would be less under Alternative 2, as would the potential need for and extent of any remediation activities.

Lastly, Alternative 2 would involve the same demolition as the Project, thus involving the same potential to encounter or release ACM or LBP as the Project, and regulatory compliance would minimize associated hazards.

Overall, the impacts related to hazards and hazardous materials during construction under Alternative 2 would be less than significant with mitigation, and less than the less than significant with mitigation impacts of the Project.³

(b) Operation

As with the Project, operation of Alternative 2 would involve the use of limited quantities of potentially hazardous materials, including those used for building and ground maintenance, cleaning solvents, household chemicals, and pesticides for landscaping. As with the Project, all hazardous materials on the Project Site under Alternative 2 would be handled in compliance with all applicable federal, state, county, and local requirements concerning the handling and disposal of hazardous waste. Overall, impacts under Alternative 2 would be less than significant and similar to the less than significant impacts of the Project due to the same development program and similar types and amounts of hazardous materials use during operation of Alternative 2 and the Project.

g. Land Use and Planning

As with the Project, Alternative 2 would not require either a General Plan Amendment or zone change with approval of the requested Density Bonus Compliance review.⁴ Specifically, the land uses proposed under the Project and Alternative 2 (which are the same and include residential, office and commercial [retail/restaurant] uses) are already permitted by the existing General Plan land use designation and zoning, while the density (FAR) and heights of the proposed land uses would be permitted with approval of the requested Density Bonus Compliance Review. In addition, the Project would comply with the guidance principles related to the design of above-grade parking pursuant to the City of Los Angeles Above-Grade Parking Advisory Notice.

As concluded in Section IV.G, Land Use and Planning, of this Draft EIR, the Project would not conflict with applicable land use plans, policies, and regulations adopted for the purposes of avoiding or mitigating an environmental effect (i.e., General Plan Framework Element, Housing Element, Conservation Element, Mobility Plan 2035, Hollywood Community Plan, LAMC, Citywide Design Guidelines, and SCAG's 2020–2045 RTP/SCS). Because Alternative 2 would be developed on the same site as the Project and would

³ Under both the Project and Alternative 2, all construction-related hazards and hazardous materials impacts would be less than significant, except for the Threshold (b) impact (i.e., release of hazardous materials into the environment) which would be less than significant with mitigation.

⁴ Pursuant to LAMC Section 12.22 (A.)(25), Density Bonus Compliance Review for a project totaling 350 dwelling units, including 44 dwelling units for very low income household occupancy, with the following two On-Menu Incentives: (1) a Floor Area Ratio increase on the Hollywood Lot from 1.5:1 to 3:1 and on the Carlton Lot from 3:1 to 4.05:1 under LAMC Section 12.22 (A.)(25)(f)(4), and (2) FAR, density, parking, open space, vehicle parking averaging across the entire property.

share the same development program, Alternative 2 would similarly not conflict with the above-listed applicable land use plans, policies, and regulations.

Based on the above, the impacts of Alternative 2 related to potential conflicts with applicable land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant and similar to the less than significant impacts of the Project.

h. Noise

(1) Noise

(a) Construction

The types of construction activities under Alternative 2 would be similar to the Project; however, the overall amount of construction activities and duration would be reduced due to the reduction in required excavations depths. As with the Project, construction of Alternative 2 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Under Alternative 2, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to that of the Project during maximum activity days during the grading, excavation, and foundation phases (i.e., there would be no change to the intensity for days in which the maximum construction activity is required). Peak construction activities occurring during the grading, excavation, and foundation phases would be considered maximum activity days under the Project. However, the excavation phase under Alternative 2 would be shortened due to the elimination of the subterranean parking garage. As such, the impact experienced during this peak construction phase would occur over a shorter period as compared to the Project. Nonetheless, noise levels during maximum activity days would be similar to those of the Project. As with the Project, Alternative 2 would implement similar project design features and mitigation, which would minimize construction noise. As the impact significance is based on maximum construction activity days, Alternative 2 would similarly result in significant and unavoidable on-site and off-site construction noise impacts since the noise levels during maximum activity days would be similar to the Project. While such impacts would be similar to the Project, the impacts would be experienced for a shorter duration given the reduction in excavation activities. Given the reduced scope of grading and excavation activities, Alternative 2 would result in approximately 1.5 months of impacts related to grading and excavation activities, which is a 3.5-month shorter duration than the Project's anticipated 5 months of grading and excavation activities. Nevertheless, as with the Project, Alternative 2 would still result in significant and unavoidable on-site and off-site construction noise impacts.

(b) Operation

As discussed in Section IV.H, Noise, of this Draft EIR, sources of operational noise under the Project would include (a) on-site stationary noise sources, including mechanical equipment, activities within the proposed outdoor spaces (i.e., outdoor dining and terraces), parking facilities and loading dock; and (b) off-site mobile (roadway traffic) noise sources. Regarding on-site operational noise, Alternative 2 would introduce noise from similar on-site noise sources. Alternative 2 would implement project design features similar to the Project, including regarding acoustic screening of loading areas from off-site noise receptors and controls on amplified sound and solid screening of above ground parking levels, which would minimize on-site operational noise. As with the Project, Alternative 2 would also comply with the regulations under LAMC Section 112.02 which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. Thus, operational on-site noise impacts under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

With regard to operational off-site (i.e., traffic) noise, Alternative 2 would generate the same level of operational traffic when compared to the Project. Therefore, as with the Project, off-site noise impacts under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 2 would be similar to the Project, although the amount of excavation activities and associated duration would be reduced. As with the Project, construction of Alternative 2 would generate on- and off-site vibration from the use of heavy-duty construction equipment and from truck trips. While the overall amount of excavation activities would be reduced under Alternative 2, on- and off-site construction activities and the associated construction on- and off-site vibration levels would be expected to be similar to those of the Project as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment (i.e., there would be no change to the intensity for the days in which the maximum construction activity is required). However, as previously noted, the excavation phase under Alternative 2 would be shortened. The impact experienced during this peak construction phase would occur over a shorter period as compared to the Project. Notwithstanding, peak vibration levels generated by construction equipment and construction truck trips under Alternative 2 would be similar to those of the Project as the same activities and same equipment would occur, although for a shorter duration. Accordingly, as with the Project, construction activities under Alternative 2 would result in significant and unavoidable on-site and off-site vibration impacts (human annoyance).

Impacts would remain significant and unavoidable with implementation of Mitigation Measure NOI-MM-2. In addition, as with the Project, vibration impacts due to on- and off-site construction activities under Alternative 2 would similarly be less than significant with mitigation for on-site construction vibration and less than significant for off-site construction vibration pursuant to the significance threshold for building damage. Such impacts would be similar to the Project although they would be experienced over a shorter duration compared to the Project.

(b) Operation

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

i. Public Services

(1) Fire Protection

(a) Construction

The types of construction activities required for Alternative 2 would be similar to those of the Project due to the same development program being developed; however, the overall amount of construction activities and duration of construction would be reduced compared to the Project as Alternative 2 would eliminate the subterranean parking levels. As with the Project, construction under Alternative 2 would occur in compliance with all applicable federal, State, and local requirements concerning fire prevention and hazardous materials, which would effectively reduce the potential for construction-related fire and explosion. Similar to the Project, Alternative 2 would also maintain travel lanes in each direction on all streets around the Project Site throughout the construction period, and would implement a Construction Traffic Management Plan (Project Design Feature TR-PDF-1) which would include provisions for maintaining emergency access during construction, such that emergency access would not be impeded. Therefore, construction of Alternative 2, as with the Project, would not result in the need for new or altered government facilities (i.e., fire

stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 2 would be less than significant and less than the less than significant impacts of the Project.

(b) Operation

As previously discussed, the development program under the Alternative 2 would be the same as under the Project (i.e., the same types and quantities of uses). As such, the increase in LAFD fire protection service demand would be similar between the Project and Alternative 2. In addition, similar to the Project, Alternative 2 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, life safety features (e.g., automatic fire sprinkler systems, fire service access elevators, a rooftop emergency helicopter landing facility [EHLF], etc.), and would undergo LAFD fire/life safety plan review to ensure compliance with the above, which would reduce the demand for fire protection and also ensure adequate emergency access. Furthermore, as with the Project, traffic generated by Alternative 2 operation would not significantly impact emergency vehicle response to the Project Site and surrounding area as the drivers of emergency vehicles have the ability to bypass traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. The Project Site is also located within the required 1-mile response distance from a fire station with an engine company and within the 1.5 miles response distance from a fire station with a truck company and such that both the Project and Alternative 2 would both meet LAFD first-in distance requirements. As with the Project, driveways and internal circulation under Alternative 2 would also be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Lastly, as with the Project, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for Alternative 2 as the development program of Alternative 2, and thus the fire flow requirements, would be the same as the Project. Therefore, similar to the Project, operation of Alternative 2 would not necessitate the construction of new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. As such, impacts with regard to fire protection services during operation of Alternative 2 would be less than significant and similar to the less than significant impacts of the Project.

(2) Police Protection

(a) Construction

As discussed above, construction activities under Alternative 2 would be similar to those of the Project; however, the overall amount of construction activities and duration of construction would be reduced compared to the Project as Alternative 2 would eliminate the subterranean parking levels proposed by the Project. Similar to the Project, construction

would not generate a new permanent population on the Project Site that would substantially increase the police service population of the Hollywood Division. The existing commercial uses on the Project Site currently generate a daytime population that may require police protection services. The demand for police protection services during construction of Alternative 2, like the Project, would be offset by the removal of the existing on-site commercial buildings and associated existing service demand. However, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. However, as with the Project, Alternative 2 would incorporate similar project design features as the Project, including security fencing, lighting, and locked entry to secure the Project Site, which would serve to reduce demand on LAPD facilities.

Furthermore, both the Project and Alternative 2 would implement a Construction Traffic Management Plan that would ensure continued provision of emergency access during construction. Lastly, pursuant to CVC Section 21806, emergency vehicles can use their sirens to clear a path of travel or drive in the lanes of opposing traffic during an emergency to avoid traffic. Therefore, as with the Project, construction of Alternative 2 would not result in the need for new or altered government facilities (i.e., police stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 2 would be less than significant and less than the less than significant impacts of the Project.

(b) Operation

As previously discussed, Alternative 2 would include the same development program as the Project (the only difference being the development of above- rather than below-grade parking levels). Therefore, Alternative 2 would be expected to generate the same residential service population as the Project and the same level of demand for LAPD services and facilities within LAPD's Hollywood Division (i.e., Hollywood Community Police Station, etc.). Alternative 2 would implement similar project design features (i.e., 24-hour security camera network, access controls, security lighting, etc.) that would enhance on-site safety and help reduce the demand for police services, and both the Project and Alternative 2 would generate General Fund tax revenues for the City which could be used to expand law enforcement resources in the Hollywood Division. Lastly, like the Project, Alternative 2 would generate additional traffic in the vicinity of the Project Site; however, the drivers of police emergency vehicles have the ability of circulating around traffic by using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. Therefore, Alternative 2, as with the Project, would not result in the need for new or altered government facilities (i.e., police stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 2 would be less than significant and similar to the less than significant impacts of the Project.

j. Transportation

As previously described, Alternative 2 would be developed within the same Project Site as the Project and would include the same uses as the Project. Alternative 2 would also include the same access points and the same number of vehicle parking spaces (i.e., 894). As such, the transportation-related plans, policies, and programs applicable to the Project would also apply to Alternative 2 (i.e., Mobility Plan 2035; Plan for a Healthy Los Angeles; Hollywood Community Plan; LAMC, Vision Zero; Citywide Design Guidelines, and SCAG's 2020–2045 RTP/SCS).

As with the Project, Alternative 2 would not interfere with the complete streets balanced transportation network (i.e., Transit-Enhanced Network, Bicycle Enhanced Network, and Pedestrian-Enhanced Districts) concept of the Mobility Plan and would enhance pedestrian access within and around the Project Site as called for by the Mobility Plan and the Hollywood Community Plan. Alternative 2 would similarly include sidewalk and driveway design, vehicular parking, bicycle parking, etc., in accordance with LAMC requirements and would design parking facilities to promote public safety and prevent unsightly or barren appearance as called for by the Hollywood Redevelopment Plan. Alternative 2 would also represent urban infill development within a TPA and HQTAs in close proximity to transit which would encourage alternative transportation use as called for by the Mobility Plan and 2020–2045 RTP/SCS. As such, Alternative 2 would support these transportation plans for the same reasons as the Project. Like the Project, Alternative 2 would also reduce both household VMT per capita and work VMT per employee, including through the implementation of transportation demand management (TDM) measures as called for by the Mobility Plan, 2020–2045 RTP/SCS, and the City's TDM Ordinance. Therefore, as with the Project, Alternative 2 would not conflict with a program, plan, ordinance, or policy addressing the circulation system. The impacts of Alternative 2 in this regard would be less than significant and similar to the less than significant impacts of the Project.

With respect to VMT, like the Project, Alternative 2 would result in reduced VMT within the Central APC. Specifically, Alternative 2 would result in a household VMT per capita of 4.3 and a daily work VMT per employee of 7.0, which would be below the household VMT per capita and work VMT per employee significance thresholds for the Central APC of 6.0 and 7.6, respectively. Therefore, as with the Project, Alternative 2 would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b), regarding VMT. As such, the VMT impacts of Alternative 2 would be less than significant and similar to the less than significant impacts of the Project due to the same development program and same resultant reductions in VMT as the Project.

With respect to hazards due to geometric design features, in accordance with LADOT's TAG, impacts regarding the potential increase of hazards due to a geometric

design feature generally relate to the design of access points to and from a project site. As indicated previously, Alternative 2 would include the same access points as the Project. Hollywood Boulevard is not designated in Vision Zero as part of the HIN, and final design of the driveways would be reviewed by the City Department of Building and Safety, BOE, and LADOT during site plan review to ensure code compliance and safe pedestrian and vehicular design. As such, the new driveways along Hollywood Boulevard under both the Project and Alternative 2 would neither substantially increase vehicular conflicts with other vehicles, bicycles, and/or pedestrians nor present any geometric design hazards related to traffic movement. Like the Project, Alternative 2 would also not modify roadway widths or otherwise affect the geometric design of roads surrounding the Project Site, nor would it implement any features that would obstruct sight distance or paths of vehicular, pedestrian, or bicycle travel, and pedestrian and bicycle access to the Project Site from surrounding streets would be provided separate from vehicular access. Therefore, hazards due to geometric design features impacts under Alternative 2 would be less than significant and similar to the less than significant impacts of the Project.

