I. Executive Summary

I. Executive Summary

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this section of this Draft Environmental Impact Report (EIR) contains a brief summary of the 130 College Project (Project) and its potential environmental effects. More detailed information regarding the Project and its potential environmental effects is provided in the following sections of this Draft EIR. Also included in this section is an overview of the purpose and focus of this Draft EIR, a description of the organization of this Draft EIR, a general description of the Project and proposed entitlements, a general description of areas of controversy, a description of the public review process for this Draft EIR, and a summary of the alternatives to the Project evaluated in this Draft EIR including identification of the Environmentally Superior Alternative.

1. Purpose of this Draft EIR

As described in CEQA Guidelines Sections 15123(a) and 15362, an EIR is an informational document that will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. Therefore, the purpose of this Draft EIR is to focus the discussion on the Project's potential environmental effects that the City of Los Angeles (City), as the Lead Agency, has determined to be, or potentially may be significant. In addition, feasible mitigation measures are recommended, when applicable, that could reduce or avoid the Project's significant environmental impacts.

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

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

In accordance with CEQA Guidelines Section 15128, an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the Draft EIR. An Initial Study was prepared for the Project and a Notice of Preparation (NOP) was distributed for public comment to the State Clearinghouse, Governor's Office of Planning and Research (OPR)[1], responsible agencies, and other interested parties on June 4, 2024, for a 30-day review period. In addition, public scoping meetings for the Project were held on June 12, 2024 (English); June 13, 2024 (Spanish); June 18, 2024 (Mandarin); and June 20, 2024 (Cantonese). The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR.

The City determined through the Initial Study that the Project would not have the potential to cause significant impacts related to aesthetics, agriculture and forestry resources, air quality (odors), biological resources, cultural resources (human remains), geology and soils (geological hazards), hazards and hazardous materials (routine transport, use, or disposal; airport hazards; emergency response plans; and wildfire), hydrology and water quality, land use and planning (division of an established community), mineral resources, noise (airport and airstrip noise), population and housing, public services, recreation, transportation (hazardous geometric design features and emergency access), utilities and service systems (wastewater, stormwater, telecommunication facilities, and solid waste), and wildfire. Therefore, these areas were not analyzed further in this Draft EIR.

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

- Air Quality
- Cultural Resources (Historical Resources and Archaeological Resources)
- Energy
- Geology and Soils (Paleontological Resources)
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning
- Noise
- Transportation

[1] *OPR is now known as the Governor's Office of Land Use and Climate Innovation (LCI).*

- Tribal Cultural Resources
- Utilities and Service Systems (Water Supply and Energy infrastructure)

3. Draft EIR Organization

This Draft EIR is comprised of the following sections:

I. Executive Summary. This section describes the purpose of this Draft EIR, Draft EIR focus and effects found not to be significant, Draft EIR organization, Project summary, areas of controversy and issues to be resolved, public review process, a summary of environmental impacts and mitigation measures, and a summary of alternatives.

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

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

IV. Environmental Impact Analysis. This section contains the environmental setting, project design features (PDFs), Project and cumulative impact analyses, mitigation measures (where necessary), and conclusions regarding the level of significance after mitigation for each of the following environmental issues: air quality; cultural resources (historical resources and archaeological resources); energy; geology and soils (paleontological resources); greenhouse gas (GHG) emissions; hazards and hazardous materials; land use and planning; noise; transportation; tribal cultural resources; and utilities and service systems (water supply and energy infrastructure).

V. Alternatives. This section provides an analysis of a reasonable range of alternatives to the Project, including: Alternative 1, No Project/No Build Alternative; Alternative 2, Existing Zoning Compliant Alternative; Alternative 3, Alternative Use Alternative.

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

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

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

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

This Draft EIR includes the environmental analysis prepared for the Project and appendices as follows:

- Appendix A—Initial Study, NOP, and NOP Comment Letters
  - Appendix A.1—Initial Study
  - Appendix A.2—NOP
  - Appendix A.3—NOP Comment Letters
- Appendix B—Air Quality and Greenhouse Gas
  - Appendix B.1—Air Quality and Greenhouse Gas Emissions Methodology
  - Appendix B.2—Air Quality Worksheets
  - Appendix B.3—Greenhouse Gas Worksheets
  - Appendix B.4—Modeling Output Files
- Appendix C—Cultural Resources
  - Appendix C.1—Historic Report
  - Appendix C.2—Archaeological Report
- Appendix D—Energy
- Appendix E—Paleontological Report
- Appendix F—Hazards and Hazardous Materials
  - Appendix F.1—Phase I ESA

  - Appendix F.2—Phase II ESA
  - Appendix F.3—Clarification Memorandum
  - Appendix F.4—Methane Memorandum
- Appendix G—Land Use Tables
- Appendix H—Noise and Vibration Calculation Worksheets
- Appendix I—Transportation Assessment
- Appendix J—Tribal Report
- Appendix K—Utility Report
- Appendix L—VMT Calculator Runs for the Alternatives

