V. Alternatives

V. Alternatives

1. Introduction

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

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

> *An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed 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 should be based primarily on the ability to avoid or substantially lessen significant impacts relative to the proposed project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. The CEQA Guidelines further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are addressed. In selecting 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 analysis is to avoid or substantially lessen any of the significant effects of a project. Based on the analysis in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with regard to: historical resources; on-site construction noise (Project-level and cumulative[1]); off-site construction noise (Project-level and cumulative[2]); on-site construction vibration (building damage—Project-level); on-site construction vibration (human annoyance—Project-level and cumulative); and off-site construction vibration (human annoyance—Project-level and cumulative). Accordingly, the following alternatives to the Project have been selected for evaluation based on the significant environmental impacts of the Project, the objectives established for the Project (listed in Section II, Project Description, of this Draft EIR), the feasibility of the alternatives considered, public input received during the scoping period, and the existing zoning designation on the Project Site:

- Alternative 1: No Project/No Build Alternative
- Alternative 2: Existing Zoning Compliant Alternative
- Alternative 3: Alternative Use Alternative

The development proposed under the Project and each of these alternatives is quantified Table V-1 on page V-3 and described in full in the sections below. As required by

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[1] *The cumulative impact would occur only if Related Project No. 3 is built and occupied and concurrent construction occurs with the Project and Related Project No. 21.*

[2] *The cumulative impacts would only occur if Related Project No. 5 is completed and occupied prior to construction.*

Table V-1
Development Summary—Project and Alternatives[a]

Land Use	Project	Alternative 1: No Project/ No Build Alternative	Alternative 2: Existing Zoning Compliant Alternative	Alternative 3: Alternative Use Alternative
Floor Area				
Existing To be Removed (Except Alt. 1)				
Surface Parking Lot	0 sf	0 sf	0 sf	0 sf
New Construction (LAMC)				
General Office	224,597 sf	0 sf	139,250 sf	0 sf
Restaurant	4,095 sf	0 sf	2,539 sf	0 sf
Retail	4,110 sf	0 sf	2,548 sf	0 sf
Self-Storage	0 sf	0 sf	0 sf	232,802 sf
Total New Construction (LAMC)	*232,802 sf*	*0 sf*	*144,337 sf*	*232,802 sf*
New Construction (Non-LAMC)[b]				
Restaurant (Outdoor Uncovered Seating)	1,799 sf	0 sf	1,115	0 sf
Floor Area Total	**234,601 sf**	**0 sf**	**145,452 sf**	**232,802 sf**
Other Development Factors				
Building Height	5 stories (88 feet)	N/A	3 stories (53 feet)	5 stories (88 feet)
Parking Levels (Above/Below Grade)	2/1	N/A	2/0	1/0
Vehicle/Bicycle Parking Spaces	440/149	N/A	273/92	30/46
Floor-Area Ratio (FAR)	2.42:1	N/A	1.5:1	2.42:1

sf = square feet

[a] *Square footage is calculated pursuant to the Los Angeles Municipal Code (LAMC) definition of floor area for the purpose of calculating FAR. In accordance with LAMC Section 12.03, floor area is defined as "[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas."*

[b] *The Project and Alternative 2 would include outdoor uncovered dining area adjacent to the ground floor restaurant, which is not considered "Floor Area" as defined in the LAMC. Nevertheless, this outdoor uncovered dining area is counted towards the Project's restaurant area for purposes of this environmental analysis. As such, for purposes of this environmental analysis, the Project and Alternative 2 would include 5,894 sf and 3,564 sf of restaurant space, respectively.*

Source: Eyestone Environmental, 2025.

CEQA Guidelines Section 15126.6(c), the alternatives that were considered for analysis but rejected as infeasible are also discussed below.

3. Alternatives Considered and Rejected as Infeasible

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

- **Alternative Project Site:** The Applicant owns the Project Site, and its location is conducive to the development of a commercial project. The Project Site is located in an area of the Central City North Community Plan (Community Plan) that is generally zoned C2 consistent with the zoning of the Project Site and characterized by low-rise industrial, office, self-storage, and residential uses, Metro light rail facilities, and a surface parking lot with proposals for future mixed-use development. These uses make the Project Site particularly suitable for a mixed-use office, retail and restaurant development for growing retail, hospitality, entertainment, and technology companies looking to locate businesses in the Downtown Los Angeles area. The Project Site is also well-served by transit, including the adjacent Metro A Line Chinatown Station. Furthermore, the Applicant cannot reasonably acquire, control, or access an alternative site in a timely fashion that would be economically feasible and result in implementation of a project with similar uses and square footage. Given its urban location, if an alternative site in the Community Plan area that could accommodate the Project could be found, it would be expected that the significant and unavoidable impacts associated with construction noise and vibration due to construction would also occur since the alternative site would also be in a developed urban area. Additionally, considering the mix of uses in the Community Plan area where sensitive uses may be located closer to an alternative site, development of the Project at an alternative site could potentially produce other environmental impacts that would otherwise not occur at the Project Site and result in greater environmental impacts when compared with the Project. Further, given the industrial history of the Community Plan area, an alternative site may have more extensive soil contamination which is known to occur widely in the area. Lastly, it is also noted that the Project Site is currently developed only with surface parking under existing conditions. Therefore, an alternative site is not considered feasible as the Applicant does not own another suitable site that would achieve the underlying purpose and objectives of the Project, and an alternative site would not likely avoid the Project's significant impacts. Thus, in accordance with CEQA Guidelines Section 15126.6(f), this alternative was rejected from further consideration.

- **Alternatives to Eliminate the Significant Unavoidable Historical Resources and On-Site Construction Vibration (Building Damage) Impacts of the**

Project: As discussed in Section IV.B, Cultural Resources and Section IV.I, Noise, of this Draft EIR, Project-construction would result in onsite vibration in the vicinity of the granite block pavers in Bruno Street which are designated as City Historic Cultural Monument (HCM) No. 211. As evaluated in Section IV.B, due to the proximity of construction activities to HCM No. 211, vibration and settlement associated with Project construction has the potential to cause damage to the paving comprising HCM No. 211. As further evaluated in Section IV.I, the estimated vibration levels at the off-site historic Granite Block Paving would exceed the 0.12 PPV significance threshold with respect to building damage. Mitigation Measure CUL-MM-1 in Section IV.B, which involves the temporary removal, storage, and reinstallation of the pavers immediately adjacent to the Project Site would mitigate this impact to the extent feasible while maintaining its historic integrity. In order for vibration levels to be reduced to a less than significant level, a 20-foot setback from the historic resource would be required. This is infeasible because construction would involve work up to the property line. Although an alternative with a smaller building footprint could potentially reduce this impact by providing greater separation distances between the on-site construction vibration sources and the historical resource, the 20-foot separation distance required would not allow for the development of a viable project because such a setback would not allow demolition of the existing improvements to occur. Other mitigation measures considered to reduce vibration impacts included the installation of a wave barrier, which is typically a trench, or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise). However, wave barriers must be very deep and long to be effective and are not considered cost effective for temporary applications, such as construction. In addition, constructing a wave barrier to reduce the Project's construction-related vibration impacts would, in and of itself, generate groundborne vibration from the excavation equipment. The temporary removal, storage, and reconstruction of the entire resource, not just the pavers immediately adjacent to the Project Site, to allow for the installation of a shoring system, was also considered. This was determined to be infeasible because 1) it is unknown how many of the pavers would remain intact and removal of the entire resource could result in a substantial adverse change to the extent that its integrity as a historic resource may be impaired; 2) the subsurface conditions under the pavers are not known and as a result, secondary impacts may result as a result of additional construction that may be needed in order to bring the street up to modern standards; 3) this process would require the long-term closure of Bruno Street, which would disrupt adjacent businesses, pedestrian and bicycle access, and vehicle traffic, including emergency vehicle access; and 4) the additional time required to complete this process would extend construction considerably, thus extending the amount of time the surrounding community is exposed to the Project's construction impacts. All of this would also be true of any alternative. Therefore, an alternative to eliminate the Project's significant impacts with respect to historical resources and on-site construction vibration (building damage) has been rejected from further consideration in this Draft EIR.

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

- **Alternatives to Eliminate the Significant Unavoidable On-Site Construction Noise and Vibration (Humane Annoyance) Impacts of the Project:** As discussed in Section IV.H, Noise, of this Draft EIR, the Project would result in significant on-site construction noise impacts which would exceed the significance criterion at Related Project No. 5 represented by off-site receptor location R3 (should Project construction activities occur after development and occupancy of that related project). Implementation of Mitigation Measure NOI-MM-1, requiring the provision of temporary impermeable sound barriers between the on-site construction noise sources and receptor location R3, would reduce ground-level noise levels to below the applicable noise/criteria/thresholds; however, these barriers would not be effective in reducing the noise at the upper levels of the apartment building (seven-story building) at receptor location R3 to acceptable levels due to the apartment building's higher elevation relative to the Project Site. In order to be effective, the temporary noise barrier would need to be as high as the apartment building (i.e., up to seven stories), which would not be feasible as it would require a deep foundation with extensive structural engineering components and construction activities to erect, which would result in additional noise and vibration generation and other secondary impacts. Therefore, construction noise impacts associated with on-site construction activities would remain significant and unavoidable. Additionally, although an alternative with a smaller building footprint could potentially reduce this impact by providing greater separation distances between the on-site construction noise sources and off-site receptor location R3, the separation distance required (i.e., approximately 100 feet more than proposed under the Project) would not allow for the development of a viable project because such a setback would not allow demolition of the existing improvements to occur. Therefore, an alternative to eliminate the Project's significant on-site construction noise impacts has been rejected from further consideration in this Draft EIR.

  Regarding construction vibration, as discussed in Section IV.H, Noise, the Project would result in significant on-site construction vibration impacts in terms of human annoyance at potential off-site receptor location R3 (should Project construction activities occur after development and occupancy of that related project). Mitigation measures considered to reduce vibration impacts from on-site construction activities with respect to human annoyance included the installation of a wave barrier which is typically a trench, or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise). However, wave barriers must be installed very deep and long to be effective and are not considered cost effective for temporary applications, such as construction, and constructing a wave barrier to reduce the Project's construction-related vibration impacts would, in and of itself, generate ground-borne vibration from the excavation equipment. Furthermore, it would not be technologically feasible to install a wave barrier between the Project Site and off-site receptor location R3 as such a wave barrier would need to be developed within the public right-of-way of West College Street, over which the Applicant does not have control. As such,

there are no technologically feasible mitigation measures available to reduce the temporary vibration impacts from on-site construction activities associated with human annoyance to a less-than-significant level.

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

- **Alternative to Eliminate the Significant Unavoidable Off-Site Construction Noise and Vibration (Human Annoyance) Impacts of the Project:** As discussed in Section IV.H, Noise, of this Draft EIR, the Project would result in significant off-site construction noise impacts associated with construction trucks which would exceed the significance criterion at Related Project No. 5 represented by off-site receptor location R3 (should Project construction activities occur after development and occupancy of that related project). Mitigation measures considered to reduce off-site construction noise impacts included the provision of a temporary sound barrier wall along the off-site receptor location R3's College Street frontage. However, such a barrier would not be practical as it would obstruct access to and visibility of receptor location R3 from College Street. Other measures such as limiting the number of trucks per hour would not be feasible and would not reduce impacts to a less-than-significant level, as it would extend the construction period (resulting in longer on-site construction noise impacts), and the concrete foundation pour requires a continuous number of concrete trucks. As such, there are no other feasible mitigation measures to reduce the temporary significant noise impacts associated with the Project's off-site construction trucks.

  Regarding construction vibration, as discussed in Section IV.H, Noise, of this Draft EIR, the Project would result in a significant off-site construction vibration impacts associated with construction trucks in terms of human annoyance at potential off-site receptor location R3 (should Project construction activities occur after development and occupancy of that related project). Mitigation measures considered to reduce vibration impacts from off-site construction trucks with respect to human annoyance included the installation of a wave barrier, but as discussed previously, wave barriers are not considered cost effective for temporary applications, such as construction, and their construction results in ground-borne vibration from the excavation equipment. Furthermore, it would not be technologically feasible to install a wave barrier along College Street as it would be within the public right-of-way over which the Applicant does not have control. Thus, it is concluded that there are no technologically feasible mitigation measures that could be implemented to reduce the temporary vibration impacts from off-site construction trucks associated with human annoyance to a less-than-significant level.

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

- **Downtown Community Plan Update (DTLA 2040) Compliant Alternative:** The City of Los Angeles Department of City Planning updated the Central City North

Community Plan and the Central City Community Plan, whose areas together make up Downtown Los Angeles (sometimes known as DTLA), in a combined planning process referred to as the DTLA 2040 Plan, which became effective on January 27, 2025. Since the application for the Project was filed and deemed complete before DTLA 2040 became effective, the provisions of DTLA 2040 do not apply to the Project. Nevertheless, anticipating this update, the Project has been designed to be as consistent with the DTLA 2040 Community Plan as possible. As such, this alternative would not differ substantially from the Project in terms of proposed uses, square footage, height, and FAR. Because a DTLA 2040 Community Plan compliant alternative would be substantially similar to the Project, impacts would be similar to the Project and would remain significant and unavoidable as there are no feasible mitigation measures to eliminate these impacts. Therefore, in accordance with CEQA Guidelines Section 15126.6(f), this alternative was rejected from further consideration.