Regarding freeway safety, as discussed in Section IV.J, Transportation, of this Draft EIR, a freeway safety analysis evaluates a proposed project's potential to cause or lengthen a forecasted off-ramp queue on the freeway mainline that could lead to a potential safety impact due to speed differentials between vehicles exiting the freeway off ramps and vehicles traveling on the freeway mainline. The City's guidance on freeway safety analysis requires analysis of freeway off-ramps where a proposed project adds 25 or more trips in either the morning or afternoon peak hour to be studied for potential queuing impacts. If the project is not projected to add 25 or more peak hour trips at any freeway off-ramps, then a freeway ramp analysis is not required. According to the Transportation Assessment included as Appendix J of this Draft EIR, the Project is not projected to add 25 or more trips to the surrounding freeway off-ramps. Because Alternative 2 would include the same development program as the Project, the same is true of Alternative 2. Therefore, the freeway safety impacts of Alternative 2 would be less than significant and similar to the less than significant impacts of the Project.

k. Tribal Cultural Resources

As previously discussed, Alternative 2 would eliminate the three subterranean parking levels proposed by the Project. This would result in shallower maximum excavation depths under Alternative 2 (i.e., 6 feet below ground surface) than under the Project (i.e., 40 feet below ground surface). However, as tribal cultural resources are typically found in the first six to ten feet of excavation, the potential for Alternative 2 to uncover subsurface tribal cultural

resources would be similar compared to that of the Project.⁵ As discussed in Section IV.K, Tribal Cultural Resources, of this Draft EIR, no tribal cultural resources have been previously recorded at the Project Site or identified during consultations with the applicable California Native American Tribes conducted in accordance with AB 52. Overall, as concluded in the Tribal Cultural Resources Assessment included as Appendix K of this Draft EIR, the Native American archaeological sensitivity of the Project Site is considered “low,” and impacts would be less than significant. Nonetheless, like the Project, Alternative 2 would implement the City’s standard condition of approval for the inadvertent discovery of tribal cultural resources which would further reduce any potential impacts to previously unknown tribal cultural resources that may be encountered during construction. Therefore, Alternative 2 would result in less than significant impacts which would be similar to the less than significant impacts of the Project.

I. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities for Alternative 2 would result in a temporary demand for dust control, cleaning of equipment, excavation, and grading/recompaction activities. Construction-related water use under Alternative 2 would be less than the Project as this alternative would eliminate the subterranean parking levels proposed by the Project and reduce the need for excavation, soil export, and associated dust control. Furthermore, because the Project Site is already developed and the existing on-site uses already use LADWP water, water is already available at the Project Site. Lastly, it is determined in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR that Project construction-related water demand would be offset by the water demand associated with the existing on-site uses to be removed—because construction water demand under Alternative 2 would be less than under the Project, the same would be true for Alternative 2. Hence, as with the Project, new water infrastructure would not need to be extended to the Project Site to provide the required construction water for Alternative 2. Furthermore, like the Project, the construction of Alternative 2 would not result in the removal or relocation of existing major water trunk lines in the adjacent streets. Therefore, Alternative 2, like the Project, would not result in construction activities that require or result in the relocation or construction of new or

⁵ As indicated in Section IV.K, Tribal Cultural Resources, of this Draft EIR, based on regional geologic mapping, the subsurface environment of the Project Site appears to be characterized by alluvium and fan deposits formed in the late Pleistocene age, meaning mostly before Native Americans are documented to have been present in North America. This suggests that any Native American activities that occurred on these surfaces and produced physical remains are, in general, more likely to occur as shallowly buried deposits.

expanded water facilities, the construction or relocation of which could cause significant environmental impacts. Like the Project, water supplies would also be available to provide the required construction water for Alternative 2. Overall, Alternative 2 would result in less than significant impacts that would be less than the less than significant impacts of the Project.

(b) Operation

Alternative 2, like the Project, would result in a net increase in long-term water demand. As indicated in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, based on the IFFAR, there is adequate fire flow available for the Project to comply with the fire flow requirements identified for the Project in accordance with LAMC Section 57.507.3.1. In addition, based on the WSA, existing and future water supplies are adequate to provide the Project with water during normal, single-dry and multi-dry years through the year 2040. Because Alternative 2 would include the same development program as the Project, and because Alternative 2 would thus result in the same water demand as the Project, LADWP would similarly have sufficient water supplies and infrastructure capacity to meet the water demand of Alternative 2. Furthermore, similar to the Project, Alternative 2 would implement the necessary infrastructure and connections to the LADWP water system pursuant to applicable City requirements to accommodate the new development, would implement Code-required water conservation measures, and would implement the additional water conservation measures set forth in Project Design Feature WAT-PDF-1. Thus, Alternative 2 would result in less than significant impacts which would be similar to the less than significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, the existing on-site uses would be removed and the existing sewer laterals serving these uses capped such that no new sewage would enter the public sewer system during construction of Alternative 2. As with the Project, temporary facilities, such as portable toilet and hand wash areas would be provided by the construction contractor; however, any sewage generated from these facilities would be collected and hauled off-site and would not be discharged into the public sewer system. In addition, Alternative 2, as with the Project, would remove the existing on-site buildings, thereby resulting in a net reduction in the existing sewage entering the sewer system during construction. Lastly, as with the Project, no new off-site sewer lines would be required for Alternative 2. Construction impacts associated with new wastewater infrastructure would primarily be confined trenching in order to place the new sewer line connections below surface for connection into the existing off-site sewer public infrastructure, and any off-site work potentially affecting existing sewer service to adjacent properties would be coordinated with the City's Bureau of Engineering (BOE). As such, construction of Alternative 2, as with

the Project, would not require or result in the relocation or construction of new or expanded wastewater facilities, the construction or relocation of which could cause significant environmental effects. Therefore, Alternative 2 would result in less than significant impacts that would be similar to the less than significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 2 would generate a net increase in wastewater flows from the Project Site. As provided in Section IV.L.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the wastewater generated during Project operation would be able to be accommodated by the existing remaining treatment capacity of the Hyperion Wastewater Reclamation Plan (HWRP). Because Alternative 2 would include the same development program as the Project and thus generate the same amount of operational wastewater, the same would be true for Alternative 2.

Regarding wastewater conveyance (sewer) capacity, as discussed in Section IV.J.2, Utilities and Service Systems—Wastewater, of this Draft EIR, sewer service for the Project would be provided utilizing new connections to the existing sewer mains in Hollywood Boulevard and Carlton Way. According to both a Wastewater Services Information (WWSI) request and Sewer Capacity Availability Review (SCAR) prepared by the Los Angeles Bureau of Sanitation (LASAN) for the Project, the existing sewer lines in Hollywood Boulevard and Carlton Way have adequate capacity to serve the Project. Because Alternative 2 would have the same development program as the Project and generate the same amount of sewage during operation, adequate sewer capacity would also be available to serve Alternative 2. Still, as with the Project, additional detailed gauging and evaluation would be conducted for Alternative 2, as required by LAMC Section 64.14, to obtain final approval of sewer capacity and connection permit during the permitting process. Furthermore, as with the Project, all sanitary sewer connections and on-site infrastructure under Alternative 2 would be designed and constructed in accordance with applicable standards. Based on the above, operation of Alternative 2, as with the Project, would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. Therefore, Alternative 2 would result in less than significant impacts that would be similar to the less than significant impacts of the Project.

(3) Energy Infrastructure

(a) Construction

The energy consumed by Alternative 2 construction activities would be reduced compared to the Project because, while Alternative 2 would include the same development program as the Project, it would not include subterranean parking levels which would require a substantial amount of excavation and soil export. While most of the energy saved would

be in terms of fuel rather than electricity, it is anticipated that there would still be a savings in electricity consumption associated with not constructing subterranean parking levels under Alternative 2 (although some or all of this savings would likely be offset by construction of the three additional building levels under this alternative). Furthermore, it is anticipated that removal of the existing on-site uses would partially to fully offset any demand for electricity from LADWP power lines. Because LADWP has confirmed that the electricity supply and existing electricity infrastructure in the Project area would be sufficient to provide the electricity required for Project construction activities, the same would be true for Alternative 2. Therefore, as with the Project, construction activities associated with Alternative 2 would not result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new electricity or natural gas facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. The impacts of Alternative 2 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 2 would generate an increased consumption of electricity relative to existing conditions. In compliance with Ordinance 187,714, the proposed office, residential, retail, and restaurant uses under both the Project and Alternative 2 would be all-electric, except restaurant cooking uses which would use natural gas. Because the Alternative 2 development program would be the same as the Project, operational electricity demand under Alternative 2 would be the same as the Project. Furthermore, Alternative 2 would implement the same energy conservation measures as the Project. Therefore, as with the Project, Alternative 2 operational energy demand would not result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new electricity or natural gas facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. The impacts of Alternative 2 would be less than significant and similar to the less than significant impacts of the Project.

3. Comparison of Impacts

Based on the analysis above, Alternative 2 would not avoid the Project's significant and unavoidable noise and vibration impacts. However, Alternative 2 would reduce the construction-related grading, excavation, and foundation phases of the Project such that the impacts above related to construction would occur for a shorter duration as compared to the Project (overall construction duration would be approximately 38 months compared to the Project's construction duration of 44 months). In addition, Alternative 2 would reduce several of the less than significant with mitigation impacts of the Project--archaeological resources, paleontological resources, construction-related hazards/hazardous materials and on-site vibration. Alternative 2 would also reduce some of the less than significant impacts of the

Project (i.e., regional construction emissions, localized construction emissions, construction TACs, construction-related energy, construction-related fire protection, construction-related police protection, and construction-related water supply/infrastructure), while all other impacts would be similar to those of the Project. Alternative 2 would not result in greater impacts than the Project in terms of any of the environmental issues evaluated in this Draft EIR.

4. Relationship of the Alternative to Project Objectives

As indicated previously, Alternative 2 would develop the Project Site with the same development program as the Project, except that parking would be provided in above-grade rather than below-grade parking levels. Accordingly, Alternative 2 would meet the underlying purpose of the Project to redevelop an underutilized site with a high-density, mixed-use, transit- and pedestrian-oriented development that provides a mix of new housing opportunities that are integrated with commercial and office uses that provide new employment and commercial opportunities for the surrounding community.

Regarding the Project objectives, Alternative 2 would meet all the objectives of the Project, as listed below, as effectively as the Project:

- Provide for the development of new housing units to support the high or significant demand for a mix of housing in the City and to meet the diverse economic and physical needs of both existing and future residents.
- To provide high-density multi-family housing in furtherance of the goals of the City's Housing Element and the City's Regional Housing Needs Assessment.
- Locate new housing and employment opportunities near one another and in close proximity to transit stations, along transit corridors, and within high activity areas.
- Create a range of housing types and scales with access to open space and outdoor amenities to accommodate varied household sizes and needs in a village-like setting.
- Focus housing and employment growth within a High Quality Transit Area consistent with a key element in SCAG's Regional Transportation Plan/ Sustainability Communities Strategy.
- Promote local and regional mobility objectives by providing a mix of higher density housing and commercial uses that are in close proximity to a range of mobility options including public transportation, rideshare pickup and drop off locations, and convenient on-site parking for vehicle-dependent residents and visitors.

- Strengthen viable commercial development in the community and provide additional opportunities for new commercial development and services by providing a variety of commercial uses, including office space and retail and restaurant space.
- Improve the visual character and maximize the value of an underutilized site by replacing existing low-intensity uses with higher-density housing and commercial uses at an in-fill location that is responsive to market demands.
- Provide upgraded neighborhood-serving commercial uses to provide a strong and competitive commercial sector that promotes economic vitality and job creation and serves the needs of project residents, visitors, and the surrounding community.
- Provide convenient neighborhood-serving commercial uses and open space within walking distance of existing off-site residential and commercial uses, proposed on-site residential uses and on and off-site office uses;
- Create a pedestrian-friendly project by providing publicly accessible open space and activating streetscapes around the Project Site through use of outdoor dining, greenspace, and varied elevations.

V. Alternatives

C. Alternative 3: Reduced Development Alternative

1. Description of the Alternative

Alternative 3, the Reduced Development Alternative, would develop the same mix of uses as the Project but would reduce the total amount of new floor area by approximately 27 percent. Specifically, the Reduced Development Alternative includes the development of 201 residential units (including 44 dwelling units for very low income household occupancy), 136,000 square feet of office uses, and 22,042 square feet of commercial uses. The heights of the proposed buildings under Alternative 3 would be up to 27 stories with a maximum height of 316 feet. Upon completion, Alternative 3 would comprise 364,394 square feet of floor area (compared to the Project's 501,185 square feet of new floor area) with an FAR of 2.25:1. A total of 732 vehicle parking spaces would be provided within two subterranean parking levels (a reduction of one level compared to the Project) and surface and above-grade parking within the proposed podium, similar to the Project.

Alternative 3 would require grading and excavation for the subterranean parking, which would extend to a maximum depth of 30 feet below ground surface (compared to the Project's proposed excavation depth of 40 feet below ground surface). It is estimated that approximately 160,000 cubic yards of soil export would be hauled from the Project Site under Alternative 3 (compared to the estimated 210,000 cubic yards of export for the Project). Additionally, as with the Project, Alternative 3 would remove 31,833 square feet of existing commercial uses and parking. A conceptual site plan for Alternative 3 is provided in Figure V-2 on page V-48.

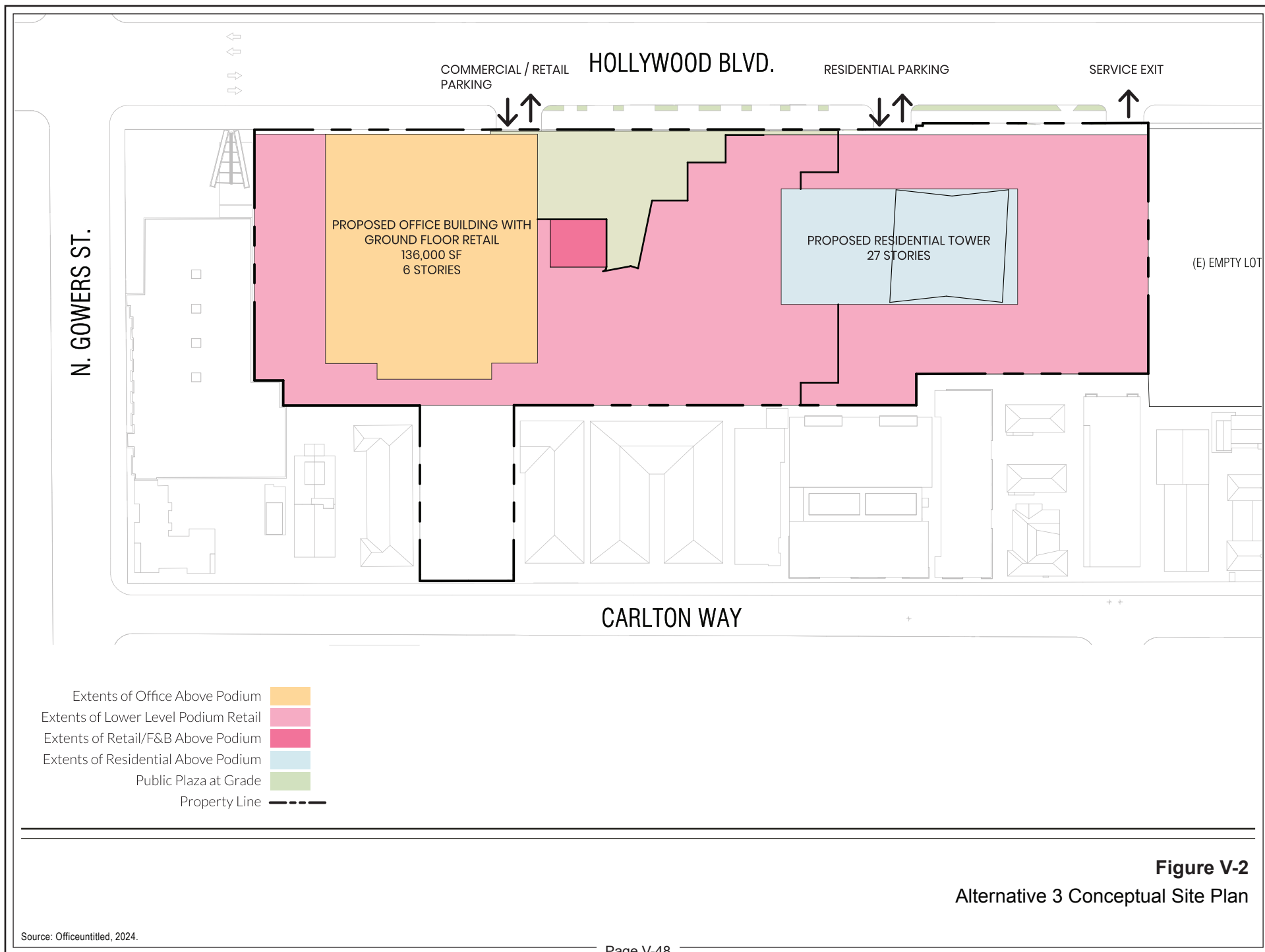


Figure V-2
Alternative 3 Conceptual Site Plan

2. Environmental Impacts

a. Air Quality

(1) Regional Emissions

(a) Construction

As with the Project, construction of Alternative 3 has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. As with the Project, Alternative 3 would comply with applicable air quality regulations during construction to minimize stationary source construction emissions.