4. Thresholds of Significance

In 2006, the City published the L.A. CEQA Thresholds Guide (Thresholds Guide) as a guidance document for preparing CEQA analyses for projects within the City. The Thresholds Guide includes two sets of criteria to evaluate project impacts: screening criteria, which provide direction in determining the appropriate environmental document required for a project; and significance thresholds, which assist in determining whether a project's impacts generally would be significant under normal circumstances and would therefore require mitigation. Although intended as a voluntary tool, the Thresholds Guide offers a consistent set of evaluation criteria applicable to most discretionary projects in the City, and the Los Angeles Department of City Planning has typically used both the screening criteria and significance thresholds as the basis for project analyses in its CEQA documents. However, the Thresholds Guide clearly indicates the Lead Agency—in this case, the City—retains the authority to determine significance thresholds on a case-by-case basis, dependent upon unique environments, evolving regulatory requirements, and the nature of each project. In addition, the Thresholds Guide states it is not intended as a substitute for the use of independent judgment to determine significance or the evaluation of the evidence in the record. Moreover, it states "[b]ecause evaluation practices continue to evolve due to changing regulations, scientific methods, and court decisions, the project evaluator and lead City agency should always use the best information and evaluation methods available, including those from sources other than the Thresholds Guide."[2]

In light of an evolving regulatory environment, recent case law, new topics such as greenhouse gas emissions and tribal cultural resources that are now addressed in Appendix

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

G of the State CEQA Guidelines (Appendix G), and the age of the Thresholds Guide, City Planning has begun to update its CEQA guidance. At this point in time, the Department of City Planning has chosen to rely on the Appendix G questions as thresholds of significance. As noted above, the City has discretion in choosing appropriate significance thresholds. Therefore, throughout this Draft EIR, the thresholds contained in Appendix G are used. The factors and considerations set forth in the Thresholds Guide are utilized where appropriate to assist in answering the Appendix G threshold questions.

5. Existing Project Site Conditions

The Project Site is currently developed with a surface asphalt parking lot used for bus storage. There are no buildings or landscaping within the Project Site, but there is a billboard, lighting, a shipping container, six electric bus chargers, and fencing. The Project Site is relatively flat. There are no trees on the Project Site. There are two street trees adjacent to the Project Site, both of which are located along Alameda Street. The two street trees consist of non-native species. Neither one of the street trees is “significant” or considered a protected tree as defined by the City of Los Angeles Protected Tree and Shrub Regulations (Ordinance No. 186,873).

The Project Site is located within the Central City North Community Plan area.[3] The Project Site is designated as Regional Commercial and is zoned as [Q]C2-2-RIO and [T][Q]C2-2-RIO (Qualified Classification, Commercial Zone, Height District 2, River Improvement Overlay District; and Tentative Zone Classification, Qualified Classification, Commercial Zone, Height District 2, River Improvement Overlay District, respectively).

The C2 Zone allows for a wide range of commercial land uses, including, but not limited to, the Project’s proposed office, restaurant, and retail uses. The “2” in the Project Site’s zoning designation refers to the Project Site’s location in Height District No. 2, which allows a 6:1 floor area ratio (FAR) and does not limit building height. The Project Site has two sets of requirements associated with “[Q]” and “[T][Q]” in the zoning designation. The lot comprising the western portion of the Project Site is subject to conditions outlined in Ordinance No. 164,855, which limits the FAR for commercial projects to 1.5:1, residential FAR to an additional 1.5:1 FAR, and a requirement that projects over 2:1 FAR are reviewed by the City Planning Commission. The remaining lots are subject to Ordinance No. 163,510 which includes both “[T]” and “[Q]” conditions related to certain on- and off-site improvements, a 1.5:1 FAR limitation for hotel rooms and 1.5:1 FAR limitation for other commercial uses, requirements that were imposed as part of, and specific to, a proposed

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[3] *The Project is located with the Downtown Community Plan (DTLA 2040) which became effective on January 27, 2025. Since the application for this Project was filed before DTLA 2040 became effective, the provisions of DTLA 2040 do not apply to this Project. As such, the Central City North Community Plan is still the operative land use document for the Project Site.*

hotel development, associated with City Planning Case Nos. CPC-1987-350-ZC, ZA-1986-974-CUB, and MND-86-441-CUZ-CU-ZV This proposed hotel was not constructed.

The "RIO" in the Project Site's zoning designation refers to the Project Site's location in the Los Angeles River Improvement Overlay Zone. The RIO does not impose any use, FAR, height, or setback restrictions or standards. Pursuant to the Los Angeles Municipal Code (LAMC) Section 13.17, projects in the Los Angeles River's Outer Core that are not adjacent to the river, including the Project, are required to comply with various screening standards and utilize native California plant species in all landscaped areas. As such, the Project would comply with the requirements set forth in LAMC Section 13.17.

The Project Site is also identified by the City in the Zoning Information and Map Access System as being in a Transit Priority Area (TPA) as defined by Senate Bill (SB) 743 and the City Zoning Information File (ZI) No. 2452.

6. Description of the Proposed Project

a. Project Overview

The Project proposes the demolition of an asphalt parking lot, billboard, lighting, shipping container, six electric bus chargers, and fencing to construct a new five-story (including a mezzanine parking level) infill commercial project. Specifically, the Project would develop up to 234,601 square feet of new uses, comprised of 224,597 square feet of office uses, 4,095 square feet of restaurant uses, and 4,110 square feet of retail uses, resulting in a FAR of 2.42:1. Adjacent to the ground floor restaurant, 1,799 square feet of outdoor uncovered dining area would be provided, and while this area is not considered floor area per the LAMC, it is conservatively included in this environmental analysis. The Project would be five stories, with a height of 88 feet measured from grade to the top of the mechanical penthouse. The Project would include a podium with one level of at-grade parking and one mezzanine level of above-grade parking (both podium levels would be wrapped with active ground floor commercial uses along the Alameda Street, Bruno Street, and Main Street frontages and new street trees along College Street where primary vehicle access would be provided), and four levels of office uses above. The Project would include a total of 52,716 square feet of outdoor areas. Additionally, up to seven off-site trenches for utility connections for water, sewer, and electrical laterals, as well as the undergrounding of existing overhead electrical lines would be required. This work would consist of lateral connections to water and sewer lines in Alameda Street and Main Street, the undergrounding of electrical lines on College Street and Main Street, and an electrical lateral connection from the Project Site to the electrical main on Main Street.

b. Design and Architecture

The Project includes a five-story building (including a mezzanine parking level), conceived as a series of three stacked massings that progressively step back from Bruno Street as it rises. The Project's architectural concept is a series of cascading terraces that recede into the Project Site from the Bruno Street frontage; each terrace would provide more open-air exposure as the building increases in height.