4. Alternatives Analysis Format

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the project objectives, identified in Section II, Project Description, of this Draft EIR, would be substantially attained by the alternative.[3] The evaluation of each of the alternatives follows the process described below:

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

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

   - 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.”

[3] *CEQA Guidelines Section 15126.6 (c).*

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

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

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

Table V-2
Summary Comparison of Impacts—Project and Alternatives

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Existing Zoning Compliant Alternative	Alternative 3: Alternative Use Alternative
A. AIR QUALITY				
Conflicts with Plans	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Construction Emissions				
Regional and Localized	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Toxic Air Contaminants	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Operational Emissions				
Regional and Localized	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Toxic Air Contaminants	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
B. CULTURAL RESOURCES				
Historic Resources	Significant and Unavoidable	Less (No Impact)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)
Archaeological Resources	Less Than Significant with Mitigation	Less (No Impact)	Less (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)
C. ENERGY				
Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources				
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Conflict with Plans for Renewable Energy or Energy Efficiency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)

Table V-2 (Continued)
Summary Comparison of Impacts—Project and Alternatives

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Existing Zoning Compliant Alternative	Alternative 3: Alternative Use Alternative
D. GEOLOGY AND SOILS (PALEONTOLOGICAL RESOURCES				
Paleontological Resources	Less Than Significant with Mitigation	Less (No Impact)	Less (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)
E. GREENHOUSE GAS EMISSIONS				
Greenhouse Gas Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Greater (Less Than Significant)
F. HAZARDS AND HAZARDOUS MATERIALS				
Construction	Less Than Significant with Mitigation	Less (No Impact)	Less (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
G. LAND USE				
Conflict with Land Use Plans	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
H. NOISE				
Construction				
On-Site Noise	Significant and Unavoidable[a,b]	Less (No Impact)	Less (Significant and Unavoidable[a,b])	Less (Significant and Unavoidable[a,b])
Off-Site Noise	Significant and Unavoidable[a,c]	Less (No Impact)	Less (Significant and Unavoidable[a,c])	Less (Significant and Unavoidable[a,c])
On-Site Vibration (building damage)	Significant and Unavoidable	Less (No Impact)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)
On-Site Vibration (human annoyance)	Significant and Unavoidable[a]	Less (No Impact)	Less (Significant and Unavoidable[a])	Less (Significant and Unavoidable[a])

Table V-2 (Continued)
Summary Comparison of Impacts—Project and Alternatives

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Existing Zoning Compliant Alternative	Alternative 3: Alternative Use Alternative
Off-Site Vibration (building damage)	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Off-Site Vibration (human annoyance)	Significant and Unavoidable[a]	Less (No Impact)	Less (Significant and Unavoidable[a])	Less (Significant and Unavoidable[a])
Operation				
On-Site Noise	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Off-Site Noise	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Vibration	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
I. TRANSPORTATION				
Conflict with Plans	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Vehicle Miles Traveled	Less Than Significant with Mitigation	Less (No Impact)	Greater (Less Than Significant with Mitigation)	Greater (Less Than Significant with Mitigation)
J. TRIBAL CULTURAL RESOURCES				
Tribal Cultural Resources	Less Than Significant with Mitigation	Less (No Impact)	Less (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)
K. UTILITIES AND SERVICE SYSTEMS				
Water Supply and Infrastructure				
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)

Table V-2 (Continued)
Summary Comparison of Impacts—Project and Alternatives

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Existing Zoning Compliant Alternative	Alternative 3: Alternative Use Alternative
Energy Infrastructure				
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)

[a] *Cumulative impacts would also be significant and unavoidable.*

[b] *This significant unavoidable cumulative impact would occur only if Related Project No. 3 is built and occupied and concurrent construction occurs with the Project and Related Project No. 3.*

[c] *This significant unavoidable cumulative impact would occur only if Related Project No. 3 is completed and occupied prior to Project construction.*

Source: Eyestone Environmental, 2025.

5. Project Objectives

CEQA Guidelines Section 15124(b) states that the project description shall contain "a statement of the objectives sought by the proposed project." Section 15124(b) of the CEQA Guidelines further states that "the statement of objectives should include the underlying purpose of the project." The underlying purpose of the Project is to provide an infill commercial development for growing retail, hospitality, entertainment, and technology companies looking to locate businesses within Downtown Los Angeles. The Project's specific objectives are as follows:

- To support the Downtown Community Plan's Goal 6 to a broad-based economy that leverages Downtown's central location, land use mix, and infrastructure to foster a diversity of industry sectors and business sizes.
- To support the Downtown Community Plan's Objective 8.3 to foster long-term success with an ecosystem that accommodates both industrial and professional office sectors for future generations.
- To develop a pedestrian-friendly project by creating a street-level identity for the Project Site and improving the pedestrian experience through physical improvements and the introduction of retail and restaurant uses on the ground level.
- To provide a sustainable building design that allows for the use of energy-efficient technology and, thereby, reducing the overall reliance on energy for lighting and cooling.
- To provide a Project on an urban infill site which can serve various industry segments and meet the changing needs of workplaces through the creation of high-quality indoor and outdoor workspaces that encourage collaboration, productivity, and a healthy lifestyle.
- To locate employment opportunities near existing and future residential uses along a major transit corridor within a high activity area to promote sustainability and reduce vehicle miles traveled, with associated reductions in air quality and greenhouse gas emissions, to create a dynamic and economically viable commercial project with sufficient density to facilitate a healthy jobs-housing balance in the area.
- To support the growth of the City's economic base by creating a significant number of construction and permanent jobs.

V. Alternatives

A. Alternative 1: No Project/No Build Alternative

1. Description of the Alternative

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which a proposed project does not proceed. CEQA Guidelines Section 15126.6(e)(3)(B) states that "in certain instances, the No Project Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, Alternative 1, the No Project/No Build Alternative, assumes that the Project would not be approved, and no new development would occur within the 2.2-acre Project Site. Thus, the physical conditions of the Project Site would generally remain as they are today. Under Alternative 1, the Project Site would continue to be occupied by a surface asphalt parking lot used for bus storage with a billboard, parking lights, a cargo storage container, six electric bus chargers, and fencing. No new construction would occur.

2. Environmental Impacts

a. Air Quality

(1) Conflicts with Plans

Alternative 1 would not alter the existing uses or require any construction activities on the Project Site. Therefore, no new air quality emissions would occur, and Alternative 1 would not conflict with or obstruct implementation of the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP). Impacts would be less than the less-than-significant impacts of the Project.

(2) Construction Emissions

(a) Regional and Localized Air Quality Impacts

Alternative 1 would not alter the existing uses or require any construction activities on the Project Site. Therefore, no construction-related air quality impacts associated with regional and localized emissions would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Toxic Air Contaminants

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

(3) Operational Emissions

(a) Regional and Localized Air Quality Impacts

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

(b) Toxic Air Contaminants

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

b. Cultural Resources

(a) Historic Resources

As indicated in Section IV.B, Cultural Resources, of this Draft EIR, the Project Site is currently used for bus storage and does not contain any designated historic resources. However, as further indicated in Section IV.B, there is an existing historic resource in close proximity to the Project Site: Granite Block Paving on West Bruno Street, between North Alameda Street and North Main Street, one segment of which was designated as Los Angeles HCM No. 211 in 1979. Alternative 1 would not include construction activities and thus would not have the potential to directly or indirectly (through construction vibration that could damage) impact this resource. As such, Alternative 1 would avoid the Project's significant and unavoidable impacts related to historic resources.

(b) Archaeological Resources

As indicated in Section IV.B, Cultural Resources, of this Draft EIR, no archaeological resources have been previously recorded within the Project Site, although one of the segments of the Granite Paving Block on Bruno Street, the road and shoulder along Bruno Street and College Street, is in close proximity to the Project Site and has been recorded as archaeological resource LAN-4183H. However, LAN-4183H has been evaluated for significance and determined to not be eligible for federal, State, or local historical designation (i.e., does not represent an archaeological resource as defined in Section 15064.5 of the CEQA Guidelines). In addition, although subsurface archaeological resources could potentially be present at the Project Site because Alternative 1 would not include construction activities, it would not have the potential to inadvertently encounter any subsurface archaeological resources that may present at the Project Site. Therefore, no impacts to archaeological resources would occur under Alternative 1, and impacts would be less when compared to the less-than-significant-with-mitigation impacts of Project.

c. Energy

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

(2) Operation

Alternative 1 would not alter the existing land use or site operations on the Project Site. Therefore, Alternative 1 would not increase the long-term energy demand on the Project Site, would not have the potential to result in the wasteful, inefficient, and unnecessary use of energy, and would not have the potential to conflict with applicable plans for renewable energy or energy efficiency. As such, no impacts associated with operational energy use would occur, and impacts would be less when compared to the less-than-significant impacts of the Project.

d. Geology and Soils (Paleontological Resources)

As indicated 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 Resources Assessment included as Appendix E of this Draft EIR, no fossil vertebrate localities have been previously recorded within the Project Site. Furthermore, grading and other earthwork activities would not occur under the No

Project/No Build Alternative such that there would be no potential for Alternative 1 to impact (through inadvertently encounter) any subsurface paleontological resources that may be present at the Project Site. As such, no impacts to (i.e., inadvertent encounter of) paleontological resources would occur, and impacts would be less when compared to the less-than-significant-with-mitigation impacts of the Project.

e. Greenhouse Gas Emissions

Alternative 1 would not develop new uses on the Project Site. Therefore, no new greenhouse gas (GHG) emissions would be generated under Alternative 1, and new impacts associated with global climate change would not occur. As such, impacts associated with GHG emissions under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

f. Hazards and Hazardous Materials

(1) Construction

Construction activities would not occur under Alternative 1. Therefore, Alternative 1 would not result in the use, handling, storage, or disposal of hazardous materials, or result in the potential to release hazardous materials from existing hazardous materials contamination into the environment, and no impact would occur. As such, the impact would be less when compared to the less-than-significant-with-mitigation impacts of the Project.

(2) Operation

Alternative 1 would not alter the existing land uses or site operations on the Project Site as a parking lot for bus storage. Therefore, Alternative 1 would not increase use, handling, storage, or disposal of hazardous materials and no impact would occur. As such, the impact would be less when compared to the less-than-significant impacts of the Project.

g. Land Use

Under Alternative 1, there would be no changes to the physical or operational characteristics of the existing on-site uses. No land use approvals or permits would be required. Therefore, no impacts associated with conflicts with land use plans would occur, and impacts would be less when compared to the less-than-significant impacts of the Project.

h. Noise

(1) Construction

Construction activities would not occur on the Project Site under Alternative 1. Therefore, no construction-related noise or vibration would be generated on-site or off-site. As such, Alternative 1 would avoid the Project's: significant and unavoidable impacts associated with on- and off-site construction noise (Project-level and cumulative); on-site construction vibration (building damage: Project-level); and on- and off-site construction vibration (human annoyance; Project-level and cumulative). Alternative 1 would also avoid the Project's less-than-significant off-site construction vibration (building damage) impacts.

(2) Operation

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

i. Transportation

Since Alternative 1 would not develop new or additional land uses on the Project Site, Alternative 1 would not generate any additional vehicle trips or alter existing access or circulation within the Project Site during operation. Therefore, no impacts would occur with respect to potential conflicts with programs, plans, ordinances, or policies addressing the circulation system or vehicle miles traveled (VMT), and impacts would be less when compared to the less-than-significant conflict with plans impacts and less-than-significant-with-mitigation VMT impacts of the Project.

j. 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, and impacts would be less when compared to the less-than-significant-with-mitigation impacts of the Project.

k. Utilities and Service Systems

(1) Water Supply

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

(2) Energy Infrastructure

The Alternative 1 would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the short- or long-term energy demand on the Project Site, and no new or upgraded infrastructure would be required during either construction or operation. No impacts related to energy infrastructure would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above and shown in Table V-2 on page V-10, Alternative 1 would avoid the Project's significant and unavoidable impacts related to: historic resources; on- and off-site construction noise (Project level and cumulative); on-site construction vibration in terms of building damage (Project-level); and on- and off-site construction vibration in terms of human annoyance (Project-level and cumulative). Impacts associated with the remaining environmental issues would also be less than the less-than-significant and less-than-significant-with-mitigation impacts of the Project.

4. Relationship of the Alternative to Project Objectives

Under Alternative 1, the existing use 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 provide an infill commercial development for growing retail, hospitality, entertainment, and technology companies looking to locate businesses within Downtown Los Angeles. In addition, Alternative 1 would not meet any of the Project objectives, including:

- To support the Downtown Community Plan's Goal 6 to a broad-based economy that leverages Downtown's central location, land use mix, and infrastructure to foster a diversity of industry sectors and business sizes.

- To support the Downtown Community Plan's Objective 8.3 to foster long-term success with an ecosystem that accommodates both industrial and professional office sectors for future generations.