During Project construction, maximum daily emissions occur during the grading, excavation, and foundation phases. During these phases, the number of equipment as well as trucks exporting soil and delivering concrete would be greater than other phases of construction (e.g., building construction, architectural coatings phases). As evaluated in Section IV.A, Air Quality, of this Draft EIR, Project construction-related daily maximum regional construction emissions (i.e., combined on-site and off-site emissions) would not exceed the SCAQMD daily significance thresholds during any of the four years of Project construction (i.e., 2026–2029).

Under Alternative 3, overall construction activities would be reduced in comparison to the Project during the grading, excavation, and foundation phases due to the development of one less subterranean parking level, the associated reduction in the excavation depth from 40 feet to 30 feet below ground surface, and the associated reduction in soil export from 210,000 cubic yards to 160,000 cubic yards and associated truck hauling trips. Accordingly, the overall amount of grading and excavation equipment, number of days of excavation activities, and the overall number of required truck haul trips would be lower under Alternative 3, thereby shortening the overall construction period. Specifically, grading and excavation activities for Alternative 3 would be reduced to approximately 3.5 – 4 months compared to the Project's duration of grading and excavation activities of approximately 5 months. However, the intensity of air emissions and fugitive dust from grading, excavation, and foundation activities under Alternative 3 would be similar to the Project on maximum (peak) construction activity days because the maximum number of trucks and equipment operating during the peak construction activity days during the excavation and foundation phases would be similar to the Project on a daily basis (i.e., there would be no change to the intensity

of maximum construction activity). As such, air emissions during maximum activity days would be similar to those of the Project. Hence, as with the Project, construction-related daily maximum regional construction emissions under Alternative 3 would not exceed SCAQMD daily significance thresholds. Therefore, impacts under Alternative 3, like the Project, would be less than significant, with the degree of the impact similar to that of the Project during peak construction activity. However, as the overall duration of the maximum activity days would be reduced, these impacts would be experienced for a shorter duration compared to the Project.

(b) Operation

Operational regional air pollutant emissions associated with Alternative 3 would be generated by vehicle trips to the Project Site, which are the largest contributors to operational air pollutant emissions, and the consumption of electricity and natural gas. As previously discussed, Alternative 3 would reduce the overall development proposed on the Project Site. As such, the number of net new daily vehicle trips generated by Alternative 3 would be less than the net new daily vehicle trips generated by the Project. Since the amount of vehicular emissions is based on the number of trips generated, the overall pollutant emissions generated by Alternative 3 would be less than the emissions generated by the Project. With the reduction in overall floor area, both area sources and stationary sources would also generate less on-site operational air emissions compared to the Project. Therefore, under Alternative 3, total contributions to regional air pollutant emissions during operation would be less than the Project's contribution. Thus, impacts to regional air quality under Alternative 3 would be less than significant and less than the less than significant impacts of the Project.

(2) Localized Emissions

(a) Construction

On-site construction activities under Alternative 3 would be located slightly further away from sensitive receptors than the Project as the proposed residential tower would be located further away from the edge of the Project Site. In addition, Alternative 3 would result in a reduction in the overall amount of the higher-emission generating construction activities (i.e., grading, excavation, and foundations construction) due to the reduction in the number of subterranean parking levels and associated reductions in grading, excavation, and soil export compared to the Project. However, as previously discussed above, the intensity of air emissions from grading, excavation, and foundation activities under Alternative 3 would be similar to the Project on days with maximum (peak) construction activities (i.e., there would be no change to the intensity of maximum construction activity). As such, air emissions during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Because localized emissions under the Project would not exceed the SCAQMD localized screening threshold during construction, neither would such emissions exceed SCAQMD screening thresholds during construction of

Alternative 3. Therefore, impacts associated with localized air pollutant emissions during construction of Alternative 3 would be less than significant and similar to the less significant impacts of the Project during peak construction activity. However, as the overall duration of the maximum activity days would be reduced, these impacts would be experienced for a shorter duration compared to the Project.

(b) Operation

Localized operational impacts are determined primarily by traffic volumes. As discussed above, Alternative 3 would reduce the overall development proposed on the Project Site. As such, the number of net new daily vehicle trips generated by Alternative 3 would be less than the net new daily vehicle trips generated by the Project. With the reduction in overall floor area, both area sources and stationary sources would also generate less on-site operational air emissions compared to the Project. Accordingly, localized air quality impacts under Alternative 3 operation would be less than significant and less than the less than significant impacts of the Project.

(3) Toxic Air Contaminants

(a) Construction

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

(b) Operation

As set forth in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential TAC emissions associated with Project operations would include diesel particulate matter from delivery trucks. Under Alternative 3, the overall increase in the number of deliveries and associated diesel particulate matter emissions would be reduced compared to the Project due to the reduction in the number of residential units. Furthermore, similar to the Project, the land uses proposed under Alternative 3 are not considered land uses that generate substantial TAC emissions. Therefore, Alternative 3 operation would not release substantial amounts of TACs. Impacts due to TAC emissions and the corresponding cancer

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

b. Cultural Resources (Archaeological Resources)

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, no known archaeological sites or resources associated with either Native Americans or historical archaeology have been identified within the Project Site. Thus, neither Alternative 3 nor the Project would impact known archaeological sites.

Alternative 3 would include one fewer subterranean parking level compared to the Project. As such, the depth of excavation and total soil export under this alternative (i.e., 30 feet below ground surface and 160,000 cubic yards, respectively) would be less than under the Project (i.e., 40 feet below ground surface and 210,000 cubic yards, respectively). Therefore, the potential for Alternative 3 to uncover archaeological deposits or features (i.e., result in inadvertent discovery) during construction would be less than for the Project. Nonetheless, like the Project, Alternative 3 would implement Mitigation Measure CUL-MM-1 in order to mitigate potential impacts to archaeological resources. As such, impacts to archaeological resources under Alternative 3 would be less than significant with mitigation and less than the less than significant with mitigation impacts of the Project.

c. Energy

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

(a) Construction

Similar to the Project, construction activities under Alternative 3 would consume electricity to convey water for dust control and to power lighting, electronic equipment, and other construction activities, and petroleum-based fuels for heavy construction equipment, delivery and haul trucks, and construction worker traffic. Similar to the Project, construction activities associated with Alternative 3 would not involve the consumption of natural gas. As with the Project, Alternative 3 would also generate a demand for transportation energy associated with on- and off-road vehicles. However, the energy consumed during construction of Alternative 3 would be reduced compared to the Project due to the reduction in construction activities and duration. As with the Project, the use of construction equipment/vehicles used during construction of Alternative 3 would comply with Title 24 standards and other applicable energy conservation requirements, CARB anti-idling and In-Use Off-Road Diesel-Fueled Fleet regulations, federal fuel efficiency standards, and other applicable requirements. Alternative 3 would also implement design features, similar to the Project, to reduce energy usage and fuel consumption during construction. Therefore, as with the

Project, Alternative 3 construction activities would require energy demand that is not wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 3 and less than the less than significant impacts of the Project.

(b) Operation

As with the Project, Alternative 3 operations would generate an increased demand for electricity and natural gas. Based on the reduction in total development proposed by Alternative 3, electricity, natural gas, and petroleum-based fuel consumption would be less than the Project's estimated increase in energy consumption. Specifically, the consumption of electricity and natural gas would be reduced due to the reduction in residential units and commercial square footage. Furthermore, as with the Project, Alternative 3 would be developed in accordance with applicable energy conservation requirements, including those in California's Building Energy Efficiency Standards (Title 24 standards). Therefore, as with the Project, operation of Alternative 3 would not involve the wasteful, inefficient, or unnecessary consumption of energy resources. Impacts related to energy use under Alternative 3 would be less than significant and less than the less than significant impacts of the Project.

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

As discussed in Section IV.C, Energy, of this Draft EIR, the energy conservation policies and plans relevant to the Project include the Title 24 energy standards, including the CALGreen Code (Part 11, Title 24), the City of Los Angeles Green Building Code, City of LA Green New Deal, and the 2020–2045 RTP/SCS. As these conservation policies are mandatory under the City's Building Code, Alternative 3, as with the Project, would not conflict with applicable plans for renewable energy or energy efficiency. Furthermore, as discussed previously, as with the Project, Alternative 3 would represent urban infill development within a Transit Priority Area and High Quality Transit Area in close proximity to transit, which would reduce vehicle trips, VMT, per capita VMT, and associated fuel usage in accordance with Senate Bill 375 and SCAG's RTP/SCS. As with the Project, Alternative 3 would also be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction, which would save transportation energy. Therefore, Alternative 3, as with the Project, would not conflict with plans for renewable energy or energy efficiency. The impacts of Alternative 3 would be less than significant and similar to the less than significant impacts of the Project.

d. Geology and Soils (Paleontological Resources)

As discussed in Section IV.D, Geology and Soils (Paleontological Resources), of this Draft EIR, according to a records search of the paleontological specimen and locality records

held by the Natural History Museum of Los Angeles Vertebrate Paleontology Department and the Paleontology Technical Report, there are no previously encountered fossil vertebrate localities located within the Project Site.

Alternative 3 would include one less subterranean parking level compared to the Project. As such, the depth of excavation and total soil export under this alternative (i.e., 30 feet below ground surface and 160,000 cubic yards, respectively) would be less than under the Project (i.e., 40 feet below ground surface and 210,000 cubic yards, respectively). Therefore, the potential for Alternative 3 to disturb undiscovered paleontological resources during construction would be less than for the Project because Alternative 3 reduces the potential for unearthing paleontological resources. Nonetheless, like the Project, Alternative 3 would implement Mitigation Measures GEO-MM-1 through GEO-MM-4 in order to mitigate potential impacts to paleontological resources. As such, impacts to paleontological resources under Alternative 3 would be less than significant with mitigation and less than the less than significant with mitigation impacts of the Project.

e. Greenhouse Gas Emissions

As discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, GHG emissions from a development project are determined in large part by the number of daily vehicle trips generated and associated VMT, as well as by energy consumption from proposed land uses. Under Alternative 3, the number of daily trips, daily VMT trip generation, and energy and water consumption would be reduced compared to both Project due to the reduction in development. Thus, the amount of GHG emissions generated by Alternative 3 would be less than the amount generated by the Project. In addition, as with the Project, Alternative 3 would be designed to comply with the requirements of Title 24 and the Los Angeles Green Building Code. As with the Project, Alternative 3 would incorporate design features to reduce GHG emissions such as the sustainability features required to achieve LEED certification per Project Design Feature GHG-PDF-1. Like the Project, Alternative 3 would also increase urban density within a Transit Priority Area and High Quality Transit Area in proximity to transit, would include LAMC-required bicycle parking, and would include electric vehicle (EV)-ready parking, which would all reduce VMT and associated fuel usage and GHG emissions. Therefore, with compliance with applicable regulations and with implementation of comparable sustainability features as the Project, Alternative 3 would be consistent with the GHG reduction goals and objectives included in adopted State, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 3 would be less than significant and less than the less than significant impacts of the Project.

f. Hazards and Hazardous Materials

(a) Construction

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

Like the Project, Alternative 3 would also have the potential to encounter contaminated soils, soil gas, and impacted groundwater during construction. As previously described, Alternative 3 would eliminate one subterranean parking level such that excavation under Alternative 3 would be reduced from 40 feet below ground surface to 30 feet below ground surface and soil export would be reduced from approximately 210,000 cubic yards to 160,000 cubic yards, which would result in less of a potential to encounter contaminated soil, soil gas and/or contaminated groundwater that may be present. As with the Project, any contaminated soils, soil gas, or impacted soil and groundwater encountered would be treated and disposed of in accordance with applicable regulations and Mitigation Measure HAZ-MM-1, which requires a soil management plan, soil gas monitoring, and subsurface gas controls to reduce potential impacts to less than significant levels. However, because Alternative 3 would involve shallower excavations than the Project and the export of less soil, the potential to encounter contaminated soil, soil gas and/or contaminated groundwater would be less under Alternative 3, as would the potential need for and extent of any remediation activities.

Lastly, Alternative 3 would involve the same demolition as the Project, thus involving the same potential to encounter or release ACM or LBP as the Project, and regulatory compliance would minimize associated hazards.

Overall, the impacts related to hazards and hazardous materials during construction under Alternative 3 would be less than significant with mitigation, and less than the less than significant with mitigation impacts of the Project.⁶

(b) Operation

As with the Project, operation of Alternative 3 would involve the use of limited quantities of potentially hazardous materials, including those used for building and ground maintenance, cleaning solvents, household chemicals, and pesticides for landscaping. As with the Project, all hazardous materials on the Project Site under Alternative 3 would be handled in compliance with all applicable federal, state, county, and local requirements concerning the handling and disposal of hazardous waste. Overall, impacts under Alternative 3 would be less than significant and similar to the less than significant impacts of the Project.

g. Land Use and Planning

As described above, Alternative 3 would develop the Project Site similar to the Project but would reduce the residential units and commercial square footage, as well as the heights of the proposed buildings. Accordingly, the overall FAR, density, and building height would be reduced compared to the Project. As with the Project, following approval of the proposed land use entitlements, Alternative 3 would be consistent with the overall intent of the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site and that were adopted to avoid or mitigate an environmental effect, including but not limited to the City's General Plan Framework Element, Hollywood Community Plan and LAMC, and SCAG's 2020–2045 RTP/SCS. Therefore, the impacts of Alternative 3 related to potential conflicts with applicable land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant and similar to the less than significant impacts of the Project

h. Noise

(1) Noise

(a) Construction

The types of construction activities under Alternative 3 would be similar to the Project; however, the overall amount of construction activities and duration would be reduced due to

⁶ Under both the Project and Alternative 3, all construction-related hazards and hazardous materials impacts would be less than significant, except for the Threshold (b) impact (i.e., release of hazardous materials into the environment) which would be less than significant with mitigation.

the reduction in overall development and excavation depth. As with the Project, construction of Alternative 3 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Under Alternative 3, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to that of the Project during maximum activity days during the excavation phase (i.e., there would be no change to the intensity for days in which the maximum construction activity is required). However, the excavation phase under Alternative 3 would be shortened (approximately 3.5 to 4 months compared with the Project's 5-month duration). As such, the impact experienced during this peak construction phase would occur over a shorter period as compared to the Project. Nonetheless, noise levels during maximum activity days would be similar to those of the Project. As with the Project, Alternative 3 would implement similar project design features and mitigation, which would minimize construction noise. As the impact significance is based on maximum construction activity days, Alternative 3 would similarly result in significant and unavoidable on-site and off-site construction noise impacts since the noise levels during maximum activity days would be similar to the Project. While such impacts would be similar to the Project, the impacts would be experienced for a shorter duration given the reduction in development and excavation.