The proposed retail and restaurant uses would be located on the ground floor to activate the pedestrian environment, with double height floorplates, creating an inviting high ceiling ground floor. Specifically, the proposed restaurant uses would be located at the corner of Alameda Street and College Street, with outdoor seating, landscaping, and other pedestrian realm improvements. The retail uses would be located along Main Street near the intersection of Main Street and College Street, activating the eastern elevation with an active use. Pedestrian access to these uses would be provided via two entrances on Alameda Street and two entrances on Main Street, respectively.

Most of the office uses would be located on Levels 2 through 5. The office uses on Level 1 would include a lobby on the ground floor with pedestrian access from Alameda Street and Bruno Street, and interior and exterior workspaces totaling approximately 20,018 square feet. The exterior workspaces would include tenant courtyard spaces that would incorporate privacy screening. On Level 2, the office uses would include a private outdoor amenity terrace totaling 6,243 square feet that would separate the Project into two different sections. In addition, the Project would include a landscaped amenity terrace on the second and fourth levels of the office building, which would create a building break, create a connection between the office levels atop the podium, and provide pedestrian circulation. Floors above Level 2 would continue to be divided leaving an opening in the middle of the Project. Levels 2 and above would include exterior covered workspaces that face Bruno Street. Solar panels would be provided within a rooftop structure (the area beneath this rooftop structure would not be occupiable), and a landscaped green roof would be provided over a portion of the podium along College Street.

The Project's proposed design provides variable massing, a variety of materials, and texture on the public-facing street façades. Materials that would be used in the Project's façades include glazed panels, timber battens, textured concrete, perforated metal panels, and planted green walls. Internally, the Project would utilize a hybrid mass timber structural approach, specifically with cross-laminated timber floor and ceiling, along with ample provision for biophilic design, including the integration of native plantings and lush landscaping in both the interior workspace, as well as the various exterior communal terraces facing the public realm.

c. Outdoor Areas and Landscaping

In accordance with the LAMC, as a commercial development, the Project is not required to provide open space. Nonetheless, the Project would provide landscaping and outdoor areas to enhance the public realm, create more effective transitions between off-site and on-site uses, and provide usable outdoor areas on-site. Specifically, the Project would provide approximately 52,716 square feet of outdoor areas on-site, including 33,776 square feet of hardscaping and 18,940 square feet of landscaping, 14,551 square feet of which would be publicly accessible on the ground floor. Additionally, the Project would provide approximately 13,575 square feet of outdoor space within the public right-of-way and accessible to the public, of which 11,217 square feet would be hardscaping, and 2,358 square feet would be landscaping at the sidewalk areas adjacent to the Project Site. In total, the Project would provide approximately 28,126 square feet of publicly-accessible hardscape and landscape area on- and off-site.

The Project would also enhance the public realm through streetscape improvements that would create a cohesive visual identity for the Project Site. Specifically, the Project would include new landscaping, consisting of street trees and shrubs, along North Alameda Street, West College Street, North Main Street, and Bruno Street.

Other outdoor amenities included in the Project are a publicly accessible street plaza and garden, which would both be located on the ground floor. The street plaza would be located on the corner of North Alameda Street and West College Street. The street plaza would include an entrance to the Project, outdoor seating, a raised planter, and bicycle parking. The garden would be located near the entrance of the Project along Bruno Street with egress stairs, raised planters, and architectural screening. The Level 2 amenity terrace would contain with more raised planters, lounges, and movable seating. The Level 4 amenity terrace would contain a terrace garden and lounge areas with seating.

The Project would include a cohesive plant palette to be used along the streetscape, within the outdoor spaces on Level 2, and within the exterior-covered workspaces. Plantings would include resilient, drought-tolerant native and adaptive trees, shrubs, and groundcover species, including shade trees. The two existing street trees along Alameda Street would be retained as part of the Project. In addition, the Project would plant a total of 67 trees, of which 38 would be located within the Project Site and 29 would be located within the adjacent public right-of-way.

d. Access, Circulation, and Parking

Vehicular and loading access to the Project Site would be provided by two driveways located along West College Street. The westernmost driveway along West College Street would be exclusively for loading access, while the other driveway would provide access to the Project's parking garage. A passenger drop-off and pick-up area would also be provided along Bruno Street, which is designed to preserve the Granite Block Paving (HCM #211) along Bruno Street consistent with City Planning policy. Pedestrian access to the Project's proposed uses would be provided via three entrances on Alameda Street, two entrances on Main Street, and one entrance on Bruno Street.

The Project would provide approximately 440 vehicle parking spaces within a parking structure with one subterranean level, one ground level, and one above ground (mezzanine) level (the at-grade and above-grade parking levels would be wrapped with active ground floor commercial uses along the Alameda Street, Bruno Street, and Main Street frontages and screened with timber battens panels along College Street).