- To develop a pedestrian-friendly project by creating a street-level identity for the Project Site and improving the pedestrian experience through physical improvements and the introduction of retail and restaurant uses on the ground level.

- To provide a sustainable building design that allows for the use of energy-efficient technology and, thereby, reducing the overall reliance on energy for lighting and cooling.

- To provide a Project on an urban infill site which can serve various industry segments and meet the changing needs of workplaces through the creation of high-quality indoor and outdoor workspaces that encourage collaboration, productivity, and a healthy lifestyle.

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

- To support the growth of the City's economic base by creating a significant number of construction and permanent jobs.

V. Alternatives

B. Alternative 2: Existing Zoning Compliant Alternative

1. Description of the Alternative

The Existing Zoning Compliant Alterative (Alternative 2) would develop the same uses as the Project, but at a density consistent with the existing [Q]C2-2-RIO and [T][Q]C2-2-RIO zones which limit FAR for commercial projects to 1.5:1. Accordingly, Alternative 2 would develop 139,250 square feet of office uses, 2,539 square feet of restaurant uses, and 2,548 square feet of retail uses. Like the Project, the analysis of Alternative 2 would also conservatively include outdoor uncovered restaurant seating which does not count as floor area under the LAMC, though this square footage would be reduced from 1,799 square feet to 1,115 square feet. Building height would be reduced from 5 stories and 88 feet to 3 stories and 53 feet. Alternative 2 would provide 273 vehicle parking spaces and 92 bicycle parking spaces (16 short term/76 long term) within one at-grade level and one above ground mezzanine level (versus one at-grade level, one above-grade mezzanine level, and one below-grade level under the Project). Like the Project, Alternative 2 would provide landscaping and outdoor areas to enhance the public realm, create more effective transitions between off-site and on site uses, and provide useable outdoor areas on site, though the amount would be reduced proportionately with the reduction in development.

Alternative 2 would implement a similar building design as the Project, though the height of the building would be less, as noted above, and would implement similar signage, lighting, setbacks, and sustainability features as the Project. Alternative 2 would also require the Main Conditional Use Permit (MCUP), Site Plan Review, and Vesting Tentative Tract Map required by the Project, along with a Major Development Condition Use Permit, but would not require its General Plan Amendment, Vesting Zone Change, and Height District Change to increase the Project Site's existing 1.5:1 FAR limit for commercial projects.

With regard to construction activities and schedule, it is anticipated that the overall duration of construction would be reduced compared to the Project based on the reduced amount of total floor area under this alternative (i.e., 145,452 square feet compared to 234,601 square feet under the Project). Additionally, as with the Project, a Los Angeles Department of Transportation (LADOT) reviewed and approved Construction Traffic Management Plan (CTMP) (as set forth in Project Design Feature TR-PDF-1) and Truck Haul Route Program would be implemented during construction to minimize potential conflicts between construction activity and through traffic.

2. Environmental Impacts

a. Air Quality

(1) Conflicts with Plans

As discussed further below, like the Project, Alternative 2 would result in less than significant localized air quality emissions and thus would not conflict with the AQMP. With respect to operation, as with the Project, Alternative 2 represents infill development located in close proximity to existing transit lines and would utilize existing infrastructure to serve the proposed uses. As such, like the Project, Alternative 2 would advance regional goals to reduce VMT through infill development near transit that would reduce air pollutant emissions compared to an average regional project. Alternative 2 would similarly result in less than significant localized operational impacts. Impacts associated with conflict with plans related to air quality would be similar to the Project.

(2) Construction Emissions

(a) Regional and Localized Air Quality Impacts

As with the Project, construction of Alternative 2 has the potential to result in air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. Under Alternative 2, overall duration of construction would be reduced due to no subterranean parking levels versus the Project's one subterranean level, thus reducing the overall excavation and export required; and a substantial reduction in new development resulting from the reduced height and FAR. However, air quality impacts are based on peak day regional and localized construction emissions which would be the same as under the Project as peak day construction activities would be roughly the same between both the Project and Alternative 2. There would be fewer peak days under this alternative as the overall amount of excavation and export would be reduced under Alternative 2 in comparison to the Project. As such, both projects would result in less-than-significant regional and localized construction emission impacts, and overall regional and localized construction emission impacts would be similar under Alternative 2 as air quality impacts are assessed for the worst-case day of construction.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 2 would generate DPM emissions associated with heavy equipment and haul truck operations primarily during grading and

excavation activities. These activities would represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to construction-related TAC emissions. Overall construction emissions generated by Alternative 2 would be less than those of the Project because Alternative 2 would require less overall excavation, export, and building construction. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 2 would be less-than-significant and less when compared to the less-than-significant impacts of the Project.

(3) Operational Emissions

(a) Regional and Localized Air Quality Impacts

Similar to the Project, operational regional air pollutant emissions associated with Alternative 2 would be generated by vehicle trips to the Project Site and the consumption of electricity and natural gas. The new development proposed under Alternative 2 would be reduced compared to the Project (i.e., 145,452 square feet under Alternative 2 versus 234,601 square feet under the Project), and like the Project, office, restaurant, and retail uses would be provided. As such, the number of new daily trips generated by Alternative 2 would be less than the number of new daily trips generated by the Project. Specifically, as provided in the VMT Calculator results in Appendix L of this Draft EIR, with mitigation incorporated, Alternative 2 would result in 1,258 daily vehicle trips and 9,744 daily VMT compared to the Project's 1,995 daily vehicle trips and 15,445 daily VMT.[4,5] As vehicular emissions depend on the number of trips, vehicular sources would result in a smaller increase in air pollutant emissions compared to the Project. In addition, because the overall square footage would be reduced when compared to the Project, demand for electricity and natural gas would proportionally be reduced along with related air pollutant emissions in comparison to the Project. Therefore, impacts associated with regional operational emissions under Alternative 2 would be less-than-significant and less when compared to the less-than-significant impacts of the Project.

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 2 would not introduce any major new sources of air pollution within the Project Site because the same uses are proposed. Therefore, similar to the Project, localized impacts from on-site emission sources associated with Alternative 2 would also be less-than-significant. Such impacts would be less than those of the Project due to the overall

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[4] *Gibson Transportation Consulting, Inc., VMT Calculator Runs for the Alternatives, September 2025. See Appendix L of this Draft EIR.*

[5] *The mitigation being referred to here is the equivalent of Mitigation Measure TR-MM-1, implementation of additional TDM measures, in Section IV.I, Transportation, of this Draft EIR which would reduce Project (and Alternative 2) operational motor vehicle trips.*

decreased amount of development. Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. As discussed above, the number of daily trips generated under Alternative 2 would be less than the Project, and the number of peak-hour trips would also be reduced. Therefore, localized and stationary source impacts under Alternative 2 would be less-than-significant and less when compared to the less-than-significant impacts of the Project.

(b) Toxic Air Contaminants

As set forth in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential TAC emissions associated with Project operations would include DPM emissions from delivery trucks. Alternative 2 would include less development than the Project, but would include similar types of uses and, thus, would require reduced operational truck deliveries and associated DPM emissions. Therefore, Alternative 2 would result in less-than-significant operational TAC emission impacts, which would be less when compared to the less-than-significant impacts of the Project.

b. Cultural Resources

(a) Historic Resources

As indicated in Section IV.B, Cultural Resources, of this Draft EIR, the Project Site is currently used for bus storage and does not contain any designated historic resources. However, as further discussed in Section IV.B, there is an existing historic resource adjacent to the Project Site: Granite Block Paving on West Bruno Street, between North Alameda Street and North Main Street, one segment of which was designated as Los Angeles HCM No. 211 in 1979. While neither the Project nor Alternative 2 would result in direct impacts to historic resources, both the Project and Alternative 2 would include construction activities that would generate construction vibration that could potentially damage the Granite Block Paving without mitigation. Still, because Alternative 2 would not include any subterranean parking levels versus the Projects one subterranean parking level, less excavation would occur and thus less related vibration would be generated during construction which would reduce the potential for vibration-related impacts to the Granite Block Paving. Alternative 2 would also include Mitigation Measure CUL-MM-1 which requires temporary shoring, construction monitoring, and, if necessary, temporary removal, cataloging, and ultimate replacement of the historic pavers immediately adjacent to the Project Site to mitigate damage to this designated historic resource to the extent feasible. However, like the Project, impacts would remain significant and unavoidable because other mitigation measures such as avoidance of the area, wave barriers, and the temporary removal of the entire resource were determined to be infeasible. Therefore, like the Project, impacts to historical resources would be significant and unavoidable, though such impacts would be reduced compared to the Project because of the reduced amount of construction.

(b) Archaeological Resources

As indicated in Section IV.B, Cultural Resources, of this Draft EIR, no archaeological resources have been previously recorded within the Project Site. One of the segments of the Granite Paving Block on Bruno Street , the road and shoulder along Bruno Street and College Street, is in close proximity to the Project Site and has been recorded as archaeological resource LAN-4183H. However, LAN-4183H has been evaluated for significance and determined to not be eligible for federal, state, or local historical designation (i.e., does not represent an archaeological resource as defined in Section 15064.5 of the CEQA Guidelines). In addition, although subsurface archaeological resources could potentially be present at the Project Site, the potential to inadvertently encounter subsurface archaeological resources would be reduced compared to the Project as a result of the lack of subterranean parking under Alternative 2. Alternative 2 would still require grading for site preparation and building footings, and as such, still has the potential to encounter previously unidentified archaeological resources. However, like the Project, Alternative 2 would also include Mitigation Measure CUL-MM-2 which requires retention of a Qualified Archeologist to brief construction crews prior to ground-disturbing activities, prepare an archeological resources management plan (ARMP) addressing monitoring protocols, monitor certain ground-disturbing activities, and, if necessary, prepare a treatment plan for any encountered archaeological resources. Therefore, like the Project, impacts to archaeological resources would be less than significant with mitigation, though such impacts would be reduced compared to the Project because of the reduced amount of excavation.

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, on a limited basis, to power lighting, electric equipment, and other construction activities. Alternative 2 would also consume energy in the form of petroleum-based fuels for heavy construction equipment, delivery and haul trucks, and construction worker traffic. However, as with the Project, the use of construction equipment/vehicles under Alternative 2 would comply with Title 24 standards and other applicable energy conservation requirements, California Air Resources Board (CARB) anti-idling and In-Use Off-Road Diesel-Fueled Fleet regulations, federal fuel efficiency standards, and other applicable requirements which together would minimize energy use during construction. Furthermore, energy use during construction would be temporary. Therefore, as with the Project, construction activities under 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 to energy resources during construction which would

be less when compared to the less-than-significant impacts of the Project because less construction would occur.

(b) Operation

As with the Project, operation of Alternative 2 would generate an increased consumption of gasoline, electricity, and natural gas relative to existing conditions. When compared to the Project, Alternative 2 would include less new development (i.e., 145,452 square feet versus 234,601 square feet under the Project) but like the Project would include office, restaurant and retail uses and, thus, would be expected to generate lower operational energy demand than the Project. Additionally, similar to the Project, Alternative 2 would comply with applicable energy conservation requirements during operation, including California's Building Energy Efficiency Standards (Title 24 standards), CALGreen Code, and the Los Angeles Green Building Code, and would implement Project Design Feature GHG-PDF-1, which prohibits the use of natural gas during Project operations, excluding restaurant cooking equipment and the emergency generator which together would minimize electricity and natural gas consumption. Furthermore, as provided in the VMT Calculator results for the alternatives in Appendix L of this Draft EIR, with mitigation incorporated, Alternative 2 would result in 1,258 daily vehicle trips and 9,744 daily VMT compared to the Project's 1,995 daily vehicle trips and 15,445 daily VMT and, thus, would consume less operation-related petroleum-based fuels than the Project.[6,7] Furthermore, the Project Site is located in close proximity to transit, including the adjacent Metro A Line Chinatown Station, which would encourage the use of alternative modes of transportation that are more efficient and minimize fuel consumption. Therefore, similar to 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 during operation, which would be less when compared to the less-than-significant impacts of the Project.