(b) Operation

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

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

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 3 would be similar to the Project, although the amount of development and excavation activities and associated duration would be reduced. As with the Project, construction of Alternative 3 would generate on- and off-site vibration from the use of heavy-duty construction equipment and from truck trips. While the overall amount of excavation activities would be reduced under Alternative 3, on- and off-site construction activities and the associated construction on- and off-site vibration levels would be expected to be similar to those of the Project as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment (i.e., there would be no change to the intensity for the days in which the maximum construction activity is required). However, as previously noted, the excavation phase under Alternative 3 would be shortened. The impact experienced during this peak construction phase would occur over a shorter period as compared to the Project. Notwithstanding, peak vibration levels generated by construction equipment and construction truck trips under Alternative 3 would be similar to those of the Project as the same activities and same equipment would occur, although for a shorter duration. Accordingly, as with the Project, construction activities under Alternative 3 would result in significant and unavoidable on-site and off-site vibration impacts (pursuant to the significance threshold for human annoyance). In addition, as with the Project, vibration impacts due to on- and off-site construction activities under Alternative 3 would similarly be less than significant for on-site and off-site construction vibration pursuant to the significance threshold for building damage. Such impacts would be similar to the Project although they would be experienced over a shorter duration compared to the Project.

(b) Operation

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

i. Public Services

(1) Fire Protection

(a) Construction

As previously discussed, the total floor area and building heights under Alternative 3 would be reduced compared to that of the Project. Therefore, the overall duration of construction for Alternative 3 would be reduced compared to the Project. As with the Project, construction activities under Alternative 3 would have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, exposed electrical lines, chemical reactions, and lighted cigarettes. As with the Project, construction activities under Alternative 3 would comply with the safety and health provisions of OSHA. Construction would also occur in compliance with all applicable federal, State, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, compliance with regulatory requirements would effectively reduce the potential for construction activities associated with Alternative 3 to expose people to the risk of fire or explosion related to hazardous materials.

Additionally, similar to the Project, while Alternative 3 construction activities would primarily be contained within the boundaries of the Project Site, construction activities also have the potential to affect fire protection services by adding construction traffic to the street network and by necessitating partial lane closures for installation of required utility and street improvements. Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. However, as with the Project, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period and emergency access would not be impeded. Furthermore, similar to the Project, a Construction Traffic Management Plan would be implemented as part of Alternative 3 to ensure that adequate and safe access remains available within and near the Project Site during construction activities, and to ensure that the majority of construction-related traffic, including hauling activities and construction worker trips would occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts. Furthermore, emergency vehicles have the ability to avoid traffic delays through the use of sirens to clear paths of travel in accordance with the CVC. Therefore, construction of Alternative 3, as with the Project, would not result in the need for new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. As such, construction-related impacts related to fire protection services under Alternative 3 would be less than significant, and less than the less than significant impacts of the Project due to the reduction in construction activities and duration.

(b) Operation

As with the Project, Alternative 3 would generate a new residential population, as well as a new visitor and employee population on the Project Site that would contribute to an increased demand for LAFD fire protection services. However, due to the reduction in total new floor area and uses, Alternative 3 would generate a smaller service population compared to the Project. As such, the overall increased demand for LAFD fire protection services would be reduced compared to that of the Project. Similar to the Project, Alternative 3 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, life safety features (e.g., automatic fire sprinkler systems, fire service access elevators, etc.), and would undergo LAFD fire/life safety plan review to ensure compliance with the above, which would reduce the demand for fire protection and also ensure adequate emergency access. Furthermore, as with the Project, traffic generated by Alternative 3 would not significantly impact emergency vehicle response to the Project Site and surrounding area as the drivers of emergency vehicles have the ability to bypass traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. The driveways and internal circulation under Alternative 3 would also be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. As with the Project, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for Alternative 3. Therefore, similar to the Project, Alternative 3 would not necessitate the construction of new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. As such, impacts with regard to fire protection services during operation of Alternative 3 would be less than significant and less than the less than significant impacts of the Project due to the reduction of total floor area and residential uses.

(2) Police Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 3 would be similar to that of the Project. However, the overall amount of construction activities and duration of construction would be reduced compared to the Project due to the reduction in development. Similar to the Project, construction would not generate a permanent population on the Project Site that would substantially increase the police service population of the Hollywood Division. The existing commercial uses on the Project Site currently generate a daytime population that may require police protection services. The demand for police protection services during construction of Alternative 3 would be offset by the removal of the existing commercial buildings on the Project Site. However, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police

protection services. Additionally due to the reduction of construction activities, the small temporary demand for police services would be shorter compared to the Project. As such, Alternative 3 would not generate a new residential population on the Project Site or in the area during construction, which would result in the need for additional police protection services. Furthermore, as with the Project, Alternative 3 would incorporate Project Design Feature POL-PDF-1 to implement temporary security measures, including security fencing, lighting, and locked entry to secure the Project Site during construction, which would serve to reduce demand on LAPD facilities.

Furthermore, as with the Project, Alternative 3 would implement a Construction Traffic Management Plan that would ensure continued provision of emergency access during construction. Lastly, pursuant to CVC Section 21806, emergency vehicles would use their sirens to clear a path of travel or drive in the lanes of opposing traffic during an emergency to avoid or bypass traffic. Therefore, as with the Project, construction of Alternative 3 would not result in the need for new or altered government facilities (i.e., police stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 3 would be less than significant and less than the less than significant impacts of the Project due to the reduced excavation activities.

(b) Operation

Given the reduction in uses proposed under Alternative 3, the police service population generated by this alternative would be less than the Project's estimated police service population. While Alternative 3 would increase the existing police service population of the Hollywood Division compared to existing conditions, the increase would be less than the Project due to the reduction of residential uses. Similar to the Project, Alternative 3 would implement similar project design features as the Project during operation, which would help reduce the demand for police services and, as with the Project, Alternative 3 would generate General Fund tax revenues for the City which could be used to expand law enforcement resources in the Hollywood Division. Therefore, Alternative 3, as with the Project, would not result in the need for new or altered government facilities (i.e., police stations), the construction of which would cause significant environmental impacts, in order to maintain service. As such, impacts with regard to police protection services during operation of Alternative 3 would be less than significant, and less than the less than significant impacts of the Project.

j. Transportation

As previously described, Alternative 3 would be developed within the same Project Site as the Project and would include a mix of uses similar to the Project. In addition, while Alternative 3 would include a reduction in the residential uses and subterranean parking proposed by the Project, Alternative 3 would feature similar vehicular, pedestrian, and bicycle

access as the Project. Therefore, overall, as with the Project, the transportation-related plans, policies, and programs applicable to the Project would also apply to Alternative 3 (i.e., Mobility Plan 2035; Plan for a Healthy Los Angeles; Hollywood Community Plan; LAMC, Vision Zero; Citywide Design Guidelines, and SCAG's 2020–2045 RTP/SCS).

As with the Project, Alternative 3 would not interfere with the complete streets balanced transportation network (i.e., Transit-Enhanced Network, Bicycle Enhanced Network, and Pedestrian-Enhanced Districts) concept of the Mobility Plan and would enhance pedestrian access within and around the Project Site as called for by the Mobility Plan and the Hollywood Community Plan. In addition, sidewalk and driveway design, vehicular parking, bicycle parking, etc., would be provided in accordance with LAMC requirements. This alternative would also represent urban infill development within a TPA and HQTAs in close proximity to transit which would encourage alternative transportation use as called for by the Mobility Plan and 2020–2045 RTP/SCS. Alternative 3 would support these transportation plans for the same reasons as the Project (e.g., would intensify urban density in close proximity to transit, would include similar roadway and sidewalk improvements, would comply with LAMC driveway and parking standards, etc.). Like the Project, Alternative 3 would also reduce both household VMT per capita and work VMT per employee, including through the implementation of transportation demand management (TDM) measures as called for by the Mobility Plan, 2020–2045 RTP/SCS, and the City's TDM Ordinance. Therefore, as with the Project, Alternative 3 would not conflict with a program, plan, ordinance, or policy addressing the circulation system. The impacts of Alternative 3 in this regard would be less than significant and similar to the less than significant impacts of the Project.

With respect to VMT, Alternative 3 would result in a lower daily VMT than the Project within the Central APC. Specifically, as shown in Appendix N of this Draft EIR, Alternative 3 would result in 16,954 total daily VMT, which would be comparatively less than the 20,516 daily VMT generated by the Project. Based on the population assumptions, this Alternative would generate an average household VMT of 3.9 per capita and an average work VMT per employee of 7.0, which would be comparatively less than the Project's average household VMT of 4.3 per capita and same as the Project's average work VMT per employee of 7.0. Nevertheless, the average household VMT per capita for Alternative 3 would still fall below the significance threshold of 6.0 and average work VMT per employee of 7.6 for the Central APC. Therefore, as with the Project, Alternative 3 would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b), regarding VMT. As such, the VMT impacts of Alternative 3 would be less than significant and less than the impacts of the Project.

With respect to hazards due to geometric design features, in accordance with LADOT's TAG, impacts regarding the potential increase of hazards due to a geometric design feature generally relate to the design of access points to and from a project site.

Alternative 3, like the Project, would include three driveways off of Hollywood Boulevard. Hollywood Boulevard is not designated in Vision Zero as part of the HIN, and final design of the driveways would be reviewed by the City Department of Building and Safety, BOE, and LADOT during site plan review to ensure code compliance and safe pedestrian and vehicular design. As such, the new driveways along Hollywood Boulevard under both the Project and Alternative 3 would neither substantially increase vehicular conflicts with other vehicles, bicycles, and/or pedestrians nor present any geometric design hazards related to traffic movement. Like the Project, Alternative 3 would also not modify roadway widths or otherwise affect the geometric design of roads surrounding the Project Site, nor would it implement any features that would obstruct sight distance or paths of vehicular, pedestrian, or bicycle travel, and pedestrian and bicycle access to the Project Site from surrounding streets would be provided separate from vehicular access. As such, both the Project and Alternative 3 would enhance the pedestrian walkway continuity along the Project Site frontages. Therefore, hazards due to geometric design features impacts under Alternative 3 would be less than significant and similar to the less than significant impacts of the Project.

With respect to freeway safety, as discussed in Section IV.J, Transportation, of this Draft EIR, a freeway safety analysis evaluates a proposed project's potential to cause or lengthen a forecasted off-ramp queue on the freeway mainline that could lead to a potential safety impact due to speed differentials between vehicles exiting the freeway off ramps and vehicles traveling on the freeway mainline. The City's guidance on freeway safety analysis requires analysis of freeway off-ramps where a proposed project adds 25 or more trips in either the morning or afternoon peak hour to be studied for potential queuing impacts. If the Project is not projected to add 25 or more peak hour trips at any freeway off-ramps, then a freeway ramp analysis is not required. According to the Transportation Assessment included as Appendix J of this Draft EIR, the Project is not projected to add 25 or more trips to the surrounding freeway off-ramps. As Alternative 3 would generate fewer trips than the Project, Alternative 3 would not add 25 or more trips to any nearby freeway off-ramps, and no further freeway safety analysis is required. As such, impacts regarding freeway safety would also be less than significant and less than those of the Project.

k. Tribal Cultural Resources

As previously discussed, Alternative 3 would include fewer subterranean parking levels than the Project. This would result in shallower maximum excavation depths under Alternative 3 (i.e., 30 feet below ground surface) than under the Project (i.e., 40 feet below ground surface). However, as tribal cultural resources are typically found in the first 6 to 10 feet of excavation, the potential for Alternative 3 to uncover subsurface tribal cultural

resources would be similar to that of the Project.⁷ As discussed in Section IV.K, Tribal Cultural Resources, of this Draft EIR, no tribal cultural resources have been previously recorded at the Project Site or identified during consultations with the applicable California Native American Tribes conducted in accordance with AB 52. Overall, as concluded in the Tribal Cultural Resources Assessment included as Appendix K of this Draft EIR, the Native American archaeological sensitivity of the Project Site is considered “low,” and impacts would be less than significant. Nonetheless, like the Project, Alternative 3 would implement the City’s standard condition of approval for the inadvertent discovery of tribal cultural resources which would further reduce potential impacts to previously unknown tribal cultural resources that may be encountered during construction. Therefore, Alternative 3 would result in less than significant impacts which would be similar to the less than significant impacts of the Project.

I. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities for Alternative 3 would result in a temporary demand for dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. Construction-related water use under Alternative 3 would be less since the amount of new construction and the construction duration required under Alternative 3 would be reduced. Furthermore, while Alternative 3 would require trenching for connection to the existing water mains in the adjacent streets similar to the Project, Alternative 3 would similarly implement a Construction Traffic Management Plan (Project Design Feature TR-PDF-1 included in Section IV.J, Transportation, of this Draft EIR) to ensure the safe and efficient flow of pedestrian and vehicular traffic around the construction sites during construction. As such, as with the Project, Alternative 3 would not result in construction activities that require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental impacts. Alternative 3 would result in less than significant impacts that are less than the less than significant impacts of the Project.

⁷ As indicated in Section IV.K, based on regional geologic mapping, the subsurface environment of the Project Site appears to be characterized by alluvium and fan deposits formed in the late Pleistocene age, meaning mostly before Native Americans are documented to have been present in North America. This suggests that any Native American activities that occurred on these surfaces and produced physical remains are, in general, more likely to occur as shallowly buried deposits.

(b) Operation

As with the Project, operation of Alternative 3 would generate an increased demand for water relative to existing conditions. However, based on the reduction in total development, water demand for Alternative 3 would be less than the Project's estimated increase in water demand. Thus, the estimated net water demand under Alternative 3 would also be within the available and projected water supplies for LADWP under normal, single-dry, and multi-dry years through the year 2045. In addition, the existing water distribution infrastructure would be adequate to serve Alternative 3 since the water demand would be less than the water demand generated by the Project. Furthermore, similar to the Project, Alternative 3 would construct the necessary water infrastructure and connections to the LADWP water system pursuant to applicable City requirements to accommodate the new development. Thus, operational impacts to water supply and infrastructure under Alternative 3 would be less than significant and less than the less than significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, the existing sewer laterals would be capped during construction of Alternative 3. As such, no new sewage would enter the public sewer system. As with the Project, temporary facilities, such as portable toilet and hand wash stations, would be provided by the construction contractor; however, any sewage generated from these facilities would be collected and hauled off-site and would not be discharged into the public sewer system. Thus, wastewater generation from construction activities under Alternative 3 would not cause a measurable increase in wastewater flows.