Additionally, the Project is required to provide a minimum of 75 bicycle parking spaces pursuant to the LAMC 12.21 A.16(a)(2) for the Project's uses. The Project would exceed this requirement and provide approximately 149 bicycle parking spaces, comprised of 123 long-term spaces and 26 short-term spaces. Bicycle lockers and showers would also be provided in accordance with the LAMC.

e. Lighting and Signage

All Project lighting would comply with all applicable energy standards and codes (i.e., California Code of Regulations, Title 24, Part 11; referred to as the California Green Building Standards Code [CALGreen Code]) while providing sufficient lighting levels to accent signage, architectural features, and landscaping elements. Light sources would be shielded and/or directed inward to minimize light spill-over to neighboring properties and the surrounding area while utilizing low-level exterior lights at the site perimeter, as needed, for aesthetic, security, and wayfinding purposes. Additionally, new street and pedestrian lighting within the public right-of-way would provide appropriate and safe lighting levels on both sidewalks and roadways, while minimizing light and glare on adjacent properties, in compliance with applicable City regulations and with approval from the City's Bureau of Street Lighting. Glass in building façades would be selected for qualities, such as low reflectivity, to reduce glare; energy efficiency to limit solar heat gain; and high visibility for adequate light transmission.

New Project signage would be integrated with and complement the overall aesthetic character of the proposed on-site development and the surrounding areas. Project signage could include general ground-level and wayfinding pedestrian signage along the Project Site perimeter, building identification signs, marquee and monument signs, pillar and pole signs, banners, and other sign types such as on-site wall signs, internal digital on-site signage, and murals. Project signage may include both externally and internally lit signs, which would be required to comply with LAMC illumination regulations.

f. Sustainability Features

The Project would support environmental sustainability by incorporating sustainable building features and construction protocols required by the Los Angeles Green Building Code (LAMC Chapter IX, Article 9), the CALGreen Code, and the California Building Energy Efficiency Standards (California Code of Regulations, Title 24, Part 6; referred to as the California Energy Code). Both in compliance with and, in some cases, in exceedance of the aforementioned Code requirements, a number of specific sustainable design components would be incorporated into the Project, such as Energy Star appliances; solar panels; plumbing fixtures and fittings that comply with the performance requirements specified in the Los Angeles Green Building Code; weather-based irrigation systems; water-efficient plantings with drought-tolerant species; shade trees in public areas; green walls in some outdoor areas; vegetated roofs to help reduce energy use; short- and long-term bicycle parking in excess of LAMC requirements; storm water capture; pedestrian-first design; employment and commercial activity center near various public transit stops; use of daylighting, where feasible; and energy-efficient lighting. The Project would also include a 500-kilowatt (kw) solar system with two 250-kw inverters consistent with Section 140.10 of the California Energy Code. In addition, the Project would meet the Los Angeles Green Building Code requirements (Ordinance No. 186,485 and Ordinance No. 186,488) requiring 30 percent of total new parking spaces would be capable of supporting future EVSE, and 10 percent of total new spaces would include EV charging stations. Lastly, the Project would prohibit the use of natural gas during Project operations, excluding restaurant cooking equipment and emergency generators which is included as Project Design Feature GHG-PDF-1, which will be enforceable as part of the Project's Mitigation Monitoring Program.

g. Anticipated Construction Schedule and Haul Route

Project construction would begin with the demolition of the existing surface parking lot and removal of the billboard, lighting, shipping container, electric bus chargers, and fencing. The next phase would include grading and excavation for the subterranean parking level, which would extend to a depth of up to 17 feet below ground surface as measured from the northeast corner of the Project Site where the grade elevation is the highest. Project construction also includes off-site trenching for utility connections and the undergrounding of existing electrical lines as discussed above. The foundation would then be laid, followed by building construction, and then finally paving and landscaping installation. Project construction is anticipated to be complete in 2028. It is estimated that approximately 67,791 cubic yards of soil would be excavated and hauled off the Project Site.

During construction, haul trucks would exit the Project Site onto West College Street heading west, turn left (south) onto North Alameda Street, turn left (east) onto Commercial Street, and merge onto US-101 south. Trucks arriving at the Project Site would exit US-101 northbound at North Alameda Street, turn right (north) onto North Alameda Street, turn right (east) onto College Street, and continue to the Project Site. Trucks would not enter the Project Site from, or travel along, Bruno Street.

Construction would occur Monday through Friday between 7:00 A.M. and 9:00 P.M., and Saturdays between 8:00 A.M. and 6:00 P.M. consistent with the allowable hours per LAMC Section 41.40. No construction would occur on Sundays.

h. Requested Permits and Approvals

The list below includes the anticipated requests for approval of the Project. The EIR analyzes the potential impacts associated with the Project and provides environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits, and approvals required to implement the Project include, but are not necessarily limited to, the following:

- Pursuant to LAMC Section 11.5.6, a General Plan Amendment to amend Central City North Community Plan Footnote No. 7 to allow the FAR for commercial development at the Project Site to exceed 1.5:1;

- Pursuant to LAMC Sections 12.32 F and 12.32 Q, a Vesting Zone and Height District Change to change the zoning for the Project Site from [Q]C2-2-RIO and [T][Q]C2-2-RIO to (T)(Q)C2-2D-RIO;

- Pursuant to LAMC Section 12.24 W.1, a Main Conditional Use Permit for the sale and dispensing of a full-line of alcohol beverages for on-site and off-site consumption within up to three establishments, in connection with the proposed restaurant and retail spaces;

- Pursuant to LAMC Section 16.05, Site Plan Review for a development which creates, or results in an increase of, 50,000 gross square feet or more of nonresidential floor area;

- Pursuant to LAMC Sections 17.03 and 17.15, a Vesting Tentative Tract Map for the merger and re-subdivision of 14 lots into one (1) ground lot and 16 airspace lots, and approval of a haul route for 67,791 cubic yards of soil export; and

- Other discretionary and ministerial permits that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, off-site or right-of-way encroachment permits, on-site and off-site tree removal permits, and sign permits.