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

As with the Project, Alternative 2 would comply with the Los Angeles Green Building Code and, thus, with the Title 24 standards and the CALGreen Code Alternative 2 would also be required to comply with the City's All-Electric Buildings Ordinance (Ordinance No. 187,714) and implement Project Design Feature GHG-PDF-1 which prohibit the use of natural gas during Project operations, excluding restaurant cooking equipment and emergency generators. With regard to transportation-related energy usage, Alternative 2

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[6] *Gibson Transportation Consulting, Inc., VMT Calculator Runs for the Alternatives, September 2025. See Appendix L of this Draft EIR.*

[7] *The mitigation being referred to here is the equivalent of Mitigation Measure TR-MM-1, implementation of additional TDM measures, in Section IV.I, Transportation, of this Draft EIR which would reduce Project (and alternative) operational motor vehicle trips.*

would also comply with the goals of the Southern California Association of Governments' (SCAG) Regional Transportation Plan (RTP)/Sustainable Communities Strategies (SCS), which incorporate VMT targets established by Senate Bill (SB) 375. As with the Project, Alternative 2 would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction. Therefore, as with the Project, Alternative 2 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, 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 Resources Assessment included as Appendix E of this Draft EIR, no fossil vertebrate localities have been previously recorded within the Project Site. However, as with the Project, excavation, grading and other earthwork activities under Alternative 2 have the potential to inadvertently encounter subsurface paleontological resources if such resources are present at the Project Site though such activities would be reduced because no subterranean levels are proposed. Like the Project, Alternative 2 would nevertheless include Mitigation Measure GEO-MM-1 requiring monitoring for paleontological resources to reduce this impact to a less-than-significant level. Therefore, impacts to paleontological resources under Alternative 2 would be less-than-significant with mitigation and less compared to 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 the energy consumption resulting from operation of the proposed land uses. The number of daily trips and daily VMT under Alternative 2 would be reduced when compared to the Project. Specifically, as provided in the VMT Calculator results for the alternatives in Appendix L of this Draft EIR, with mitigation incorporated, Alternative 2 would result in 1,258 daily vehicle trips and 9,744 daily VMT compared to the Project's 1,995 daily vehicle trips and 15,445 daily VMT.[8,9] Thus, the amount of GHG emissions generated by Alternative 2 would be less than the amount

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[8] *Gibson Transportation Consulting, Inc., VMT Calculator Runs for the Alternatives, September 2025. See Appendix L of this Draft EIR.*

[9] *The mitigation being referred to here is the equivalent of Mitigation Measure TR-MM-1, implementation of additional TDM measures, in Section IV.I, Transportation, of this Draft EIR which would reduce Project (and alternative) operational motor vehicle trips.*

generated by the Project. Additionally, as noted above, energy consumption would be less than the Project because of the reduction in square footage. As with the Project, Alternative 2 would be designed to comply with the requirements of the CALGreen Code and the Los Angeles Green Building Code. Additionally, like the Project, Alternative 2 would include Project Design Feature GHG-PDF-1, which prohibits the use of natural gas during Project operations, excluding restaurant cooking equipment and the emergency generator. With compliance with the CALGreen Code and the Los Angeles Green Building Code, and with the implementation of comparable sustainability features as the Project, Alternative 2, like the Project, would be consistent with the GHG reduction goals and objectives included in adopted State, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 2 would be less-than-significant and less when compared to the less-than-significant impacts of the Project.

f. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, would be used and, therefore, would require proper handling and management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases and, subsequently, the exposure of the public to hazardous materials. However, similar to the Project, all potentially hazardous materials under Alternative 2 would be used, stored, and disposed in accordance with manufacturers' specifications and instructions and applicable regulations (i.e., Resource Conservation and Recovery Act (RCRA), California Hazardous Waste Control Law, Federal and State Occupational Safety and Health Acts, South Coast Air Quality Management District (SCAQMD) Rules, and permits and associated conditions issued by the Los Angeles Department of Building and Safety (LADBS), thereby reducing the risk associated with hazardous materials use during construction.

With respect to existing hazardous materials conditions at the Project Site, as discussed in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, the Project Site is identified in multiple hazardous materials databases compiled pursuant to Government Code Section 65962.5; the Project Site has a history of industrial use and may contain unknown/unidentified underground storage tanks (USTs), as well as residual UST/above-ground storage tank (AST) contamination (including groundwater contamination); and contaminated soil and soil gas has been identified on the Project Site. As such, as with the Project, construction activities under Alternative 2 would have the potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment associated with the above. However, such potential would be reduced

under Alternative 2 as compared to the Project owing to the lack of subterranean parking and thus the reduced amount of excavation required under this alternative. Additionally, any contaminated soil, soil gas, and/or groundwater encountered would be treated and disposed of in accordance with applicable regulations, HAZ-MM-1 (Soil Management Plan [SMP]), HAZ-MM-2 (Combined Methane/Vapor Intrusion Mitigation), and HAZ-MM-3 (Post-Construction Monitoring), which together would reduce potential impacts to less-than-significant levels under both the Project and Alternative 2. Furthermore, as discussed in IV.F, although methane was not detected in any of the samples taken on-site, the Project Site is located within a LADBS designated Methane Zone; however, compliance with existing regulations would avoid significant methane impacts during construction under both projects.

Lastly, while construction activities would occur in accordance with regulatory requirements, and ground disturbance associated with site clearance, excavation, and grading activities during construction would be required to comply with relevant and applicable federal, State, and local regulations and requirements, because of the presence of contaminated soil and soil gas beneath the Project Site, Alternative 2, like the Project, would have the potential to emit hazardous emissions or materials within one-quarter mile of an existing or proposed school. However, any such potential would be less-than-significant under both the Project and Alternative 2 with implementation of Mitigation Measure HAZ-MM-1, with this impact reduced under Alternative 2 owing to less excavation and less potential for construction-related hazardous emissions under Alternative 2.

Overall, Alternative 2 would result in less-than-significant impacts with mitigation which would be less when compared to the less-than-significant-with-mitigation impacts of the Project.

(2) Operation

Operation of Alternative 2, as with operation of the Project, would involve the routine use of small quantities of potentially hazardous materials typical of those used in commercial office, restaurant, and uses, including cleaning products, paints, and those used for maintenance of landscaping. Such routine use, and associated storage and disposal would occur in accordance with applicable regulations (i.e., RCRA, California Hazardous Waste Control Law, Federal and State Occupational Safety and Health Acts, SCAQMD Rules, and permits and associated conditions issued by LADBS) under both the Project and Alternative 2, and because both the Project and Alternative 2 would include commercial office, restaurant, and retail development, only small quantities of hazardous materials would be used, stored and disposed of. Lastly, as discussed in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, although methane was not detected in any of the samples taken on-site, the Project Site is located within a LADBS designated Methane Zone; however, with compliance with LAMC Section 91.7104.2 requiring that all buildings located in the Methane Zone and Methane Buffer Zone include a methane mitigation system as required by LAMC

Table 71 based on the appropriate Site Design Level, methane impacts during operation of both the Project and Alternative 2 would be less-than-significant. Overall, operational impacts under Alternative 2 would be less-than-significant and less compared to the less-than-significant impacts of the Project owing to less development and less associated hazardous materials use, storage, and disposal.

g. Land Use

As described above, Alternative 2 would develop the same uses as the Project, but at a density consistent with the existing [Q]C2-2-RIO and [T][Q]C2-2-RIO zones which limit FAR for commercial projects to 1.5:1. As such, Alternative 2 would require the MCUP, Site Plan Review, and Vesting Tentative Tract Map required for the Project, but would not require its General Plan Amendment, Vesting Zone Change, and Height District Change since an increase in FAR would not be needed. Still, as with the Project, Alternative 2 would be generally 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 SCAG's RTP/SCS, the General Plan, including the Framework Element and the Central City North Community Plan, and the LAMC (i.e., development of the Project Site with a mixed-use commercial development within a City-designated Transit Priority Area (TPA), SCAG-designated High Quality Transit Corridor (HQTC), and a SCAG-designated Livable Corridor in close proximity to transit, housing, services, etc., which would encourage transit use, reduce per capita VMT, and reduce associated air emissions). Therefore, impacts related to land use consistency under Alternative 2 would be less-than-significant and less than the less-than-significant impacts of the Project.

h. Noise

(1) Noise

(a) Construction

As discussed in Section IV.H, Noise, of this Draft EIR, construction of the Project would generate noise from the use of heavy-duty construction equipment, as well as from haul truck and construction worker trips. Construction of Alternative 2 would be expected to generate noise from the same types of sources and activities. The types of construction activities under Alternative 2 would be substantially similar to those of the Project owing to the same types of proposed uses, although the overall amount and duration of construction activities would be less due to the reduced amount of floor area (i.e., 145,452 square feet versus 234,601 square feet under the Project) and number of subterranean parking levels (zero versus one under the Project). Under Alternative 2, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to those of the Project during maximum activity (i.e., peak construction) days because the types

of construction activities would be the same. Like the Project, Alternative 2 would also implement Mitigation Measures NOI-MM-1 (requiring a temporary impermeable sound barrier along the Project Site's northern property across from potential future residential uses along the north side of College Street [i.e., receptor location R3 which is also Related Project No. 5]) which would minimize this construction noise to the greatest extent possible. Still, like the Project, Alternative 2 would be expected to result in significant and unavoidable on- and off-site construction noise impacts (Project-level and cumulative) because this impact cannot be mitigated at the upper levels of receptor location R3. The degree of these impacts would be less under Alternative 2 owing to the lack of a subterranean parking under this alternative and the resultant reduction in required excavation and soil export activities.

(b) Operation

As discussed in Section IV.H, Noise, of this Draft EIR, sources of operational noise under the Project would include: (1) 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 (2) off-site mobile (roadway traffic) noise sources. Regarding on-site operational noise, Alternative 2 would introduce noise from similar on-site noise sources. However, it is anticipated that with the overall reduction in total floor area under this alternative (i.e., 145,452 square feet versus 234,601 square feet under the Project), the noise levels from building mechanical equipment, outdoor spaces, and parking facilities would be commensurately reduced. In addition, similar to the Project, Alternative 2 would implement project design features similar to Project Design Features NOI-PDF-1 (acoustic screening of outdoor mechanical equipment), NOI-PDF-2 (acoustic screening of loading docks), and NOI-PDF-3 (limitations on the operation of outdoor amplified sound systems), 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 A-weighted decibel (dBA). Thus, operational on-site noise impacts under Alternative 2 would be less-than-significant and less when compared to the less-than-significant impacts of the Project.

With regard to operational off-site (i.e., traffic) noise, with mitigation incorporated, Alternative 2 would generate less operational traffic than the Project (i.e., 1,258 daily trips versus 1,995 daily trips under the Project).[10,11] The reduction in vehicle trips would result in

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[10] *Gibson Transportation Consulting, Inc., VMT Calculator Runs for the Alternatives, September 2025. See Appendix L of this Draft EIR.*

[11] *The mitigation being referred to here is the equivalent of Mitigation Measure TR-MM-1, implementation of additional TDM measures, in Section IV.J, Transportation, of this Draft EIR which would reduce Project (and alternative) operational motor vehicle trips.*

a decrease in off-site operational traffic-related noise levels under Alternative 2. Therefore, off-site operational noise impacts under Alternative 2 would be less-than-significant and less when compared to the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 2 would be similar to the Project, although the amount and duration of construction activities would be reduced. As with the Project, construction of Alternative 2 would generate on- and off-site vibration from the use of heavy-duty construction equipment and from truck trips. Also as with the Project, Alternative 2 would implement Mitigation Measures CUL-MM-1 (i.e., implementation of a Construction Monitoring Plan including vibration monitoring) set forth in Section IV.B, Cultural Resources, of this Draft EIR to minimize on-site construction vibration impacts (building damage) on the off-site historic Granite Block Paving immediately adjacent to the Project Site to the extent feasible. While the overall amount and duration of construction 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 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. As such, peak vibration levels generated by construction equipment and construction truck trips under Alternative 2 (which are the basis of the significance determination) would be similar to those of the Project. Further, additional mitigation measures such as avoidance of the area, wave barriers, and the temporary removal of the entire historic resource were determined to be infeasible. Accordingly, like the Project, construction activities under Alternative 2 would result in (significant and unavoidable impacts with respect to on-site construction vibration pursuant to the threshold for building damage (Project-level); on- and off-site construction vibration pursuant to the threshold for human annoyance (Project-level and cumulative; and less-than-significant impacts with respect to off-site construction vibration impacts pursuant to the threshold for building damage. However, the overall amount/duration of construction activities and associated vibration under Alternative 2 would be less than under the Project.

(b) Operation

As discussed 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, like 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. The degree of operational vibration impacts would be less under Alternative 2 than under the Project due to the reduction in vehicle trips (i.e., 1,298 post-mitigation daily trips versus 1,995 post-mitigation daily trips under the Project),[12,13] lack of vehicle movement in a subterranean parking level, the reduction in floor area (i.e., 145,452 square feet under Alternative 2 as compared to 234,601 square feet under the Project), and less associated building mechanical equipment under this alternative.

i. Transportation

(a) Conflicts with Transportation Plans

Alternative 2 would generally support applicable transportation plans and multimodal transportation options. Similar to the Project, Alternative 2 would represent urban infill development in a City-designated TPA and SCAG-designated HQTC in close proximity to transit, housing, services, etc. which would encourage alternative transportation use as called for by the Mobility Plan and RTP/SCS; and include sidewalk and driveway design, vehicular and bicycle parking, etc. in accordance with LAMC requirements. Both the Project and Alternative 2 would also implement transportation demand management (TDM) measures as called for by the Mobility Plan, Community Plan, and RTP/SCS, and as required by the City's TDM Ordinance, which along with the Project Site's location on an infill site and proximity to transit would reduce VMT. Furthermore, while none of the streets adjacent to the Project Site are listed in Vision Zero's High Injury Network (HIN), neither the Project nor Alternative 2 would preclude future Vision Zero safety improvements by the City. Like the Project, Alternative 2 would not conflict with the applicable transportation plans because it would include similar types of land uses and transportation improvements, generate less operational traffic (i.e., 1,258 post-mitigation daily trips versus 1,995 post-mitigation daily trips under the Project)[14,15], and be developed on the same urban infill site in close proximity to transit as the Project. Therefore, like the Project, Alternative 2 would not conflict with a

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[12] *Gibson Transportation Consulting, Inc., VMT Calculator Runs for the Alternatives, September 2025. See Appendix L of this Draft EIR.*

[13] *The mitigation being referred to here is the equivalent of Mitigation Measure TR-MM-1, implementation of additional TDM measures, in Section IV.I, Transportation, of this Draft EIR which would reduce Project (and alternative) operational motor vehicle trips.*

[14] *Gibson Transportation Consulting, Inc., VMT Calculator Runs for the Alternatives, September 2025. See Appendix L of this Draft EIR.*

[15] *The mitigation being referred to here is the equivalent of Mitigation Measure TR-MM-1, implementation of additional TDM measures, in Section IV.I, Transportation, of this Draft EIR which would reduce Project (and alternative) operational motor vehicle trips.*

program, plan, ordinance, or policy addressing the circulation system and impacts would be less-than-significant, with the degree of the impact similar between the two projects as neither project would conflict with the applicable transportation plans.