Additionally, as with the Project, Alternative 3 would require the installation of new on-site sewer line connections to connect the proposed buildings to the existing off-site public sewer mains along the streets surrounding the Project Site. Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to the public infrastructure. As with the Project, any offsite work that may affect services to the existing sewer lines in the vicinity of the Project Site during construction of Alternative 3 would be coordinated with BOE. In addition, similar to the Project, a Construction Traffic Management Plan would be implemented during construction of Alternative 3 to reduce any temporary pedestrian and traffic impacts resulting from the minor off-site work that might result from trenching and installation of new sewer line connections. Therefore, construction-related impacts to the wastewater system under Alternative 3 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 3 would generate greater wastewater flows relative to existing conditions. However, based on the reduction in total development, wastewater generation under Alternative 3 would be less than the Project's estimated wastewater flow. Since the Project's wastewater flows would be accommodated by the existing infrastructure, the wastewater generated by Alternative 3 would also be accommodated by the existing capacity of the Hyperion Water Reclamation Plant, and impacts with respect to treatment capacity would be less than significant.

Similar to the Project, sewer service for Alternative 3 would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site. Given that wastewater flows generated by Alternative 3 would be less than the estimated wastewater flow of the Project, it is anticipated that there would be sufficient capacity within the sewer lines serving the Project Site to accommodate the flows from Alternative 3. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for Alternative 3 during the permitting process. In addition, sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Thus, operational impacts with regard to wastewater generation and infrastructure capacity under Alternative 3 would be less than significant and less than the less than significant impacts of the Project.

(3) Energy Infrastructure

(a) Construction

As discussed above, Alternative 3 would reduce the amount of energy needed for construction activities based on the reduction in development. As discussed in Section IV.C, Energy, of this Draft EIR, the estimated energy usage of the Project during construction would be within the available capacity and supply of the existing infrastructure. Since Alternative 3 would generate a reduced demand for energy during construction compared to the Project due to less overall construction, the energy demand of Alternative 3 would similarly be within the available capacity of the existing infrastructure. Therefore, impacts to energy infrastructure capacity associated with construction of Alternative 3 would be less than significant and less than the less than significant impacts of the Project.

(b) Operation

As previously discussed, the total energy consumption of Alternative 3 would be less than that of the Project due to the reduction in uses. Therefore, as with the Project, the existing energy infrastructure would similarly have capacity to support Alternative 3. Impacts

related to energy infrastructure would be less than significant under Alternative 3 and less than the less than significant impacts of the Project.

3. Comparison of Impacts

Based on the analysis above, Alternative 3 would not avoid the Project's significant and unavoidable noise and vibration impacts. However, Alternative 3 would reduce the duration of the excavation phase of the Project such that these impacts would occur for a shorter duration during this phase. In addition, Alternative 3 would reduce several of the construction-related less than significant impacts and construction-related less than significant impacts with mitigation associated with the Project (i.e., TACs during construction, energy efficiency during construction, police and fire protection services during construction, water and energy infrastructure during construction) due to the reduction in excavation activities and overall duration of construction (36 months versus the Project's 44-month construction period). Alternative 3 would also reduce the Project's operational impacts due to the reduction in residential uses.

4. Relationship of the Alternative to Project Objectives

Alternative 3 would develop a similar mix of residential and commercial uses as the Project. As such, Alternative 3 would mostly meet the underlying purpose of the Project, which is to redevelop an underutilized site with a high-density, mixed-use, transit- and pedestrian-oriented development that provides a mix of new housing opportunities that are integrated with commercial and office uses at provide new employment and commercial opportunities for the surrounding community.

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

- Locate new housing and employment opportunities near one another and in close proximity to transit stations, along transit corridors, and within high activity areas.
- Focus housing and employment growth within a High Quality Transit Area consistent with a key element in SCAG's Regional Transportation Plan/ Sustainability Communities Strategy.
- Strengthen viable commercial development in the community and provide additional opportunities for new commercial development and services by providing a variety of commercial uses, including office space and retail and restaurant space.

- Provide upgraded neighborhood-serving commercial uses to provide a strong and competitive commercial sector that promotes economic vitality and job creation and serves the needs of project residents, visitors, and the surrounding community.
- Provide convenient neighborhood-serving commercial uses and open space within walking distance of existing off-site residential and commercial uses, proposed on-site residential uses and on and off-site office uses.
- Create a pedestrian-friendly project by providing publicly accessible open space and activating streetscapes around the Project Site through use of outdoor dining, greenspace, and varied elevations.

However, Alternative 3 would not meet the following objectives to the same extent as the Project due to the reduction in proposed residential uses:

- Provide for the development of new housing units to support the high or significant demand for a mix of housing in the City and to meet the diverse economic and physical needs of both existing and future residents.
- To provide high-density multi-family housing in furtherance of the goals of the City's Housing Element and the City's Regional Housing Needs Assessment.
- Create a range of housing types and scales with access to open space and outdoor amenities to accommodate varied household sizes and needs in a village-like setting.
- Promote local and regional mobility objectives by providing a mix of higher density housing and commercial uses that are in close proximity to a range of mobility options including public transportation, rideshare pickup and drop off locations, and convenient on-site parking for vehicle-dependent residents and visitors.
- Improve the visual character and maximize the value of an underutilized site that is responsive to market demands.

V. Alternatives

E. Alternative 4: All Residential Use Alternative

1. Description of the Alternative

Alternative 4, the All Residential Use Alternative, would replace the office and most of the commercial (retail/restaurant) uses proposed under the Project with additional residential uses. Specifically, Alternative 4 would include the development of a 500,414-square-foot mixed-use project consisting of 500 residential units (compared to the Project's 350 residential units and including 44 dwelling units for very low income household occupancy) and 1,000 square feet of commercial uses⁸ (compared to the Project's 22,542 square feet of commercial uses). The Project's proposed 136,000 square feet of office uses would be eliminated under this alternative. Upon completion, Alternative 4 would comprise 500,414 square feet of floor area (compared to the Project's 501,185 square feet of new floor area) with the same 3.08:1 FAR as the Project. A total of 753 vehicle parking spaces would be provided within two subterranean parking levels (a reduction of one level compared to the Project) and surface parking (on a portion of the Project Site) and above grade parking within the proposed podium, similar to the Project. With the elimination of one level of subterranean parking under this alternative, the excavation depth would be reduced from 40 feet below ground surface to 30 feet below ground surface and the amount of soil export would decrease from 210,000 cubic yards to 160,000 cubic yards. Additionally, as with the Project, Alternative 4 would remove approximately 31,833 square feet of existing commercial uses and parking. A conceptual site plan for Alternative 4 is provided in Figure V-3 on page V-70.

⁸ Assumed to be restaurant use to provide a conservative analysis.

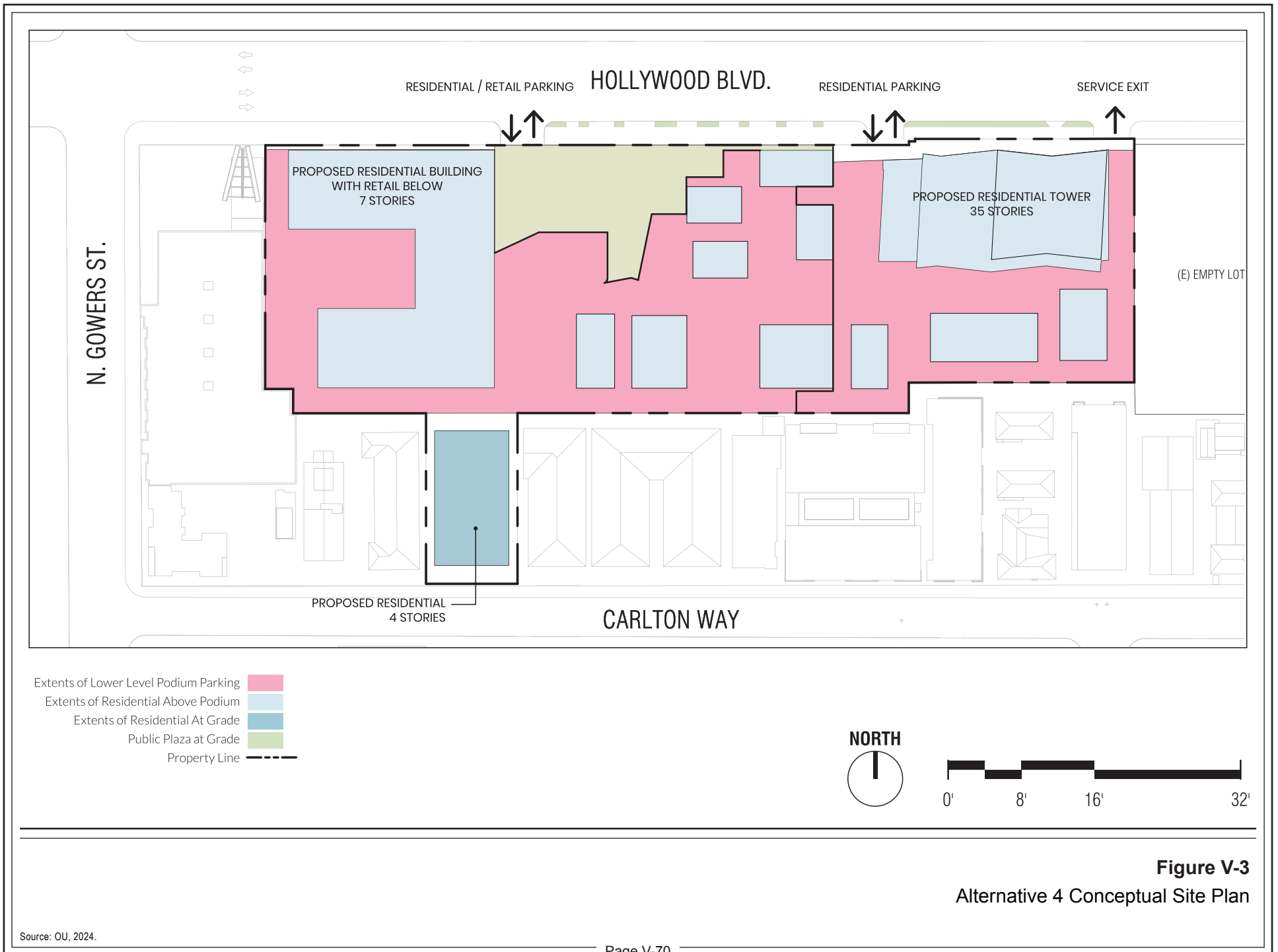


Figure V-3
Alternative 4 Conceptual Site Plan

2. Environmental Impacts

a. Air Quality

(1) Regional Emissions

(a) Construction

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

During Project construction, maximum daily emissions occur during the grading, excavation, and foundation phases. During these phases, the number of equipment as well as trucks exporting soil and delivering concrete would be greater than other phases of construction (e.g., building construction, architectural coatings phases). As evaluated in Section IV.A, Air Quality, of this Draft EIR, Project construction-related daily maximum regional construction emissions (i.e., combined on-site and off-site emissions) would not exceed the SCAQMD daily significance thresholds during any of the four years of Project construction.

Under Alternative 4, overall construction activities would be reduced in comparison to the Project during the grading, excavation, and foundation phases due to the elimination of one below-grade parking level, the associated reduction in the excavation depth from 40 feet below ground surface to 30 feet below ground surface, and the associated reduction in soil export from 210,000 cubic yards to 160,000 cubic yards and associated truck hauling trips. Accordingly, the overall amount of grading and excavation and the associated use of construction equipment, number of days of excavation activities, and the overall number of required truck haul trips would be lower under Alternative 4, thereby shortening the overall construction period. However, the intensity of air emissions and fugitive dust from grading, excavation, and foundation activities under Alternative 4 would be similar to the Project on peak construction days because the maximum number of trucks and equipment operating during the peak construction activity days during the excavation and foundation phases would be similar to the Project on a daily basis (i.e., there would be no change to the intensity for days in which the maximum construction activity is required). As such, air emissions during maximum activity days would be similar to those of the Project. Hence, as with the

Project, construction-related daily maximum regional construction emissions under Alternative 4 would not exceed SCAQMD daily significance thresholds. Therefore, impacts associated with regional air pollutant emissions during construction of Alternative 4 would be less than significant and similar to the less than significant impacts of the Project during peak construction activity days. However, as the overall duration of the maximum activity days would be reduced, these impacts would be experienced for a shorter duration compared to the Project.

(b) Operation

As previously discussed, Alternative 4 would construct 500 multi-family residential units and 1,000 square feet of ground floor commercial space (assumed to be restaurant use to provide a conservative analysis). Based on the proposed uses, the number of daily vehicle trips and VMT generated by Alternative 4 would be less than under the Project. Specifically, as provided in Appendix N of this Draft EIR, Alternative 4 would result in a total of 1,988 daily vehicle trips and 12,374 daily VMT compared to the Project's 3,077 daily vehicle trips and 20,516 VMT.⁹ As vehicular emissions depend on VMT, the overall pollutant emissions generated by this alternative would be less than the emissions generated by the Project.

As discussed above, Alternative 4 would result in a similar floor area as the Project (i.e., 771 square feet less which represents only a 0.15 percent reduction in floor area compared to the Project); however, Alternative 4 would include more residential uses, no office uses, and less commercial uses than the Project. Office and commercial uses require more electricity compared to residential uses.¹⁰ Therefore, this alternative would be anticipated to generate less on-site operational air emissions associated with energy consumption compared to the Project.

Based on the above, the overall pollutant emissions generated by Alternative 4 would be less than the emissions generated by the Project due to the reduction in vehicle trips. Therefore, impacts associated with regional air pollutant emissions during operation of Alternative 4 would be less than significant and less than the less than significant impacts of the Project.

⁹ Fehr and Peers, *VMT Calculator Runs for the Alternatives*, 2024. See Appendix N of this Draft EIR.

¹⁰ CalEEMod Users Guide. Appendix G: Default Data Tables. Table G-28 Energy Use by Climate Zone and Land Use Type.

(2) Localized Emissions

(a) Construction

On-site construction activities under Alternative 4 would be located at similar distances from sensitive receptors as the Project. In addition, Alternative 4 would result in a reduction in the overall amount of the higher-emission generating construction activities (i.e., grading, excavation, and foundations construction) due to the reduction in the number of subterranean parking levels and associated reductions in grading, excavation, and soil export compared to the Project. However, as previously discussed above, the intensity of air emissions from grading, excavation, and foundation activities under Alternative 4 would be similar to the Project on days with maximum (peak) construction activities (i.e., there would be no change to the intensity of maximum construction activity). As such, air emissions during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Therefore, because localized emissions under the Project would not exceed the SCAQMD localized screening threshold during construction, neither would such emissions exceed SCAQMD screening thresholds during construction of Alternative 4. Therefore, impacts associated with localized air pollutant emissions during construction of Alternative 4 would be less than significant and similar to the less significant impacts of the Project during peak construction activity. However, as the overall duration of the maximum activity days would be reduced, these impacts would be experienced for a shorter duration compared to the Project.

(b) Operation

Localized operational impacts are determined primarily by traffic volumes. As provided in Appendix N of this Draft EIR, Alternative 4 would result in a total of 12,374 daily vehicle trips. As such, this alternative would generate less daily trips compared to the Project's 20,516 daily vehicle trips. As discussed above, area and stationary sources would generate less on-site operational air emissions compared to the Project. As such, with the decrease in localized vehicle emissions, overall localized emissions under Alternative 4 would be less compared to the Project. As such, under Alternative 4, total contributions to localized air pollutant emissions during operation would be less than the Project's contribution. Accordingly, localized air quality impacts under Alternative 4 operation would be less than significant and less than the less than significant impacts of the Project.