7. Areas of Controversy

Potential areas of controversy and issues to be resolved by the City's decision-makers may include those environmental issue areas where the potential for a significant and unavoidable impact has been identified. In addition, issues raised during the public scoping meeting and NOP comment period include air quality, historical resources, and transportation. All of these issues were evaluated in this Draft EIR. Based on the analyses provided in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant Project-level impacts that cannot be feasibly mitigated with respect to: historical resources; on-site construction noise; off-site construction noise; on-site construction vibration (building damage and human annoyance); and off-site construction vibration (human annoyance). Implementation of the Project would also result in significant cumulative impacts that cannot be feasibly mitigated with regard to: on-site construction noise; off-site construction noise; and off-site construction vibration (human annoyance).

8. Public Review Process

The City prepared an Initial Study and circulated an NOP for public comment to the State Clearinghouse, OPR, responsible agencies, and other interested parties on June 4, 2024, for a 30-day review period. In addition, public scoping meetings for the Project were held on June 12, 2024 (English); June 13, 2024 (Spanish); June 18, 2024 (Mandarin); and June 20, 2024 (Cantonese). The Initial Study, NOP, NOP comment letters, and scoping meeting comments are included in Appendix A of this Draft EIR.

This Draft EIR is being circulated for a 60-day public comment period. Following the public comment period, a Final EIR will be prepared that will include responses to the comments raised regarding this Draft EIR.

9. Summary of Environmental Impacts

Table I-1 on page I-14 provides a summary of the environmental impacts of the Project evaluated in this Draft EIR. Based on the analysis in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant Project-level impacts that cannot be feasibly mitigated with respect to: historical resources; on-site construction noise; off-site construction noise; on-site construction vibration (building damage and human annoyance); and off-site construction vibration (human annoyance). Implementation of the Project would also result in significant cumulative impacts that cannot be feasibly mitigated with regard to: on-site construction noise; off-site construction noise; and off-site construction vibration (human annoyance).

Table I-1
Summary of Impacts Under the Project

Environmental Area	Project Impact
A. AIR QUALITY	
Conflicts with Plans	Less Than Significant
Regional Emissions	
Construction	Less Than Significant
Operation	Less Than Significant
Localized Emissions	
Construction	Less Than Significant
Operation	Less Than Significant
Toxic Air Contaminants	
Construction	Less Than Significant
Operation	Less Than Significant
B. CULTURAL RESOURCES	
Historical Resources	**Significant and Unavoidable**
Archaeological Resources	Less Than Significant with Mitigation
C. ENERGY	
Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources	
Construction	Less Than Significant
Operation	Less Than Significant
Conflict with Plans for Renewable Energy or Energy Efficiency	Less Than Significant
D. GEOLOGY AND SOILS (Paleontological Resources)	
Paleontological Resources	Less Than Significant with Mitigation
E. GREENHOUSE GAS EMISSIONS	
Construction	Less Than Significant
Operation	Less Than Significant
F. HAZARDS AND HAZARDOUS MATERIALS	
Construction	Less Than Significant with Mitigation
Operation	Less Than Significant
G. LAND USE AND PLANNING	
Conflict with Land Use Plans	Less Than Significant
H. NOISE[a]	
Construction	
On-Site Noise	**Significant and Unavoidable**
Off-Site Noise (Trucks)	**Significant and Unavoidable**
Off-Site Noise (Off-site Improvements)	Less Than Significant
On-Site Vibration (Building Damage)	**Significant and Unavoidable**
On-Site Vibration (Human Annoyance)	**Significant and Unavoidable**
Off-Site Vibration (Building Damage)	Less Than Significant

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

Environmental Area	Project Impact
Off-Site Vibration (Human Annoyance)	**Significant and Unavoidable**
Operation	
On-Site Noise	Less Than Significant
Off-Site Noise	Less Than Significant
Vibration	Less Than Significant
I. TRANSPORTATION	
Conflict with Plans	Less Than Significant
Vehicle Miles Traveled	Less Than Significant with Mitigation
Design Hazards	Less Than Significant
J. TRIBAL CULTURAL RESOURCES	
Tribal Cultural Resources	Less Than Significant with Mitigation
K. UTILITIES AND SERVICE SYSTEMS	
Water Supply and Infrastructure	
Construction	Less Than Significant
Operation	Less Than Significant
Energy Infrastructure	
Construction	Less Than Significant
Operation	Less Than Significant

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

Source: Eyestone Environmental, 2025.