(b) Vehicle Miles Travelled

Prior to mitigation, Alternative 2 would result in 1,339 daily vehicle trips and 10,454 daily VMT, resulting in a work VMT of 8.2 VMT per employee which would exceed the Central Area Planning Commission's (APC) VMT threshold of 7.6.[16] The number of daily vehicle trips and daily VMT would be less than the Project's pre-mitigation 2,124 daily trips and 16,568 daily VMT, but the VMT per employee would be greater than the Project's pre-mitigation of VMT per employee of 8.1. No residential uses are proposed, so there would be no residential VMT. Because VMT per employee would exceed the Central APC threshold, like the Project, Alternative 2 would be required to implement a mitigation measure incorporating TDM elements. The precise TDM elements included in such a measure would be subject to LADOT review and approval. However, if Alternative 2 were to include the same TDM elements as Mitigation Measure TR-MM-1 which requires implementation of a ride-share program to reduce single occupancy vehicle trips and the provision of designated parking areas for carpools/vanpools, Alternative 2 would result in 1,258 daily trips, 9,744 daily VMT, and 7.0 work VMT per employee compared to 1,995 daily trips, 15,445 daily VMT, and 6.8 work VMT per employee with the Project.[17] Alternative 2 would have a higher VMT per employee ratio than the Project because there would be less internal capture of trips between the office and retail/restaurant uses due to the reduction in the sizes and changes in the relative proportion of these land uses. Therefore, like the Project, Alternative 2's VMT impacts would be less than significant with mitigation, though such impacts would be greater than the Project because VMT per employee is the applicable significance threshold.

j. Tribal Cultural Resources

As indicated in Section IV.J, Tribal Cultural Resources, of this Draft EIR, no tribal cultural resources have been previously recorded at the Project Site. However, previously unidentified tribal cultural resources could potentially be present at the Project Site. Like the Project, excavation and other earthwork associated with the construction of Alternative 2 for building foundations, etc. could inadvertently encounter any tribal cultural resources if such resources are present, though the potential for such impacts would be reduced under Alternative 2 because no subterranean parking levels are proposed. While the uncovering of tribal cultural resources is not anticipated, both the Project and Alternative 2 would

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[16] *Gibson Transportation Consulting, Inc., VMT Calculator Runs for the Alternatives, September 2025. See Appendix L of this Draft EIR.*

[17] *Gibson Transportation Consulting, Inc., VMT Calculator Runs for the Alternatives, September 2025. See Appendix L of this Draft EIR.*

implement Mitigation Measures TCR-MM-1 through TCR-MM-4 requiring archaeological/tribal monitors to monitor ground disturbing activities, providing Worker Environmental Awareness Program (WEAP) training to construction workers, temporarily halting ground-disturbing activities with the determined avoidance radius if resources are encountered, evaluating and potentially curating resources if encountered, etc. Since Alternative 2 would include less excavation than the Project due to the lack of subterranean parking under this alternative, it would have less of a potential to impact any subsurface tribal cultural resources that may present. Therefore, impacts under Alternative 2 would be less-than-significant with mitigation and less when compared to the less-than-significant with mitigation impacts of Project.

k. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities for Alternative 2 would require water for dust control, equipment cleaning, excavation, and export of dirt, including the removal and re-compaction of dirt during the grading process. As discussed in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Los Angeles Department of Water and Power (LADWP) Service Advisory Requests (SARs) prepared for the Project indicate that adequate water would be available from the existing water mains in the adjacent streets for Project operation, and since operational water demand would be greater than construction water demand, adequate water would be available for Project construction. As such, and because Alternative 2 would include less development and no subterranean parking (as opposed to the Project's one subterranean parking level), adequate water would also be available to serve Alternative 2 construction. Additionally, like the Project, Alternative 2 would require trenching for the required on-site water distribution system and connection to the existing water mains in the adjacent streets. Additionally, as with the Project prior to ground disturbance, project contractors would coordinate with LADWP to identify the locations and depth of all lines to avoid water lines and disruption of water service and a CTMP would be implemented pursuant to Project Design Feature TR-PDF-1 to reduce any temporary pedestrian and traffic impacts and ensure emergency access during construction of the water infrastructure. Therefore, Alternative 2 would result in less-than-significant impacts which would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Like the Project, Alternative 2 would result in an increase in long-term water demand at the Project Site. As discussed in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, based on the SARs, the Project would generate

a net increase in operational water demand that would be met by connection to the existing water mains in the adjacent streets. In addition, per the analysis in Section IV.K.1, LADWP has adequate water supplies to serve the Project along with existing and anticipated future growth within its service area through at least year 2045 during normal, single-dry, and multiple-dray years. Since Alternative 2 would include less development, but otherwise the same types of land uses, as the Project, adequate capacity exists in the local water lines and LADWP has adequate water supplies to serve Alternative 2. Furthermore, the Applicant would construct the necessary on-site water infrastructure and associated connections to the LADWP water system pursuant to applicable City requirements under both the Project and Alternative 2.

Regarding fire flow, as discussed in Section IV.K.1, LADWP's Information of Fire Flow Availability (IFFAR) prepared for the Project shows that the required fire-flow to serve the Project would be available from the existing fire hydrants adjacent to the Project Site in combination with a new fire hydrant to be developed by the Applicant along North Main Street to serve the Project. Since Alternative 2 would include less development, but otherwise the same types of land uses, as the Project, Alternative 2 would be subject to the same fire flow requirements. Furthermore, a fire sprinkler suppression system would be provided under both the Project and Alternative 2, and the SAR demonstrates that adequate capacity and pressure exists in the local water lines to operate this sprinkler suppression system.

Based on the above, the operational water supply and water infrastructure impacts of Alternative 2 would be less-than-significant and less when compared to the less-than-significant impacts of the Project.

(2) Energy Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 2 would consume minor quantities of electricity (construction activities do not typically involve the consumption of natural gas). As indicated in Section IV.K.2, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR, Project construction activities would generate only a fraction of the electricity demand of Project operations, and since existing electricity infrastructure and supplies would be adequate to serve Project operation, they would also be adequate to serve Project construction. The same holds true for the Alternative 2 which would include less development and no subterranean parking level, and thus would consume even less electricity during construction than the Project. In addition, as with the Project, since the Project Site is an urban infill site that is already served by electricity and natural gas infrastructure, electricity for construction would be obtained from the existing electrical lines serving the Project Site and would not require extensive off-site infrastructure improvements to provide Alternative 2 with electricity and natural gas during construction.

Lastly, as with the Project, Alternative 2 would be required to coordinate energy infrastructure improvements with LADWP and SoCalGas to minimize potential service disruptions. Therefore, as with the Project, construction activities under Alternative 2 would not result in an increase in energy demand that exceeds available supplies or distribution infrastructure capabilities that would require the construction of new or expanded energy facilities, the construction or relocation of which could cause significant environmental effects. Thus, construction impacts under Alternative 2 would be less-than-significant and less when compared to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 2 would generate an increased consumption of electricity and natural gas relative to existing conditions, which would be miniscule when compared to existing energy supplies and peak energy flows in the local infrastructure. Also, because Alternative 2 operation would result in less electricity and natural gas consumption than the Project due to the reduction in development under this alternative, and because the existing electricity and natural gas infrastructure would be adequate to serve Project operation, existing energy infrastructure would be adequate to serve Alternative 2 operation. Furthermore, as with the Project, Alternative 2 would be developed in accordance with applicable energy conservation requirements, including those in Title 24, CALGreen Code, and the Los Angeles Green Building Code, which would minimize electricity and natural gas consumption. Therefore, as with the Project, Alternative 2 operation would not result in an increase in energy demand that would exceed available supplies or distribution infrastructure capabilities that would require the construction of new or expanded energy facilities, the construction or relocation of which could cause significant environmental effects. Thus, operational impacts under Alternative 2 would be less-than-significant and less when compared to the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above and shown in Table V-2 on page V-10, Alternative 2 would reduce, but not eliminate, the Project's significant and unavoidable impacts with respect to historic resources; on- and off-site construction noise (Project level and cumulative); on-site construction vibration in terms of building damage (Project-level); and on- and off-site construction vibration in terms of human annoyance (Project-level and cumulative). Impacts associated with the remaining environmental issues would be similar to or less than those of the Project, except for VMT which would be greater than the Project but remain less than significant with mitigation.

4. Relationship of the Alternative to Project Objectives

Alternative 2 would develop the same uses as the Project, but at a density consistent with the existing [Q]C2-2-RIO and [T][Q]C2-2-RIO zones which limit FAR for commercial projects to 1.5:1. Accordingly, Alternative 2 would develop a total of 145,452 square feet of office, restaurant and retail uses versus the Project's 234,601 square feet of such uses and a 2.42:1 FAR. As such, Alternative 2 would meet the underlying purpose of the Project, which is to provide an infill commercial development for growing retail, hospitality, entertainment, and technology companies looking to locate businesses within Downtown Los Angeles. However, Alternative 2 would meet this underlying purpose to a lesser extent than the Project given the reduced amount of total floor area under this alternative.

Alternative 2 would meet the following Project objective as it would include the same general scale, site plan, design, architecture and appearance as the Project:

- To provide a sustainable building design that allows for the use of energy-efficient technology and, thereby, reducing the overall reliance on energy for lighting and cooling.

Alternative 2 would meet the remaining Project objectives, but to a lesser extent than the Project given the reduced amount of floor area under this alternative:

- To support the Downtown Community Plan's Goal 6 to a broad-based economy that leverages Downtown's central location, land use mix, and infrastructure to foster a diversity of industry sectors and business sizes.
- To support the Downtown Community Plan's Objective 8.3 to foster long-term success with an ecosystem that accommodates both industrial and professional office sectors for future generations.
- To develop a pedestrian-friendly project by creating a street-level identity for the Project Site and improving the pedestrian experience through physical improvements and the introduction of retail and restaurant uses on the ground level.
- To provide a Project on an urban infill site which can serve various industry segments and meet the changing needs of workplaces through the creation of high-quality indoor and outdoor workspaces that encourage collaboration, productivity, and a healthy lifestyle.
- To locate employment opportunities near existing and future residential uses along a major transit corridor within a high activity area to promote sustainability and reduce vehicle miles traveled, with associated reductions in air quality and greenhouse gas emissions, to create a dynamic and economically viable commercial project with sufficient density to facilitate a healthy jobs-housing balance in the area.

- To support the growth of the City's economic base by creating a significant number of construction and permanent jobs.

V. Alternatives

C. Alternative 3: Alternative Use Alternative

1. Description of the Alternative

The Alternative Use Alternative (Alternative 3) would develop a 232,802 square foot self-storage in a single five-story, 88-foot-tall building with a 2.42:1 FAR. Since Alternative 3 would not include restaurant uses, the 1,799 square feet of non-LAMC floor area comprised of outdoor uncovered restaurant seating included in the Project would not be provided. Alternative 3 would provide 30 vehicle parking spaces and 46 bicycle parking spaces (23 long term/23 short term) within one at-grade parking level (and no mezzanine or subterranean parking levels which are included in the Project). Like the Project, Alternative 3 would provide landscaping to improve the public realm and provide transitions between on- and off-site uses, but no on-site outdoor areas would be provided.

Alternative 3 would implement a typical self-storage building design and similar signage, lighting, setbacks, and sustainability features as the Project. Alternative 3 would also require the General Plan Amendment, Vesting Zone Change, Height District Change, and Site Plan Review, but would not require the MCUP and Vesting Tentative Tract Map required by the Project.

With regard to construction activities and schedule, although the LAMC floor area for Alternative 3 is the same as the Project, it is assumed that the overall duration of construction would be less than the Project because with no subterranean levels, less excavation is expected when compared to the Project and self-storage facilities can be designed and built in a streamlined manner with simpler façades, mechanical, electrical, and plumbing design, and more straight forward structural systems..[18] Additionally, as with the Project, an LADOT reviewed and approved CTMP (as set forth in Project Design Feature TR-PDF-1) and Truck Haul Route Program would be implemented during construction to minimize potential conflicts between construction activity and through traffic.