(3) Toxic Air Contaminants

(a) Construction

As with the Project, construction of Alternative 4 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed

in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less than significant impacts with regard to construction TAC emissions. Overall construction TAC emissions generated by Alternative 4 would be less than those of the Project as this alternative would eliminate one subterranean parking level and result in an associated reduction in grading, excavation, and soil export. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 4 would be less than significant and less than the less than significant impacts of the Project.

(b) Operation

As set forth in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential TAC emissions associated with Project operations would include diesel particulate matter from delivery trucks. Under Alternative 4, the number of deliveries and associated diesel particulate matter emissions would be reduced compared to the Project due to the decrease in the number of trips generated under this alternative and because residential uses are anticipated to have less heavy delivery truck trips associated with them than do office and commercial uses. In addition, typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, and a petroleum refinery). Like the Project, the non-industrial uses proposed under Alternative 4 are not considered land uses that generate substantial TAC emissions. Therefore, Alternative 4 would not release substantial amounts of TACs. Impacts due to TAC emissions and the corresponding cancer risk under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project.

b. Cultural Resources (Archaeological Resources)

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, no known archaeological sites or resources associated with either Native Americans or historical archaeology have been identified within the Project Site. Thus, neither Alternative 4 nor the Project would impact known archaeological sites.

Alternative 4 would include excavation activities in the same areas of the Project Site as the Project; however, Alternative 4 would eliminate one level of subterranean parking, which would reduce the depth of excavation and total soil export under this alternative compared to the Project from 40 feet below ground surface to 30 feet below ground surface and 210,000 cubic yards to 160,000 cubic yards, respectively). Therefore, the potential for Alternative 4 to uncover archaeological deposits or features (i.e., result in inadvertent discovery) during construction would be less than for the Project. Furthermore, like the Project, Alternative 4 would implement Mitigation Measure CUL-MM-1 in order to mitigate potential impacts to archaeological resources. As such, impacts to archaeological resources under Alternative 4 would be less than significant with mitigation and less than the less than significant with mitigation impacts of the Project.

c. Energy

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

(a) Construction

Similar to the Project, construction activities under Alternative 4 would consume electricity to convey water for dust control and to power lighting, electronic equipment, and other construction activities, and petroleum-based fuels for heavy construction equipment, delivery and haul trucks, and construction worker traffic. Similar to the Project, construction activities associated with Alternative 4 would not involve the consumption of natural gas. As with the Project, Alternative 4 would also generate a demand for transportation energy associated with on- and off-road vehicles. However, the energy consumed during construction of Alternative 4 would be reduced compared to the Project as this alternative would eliminate one subterranean parking level, which would result in an associated reduction in grading and excavation activities under this alternative. As with the Project, the use of construction equipment/vehicles used during construction of Alternative 4 would comply with Title 24 standards and other applicable energy conservation requirements, CARB anti-idling and In-Use Off-Road Diesel-Fueled Fleet regulations, federal fuel efficiency standards, and other applicable requirements. Alternative 4 would also implement design features, similar to the Project, to reduce energy usage and fuel consumption during construction. Therefore, as with the Project, Alternative 4 construction activities would require energy demand that is not wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 4 and less than the less than significant impacts of the Project.

(b) Operation

Alternative 4 would construct 500 multi-family residential units and 1,000 square feet of ground floor commercial space (assumed to be restaurant use to provide a conservative analysis). Based on the proposed uses, the number of daily trips and daily VMT generated by Alternative 4 during operation would be less than the number of daily trips generated by the Project. Specifically, as provided in Appendix N of this Draft EIR, Alternative 4 would result in a total of 1,988 daily vehicle trips and 12,374 daily VMT as compared to the Project's 3,077 daily vehicle trips and 20,516 VMT.¹¹ Therefore, operational traffic under Alternative 4 would consume less fuel than under the Project. Furthermore, as with the Project, Alternative 4 would be developed within a TPA and HQT in close proximity to transit, which

¹¹ Fehr and Peers, *VMT Calculator Runs for the Alternatives, 2023*. See Appendix N of this Draft EIR.

would encourage the use of alternative and more energy-efficient modes of transportation (i.e., walking, bicycling, use of transit) which would minimize fuel consumption.

Alternative 4 would result in a similar floor area as the Project (i.e., 771 square feet less which represents only a 0.15 percent reduction in floor area compared to the Project); however, this alternative would include more residential uses, no office uses, and less commercial uses than the Project. Office and commercial uses require more electricity compared to residential uses.¹² While residential uses require more natural gas use compared to office and commercial uses, in accordance with the City's All-Electric Ordinance, the residential uses would use only electricity. Therefore, this alternative would be anticipated to generate less on-site operational energy demand in comparison to the Project. Furthermore, similar to the Project, Alternative 4 would comply with applicable emergency conservation requirements during operation, including Title 24 standards and the City's Green Building Code, would implement Project Design Feature GHG-PDF-1 requiring the incorporation of sustainability features required to achieve LEED certification, and would provide LAMC-required bicycle parking and EV-ready parking, all of which would save energy.

Based on the above, Alternative 4, like the Project, would not involve the wasteful, inefficient, or unnecessary consumption of energy resources. As such, Alternative 4 would result in less than significant impacts during operation that would be less than the less than significant impacts of the Project.

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

As discussed in Section IV.C, Energy, of this Draft EIR, the energy conservation policies and plans relevant to the Project include the Title 24 energy standards and the City of Los Angeles Green Building Code, City of LA Green New Deal, and the 2020–2045 RTP/SCS. As these conservation policies are mandatory under the City's Building Code, Alternative 4, as with the Project, would not conflict with applicable plans for renewable energy or energy efficiency. Furthermore, as discussed previously, as with the Project, Alternative 4 would represent urban infill development within a TPA and HQTa in close proximity to transit, which would reduce vehicle trips, VMT, per capita VMT, and associated fuel usage in accordance with the SB 375 and SCAG's RTP/SCS. As with the Project, Alternative 4 would also be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction, which would save transportation energy. Therefore, Alternative 4, as with the Project, would not conflict with

¹² CalEEMod Users Guide. Appendix G: Default Data Tables. Table G-28 Energy Use by Climate Zone and Land Use Type.

plans for renewable energy or energy efficiency. The impacts of Alternative 4 would be less than significant and similar to the less than significant impacts of the Project.

d. Geology and Soils (Paleontological Resources)

As discussed in Section IV.D, Geology and Soils, of this Draft EIR, according to a records search of the paleontological specimen and locality records held by the Natural History Museum of Los Angeles Vertebrate Paleontology Department and the Paleontology Technical Report, there are no previously encountered fossil vertebrate localities located within the Project Site.

Alternative 4 would include excavation activities in the same areas of the Project Site as the Project; however, this alternative would eliminate one subterranean parking level, which would result in a reduction in the depth of excavation and total soil export under this alternative (i.e., from 40 feet below ground surface to 30 feet below ground surface and 210,000 cubic yards to 160,000 cubic yards, respectively). Therefore, the potential for Alternative 4 to disturb undiscovered paleontological resources during construction would be less than for the Project because Alternative 4 reduces the potential for unearthing paleontological resources. Still, like the Project, Alternative 4 would implement Mitigation Measures GEO-MM-1 through GEO-MM-4 in order to mitigate potential impacts to paleontological resources. As such, impacts to paleontological resources under Alternative 4 would be less than significant with mitigation and less than the less than significant with mitigation impacts of the Project.

e. Greenhouse Gas Emissions

Greenhouse Gas emissions from a development project are determined in large part by the number of daily vehicle trips generated and associated VMT, as well as by energy consumption from proposed land uses (from lighting, heating/air conditioning, water pumping, etc.). As previously discussed, the number of daily trips and daily VMT under Alternative 4 would be reduced compared to the Project and the amount of energy consumed would be anticipated to be reduced, while the amount of water consumed would be anticipated to be greater compared to the Project due to the greater number of residential units under this alternative. The amount of GHG emissions generated by Alternative 4 would be less than the amount generated by the Project as vehicle emissions are a greater contributor to GHG emissions. Like the Project, Alternative 4 would be designed to comply with the requirements of Title 24, including the CALGreen Code (Part 11, Title 24), and the Los Angeles Green Building Code. Like the Project, Alternative 4 would also increase urban density within a TPA and HQT in proximity to transit, would include LAMC-required bicycle parking, and would include EV/EVA-ready parking, which would reduce VMT and associated fuel usage and GHG emissions. With compliance with applicable regulations and with implementation of comparable sustainability features as the Project, Alternative 4 would be

consistent with the GHG reduction goals and objectives included in adopted State, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project.

f. Hazards and Hazardous Materials

(a) Construction

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

Like the Project, Alternative 4 would also have the potential to encounter contaminated soils, soil gas, and impacted groundwater during construction. As previously described, Alternative 4 would eliminate one subterranean parking level such that excavation under Alternative 4 would be reduced from 40 feet below ground surface to 30 feet below ground surface and soil export would be reduced from approximately 210,000 cubic yards to 160,000 cubic yards, which would result in less of a potential to encounter contaminated soil, soil gas and/or contaminated groundwater that may be present. As with the Project, any contaminated soils, soil gas, or impacted soil and groundwater encountered would be treated and disposed of in accordance with applicable regulations and Mitigation Measure HAZ-MM-1, which requires a soil management plan, soil gas monitoring, and subsurface gas controls to reduce potential impacts to less than significant levels. However, because Alternative 4 would involve shallower excavations than the Project and the export of less soil, the potential to encounter contaminated soil, soil gas and/or contaminated groundwater would be less under Alternative 4, as would the potential need for and extent of any remediation activities.

Lastly, Alternative 4 would involve the same demolition as the Project, thus involving the same potential to encounter or release ACM or LBP as the Project, and regulatory compliance would minimize associated hazards.

Overall, the impacts related to hazards and hazardous materials during construction under Alternative 4 would be less than significant with mitigation, and less than the less than significant with mitigation impacts of the Project.¹³

(b) Operation

As with the Project, operation of Alternative 4 would involve the use of limited quantities of potentially hazardous materials, including those used for building and ground maintenance, cleaning solvents, household chemicals, and pesticides for landscaping. As with the Project, all hazardous materials on the Project Site under Alternative 4 would be handled in compliance with all applicable federal, state, county, and local requirements concerning the handling and disposal of hazardous waste. Overall, impacts under Alternative 4 would be less than significant and similar to the less than significant impacts of the Project.

g. Land Use and Planning

As with the Project, Alternative 4 would not require either a General Plan Amendment or zone change with approval of the requested Density Bonus Compliance review.¹⁴ Specifically, the land use proposed under the Project and Alternative 4 are already permitted by the existing General Plan land use designation and zoning, while the density, FAR, and heights of the proposed land uses would be permitted with approval of the requested Density Bonus Compliance Review. Under state density bonus law, up to a 50 percent density bonus is available in exchange for providing a requisite percentage of affordable units. To achieve Alternative 4's 500 dwelling units, a 26 percent density bonus is required. State law permits a 32.5 percent density bonus and two incentives in exchange for providing 11 percent of the base density (398 units) for very low income units. (Government Code Section 65915(f).)

In addition, it is concluded in Section IV.G, Land Use and Planning, of this Draft EIR, that the Project would not conflict with other applicable land use plans, policies, and regulations adopted for the purposes of avoiding or mitigating an environmental effect (i.e., General Plan Framework Element, Housing Element, Conservation Element, Mobility Plan 2035, Hollywood Community Plan, LAMC, Citywide Design Guidelines, and SCAG's 2020–2045 RTP/SCS). Because Alternative 4 would be developed on the same site as the Project,

¹³ Under both the Project and Alternative 4, all construction-related hazards and hazardous materials impacts would be less than significant, except for the Threshold (b) impact (i.e., release of hazardous materials into the environment) which would be less than significant with mitigation.

¹⁴ Pursuant to LAMC Section 12.22 (A.)(25), Density Bonus Compliance Review for a project totaling 500 dwelling units, including 44 dwelling units for very low income household occupancy, with the following two On-Menu Incentives: (1) a Floor Area Ratio increase on the Hollywood Lot from 1.5:1 to 3:1 and on the Carlton Lot from 3:1 to 4.05:1 under LAMC Section 12.22 (A.)(25)(f)(4), and (2) FAR, density, parking, open space, vehicle parking averaging across the entire property.

would develop similar land uses except for office uses, and would include the same floor area, building heights, driveways, energy conservation measures, etc., Alternative 4 would similarly not conflict with the above-listed applicable land use plans, policies, and regulations.

Based on the above, the impacts of Alternative 4 related to potential conflicts with applicable land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant and similar to the less than significant impacts of the Project.

h. Noise

(1) Noise

(a) Construction

The types of construction activities under Alternative 4 would be substantially similar to the Project. As with the Project, construction of Alternative 4 would generate noise from the use of heavy-duty construction equipment, as well as from haul truck and construction worker trips. Under Alternative 4, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to that of the Project during maximum activity days during the excavation phase since the daily intensity of construction activities during this phase would be expected to be similar under Alternative 4 when compared to the Project. As such, noise levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Also, as with the Project, Alternative 4 would implement project design features and mitigation to minimize construction noise. In addition, as previously noted, the excavation phase under Alternative 4 would be shortened. As such, the impact experienced during this peak construction phase would occur over a shorter period as compared to the Project. Nevertheless, similar to the Project, on-site and off-site construction noise would be significant and unavoidable under Alternative 4, and the overall level of impact would be similar to the Project.

(b) Operation

As discussed in Section IV.H, Noise, of this Draft EIR, sources of operational noise under the Project would include (a) on-site stationary noise sources, including mechanical equipment, activities within the proposed outdoor spaces (i.e., outdoor dining and terraces), parking facilities, loading dock and trash compactor areas; and (b) off-site mobile (roadway traffic) noise sources. Regarding on-site operational noise, Alternative 4 would introduce noise from similar on-site noise sources, although given the LAMC open space requirements for residential uses, it is anticipated that noise generated from outdoor areas could increase compared to the Project as the number of residential units and associated requirement for open space would increase compared to the Project. However, noise levels from building

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

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

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 4 would be similar to the Project. As with the Project, construction of Alternative 4 would generate on- and off-site vibration from the use of heavy-duty construction equipment and from truck trips. On- and off-site construction activities and the associated construction on- and off-site vibration levels would be expected to be similar under Alternative 4 compared to those of the Project as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment (i.e., there would be no change to the intensity for the days in which the maximum construction activity is required). However, as previously noted, the evacuation phase under Alternative 4 would be shortened, and the impact experienced during this peak construction phase would occur over a shorter period as compared to the Project. Nonetheless, peak vibration levels generated by construction equipment and construction truck trips under Alternative 4 would be similar to those of the Project. Accordingly, as with the Project, construction activities under Alternative 4 would result in significant and unavoidable on-site and off-site vibration impacts (human annoyance). In addition, as with the Project, vibration impacts due to on- and off-site construction activities under Alternative 3 would similarly be less than significant for on-site and off-site construction vibration pursuant to the significance threshold for building damage. Such impacts would be similar compared to the Project.