10. Project Design Features

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

a. Greenhouse Gas Emissions

Project Design Feature GHG-PDF-1: The Project will prohibit the use of natural gas during Project operations, excluding restaurant cooking equipment and the emergency generator.

b. Noise

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

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

Project Design Feature NOI-PDF-3: Outdoor amplified sound systems, if any, will be designed so as not to exceed the maximum noise level of 70 dBA ($L_{eq\text{-}1hr}$) at a distance of 15 feet from the amplified speaker sound systems at Level 1 and Level 2 common outdoor spaces and 85 dBA ($L_{eq\text{-}1hr}$) at Level 4 common outdoor spaces. A qualified noise consultant will provide written documentation at plan check that the design of the system complies with these maximum noise levels.

c. Transportation

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

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent streets.
- Implementation of temporary pedestrian, bicycle, and vehicular traffic controls (e.g., flag people) during all construction activities adjacent to North Alameda Street, West College Street, North Main Street, and Bruno Street to ensure traffic safety on the public right-of-way (ROW).
- Scheduling of construction-related activities to reduce the effect on traffic flow on surrounding arterial streets.
- Containment of construction activity within the Project Site boundaries to the extent feasible.
- Coordination with LADOT to address any transit stop modifications or relocations.
- Coordination with Metro to address any potential temporary effects along Metro ROW due to construction equipment (e.g., cranes, scaffolding, lifts).

- Implementation of safety precautions for pedestrian and bicyclists through such measures as alternate routing and protection barriers.
- Scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours as a condition of an approved haul route.
- Prohibition of construction-related vehicles/equipment staging on adjacent streets, unless specifically approved as a condition of an approved haul route.
- Sufficient dampening of the construction area to control dust caused by grading and hauling and reasonable control at all times of dust caused by wind.
- Maintenance of a log, available on the job site at all times, documenting the dates of hauling and the number of trips (i.e., trucks) per day.
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities posted at the site readily visible to any interested party during site preparation, grading, and construction.
- Obtainment of the required permits for truck haul routes from the City prior to the issuance of any grading permit for the Project.

11. Mitigation Measures

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

a. Cultural Resources

Mitigation Measure CUL-MM-1: Excavation and shoring plans and calculations for temporary shoring walls shall be prepared by a California Registered Civil Engineer experienced in the design and construction of shoring systems. The shoring systems shall be selected and designed in accordance with all current code requirements, industry best practices, and recommendations of the Project Geotechnical Engineer and a qualified preservation consultant. The final excavation and shoring plans shall include all appropriate details, material specifications, testing, and special inspection requirements and shall be reviewed by the Project Geotechnical Engineer for conformance with the design intent and submitted to the City's Department of Building and Safety (LADBS) for review and approval during the Grading Permit submission.

The general contractor shall hire a California Registered Professional Engineer or California Professional Land Surveyor to prepare a Construction Monitoring Plan, subject to review and approval by

LADBS, prior to initiation of any excavation, grading, or shoring activities to ensure the protection of immediately adjacent historic resources from damage due to settlement during construction and excavation.

Prior to the issuance of a Grading Permit, the Applicant shall, through a qualified preservation consultant, submit to the Los Angeles Office of Historic Resources (OHR) for review and approval a Construction Monitoring Plan and excavation and shoring plans and calculations, to finalize the design-level procedures to be implemented during construction to avoid potential impacts to the granite block pavers immediately adjacent to the Project Site. OHR shall determine whether any of the following procedures must be implemented during construction based on a review of the Construction Monitoring Plan and excavation and shoring plans and calculations:

- The Project Geotechnical Engineer shall provide on-site observation during the excavation and shoring work.
- Construction Monitoring Plan shall be carried out by a California Professional Land Surveyor and establish survey monuments and document and record through any necessary means, including video, photography, survey, etc. the initial positions of the adjacent historic resource to form a baseline for determining settlement or deformation. The shored excavation and adjacent historic resource should be visually inspected each day. Survey monuments should be measured at critical stages of dewatering, excavation, shoring, and construction but shall not occur less frequently than once every 30 days. Reports shall be prepared by the California Professional Land Surveyor documenting the movement monitoring results.
- In the event that settlement due to excavation or construction activity causes damage requiring touch-ups or repairs to the finishes of the adjacent historic pavers, that work shall be performed in consultation with a qualified preservation consultant and in accordance with the Secretary of the Interiors' Standards, as appropriate. In the event that excavation, grading, or shoring activities may result in any potential damage to the adjacent historic pavers beyond only requiring touch-ups or repairs to the pavers, then the Project Applicant shall implement the following procedures for the temporary removal and reinstallation of the portion of the granite block pavers immediately adjacent to the Project Site that may be damaged:
  - All granite block pavers to be temporarily removed will be tagged by a qualified preservation consultant and their existing condition and location will be documented.
  - Granite block pavers shall be removed and reinstalled in a manner that avoids any damage to the individual pavers in accordance with the Secretary of the Interiors' Standards, as appropriate.

- All removed granite block pavers will be safely stored by the Applicant or its designee during Project construction and reinstalled after major construction associated with the Project is completed.
- Documentation of the tagging, removal, storage, and reinstallation of the granite block pavers shall be provided to OHR in a memorandum.

Mitigation Measure CUL-MM-2: Prior to any ground-disturbing activities associated with the Project, the Applicant shall retain a Qualified Archeologist. A Qualified Archeologist is defined as one who meets the Secretary of the Interior's Professional Qualifications Standards for Archeology and the Society for California Archaeology's qualifications for a principal investigator. Ground-disturbing activities shall include excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, auguring, backfilling, blasting, stripping topsoil, or a similar activity in the Project's area of potential impact (API). The API is defined as the Project Site plus the areas outside the Project Site that may be required for utility trenching.

Prior to the commencement of ground-disturbing repair activities associated with the Project within the API, at the Project kickoff, the Qualified Archeologist shall provide a briefing to construction crews to provide information on regulatory requirements for the protection of archaeological resources. As part of this training, construction crews shall be briefed on proper procedures to follow should unanticipated discoveries of archaeological resources be made during construction. Workers shall be provided contact information and protocols to follow in the event these discoveries are made. Additionally, workers shall be shown examples of the types of resources that would require notification. The training shall include a summary of the applicable regulations and penalties for non-compliance. A copy of the training materials and a list of attendees shall be provided to the Department of City Planning no more than 10 days after completing the training.