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[18] *While below grade activities under Alternative 3 would be reduced as compared to the Project due to the no subterranean parking levels under this alternative, the alternatives impact analysis below is based on peak day activities (i.e., air quality, noise, and vibration) or depth of excavation (i.e., archaeological resources, paleontological resources, and tribal cultural resources), and is not affected by construction schedule or duration.*

2. Environmental Impacts

a. Air Quality

(1) Conflicts with Plans

As discussed further below, like the Project, Alternative 3 would result in less than significant localized air quality emissions and thus would not conflict with the AQMP. With respect to operation, as with the Project, Alternative 3 represents infill development located in close proximity to existing transit lines and would utilize existing infrastructure to serve the proposed uses. As such, like the Project, Alternative 3 would advance regional goals to reduce VMT through infill development near transit that would reduce air pollutant emissions compared to an average regional project. Alternative 3 would similarly result in less than significant localized operational impacts. Impacts associated with conflict with plans related to air quality would be similar to the Project.

(2) Construction Emissions

(a) Regional and Localized Air Quality Impacts

As with the Project, construction of Alternative 3 has the potential to result in air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. Under Alternative 3, peak day regional and localized construction emissions would be the same as under the Project as peak day construction activities would be roughly the same between both the Project and Alternative 3. However, overall regional and localized construction emissions would be less because Alternative 3 would include no subterranean parking levels versus the Project's one subterranean level, thus reducing the overall amount of excavation required. As such, while both the Project and Alternative 3 would result in less-than-significant regional and localized construction emission impacts, overall regional and localized construction emission impacts would be less under Alternative 3.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 3 would generate DPM emissions associated with the operation of heavy construction equipment during grading and excavation activities. These activities would represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to construction-related TAC emissions.

Overall construction emissions generated by Alternative 3 would be less than those of the Project because Alternative 3 would require less excavation and export. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 3 would be less-than-significant and less when compared to the less-than-significant impacts of the Project.

(3) Operational Emissions

(a) Regional and Localized Air Quality Impacts

Similar to the Project, operational regional air pollutant emissions associated with Alternative 3 would be generated by vehicle trips to the Project Site and the consumption of electricity and natural gas. While the amount of total floor area under Alternative 3 and the Project would be similar, the land uses would differ (i.e., self-storage facility versus office, restaurant and retail uses under the Project). As such, the number of new daily trips generated by Alternative 3 would be less than the number of new daily trips generated by the Project. Specifically, as provided in the VMT Calculator results in Appendix L of this Draft EIR, Alternative 3 would result in 390 daily vehicle trips and 2,906 daily VMT compared to the Project's 1,995 daily vehicle trips and 15,445 daily VMT with mitigation incorporated.[19,20] As vehicular emissions depend on the number of trips, vehicular sources would result in a substantially smaller increase in air pollutant emissions compared to the Project. With the change in land use, demand for natural gas would be removed since the restaurant use is not included in Alternative 3 and demand for electricity would be reduced because self-storage facilities use less electricity than office uses.[21] As such, because Alternative 3 would not have natural gas demand and daily trips and electricity demand would be reduced when compared to the Project, the generation of associated air pollutant emissions would be less than the Project. Therefore, impacts associated with regional operational emissions under Alternative 3 would be less-than-significant and less when compared to the less-than-significant impacts of the Project.

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 3 would not introduce any major new sources of air pollution within the Project Site because new sources of air pollution such as a manufacturing facility are not proposed. Therefore, similar to the Project, localized impacts from on-site emission sources

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[19] *Gibson Transportation Consulting, Inc., VMT Calculator Runs for the Alternatives, September 2025. See Appendix L of this Draft EIR.*

[20] *The mitigation being referred to here is the equivalent of Mitigation Measure TR-MM-1, implementation of additional TDM measures, in Section IV.I, Transportation, of this Draft EIR which would reduce Project (and alternative) operational motor vehicle trips.*

[21] *CAPCOA, User Guide for CalEEMod Version 2022.1, Appendix G (Default Data Tables), Table G-28, https://caleemod.com/user-guide, accessed September 18, 2025.*

associated with Alternative 3 would also be less-than-significant. Such impacts would be less than those of the Project due to the removal of natural gas demand under Alternative 3. Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. As discussed above, the number of daily trips generated under Alternative 3 would be less than the Project, and the number of peak-hour trips would also be reduced. Therefore, localized and stationary source impacts under Alternative 3 would be less-than-significant and less when compared to the less-than-significant impacts of the Project.

(b) Toxic Air Contaminants

As set forth in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential TAC emissions associated with Project operations would include DPM emissions from delivery trucks. Alternative 3 would include a similar amount of development as compared to the Project, but would include self-storage rather than office, restaurant and retail uses and no below-grade parking level. While Alternative 3 would be expected to require more operational trucks accessing the Project Site as people bring items to the storage facility, these trucks would typically be non-diesel (e.g., 2-axle) similar to the Project and thus generate similar amounts of associated DPM emissions. Therefore, Alternative 3 would result in less-than-significant operational TAC emission impacts, which would be similar when compared to the less-than-significant impacts of the Project.

b. Cultural Resources

(a) Historic Resources

As indicated in Section IV.B, Cultural Resources, of this Draft EIR, the Project Site is currently used for bus storage and does not contain any designated historic resources. However, as further indicated in Section IV.B, there is an existing historic resource adjacent to the Project Site: Granite Block Paving on West Bruno Street, between North Alameda Street and North Main Street, one segment of which was designated as Los Angeles HCM No. 211 in 1979. While neither the Project nor Alternative 3 would result in direct impacts to historic resources, both the Project and Alternative 3 would include construction activities that would generate construction vibration that could potentially damage the Granite Block Paving without mitigation. Still, because Alternative 3 would not include any subterranean parking levels versus the Projects one subterranean parking level, less excavation would occur and thus less related vibration would be generated during construction which would reduce the potential for vibration-related impacts to the Granite Block Paving. Alternative 3 would also include Mitigation Measure CUL-MM-1 which requires temporary shoring, construction monitoring, and, if necessary, temporary removal, cataloging, and ultimate replacement of the historic pavers immediately adjacent to the Project Site to mitigate damage to this designated historic resource to the extent feasible. However, like the Project, impacts would remain significant and unavoidable because other mitigation measures such

as avoidance of the area, wave barriers, and the temporary removal of the entire resource were determined to be infeasible. Therefore, like the Project, impacts to historical resources would be significant and unavoidable, though such impacts would be reduced compared to the Project because of the reduced amount of construction.

(b) Archaeological Resources

As indicated in Section IV.B, Cultural Resources, of this Draft EIR, no archaeological resources have been previously recorded within the Project Site. One of the segments of the Granite Paving Block on Bruno Street, the road and shoulder along Bruno Street and College Street, is in close proximity to the Project Site and has been recorded as archaeological resource LAN-4183H. However, LAN-4183H has been evaluated for significance and determined to not be eligible for federal, state, or local historical designation (i.e., does not represent an archaeological resource as defined in Section 15064.5 of the CEQA Guidelines). In addition, although subsurface archaeological resources could potentially be present at the Project Site, the potential to inadvertently encounter subsurface archaeological resources would be reduced compared to the Project as a result of the lack of subterranean parking under this alternative. Alternative 3 would still require grading for site preparation and building footings, and as such, still has the potential to encounter previously unidentified archaeological resources. However, like the Project, Alternative 3 would also include Mitigation Measure CUL-MM-2 which requires retention of a Qualified Archeologist to brief construction crews prior to ground-disturbing activities, prepare an ARMP addressing monitoring protocols, monitor certain ground-disturbing activities, and, if necessary, prepare a treatment plan for any encountered archaeological resources. Therefore, like the Project, impacts to archaeological resources would be less than significant with mitigation, though such impacts would be reduced compared to the Project because of the reduced amount of excavation.

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, on a limited basis, to power lighting, electric equipment, and other construction activities. Alternative 3 would also consume energy in the form of petroleum-based fuels for heavy construction equipment, delivery and haul trucks, and construction worker traffic. However, as with the Project, the use of construction equipment/vehicles under 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

which together would minimize energy use during construction. Furthermore, energy use during construction would be temporary. Therefore, as with the Project, construction activities under Alternative 3 would not involve the wasteful, inefficient, or unnecessary consumption of energy resources. As such, Alternative 3 would result in less-than-significant impacts to energy resources during construction which would be less when compared to the less-than-significant impacts of the Project because less construction would occur.

(b) Operation

As with the Project, operation of Alternative 3 would generate an increased consumption of gasoline and electricity relative to existing conditions. When compared to the Project, Alternative 3 would include a similar amount of new development but unlike the Project, it would include self-storage uses and no office, restaurant, or retail uses. Because self-storage facilities utilize less energy than office buildings, Alternative 3 would be expected to generate lower operational energy demand than the Project. Additionally, similar to the Project, Alternative 3 would comply with applicable energy conservation requirements during operation, including California's Building Energy Efficiency Standards (Title 24 standards), CALGreen Code, and the Los Angeles Green Building Code, and would implement Project Design Feature GHG-PDF-1, which prohibits the use of natural gas during Project operations, excluding restaurant cooking equipment and the emergency generator which together would minimize electricity and natural gas consumption. With respect to transportation energy use, as provided in the VMT Calculator results for the alternatives in Appendix L of this Draft EIR, Alternative 3 would result in 390 net daily vehicle trips and 2,906 daily VMT as compared to the Project's 1,995 daily vehicle trips and 15,445 net daily VMT with mitigation incorporated and, thus, would consume less operation-related petroleum-based fuels than the Project.[22,23] Furthermore, the Project Site is located in close proximity to transit, including the adjacent Metro A Line Chinatown Station, which would encourage the use of alternative modes of transportation that are more efficient and minimize fuel consumption. Therefore, similar to the Project, operation of Alternative 3 would not involve the wasteful, inefficient, or unnecessary consumption of energy resources. As such, Alternative 3 would result in less-than-significant impacts during operation, which would be less when compared to the less-than-significant impacts of the Project.

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[22] *Gibson Transportation Consulting, Inc., VMT Calculator Runs for the Alternatives, September 2025. See Appendix L of this Draft EIR.*

[23] *The mitigation being referred to here is the equivalent of Mitigation Measure TR-MM-1, implementation of additional TDM measures, in Section IV.I, Transportation, of this Draft EIR which would reduce Project (and alternative) operational motor vehicle trips.*

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

As with the Project, Alternative 3 would comply with the Los Angeles Green Building Code and, thus, with the Title 24 standards and the CALGreen Code. With regard to transportation-related energy usage, Alternative 3 would also comply with the goals of the SCAG's RTP/SCS, which incorporate VMT targets established by SB 375. As with the Project, Alternative 3 would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction. Therefore, as with the Project, Alternative 3 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 Resources Assessment included as Appendix E of this Draft EIR, no fossil vertebrate localities have been previously recorded within the Project Site. However, as with the Project, excavation, grading and other earthwork activities under Alternative 3 have the potential to inadvertently encounter subsurface paleontological resources if such resources are present at the Project Site though such activities would be reduced because no subterranean levels are proposed. Like the Project, Alternative 3 would nevertheless include Mitigation Measure GEO-MM-1 requiring monitoring for paleontological resources to reduce this impact to a less-than-significant level. Therefore, impacts to paleontological resources under Alternative 3 would be less-than-significant with mitigation and less compared to 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 resulting from operation of the proposed land uses. The number of daily trips and daily VMT under Alternative 3 would be reduced when compared to the Project. Specifically, as provided in the VMT Calculator results for the alternatives in Appendix L of this Draft EIR, Alternative 3 would result in 390 daily vehicle trips and 2,906 daily VMT as compared to the Project's 1,995 daily vehicle trips and 15,445 daily VMT with mitigation incorporated (an approximately

90 percent reduction).[24,25] Additionally, as discussed above, energy consumption would be reduced when compared to Project because no natural gas would be used and electricity demand would be less than the Project. As with the Project, Alternative 3 would be designed to comply with the requirements of the CALGreen Code and the Los Angeles Green Building Code. Additionally, like the Project, Alternative 3 would include Project Design Feature GHG-PDF-1, which prohibits the use of natural gas during Project operations, excluding restaurant cooking equipment and the emergency generator. With compliance with the CALGreen Code and the Los Angeles Green Building Code, and with the implementation of comparable sustainability features as the Project, Alternative 3, like the Project, would be consistent with the GHG reduction goals and objectives included in adopted State, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 3 would be less-than-significant and greater than the less-than-significant impacts of the Project.

f. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, would be used and, therefore, would require proper handling and management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases and, subsequently, the exposure of the public to hazardous materials. However, similar to the Project, all potentially hazardous materials under Alternative 3 would be used, stored, and disposed in accordance with manufacturers' specifications and instructions and applicable regulations (i.e., RCRA, California Hazardous Waste Control Law, Federal and State Occupational Safety and Health Acts, SCAQMD Rules, and permits and associated conditions issued by LADBS), thereby reducing the risk associated with hazardous materials use during construction.