(b) Operation

As described in Section IV.H, Noise, of this Draft EIR, sources of vibration related to operation of the Project would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under

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

i. Public Services

(1) Fire Protection

(a) Construction

The types and amount of construction activities required for Alternative 4 would be similar to those of the Project due to development of a similar amount of floor area (i.e., 500,414 square feet vs. 501,185 square feet under the Project), same FAR, and same building heights being developed under both. As with the Project, as discussed in Section IV.I.1, Public Services—Fire Protection, of this Draft EIR, construction under Alternative 4 would occur in compliance with all applicable federal, State, and local requirements concerning fire prevention and hazardous materials, which would effectively reduce the potential for construction-related fire and explosion. Similar to the Project, Alternative 4 would also maintain travel lanes in each direction on all streets around the Project Site throughout the construction period, and would implement a Construction Traffic Management Plan which would include provisions for maintaining emergency access during construction, such that emergency access would not be impeded. In addition, emergency vehicles have the ability to avoid traffic delays through the use of sirens to clear paths of travel in accordance with the California Vehicle Code (CVC). Therefore, construction of Alternative 4, as with the Project, would not result in the need for new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. Therefore, impacts under Alternative 4 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

Like the Project, Alternative 4 would generate new residential, visitor, and employee populations on the Project Site that would contribute to an increased demand for LAFD fire protection services. Alternative 4 would include the development of a greater number of residential units than the Project (i.e., 500 vs. the Project's 350); however, this alternative

would reduce the commercial uses (i.e., 1,000 square feet vs. the Project's 22,542 square feet) and would eliminate the office uses proposed by the Project. Accordingly, Alternative 4 would generate a service population of an estimated 1,168 persons (i.e., 1,164 residents and four employees),¹⁵ which would be less than the Project's service population of an estimated 1,359 persons (i.e., 827 residents + 532 employees).¹⁶ Thus, although Alternative 4 would increase the residential service population, this increase would be less than the total service population under the Project.

Furthermore, similar to the Project, Alternative 4 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, life safety features (e.g., automatic fire sprinkler systems, fire service access elevators, etc.) and would undergo LAFD fire/life safety plan review to ensure compliance with the above, which would reduce the demand for fire protection and also ensure adequate emergency access. Furthermore, as with the Project, traffic generated by Alternative 4 would not significantly impact emergency vehicle response to the Project Site and surrounding area as the drivers of emergency vehicles have the ability to bypass traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. The driveways and internal circulation under Alternative 4 would also be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. As with the Project, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for Alternative 4 since this alternative would include a similar amount of floor area and would be constructed within the same site as the Project.

Based on the above, Alternative 4, similar to the Project, would not necessitate the construction of new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. As such, impacts with regard to fire protection services during operation of Alternative 4 would be less than significant and less than the less than significant impacts of the Project.

¹⁵ Los Angeles Department of Transportation and Los Angeles Department of City Planning, *City of Los Angeles VMT Calculator Documentation*, May 2020, Table 1. Based on the "Multi-Family Residential" rate of 2.25 persons per unit applied to the proposed 456 market-rate units, 3.14 persons per unit applied to the proposed 44 affordable housing units, and the "High-Turnover-Sit-Down Restaurant" employee generation rate of four employees per 1,000 square foot applied to the proposed restaurant uses (1,000 square feet), under Alternative 4.

¹⁶ See Section IV.I.1, *Public Services—Fire Protection*, of this Draft EIR for calculations.

(2) Police Protection

(a) Construction

As discussed above, construction activities under Alternative 4 would be similar to those of the Project due to a similar amount of development (i.e., 500,414 square feet under Alternative 4 vs. 501,185 square feet under the Project); however, the overall amount of construction activities and duration of construction would be reduced slightly under Alternative 4 compared to the Project as this alternative would eliminate one less level of subterranean parking. Similar to the Project, construction would not generate a permanent population on the Project Site that would substantially increase the police service population of the Hollywood Division. The demand for police protection services during construction of Alternative 4, like the Project, would be offset by the removal of the existing on-site commercial buildings and associated existing service demand. However, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. However, as with the Project, Alternative 4 would incorporate temporary security measures during construction, including security fencing, lighting, and locked entry to secure the Project Site, which would serve to reduce demand on LAPD facilities.

Additionally, the duration of construction activities could be less under Alternative 4 as this alternative would eliminate one less below-grade parking level, which would result in an associated reduction in excavation and soil export. Furthermore, both the Project and Alternative 4 would implement a Construction Traffic Management Plan that would ensure continued provision of emergency access during construction. Lastly, pursuant to CVC Section 21806, emergency vehicles can use their sirens to clear a path of travel or drive in the lanes of opposing traffic during an emergency to avoid traffic. Therefore, as with the Project, construction of Alternative 4 would not result in the need for new or altered government facilities (i.e., police stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 4 would be less than significant and less than the less than significant impacts of the Project.

(b) Operation

Like the Project, Alternative 4 would generate a new residential population, as well as a new visitor and employee population on the Project Site that would contribute to an increased demand for police protection services. As indicated previously, Alternative 4 would generate a total service population of 1,168 persons (i.e., 1,164 residents and four employees), which is less than the Project's service population of 1,359 persons (i.e., 827 residents and 532 employees). However, due to the introduction of a greater number of residential units, Alternative 4 would generate a greater overall demand on LAPD services when compared to the Project since LAPD evaluates demand based on a resident to police officer ratio. Still, Alternative 4 would include only approximately 354 more residents than

the Project, with this difference representing only approximately 0.12 percent of the total existing service population of the Hollywood Division (i.e., Hollywood Community Police Station) of approximately 300,000 persons. Furthermore, like the Project, Alternative 4 would implement Project Design Features POL-PDF-2 through POL-PDF-6 (i.e., 24-hour security camera network, access controls, security lighting, etc.) that would enhance on-site safety and help reduce the demand for police services, and both the Project and Alternative 4 would generate General Fund tax revenues for the City which could be used to expand law enforcement resources in the Hollywood Division. Like the Project, Alternative 4 would generate additional traffic in the vicinity of the Project Site; however, this alternative would generate less traffic compared to the Project and the drivers of police emergency vehicles have the ability of circulating around traffic by using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. Therefore, Alternative 4, as with the Project, would not result in the need for new or altered government facilities (i.e., police stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 4 would be less than significant and greater than the less than significant impacts of the Project due to the increased residential population.

j. Transportation

As previously described, Alternative 4 would include more residential units, less commercial floor area, no office uses, one less subterranean parking level, and fewer parking spaces than the Project. However, Alternative 4 would be developed within the same Project Site as the Project, would include a similar amount of overall floor area, and would include the same maximum building height, FAR, and access driveways as the Project. As such, the transportation-related plans, policies, and programs applicable to the Project would also apply to Alternative 4 (i.e., Mobility Plan 2035; Plan for a Healthy Los Angeles; Hollywood Community Plan; LAMC, Vision Zero; Citywide Design Guidelines, and SCAG's 2020–2045 RTP/SCS).

As with the Project, Alternative 4 would not interfere with the complete streets balanced transportation network (i.e., Transit-Enhanced Network, Bicycle Enhanced Network, and Pedestrian-Enhanced Districts) concept of the Mobility Plan and would enhance pedestrian access within and around the Project Site as called for by the Mobility Plan and the Hollywood Community Plan. Alternative 4 would also include a sidewalk and driveway design, vehicular parking, bicycle parking, etc., in accordance with LAMC requirements. As with the Project, Alternative 4 would also represent an urban infill development within a TPA and HQTAs in close proximity to transit which would encourage alternative transportation use as called for by the Mobility Plan and 2020–2045 RTP/SCS. Alternative 4 would support these transportation plans for the same reasons as the Project (e.g., would intensify urban density in close proximity to transit, would include similar roadway and sidewalk improvements, would comply with LAMC driveway and parking standards,

etc.). Like the Project, Alternative 4 would also reduce both household VMT per capita and work VMT per employee, including through the implementation of TDM measures as called for by the Mobility Plan, 2020–2045 RTP/SCS, and the City’s TDM Ordinance. Therefore, as with the Project, Alternative 4 would not conflict with a program, plan, ordinance, or policy addressing the circulation system. The impacts of Alternative 4 in this regard would be less than significant and similar to the less than significant impacts of the Project.

With respect to VMT, like the Project, Alternative 4 would result in reduced VMT within the Central APC. As noted in Section IV.J, Transportation, of this Draft EIR, VMT impacts for residential projects are measured by comparing household VMT per capita for the land use project, to the existing average household VMT per capita for the APC area. Here, Alternative 4 would result in a household VMT per capita of 4.7 (refer to Appendix N of this Draft EIR) which would be below the household VMT per capita significance threshold for the Central APC of 6.0. This is compared to the Project which would result in a household VMT per capita of 4.3 and a daily work VMT per employee of 7.0 which would be below both the referenced household VMT per capita threshold and the daily work VMT per employee threshold within the Central APC of 7.6. Therefore, as with the Project, Alternative 4 would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b), regarding VMT. As such, although the VMT impacts of Alternative 4 would be greater than the less than significant impacts of the Project due to the increased household VMT per capita, this alternative would not have any daily work VMT impacts, and the overall VMT impacts would still be less than significant.

With respect to hazards due to geometric design features, in accordance with LADOT’s TAG, impacts regarding the potential increase of hazards due to a geometric design feature generally relate to the design of access points to and from a project site. As indicated previously, Alternative 4, like the Project, would include three driveways off of Hollywood Boulevard. Hollywood Boulevard is not designated in Vision Zero as part of the HIN, and final design of the driveways would be reviewed by the City Department of Building and Safety, BOE, and LADOT during site plan review to ensure code compliance and safe pedestrian and vehicular design. As such, the new driveways along Hollywood Boulevard under both the Project and Alternative 4 would neither substantially increase vehicular conflicts with other vehicles, bicycles, and/or pedestrians nor present any geometric design hazards related to traffic movement. Like the Project, Alternative 4 would also not modify roadway widths or otherwise affect the geometric design of roads surrounding the Project Site, nor would it implement any features that would obstruct sight distance or paths of vehicular, pedestrian, or bicycle travel, and pedestrian and bicycle access to the Project Site from surrounding streets would be provided separate from vehicular access. As such, both the Project and Alternative 4 would enhance the pedestrian walkway continuity along the Project Site frontages. Therefore, hazards due to geometric design features impacts under Alternative 4 would be less than significant and similar to the less than significant impacts of the Project.

Regarding freeway safety, as discussed in Section IV.J, Transportation, of this Draft EIR, a freeway safety analysis evaluates a proposed project's potential to cause or lengthen a forecasted off-ramp queue on the freeway mainline that could lead to a potential safety impact due to speed differentials between vehicles exiting the freeway off ramps and vehicles traveling on the freeway mainline. The City's guidance on freeway safety analysis requires analysis of freeway off-ramps where a proposed project adds 25 or more trips in either the morning or afternoon peak hour to be studied for potential queuing impacts. If the project is not projected to add 25 or more peak hour trips at any freeway off-ramps, then a freeway ramp analysis is not required. According to the Transportation Assessment included as Appendix J of this Draft EIR, the Project is not projected to add 25 or more trips to the surrounding freeway off-ramps. Because Alternative 4 would generate fewer daily vehicle trips than the Project (i.e., 1,988 vs. 3,077 under the Project), the same would be true for Alternative 4. Therefore, the freeway safety impacts of Alternative 4 would be less than significant and less than the less than significant impacts of the Project.

k. Tribal Cultural Resources

As previously discussed, Alternative 4 would include one less subterranean parking level than the Project. This would result in shallower maximum excavation depths under Alternative 4 (i.e., 30 feet below ground surface) than under the Project (i.e., 40 feet below ground surface). However, as tribal cultural resources are typically found in the first six to ten feet of excavation, the potential for Alternative 4 to uncover subsurface tribal cultural resources would be similar compared to that of the Project.¹⁷ As discussed in Section IV.K, Tribal Cultural Resources, of this Draft EIR, no tribal cultural resources have been previously recorded at the Project Site or identified during consultations with the applicable California Native American Tribes conducted in accordance with AB 52. Overall, as concluded in the Tribal Cultural Resources Assessment included as Appendix K of this Draft EIR, the Native American archaeological sensitivity of the Project Site is considered "low," and impacts would be less than significant. Nonetheless, like the Project, Alternative 4 would implement the City's standard condition of approval for the inadvertent discovery of tribal cultural resources which would further reduce potential impacts to previously unknown tribal cultural resources that may be encountered during construction. Therefore, Alternative 4 would result in less than significant impacts which would be similar to the less than significant impacts of the Project.

¹⁷ As indicated in Section IV.K, Tribal Cultural Resources, of this Draft EIR, based on regional geologic mapping, the subsurface environment of the Project Site appears to be characterized by alluvium and fan deposits formed in the late Pleistocene age, meaning mostly before Native Americans are documented to have been present in North America. This suggests that any Native American activities that occurred on these surfaces and produced physical remains are, in general, more likely to occur as shallowly buried deposits.

I. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities for Alternative 4 would result in a temporary demand for dust control, cleaning of equipment, excavation, and grading/recompaction activities. Construction-related water use under Alternative 4 would be less than under the Project as this alternative would eliminate one subterranean parking level proposed by the Project, resulting in less excavation, soil export, and associated dust control. Furthermore, because the Project Site is already developed and the existing on-site uses already use LADWP water, water is already available at the Project Site. Lastly, it is determined in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR that Project construction-related water demand would be offset by the water demand associated with the existing on-site uses to be removed—because construction water demand under Alternative 4 would be less than under the Project, the same would be true for Alternative 4. Hence, as with the Project, new water infrastructure would not need to be extended to the Project Site to provide the required construction water for Alternative 4. Furthermore, like the Project, the construction of Alternative 4 would not result in the removal or relocation of existing major water trunk lines in the adjacent streets. Therefore, Alternative 4, like the Project, would not result in construction activities that require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental impacts. Like the Project, water supplies would also be available to provide the required construction water for Alternative 4. Overall, Alternative 4 would result in less than significant impacts that would be less than the less than significant impacts of the Project.

(b) Operation

Alternative 4, like the Project, would result in a net increase in long-term water demand. Table V-3 on page V-89 identifies the anticipated operational water demand for Alternative 4 based on LASAN wastewater generation rates. As indicated in Table V-3, Alternative 4 operation would generate a net increase in water demand at the Project Site of an estimated 82,467 gallons per day. This is compared to the Project's estimated net increase in water demand of 100,124 gallons per day as set forth in Table IV.L.1-5 in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR.¹⁸

¹⁸ It should be noted that Alternative 4 would provide 500 units but would include the same unit mix and unit percentages as the Project.

Table V-3
Estimated Operational Water Demand for Alternative 4^a

Land Use	No. of Units/ Floor Area	Water Demand Rate (gpd/unit) ^a	Demand (gpd)
Existing			
Automotive Dealership	31,833		2,298
Total Existing Demand to be Removed			2,298 ^b
Proposed Uses			
Residential: Studio Apartment	74 du	75	5,550
Residential: 1 bd Apartment	303 du	110	33,330
Residential: 2 bd Apartment	67 du	150	10,050
Residential: 2 bd Townhouse	37 du	150	5,550
Residential: 3 bd Townhouse	19 du	190	3,610
Retail/Restaurant	33 seat ^c	30	990
Base Demand Adjustment ^d			4,789
Landscaping and Pool ^e	56,288 sf		5,435
Covered Parking ^f	390,979	0.02	257
Cooling High Rise	1,144 ton	35.64	40,772
Subtotal Water Demand			110,333
Less Required Ordinances Water Savings ^g			(24,696)
Proposed Water Demand			85,637
Less Existing to be Removed			(2,298)
Less Additional Conservation ^h			(872)
Net Additional Water Demand			82,467

du = dwelling units

bd = bedroom

gpd = gallons per day

sf = square feet

^a Rate Source: LASAN, Sewage Facilities Charge, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012.