Before the commencement of ground-disturbing activities associated with the Project within the API, an archaeological resources management plan (ARMP) shall be prepared. The ARMP shall include, but not be limited to, monitoring protocol for ground-disturbing activities, a worker training program, and discovery and processing protocol for inadvertent discoveries of cultural resources. The ARMP shall identify areas with moderate to high sensitivity determined for cultural resources that require monitoring and detail a protocol for determining circumstances in which additional or reduced levels of monitoring (e.g., spot checking) may be appropriate. Specifically, the ARMP shall include a framework for assessing the geoarchaeological setting to determine whether undisturbed sediments capable of preserving archaeological remains are present adjacent to or beneath those sediments disturbed by agricultural and urban development, as well as the depth at which these undisturbed sediments would no longer be capable of containing archaeological material.

Monitoring shall occur during ground disturbance for the Project, including excavation within artificial fill, and shall be directed and supervised by the Qualified Archeologist. The monitor shall have the authority to temporarily halt or redirect construction activities in soils that are likely to contain potentially significant archaeological resources, as determined by the qualified archaeologist. The monitor shall complete a daily log documenting construction activities and observations. In the event that potentially significant archaeological resources are exposed during construction, work in the immediate vicinity of the find (within 25 feet) shall stop until the Qualified Archaeologist can evaluate the significance of the find. Construction activities may continue in other areas in coordination with the Qualified Archeologist. If the discovery is determined by the qualified archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code (PRC) 21083.2(g), and the treatments proposed in the ARMP are found to be infeasible or other alternatives are proposed, the Qualified Archeologist shall coordinate with the Applicant and Department of City Planning to amend the ARMP with a formal treatment plan that would reduce impacts to the resource(s). The treatment plan established for the resource(s) shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and PRC Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment if feasible, and if it is determined avoidance is not feasible, treatment may include architectural documentation and archaeological data recovery (i.e., excavation, laboratory processing and analysis) to remove the resource(s) and reduce potential impacts to less than significant.

After archaeological monitoring is completed, the Qualified Archeologist shall prepare a technical report documenting the methods and results of all work completed under the ARMP, including, if any, treatment of archaeological materials, results of artifact processing, analysis, and research, and evaluation of the resource(s) for the California Register. If archaeological materials are identified and collected for laboratory analysis, once the analysis is complete, any recovered archaeological materials shall be curated at a public, non-profit research institution that will ensure their long-term preservation and allow access to interested scholars. Should no such institutions accept the materials, they shall be donated to an educational institution or historical society. The format and content of the report shall follow the California Office of Historic Preservation's *Archaeological Resource Management Reports (ARMR): Recommended Contents and Format*. Any archaeological resources identified shall be documented on appropriate California

Department of Parks and Recreation 523-Series Forms. The report shall be prepared under the supervision of a Qualified Archeologist and submitted to the Department of City Planning. The timing and content of the final report shall consider the quantity of archaeological materials, level of analysis required, and documentation needed to establish the significance of any identified resources. The final draft of the report shall be submitted to the South Central Coastal Information Center.

b. Geology and Soils

Mitigation Measure GEO-MM-1: The Project shall implement the following measures to protect paleontological resources:

1. **Retain a Qualified Professional Paleontologist:** Prior to issuance of any demolition or grading permit, the applicant shall retain a Qualified Professional Paleontologist (Qualified Paleontologist), who meets or exceeds the Society of Vertebrate Paleontology (SVP) definition, to carry out all regulatory compliance measures and protocols related to paleontological resources. The Qualified Paleontologist shall obtain a curatorial arrangement with a qualified repository (e.g., the Natural History Museum of Los Angeles County [NHMLA]) prior to Project construction in the event of significant paleontological resource discoveries during construction.
2. **Conduct Worker Training:** The Qualified Paleontologist shall develop Worker Environmental Awareness Program training to educate the construction crew on the legal requirements for preserving fossil resources, as well as the procedures to follow in the event of a fossil discovery. This training program should be given to the crew before Project ground-disturbing work commences and should include handouts to be given to new workers as needed.
3. **Monitor for Paleontological Resources:** Full-time paleontological monitoring shall occur during Project ground-disturbing activities at depths greater than or equal to five feet below ground surface that impact previously undisturbed sediments that have high paleontological sensitivity, including late Pleistocene young alluvium, Unit 2 (Qya_2) and/or late Pleistocene old fan deposits, Unit 1 (Qof_1). In the unlikely event that early Pliocene to late Miocene Puente Formation (Tpsl, Tpss) is encountered at depth, these deposits should also be subject to full-time paleontological monitoring. Monitoring should not be required when ground-disturbing activities are less than five feet below ground surface or when impacting only previously disturbed sediments and/or recent artificial fill regardless of depth. Monitoring shall be conducted by a qualified paleontological monitor who meets the standards of the SVP (2010) and who shall be supervised by the Qualified Paleontologist. The Qualified Paleontologist may periodically inspect construction

activities to adjust the level of monitoring in response to subsurface conditions. Monitoring efforts can be increased, reduced, or ceased entirely if determined adequate by the Qualified Paleontologist. Paleontological monitoring shall include inspection of exposed sedimentary units during active excavations within sensitive geologic sediments. The monitor shall have authority to temporarily divert activity in the immediate vicinity away from exposed fossils to evaluate the significance of the find and, should the fossils be determined significant, professionally and efficiently recover the fossil specimens and collect associated data. The monitor shall record pertinent geologic data and collect appropriate sediment samples from any fossil localities. Recovered fossils should be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological repository (e.g., NHMLA).