With respect to existing hazardous materials conditions at the Project Site, as discussed in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, the Project Site is identified in multiple hazardous materials databases compiled pursuant to Government Code Section 65962.5; the Project Site has a history of industrial use and may contain unknown/unidentified USTs, as well as residual UST/AST contamination (including groundwater contamination); and contaminated soil and soil gas has been identified on the

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[24] *Gibson Transportation Consulting, Inc., VMT Calculator Runs for the Alternatives, September 2025. See Appendix L of this Draft EIR.*

[25] *The mitigation being referred to here is the equivalent of Mitigation Measure TR-MM-1, implementation of additional TDM measures, in Section IV.I, Transportation, of this Draft EIR which would reduce Project (and alternative) operational motor vehicle trips.*

Project Site. As such, as with the Project, construction activities under Alternative 3 would have the potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment associated with the above. However, such potential would be reduced under Alternative 3 as compared to the Project due to the lack of subterranean parking and thus the reduced amount of excavation required under this alternative. Additionally, any contaminated soil, soil gas, and/or groundwater encountered would be treated and disposed of in accordance with applicable regulations, HAZ-MM-1 (SMP), HAZ-MM-2 (Combined Methane/Vapor Intrusion Mitigation), and HAZ-MM-3 (Post-Construction Monitoring), which together would reduce potential impacts to less-than-significant levels under both the Project and Alternative 3.

Furthermore, as discussed in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, although methane was not detected in any of the samples taken on-site, the Project Site is located within a LADBS designated Methane Zone; however, compliance with existing regulations would avoid significant methane impacts during construction under both Alternative 3 and the Project.

Lastly, while construction activities would occur in accordance with regulatory requirements, and ground disturbance associated with site clearance, excavation, and grading activities during construction would be required to comply with relevant and applicable federal, State, and local regulations and requirements, because of the presence of contaminated soil and soil gas beneath the Project Site, Alternative 3, like the Project, would have the potential to emit hazardous emissions or materials within one-quarter mile of an existing or proposed school. However, any such potential would be less-than-significant under both the Project and Alternative 3 with implementation of Mitigation Measure HAZ-MM-1, with this impact reduced under Alternative 3 owing to less excavation and less potential for construction-related hazardous emissions under this alternative.

Overall, Alternative 3 would result in less-than-significant impacts with mitigation which would be less when compared to the less-than-significant-with-mitigation impacts of the Project.

(2) Operation

Operation of Alternative 3, as with operation of the Project, would involve the routine use of small quantities of potentially hazardous materials typical of those used in commercial, office, restaurant, and uses, including cleaning products, paints, and those used for maintenance of landscaping. The amount of hazardous materials in use would be less than the Project because fewer employees would be located on-site and no outdoor areas would be provided. Regardless, such routine use, and associated storage and disposal would occur in accordance with applicable regulations (i.e., RCRA, California Hazardous Waste

Control Law, Federal and State Occupational Safety and Health Acts, SCAQMD Rules, and permits and associated conditions issued by LADBS) under both the Project and Alternative 3. Lastly, as discussed in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, although methane was not detected in any of the samples taken on-site, the Project Site is located within a LADBS designated Methane Zone; however, with compliance with LAMC Section 91.7104.2 requiring that all buildings located in the Methane Zone and Methane Buffer Zone include a methane mitigation system as required by LAMC Table 71 based on the appropriate Site Design Level, methane impacts during operation of both projects would be less-than-significant. Therefore, operational hazardous materials impacts would be less-than-significant with compliance with applicable regulations under both the Project and Alternative 3. Overall, operational impacts under Alternative 3 would be less-than-significant and less compared to the less-than-significant impacts of the Project because fewer employees would be on site and no outdoor areas would be provided, therefore reducing the associated hazardous materials use, storage, and disposal.

g. Land Use

As discussed above, Alternative 3 would request the same General Plan Amendment and Vesting Zone and Height District Change as the Project, and like the Project would require Site Plan Review. However, because Alternative 3 would be a self-storage facility rather than include office, restaurant and retail uses, it would not require the MCUP required for the restaurant and retail uses under the Project, and would not require the Vesting Tentative Tract Map. As with the Project, Alternative 3 would be generally 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 SCAG's regional plans, the General Plan Framework Element, the Central City North Community Plan, and the LAMC (i.e., development of the Project Site with increased urban density and employment-generating uses within a City-designated TPA, SCAG-designated HQTC, and a SCAG-designated Livable Corridor in close proximity to transit, housing, services, etc., which would encourage transit use, reduce per capita VMT, and reduce associated air emissions). Therefore, impacts related to land use consistency under Alternative 3 would be less-than-significant and less than the less-than-significant impacts of the Project.

h. Noise

(1) Noise

(a) Construction

As discussed in Section IV.I, Noise, of this Draft EIR, construction of the Project would generate noise from the use of heavy-duty construction equipment, as well as from haul truck and construction worker trips. Construction of Alternative 3 would be expected to generate

noise from the same types of sources and activities. The types of construction activities under Alternative 3 would be substantially similar to those of the Project, because while the type of proposed use to be constructed under Alternative 3 (i.e., a self-storage facility) would be different than under the Project (i.e., office, restaurant, and retail uses and outdoor activity areas), and while Alternative 3 would include no subterranean parking level versus the Project's one subterranean parking level, the amount of new floor area, building height, and the extent of the required driveway and utility improvements would be roughly similar between Alternative 3 and the Project. Therefore, on- and off-site construction activities and the associated construction noise levels under Alternative 3 would be expected to be similar to those of the Project during maximum activity (i.e., peak construction) days. Like the Project, Alternative 3 would also implement Mitigation Measures NOI-MM-1 (requiring a temporary impermeable sound barrier along the Project Site's northern property across from potential future residential uses along the north side of College Street [i.e., receptor location R3 which is also Related Project No. 5]) which would minimize this construction noise to the greatest extent possible. Still, like the Project, Alternative 3 would be expected to result in significant and unavoidable on- and off-site construction noise impacts (Project-level and cumulative) because this impact cannot be mitigated at the upper floors of receptor location R3. The degree of these impacts would be less under Alternative 3 owing to the lack of a subterranean parking under this alternative and the resultant reduction in required excavation and soil export activities.

(b) Operation

As discussed in Section IV.H, Noise, of this Draft EIR, sources of operational noise under the Project would include: (1) 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 (2) off-site mobile (roadway traffic) noise sources. Regarding on-site operational noise, while the amount of total floor area under Alternative 3 and the Project would be similar (i.e., 232,802 square feet versus 234,601 square feet under the Project), the land uses would differ (i.e., a self-storage facility versus office, restaurant and retail uses under the Project). There would also be expected to be fewer on-site loading docks under Alternative 3, and fewer delivery truck deliveries, due to the lack of need for deliveries of office supplies, food for the restaurants, and stock for retail uses under this alternative. However, the self-storage facility would generate more smaller-type truck traffic from moving trucks (e.g., U-Haul type vehicles) accessing the site for loading and unloading purposes. The differences in land uses would result in less on-site outdoor activity noise under Alternative 3 owing to the lack of outdoor dining and on-site outdoor activity areas (0 square feet versus 52,716 square feet under the Project), lack of outdoor amplified sound system use, many fewer employes (i.e., 77 employees versus

930 under the Project[26]), and less on-site parking (30 spaces versus 440 spaces under the Project). Consequently, Alternative 3 would eliminate noise sources associated with outdoor amplified sound systems and people gathering in the outdoor dining and terraces, and less noise associated with parking operations. Because rooftop building mechanical equipment design and operation is subject to 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, and because like the Project, Alternative 3 would implement Project Design Features NOI-PDF-1 (acoustic screening of outdoor mechanical equipment) and NOI-PDF-2 (acoustic screening of loading docks), on-site operational noise would be less-than-significant under both projects. Since less on-site outdoor activity and related noise would occur under Alternative 3, the degree of the impact would be less under this alternative as compared to the Project.

With regard to operational off-site (i.e., traffic) noise, Alternative 3 would generate substantially less operational traffic than the Project (i.e., 390 daily trips versus 1,995 post-mitigation daily trips under the Project).[27,28] The reduction in vehicle trips would result in a decrease in off-site operational traffic-related noise levels under Alternative 3. Therefore, off-site operational noise impacts under Alternative 3 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 3 would be similar to the Project, although the amount and duration of construction activities would be reduced since Alternative 3, in part, would not include a below-grade parking level, like the Project. 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. Also, as with the Project, Alternative 3 would implement Mitigation Measures CUL-MM-1 (i.e., implementation of a Construction Monitoring Plan including vibration monitoring) set forth in Section IV.B, Cultural Resources, of this Draft EIR to minimize on-site construction vibration impacts (building damage) on the off-site historic Granite Block Paving immediately adjacent

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[26] *Gibson Transportation Consulting, Inc., VMT Calculator Runs for the Alternatives, September 2025. See Appendix L of this Draft EIR.*

[27] *Gibson Transportation Consulting, Inc., VMT Calculator Runs for the Alternatives, September 2025. See Appendix L of this Draft EIR.*

[28] *The mitigation being referred to here is the equivalent of Mitigation Measure TR-MM-1, implementation of additional TDM measures, in Section IV.I, Transportation, of this Draft EIR which would reduce Project (and alternative) operational motor vehicle trips.*

to the Project Site to the extent feasible. While the overall amount and duration of construction activities would be reduced under Alternative 3 due primarily to the lack of a subterranean parking level (versus one subterranean parking level under the Project), on- and off-site construction activities and the associated construction on- and off-site vibration levels would 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. As such, peak vibration levels generated by construction equipment and construction truck trips under Alternative 3 (which are the basis of the significance determination) would be similar to those of the Project. Further, additional mitigation measures such as avoidance of the area, wave barriers, and the temporary removal of the entire historic resource were determined to be infeasible. Accordingly, like the Project, construction activities under Alternative 3 would result in (significant and unavoidable impacts with respect to on-site construction vibration pursuant to the threshold for building damage (Project-level); on- and off-site construction vibration pursuant to the threshold for human annoyance (Project-level and cumulative; and less-than-significant impacts with respect to off-site construction vibration impacts pursuant to the threshold for building damage. However, the overall amount/duration of construction activities and associated vibration under Alternative 3 would be less than under the Project.

(b) Operation

As discussed in Section IV.H, Noise, of this Draft EIR, sources of vibration related to the operation of the Project would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under Alternative 3. As with the Project, vehicular-induced vibration from Alternative 3 would not generate perceptible vibration levels at off-site sensitive uses. In addition, like 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 the operation of Alternative 3 would also be less-than-significant. The degree of these impacts would be less under Alternative 3 owing to the substantial reduction in vehicle trips (i.e., 390 daily trips versus 1,995 post-mitigation daily trips under

the Project),[29,30] lack of vehicle movement in a subterranean parking level under this alternative.

i. Transportation

(a) Conflicts with Transportation Plans

Alternative 3 would generally support applicable transportation plans and multimodal transportation options. Similar to the Project Alternative 3 would represent urban infill development in a City-designated TPA and SCAG-designated HQTC in close proximity to transit, housing, services, etc. which would encourage alternative transportation use as called for by the Mobility Plan and RTP/SCS; and include sidewalk and driveway design, vehicular and bicycle parking, etc. in accordance with LAMC requirements. Both the Project and Alternative 3 would also implement TDM measures as called for by the Mobility Plan, Community Plan, and RTP/SCS, and as required by the City's TDM Ordinance, which along with the Project Site's location on an infill site and proximity to transit would reduce VMT. Furthermore, while none of the streets adjacent to the Project Site are listed in Vision Zero's HIN, neither the Project nor Alternative 3 would preclude future Vision Zero safety improvements by the City. Like the Project, Alternative 3 would not conflict with the applicable transportation plans because it would increase urban density on an urban infill site within a City-designated TPA and SCAG-designated HQTC in close proximity to transit, and would generate less operational traffic (i.e., 390 daily trips versus 1,995 post-mitigation daily trips under the Project).[31,32] Therefore, like the Project, Alternative 3 would not conflict with a program, plan, ordinance, or policy addressing the circulation system and impacts would be less-than-significant, with the degree of the impact similar between the two projects as neither project would conflict with the applicable transportation plans.