^b The existing water demand is based on LADWP billing data from June 2018 to May 2023.

^c Assumes all of the proposed 1,000 square feet of commercial uses under Alternative 4 would consist of restaurant uses for a conservative estimate. Seat count estimated at 30 sf/seat.

^d Base Demand Adjustment is the estimated savings due to Ordinance No. 180822 accounted for in the current version of BOS Sewer Generation Rates, which does not apply to the current uses.

^e Landscaping and water features use is estimated per California Code of Regulations Title 23, Division 2, Chapter 2.7 Model Water Efficient Landscape Ordinance. The Project would include a swimming pool.

^f Automobile parking water uses are based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, assuming cleaning 12 times per year.

^g The proposed land uses would comply with City of Los Angeles Ordinance No. 186,488, Ordinance No. 184,248, the 2020 Los Angeles Plumbing Code, and 2020 Los Angeles Green Building Code.

^h Water conservation due to additional conservation commitments agreed by the Applicant for the Project. See Table II of the WSA.

Source: Eyestone Environmental, 2024.

In addition, as with the Project, Alternative 4 would implement the necessary infrastructure and connections to the LADWP water system pursuant to applicable City requirements to accommodate the new development and would implement Code-required water conservation measures. Furthermore, the changes in the Project under Alternative 4 would not change the fire flow requirements of the Project (i.e., 9,000 gallons per minute [gpm] from six fire hydrants flowing simultaneously with a minimum residual water pressure of 20 psi). Therefore, Alternative 4 would result in less than significant impacts which would be less than the less than significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, the existing on-site uses would be removed and the existing sewer laterals serving these uses would be capped such that no new sewage would enter the public sewer system during construction of Alternative 4. As with the Project, temporary facilities, such as portable toilet and hand wash areas would be provided by the construction contractor; however, any sewage generated from these facilities would be collected and hauled off-site and would not be discharged into the public sewer system. In addition, Alternative 4, as with the Project, would remove the existing on-site buildings, thereby resulting in a net reduction in the existing sewage entering the sewer system during construction. Lastly, as with the Project, no new off-site sewer lines would be required for Alternative 4 and the construction impacts associated with new wastewater infrastructure would primarily be confined to trenching in order to place the new sewer line connections below surface for connection into the existing off-site sewer public infrastructure. Any off-site work potentially affecting existing sewer service to adjacent properties would be coordinated with the BOE. As such, construction of Alternative 4, as with the Project, would not require or result in the relocation or construction of new or expanded wastewater facilities, the construction or relocation of which could cause significant environmental effects. Therefore, Alternative 4 would result in less than significant impacts that would be similar to the less than significant impacts of the Project.

(b) Operation

Alternative 4, like the Project, would result in a net increase in operational wastewater flows from the Project Site. Table V-4 on page V-91 identifies the anticipated operational wastewater generation for Alternative 4 based on LASAN wastewater generation rates. As indicated in the table, Alternative 4 operation would generate a net increase in wastewater generation of an estimated 47,509 gpd. This is compared to the Project's estimated net increase of 74,749 gpd as set forth in Table IV.L.1-2 in Section IV.L.2, Utilities and Service Systems—Wastewater, of this Draft EIR.

Table V-4
Estimated Operational Wastewater Generation for Alternative 4

Land Use	No. of Units/ Floor Area	Sewer Generation Rate (gpd/unit)^a	Demand (gpd)
Existing Uses to Be Removed			
Automotive Dealership	31,833 sf	—	2,298 ^b
Total Existing to be Removed			2,298
Proposed			
Residential: Studio Apartment	74 du	75 gpd/du	5,550
Residential: 1 bd Apartment	303 du	110 gpd/du	33,330
Residential: 2 bd Apartment	67 du	150 gpd/du	10,050
Residential: 2 bd Townhouse	37 du	150 gpd/du	5,550
Residential: 3 bd Townhouse	19 du	190 gpd/du	3,610
Retail/Restaurant	33 seat ^c	30 gpd/seat	990
Covered Parking	390,979 sf	0.02	257 ^d
Base Demand Adjustment ^e			4,789
Project Total Wastewater Generation			64,126
Less Required Ordinances Savings ^f			(14,135)
Less Existing to be Removed			(2,298)
Less Additional Conservation ^g			(184)
Net Additional Wastewater Generation			47,509

bd = bedroom

du = dwelling units

gpd = gallons per day

sf = square feet

^a Rate Source: LASAN, Sewage Facilities Charge, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012.

^b Based on LADWP water demand billing data from June 2018 to May 2023.

^c Assumes all of the proposed 1,000 square feet of commercial uses under Alternative 4 would consist of restaurant uses for a conservative estimate. Seat count estimated at 30 sf/seat.

^d Automobile parking water use is based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, assuming cleaning 12 times per year.

^e Base Demand Adjustment is the estimated savings due to Ordinance No. 180822 accounted for in the current version of BOS Sewer Generation Rates, which does not apply to the current uses.

^f The proposed land uses would comply with City of Los Angeles Ordinance No. 186,488, Ordinance No. 184,248, the 2020 Los Angeles Plumbing Code, and 2020 Los Angeles Green Building Code. Includes water savings from residential and non-residential uses only (excludes water savings associated with landscaping and cooling).

^g Water conservation due to additional conservation commitments agreed by the Applicant. See Table II of the WSA. Includes water conservation from residential and non-residential uses only (excluding water conservation associated with landscaping).

Source: Eyestone Environmental, 2024.

Regarding wastewater treatment, as provided in Section IV.L.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the wastewater generated during Project operation would be able to be accommodated by the existing remaining treatment capacity of the HWRP. Because Alternative 4 would generate less operational wastewater than the Project, the same would be true for Alternative 4.

Regarding wastewater conveyance (sewer) capacity, as discussed in IV.L.2, Utilities and Service Systems—Wastewater, of this Draft EIR, sewer service for the Project would be provided utilizing new connections to the existing sewer mains in Hollywood Boulevard and Carlton Way. According to both a WWSI request and SCAR prepared by LASAN for the Project, the existing sewer lines in Hollywood Boulevard and Carlton Way have adequate capacity to serve the Project. Because Alternative 4 would generate less operational wastewater than the Project, the same would be true for Alternative 4. Still, as with the Project, additional detailed gauging and evaluation would be conducted for Alternative 4, as required by LAMC Section 64.14, to obtain final approval of sewer capacity and connection permit during the permitting process. Furthermore, as with the Project, all sanitary sewer connections and on-site infrastructure under Alternative 4 would be designed and constructed in accordance with applicable standards and Alternative 4 would comply with other applicable Code requirements to minimize the generation of wastewater during operation. Based on the above, operation of Alternative 4, as with the Project, would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. Therefore, Alternative 4 would result in less than significant impacts that would be less than the less than significant impacts of the Project.

(3) Energy Infrastructure

(a) Construction

The energy consumed by Alternative 4 construction activities would be reduced compared to the Project because while Alternative 4 would include a similar amount of floor area as the Project (i.e., 500,414 square feet vs. 501,185 square feet under the Project), it would eliminate one subterranean parking level and result in an associated reduction in both the maximum excavation depth (30 feet below ground surface vs. 40 feet below ground surface under the Project) and soil export (160,000 cubic yards vs. 210,000 cubic yards under the Project). While most of the energy saved would be in terms of fuel rather than electricity, it is anticipated that there would still be a small savings in construction-related electricity consumption. Furthermore, as with the Project, removal of the existing on-site uses would partially to fully offset the demand for electricity from LADWP power lines. Because LADWP has confirmed that the electricity supply and existing electricity infrastructure in the Project area would be sufficient to provide the electricity required for Project construction activities, the same would be true for Alternative 4 construction activities. Therefore, as with the Project, construction activities associated with Alternative 4 would not

result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new electricity or natural gas facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. The impacts of Alternative 4 would be less than significant and less than the less than significant impacts of the Project.

(b) Operation

As discussed previously, Alternative 4 would result in a similar amount of floor area as the Project (i.e., 771 square feet less which represents only a 0.15 percent reduction in floor area compared to the Project), but would include more residential uses and less commercial uses compared to the Project. In addition, this alternative would eliminate the office uses proposed by the Project. Office and commercial uses require more electricity compared to residential uses.¹⁹ While residential uses generally require increased natural gas compared to office and commercial uses, this alternative would comply with the City's All-Electric Ordinance to include electricity use only. Therefore, this alternative would be anticipated to generate less on-site operational energy demand in comparison to the Project. Furthermore, similar to the Project, Alternative 4 would comply with applicable energy conservation requirements during operation, including Title 24 standards and the City's Green Building Code and would provide LAMC-required bicycle parking and EV-ready parking, all of which would save energy. Therefore, as with the Project, Alternative 4 operations would not result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new electricity or natural gas facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. As such, the impacts of Alternative 4 would be less than significant and less than the less than significant impacts of the Project.

3. Comparison of Impacts

Based on the analysis above, Alternative 4 would not avoid the Project's significant and unavoidable noise and vibration impacts, including those related to: on- and off-site noise during construction; and on- and off-site vibration during construction (pursuant to the significance threshold for human annoyance). Alternative 4 would also not avoid the Project's significant and unavoidable cumulative on- and off-site construction noise and cumulative on- and off-site construction vibration (human annoyance). However, Alternative 4 would reduce the construction-related grading, excavation, and foundation phases of the Project due to the development of one less subterranean parking level such that the significant unavoidable construction-related noise and vibration impacts would occur for a

¹⁹ CalEEMod Users Guide. Appendix D: Default Data Tables. Table 8.1 Energy Use by Climate Zone and Land Use Type.

shorter duration as compared to the Project. In addition, Alternative 4 would reduce the less than significant with mitigation impacts of the Project (i.e., archaeological resources, paleontological resources, construction-related hazards/hazardous materials) and would reduce the majority of the other less than significant impacts of the Project. However, Alternative 4 would result in greater operations-related police protection and VMT impacts than the Project due to the greater number of residential units under this alternative.

4. Relationship of the Alternative to Project Objectives

As indicated previously, Alternative 4 would develop the Project Site with more residential units, less commercial uses, and no office uses, as compared to the Project, and would also develop two below-grade parking levels versus the Project's three below-grade parking levels. Most of the other aspects of Alternative 4 (i.e., location, total floor area, FAR, maximum building height, driveways, other improvements along Hollywood Boulevard, etc.) would be similar to the Project. Overall, Alternative 4 would meet portions of the underlying purpose of the Project, which is to redevelop an underutilized site with a high-density, mixed-use, transit- and pedestrian-oriented development that provides a mix of new housing opportunities that are integrated with commercial and office uses that provide new employment and commercial opportunities for the surrounding community. However, because Alternative 4 would include only 1,000 square feet of commercial (i.e., restaurant) use and none of the Project's 22,542 square feet of office use, Alternative 4 would not achieve the mixed-use element of this underlying purpose as effectively as the Project.

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

- Provide for the development of new housing units to support the high or significant demand for a mix of housing in the City and to meet the diverse economic and physical needs of both existing and future residents.
- To provide high-density multi-family housing in furtherance of the goals of the City's Housing Element and the City's Regional Housing Needs Assessment.
- Create a range of housing types and scales with access to open space and outdoor amenities to accommodate varied household sizes and needs in a village-like setting.
- Create a pedestrian-friendly project by providing publicly accessible open space and activating streetscapes around the Project Site through use of outdoor dining, and greenspace.

However, Alternative 4 would not meet the following Project objectives as effectively as the Project due to the lack of the office and most of the commercial uses proposed under the Project:

- Locate new housing and employment opportunities near one another and in close proximity to transit stations, along transit corridors, and within high activity areas.
- Focus housing and employment growth within a High Quality Transit Area consistent with a key element in SCAG's Regional Transportation Plan/ Sustainability Communities Strategy.
- Promote local and regional mobility objectives by providing a mix of higher density housing and commercial uses that are in close proximity to a range of mobility options including public transportation, rideshare pickup and drop off locations, and convenient on-site parking for vehicle-dependent residents and visitors.
- Strengthen viable commercial development in the community and provide additional opportunities for new commercial development and services by providing a variety of commercial uses, including office space and retail and restaurant space.
- Improve the visual character and maximize the value of an underutilized site that is responsive to market demands.
- Provide upgraded neighborhood-serving commercial uses to provide a strong and competitive commercial sector that promotes economic vitality and job creation and serves the needs of project residents, visitors, and the surrounding community.
- Provide convenient neighborhood-serving commercial uses and open space within walking distance of existing off-site residential and commercial uses, proposed on-site residential uses and on and off-site office uses.

V. Alternatives

F. Environmentally Superior Alternative

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

With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible alternatives includes: Alternative 1—No Project Alternative; Alternative 2—No Below-Grade Parking Alternative; Alternative 3—Reduced Development Alternative; and Alternative 4—All Residential Use Alternative. Table V-2 on page V-10 provides a comparative summary of the environmental impacts anticipated under each alternative with the environmental impacts associated with the Project. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to “avoid or substantially lessen one or more of the significant effects” of the Project.

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project Alternative, would avoid all of the Project’s impacts (i.e., would avoid the Project’s significant unavoidable impacts, less than significant impacts w/mitigation, and less than significant impacts).

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative 3, the Reduced Development Alternative, would be the Environmentally Superior Alternative. As described above and summarized in Table V-1 on page V-4, Alternative 3 would result in less development compared to the Project. Specifically, Alternative 3 would include: approximately 364,394 square feet of total floor area as compared to the Project at 501,185 square feet. Comparatively, Alternative 2 would include 501,185 square feet and Alternative 4 would include 500,414 square feet of floor area. In addition, Alternative 3 would include 201 residential units as compared to the Project and Alternative 2 would include 350 units and Alternative 4 would include 500 units. All of this would result in a corresponding decrease in the environmental impacts of Alternative 3. Specifically, while Alternative 3 (like Alternatives 2 and 4) would not avoid the significant and unavoidable construction- and operations-related noise and vibration impacts of the Project, it would: (1) reduce these impacts; (2) reduce all

of the Project's less than significant w/mitigation impacts (i.e., archaeological resources, paleontological resources, and construction-related hazardous materials); and (3) reduce the majority of the Project's less than significant impacts (i.e., air quality, construction, energy, greenhouse gas emissions, public services, transportation [specifically VMT and freeway safety analysis], water, wastewater, and energy). Furthermore, Alternative 3 would not result in greater impacts compared to the Project.

In summary, based on the above and as summarized in Table V-2 on page V-10, while Alternative 3 would not avoid the Project's significant and unavoidable impacts, Alternative 3 would reduce these impacts to a greater extent than would Alternatives 2 and 4. Furthermore, Alternative 3 would reduce more of the Project's other impacts than would Alternatives 2 and 4, and in many cases to a greater extent. Lastly, as indicated previously, Alternative 3 would not result in greater impacts than the Project. Therefore, of the range of alternatives analyzed, Alternative 3, the Reduced Development Alternative, would be the Environmentally Superior Alternative.