(b) Vehicle Miles Travelled

Prior to mitigation, Alternative 3 would result in 401 daily vehicle trips and 2,998 daily VMT, resulting in a work VMT of 7.9 VMT per employee which would exceed the Central

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[29] *Gibson Transportation Consulting, Inc., VMT Calculator Runs for the Alternatives, September 2025. See Appendix L of this Draft EIR.*

[30] *The mitigation being referred to here is the equivalent of Mitigation Measure TR-MM-1, implementation of additional TDM measures, in Section IV.I, Transportation, of this Draft EIR which would reduce Project (and alternative) operational motor vehicle trips.*

[31] *Gibson Transportation Consulting, Inc., VMT Calculator Runs for the Alternatives, September 2025. See Appendix L of this Draft EIR.*

[32] *The mitigation being referred to here is the equivalent of Mitigation Measure TR-MM-1, implementation of additional TDM measures, in Section IV.I, Transportation, of this Draft EIR which would reduce Project (and alternative) operational motor vehicle trips.*

APC VMT threshold of 7.6.[33] The number of daily vehicle trips and daily VMT would be less than the Project's pre-mitigation 2,124 daily trips and 16,568 daily VMT and VMT per employee would be less than the Project's pre-mitigation of VMT per employee of 8.1. No residential uses are proposed, so there would be no residential VMT. Because VMT per employee would exceed the Central APC threshold, like the Project, Alternative 3 would be required to implement a mitigation measure incorporating TDM elements. The precise TDM elements included in such a measure would be subject to LADOT review and approval. However, if Alternative 3 were to include the same TDM elements as Mitigation Measure TR-MM-1 which requires implementation of a ride-share program to reduce single occupancy vehicle trips and the provision of designated parking areas for carpools/vanpools, Alternative 3 would result in 390 daily trips, 2,906 daily VMT, and 6.7 work VMT per employee compared to 1,995 daily trips, 15,445 daily VMT, and 6.8 work VMT per employee with the Project.[34] Therefore, like the Project, Alternative 3's VMT impacts would be less than significant with mitigation, though such impacts would be less than the Project.

j. Tribal Cultural Resources

As indicated in Section IV.J, Tribal Cultural Resources, of this Draft EIR, no tribal cultural resources have been previously recorded at the Project Site. However, previously unidentified tribal cultural resources could potentially be present at the Project Site. Like the Project, excavation and other earthwork associated with the construction of Alternative 3 for building foundations, etc. could potentially impact (i.e., inadvertently encounter) subsurface tribal cultural resources if such resources are present, though the potential for such impacts would be reduced under Alternative 3 because no subterranean parking levels are proposed. While the uncovering of tribal cultural resources is not anticipated, both the Project and Alternative 3 would implement Mitigation Measures TCR-MM-1 through TCR-MM-4 requiring archaeological/tribal monitors monitor of ground disturbing activities, providing WEAP training to construction workers, temporarily halting ground-disturbing activities with the determined avoidance radius if resources are encountered, evaluating and potentially curating resources if encountered, etc. Since Alternative 3 would include less excavation than the Project due to the lack of subterranean parking under this alternative, it would have less of a potential to impact any subsurface tribal cultural resources that may present. Therefore, impacts under Alternative 3 would be less-than-significant with mitigation and less when compared to the less-than-significant-with-mitigation impacts of Project.

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[33] *Gibson Transportation Consulting, Inc., VMT Calculator Runs for the Alternatives, September 2025. See Appendix L of this Draft EIR.*

[34] *Gibson Transportation Consulting, Inc., VMT Calculator Runs for the Alternatives, September 2025. See Appendix L of this Draft EIR.*

k. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities for Alternative 3 would require water for dust control, equipment cleaning, excavation, and export of dirt, including the removal and re-compaction of dirt during the grading process. As discussed in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the LADWP SARs prepared for the Project indicate that adequate water would be available from the existing water mains in the adjacent streets for Project operation, and since operational water demand would be greater than construction water demand, adequate water would be available for Project construction. Additionally, like the Project, Alternative 3 would require trenching for the required on-site water distribution system and connection to the existing water mains in the adjacent streets, but impacts associated with this work are included throughout the analysis. Additionally, prior to ground disturbance, project contractors would coordinate with LADWP to identify the locations and depth of all lines to avoid water lines and disruption of water service and a CTMP would be implemented pursuant to Project Design Feature TR-PDF-1 to reduce any temporary pedestrian and traffic impacts and ensure emergency access during construction of the water infrastructure. Therefore, Alternative 3 would result in less-than-significant impacts which would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Like the Project, Alternative 3 would result in an increase in long-term water demand at the Project Site. As discussed in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, based on the SARs, the Project would generate a net increase in operational water demand that would be met by connection to the existing water mains in the adjacent streets. In addition, per the analysis in Section IV.K.1, LADWP has adequate water supplies to serve the Project along with existing and anticipated future growth within its service area through at least year 2045 during normal, single-dry and multiple-dray years. Since Alternative 3 would develop a self-storage facility, which uses less water per square foot than office, restaurant, and retail uses, adequate capacity exists in the local water lines and LADWP has adequate water supplies to serve Alternative 3.[35] Furthermore, the Applicant would construct the necessary on-site water infrastructure and

[35] *LA Sanitation (LASAN) wastewater generation rates are used to determine water demand. The use category Storage: Self-Storage Bldg is expected to generate water demand of 30 gallons per 1,000 square feet compared to 120 gallons per 1,000 square feet of office space..*

associated connections to the LADWP water system pursuant to applicable City requirements under both projects.

Regarding fire flow, as discussed in Section IV.K.1, LADWP's IFFAR prepared for the Project shows that the required fire-flow to serve the Project would be available from the existing fire hydrants adjacent to the Project Site in combination with a new fire hydrant developed by the Applicant along North Main Street to serve the Project. Because it is anticipated that Alternative 3 would be subject to the same LAFD fire flow requirement as the Project (since LAFD fire flow requirements are based on zoning and the zoning would be the same between Alternative 3 and the Project). Furthermore, a fire sprinkler suppression system would be provided under both the Project and Alternative 3, and the SAR demonstrates that adequate capacity and pressure exists in the local water lines to operate this sprinkler suppression system.

Based on the above, the operational water supply and water infrastructure impacts of Alternative 3 would be less-than-significant and less when compared to the less-than-significant impacts of the Project.

(2) Energy Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 3 would consume minor quantities of electricity (construction activities do not typically involve the consumption of natural gas). As indicated in Section IV.K.2, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR, Project construction activities would generate only a fraction of the electricity demand of Project operations, and since existing electricity infrastructure and supplies would be adequate to serve Project operation, they would also be adequate to serve Project construction. The same holds true for the Alternative 3, which would include a similar amount of development and no subterranean parking level, and thus would consume even less electricity during construction than the Project. In addition, as with the Project, since the Project Site is an urban infill site that is already served by electricity infrastructure electricity for construction would be obtained from the existing electrical lines serving the Project Site and it is not anticipated that Alternative 3 would require extensive off-site infrastructure improvements to provide Alternative 3 with electricity during operation. Lastly, as with the Project, Alternative 3 would be required to coordinate energy infrastructure improvements with LADWP to minimize potential service disruptions. Therefore, as with the Project, construction activities under Alternative 3 would not result in an increase in energy demand that exceeds available supplies or distribution infrastructure capabilities that would require the construction of new or expanded energy facilities, the construction or relocation of which could cause significant environmental effects. Thus, construction impacts under

Alternative 3 would be less-than-significant and less when compared to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 3 would generate an increased consumption of electricity relative to existing conditions, which would be miniscule when compared to existing energy supplies and peak energy flows in the local infrastructure. Also, because Alternative 3 operation would result in less electricity consumption than the Project due to the change in use under this alternative, and because the existing electricity infrastructure would be adequate to serve Project operation, existing electricity infrastructure would be adequate to serve Alternative 3 operation. Furthermore, with the implementation of Project Design Feature GHG-PDF-1, Alternative 3 would not result in any new natural gas demand. Lastly, as with the Project, Alternative 3 would be developed in accordance with applicable energy conservation requirements, including those in Title 24, CALGreen Code, and the Los Angeles Green Building Code, which would minimize electricity consumption. Therefore, as with the Project, Alternative 3 operation would not result in an increase in energy demand that would exceed available supplies or distribution infrastructure capabilities that would require the construction of new or expanded energy facilities, the construction or relocation of which could cause significant environmental effects. Thus, operational impacts under Alternative 3 would be less-than-significant and less when compared to the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above and shown in Table V-2 on page V-10, Alternative 3 would reduce, but not eliminate, the Project's significant and unavoidable impacts with respect to historic resources; on- and off-site construction noise (Project level and cumulative); on-site construction vibration in terms of building damage (Project-level); and on- and off-site construction vibration in terms of human annoyance (Project-level and cumulative). Impacts associated with the remaining environmental issues would be similar to or less than those of the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 3 would develop a 232,802 square foot self-storage facility at the Project Site rather than the 234,601 square feet of office, restaurant and retail used proposed under the Project. As such, Alternative 3 would meet be less effective in meeting the underlying purpose of the Project, which is to provide an infill commercial development for growing retail, hospitality, entertainment, and technology companies looking to locate businesses within Downtown Los Angeles, than the Project. Alternative 3 would provide an infill commercial

development, but would not help grow the City's retail, hospitality and entertainment sectors.

Alternative 3 would meet the following Project objectives as it would include the same general scale, site plan, and design (but not necessarily the same architecture and appearance) as the Project, increase urban density at the Project Site:

- To support the Downtown Community Plan's Goal 6 to a broad-based economy that leverages Downtown's central location, land use mix, and infrastructure to foster a diversity of industry sectors and business sizes.
- To support the Downtown Community Plan's Objective 8.3 to foster long-term success with an ecosystem that accommodates both industrial and professional office sectors for future generations.
- To provide a sustainable building design that allows for the use of energy-efficient technology, and thereby, reducing the overall reliance on energy for lighting and cooling.

Alternative 3 would meet the following Project objectives, but to a lesser extent than the Project given the change in use and lack of outdoor amenities under this alternative and because fewer jobs would be created and no retail and restaurant uses would be provided:

- To develop a pedestrian-friendly project by creating a street-level identity for the Project Site and improving the pedestrian experience through physical improvements and the introduction of retail and restaurant uses on the ground level.
- To provide a Project on an urban infill site which can serve various industry segments and meet the changing needs of workplaces through the creation of high-quality indoor and outdoor workspaces that encourage collaboration, productivity, and a healthy lifestyle.
- To locate employment opportunities near existing and future residential uses along a major transit corridor within a high activity area to promote sustainability and reduce vehicle miles traveled, with associated reductions in air quality and greenhouse gas emissions to create a dynamic and economically viable commercial project with sufficient density to facilitate a healthy jobs-housing balance in the area.
- To support the growth of the City's economic base by creating a significant number of construction and permanent jobs.

V. Alternatives
D. Environmentally Superior Alternative

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

Table V-2 on page V-10 provides a summary matrix that compares the impacts associated with the Project with the impacts of each of the analyzed alternatives. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to CEQA Guidelines Section 15126.6(c), the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

Alternative 1, the No Project/No Build Alternative, would avoid the Project's significant and unavoidable impacts, including: (1) on- and off-site construction noise (Project-level and cumulative); and (2) on- and off-site construction vibration (humane annoyance, Project-level and cumulative). Alternative 1 would also avoid all of the Project's remaining less-than-significant impacts and less-than-significant impacts with mitigation as no changes to the existing conditions would occur. However, Alternative 1 would not meet any of the Project objectives or the Project's underlying purpose to provide an infill commercial development for growing retail, hospitality, entertainment, and technology companies looking to locate businesses within the Hollywood community.

As stated above, the CEQA Guidelines require the identification of an Environmentally Superior Alternative other than a No Project Alternative. Accordingly, in accordance with the CEQA Guidelines, a comparative evaluation of the remaining alternatives indicates that Alternative 2 would be the environmentally superior alternative. Alternative 2 would reduce, but not eliminate, the Project's significant and unavoidable impacts with respect to: (1) on- and off-site construction noise (Project level and cumulative); and (2) on- and off-site construction vibration in terms of human annoyance (Project-level and cumulative). Alternative 2 would reduce these impacts to a greater extent than Alternative 3 because less square footage would be constructed. Impacts associated with the remaining environmental issues would be similar to or less than those of the Project, except for VMT which would be greater than the Project but remain less than significant with mitigation.

Regarding consistency with the underlying purpose and objectives of the Project,

Alternative 2 would meet the underlying purpose of the Project, which is to provide an infill commercial development for growing retail, hospitality, entertainment, and technology companies looking to locate businesses within Downtown Los Angeles. However, Alternative 2 would meet this underlying purpose to a lesser extent than the Project given the reduced amount of total floor area under this alternative.

Alternative 2 would meet the following Project objective as it would include the same general scale, site plan, design, architecture and appearance as the Project:

- To provide a sustainable building design that allows for the use of energy-efficient technology and, thereby, reducing the overall reliance on energy for lighting and cooling.

Alternative 2 would meet the remaining Project objectives, but to a lesser extent than the Project given the reduced amount of floor area under this alternative:

- To support the Downtown Community Plan's Goal 6 to a broad-based economy that leverages Downtown's central location, land use mix, and infrastructure to foster a diversity of industry sectors and business sizes.
- To support the Downtown Community Plan's Objective 8.3 to foster long-term success with an ecosystem that accommodates both industrial and professional office sectors for future generations.
- To develop a pedestrian-friendly project by creating a street-level identity for the Project Site and improving the pedestrian experience through physical improvements and the introduction of retail and restaurant uses on the ground level.
- To provide a Project on an urban infill site which can serve various industry segments and meet the changing needs of workplaces through the creation of high-quality indoor and outdoor workspaces that encourage collaboration, productivity, and a healthy lifestyle.
- To locate employment opportunities near existing and future residential uses along a major transit corridor within a high activity area to promote sustainability and reduce vehicle miles traveled, with associated reductions in air quality and greenhouse gas emissions, to create a dynamic and economically viable commercial project with sufficient density to facilitate a healthy jobs-housing balance in the area.
- To support the growth of the City's economic base by creating a significant number of construction and permanent jobs.