4. **Prepare a Paleontological Resources Monitoring Report:** Upon conclusion of Project ground-disturbing activities, the Qualified Paleontologist overseeing paleontological monitoring shall prepare a final monitoring report that documents the paleontological monitoring efforts for the Project and describes any paleontological resources discoveries observed and/or recorded during the life of the Project. If paleontological resources are curated, the final monitoring report and any associated data pertinent to the curated specimen(s) shall be submitted to the designated repository (e.g., NHMLA). A copy of the final monitoring report shall be filed with the Los Angeles Department of City Planning.

c. Hazards and Hazardous Materials

Mitigation Measure HAZ-MM-1: Soil Management Plan—The Applicant shall retain a qualified environmental consultant to prepare a Soil Management Plan for Contaminated Soils (SMP) which will be submitted to the City of Los Angeles Department of Building and Safety for review and approval prior to the commencement of excavation and grading activities. The SMP shall be implemented during grading, excavation, and installation of piles and tiebacks on the Project Site to ensure that contaminated soils (including those associated with removed or previously unidentified underground storage tanks if encountered) are properly identified, excavated, and disposed of off-site.

Elements of the SMP shall include:

- A qualified environmental consultant shall be present on the Project Site during grading and excavation activities in the known or suspected locations of contaminated soils and shall be on call at other times as necessary, to monitor compliance with the SMP and to actively monitor the soils and excavations for evidence of contamination.

- The SMP shall be prepared and executed in accordance with South Coast Air Quality Management District (SCAQMD) Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil (Rule 1166). The SMP shall require the timely testing and sampling of soils so that volatile organic compound (VOC)-contaminated soils can be separated from inert soils for proper disposal. The SMP shall specify the testing parameters and sampling frequency.
- Soil monitoring during soil excavation including visual observation, representative sampling via a photo ionization detector, and/or VOC monitoring in accordance with SCAQMD Rule 1166.
- During the Project's excavation phase, the Applicant shall remove and properly dispose of impacted materials in accordance with the provisions of the SMP. If soil is stockpiled prior to disposal, it will be managed in accordance with the Project's Storm Water Pollution Prevention Plan (SWPPP), prior to its transfer for treatment and/or disposal. All impacted soils shall be properly treated and disposed of in accordance with SCAQMD Rule 1166, as well as applicable requirements of the California Department of Toxic Substances Control (DTSC), and Los Angeles Regional Water Quality Control Board (LARWQCB).
- During excavation, SCAQMD Rule 1166 requires that soils identified as VOC-contaminated shall be sprayed with water or another approved vapor suppressant or covered with sheeting and securely anchored during periods of inactivity of greater than an hour, to prevent contaminated soils from becoming airborne. Per SCAQMD Rule 1166, VOC-contaminated soils shall be transported from the Project Site by a licensed transporter and disposed of at a licensed storage/treatment facility to prevent VOC-contaminated soils from becoming airborne or otherwise released into the environment.
- Dust suppression shall also be used for any active or inactive stockpile that is known or suspected to contain contaminants including metals above state or federal hazardous waste limits. Active and inactive excavations and stockpiles of soil shall be kept visibly moist by water spray, treated with a vapor suppressant, or covered with a continuous heavy-duty plastic sheeting (4 mm or greater) or other covering. The covering shall be overlapped at the seams and securely anchored.
- Prior to the commencement of grading and excavation, the findings of the Phase II Environmental Site Assessment shall be reported to the County of Los Angeles Fire Department Health and Hazardous Materials Division (HHMD) Site Mitigation Unit (SMU) (323-890-4045), and the Los Angeles Fire Department (LAFD) for review and

comment. The recommendations of the HHMD and LAFD shall be incorporated into the SMP.

Mitigation Measure HAZ-MM-2: Combined Methane/Vapor Intrusion Mitigation System (MMS/VIMS)—The methane mitigation system required pursuant to LAMC Section 91.7402.2 shall be designed as a combined MMS/VIMS capable of mitigating VOC vapors including tetrachloroethylene (PCE) in addition to methane. The MMS/VIMS, shall include, at a minimum the following components:

- A standard de-watering system or a reinforced concrete mat slab designed to accommodate hydrostatic pressure;
- A complete impervious membrane (barrier) system that shall form an integral and permanent bond to poured concrete to prevent water vapor, methane, and PCE and other VOC transmission at the interface of the membrane and structural concrete. The barrier material shall be selected for dual compatibility for both methane, PCE, and chlorinated VOC exposure.
- Perforated horizontal pipes that shall be installed below the membrane within a protective gravel layer that shall collect vapor flowing from the subsurface.
- Vent risers that shall direct collected vapors from the horizontal pipes for dispersion into the atmosphere.
- Conduit seals in all electrical and communication conduits that prevent gas migration through dry utility conduits.
- Utility trench dams installed along the exterior sides of the building that prevent gas migration.

Mitigation Measure HAZ-MM-3: Post-Construction Monitoring—Following Project construction, but prior to building occupancy, post-construction monitoring for vapor intrusion shall occur. The monitoring event is to be performed in accordance with DTSC's *Supplemental Guidance: Screening and Evaluating Vapor Intrusion dated February 2023 (DTSC 2023 Guidance)*. This event would include, at minimum, two indoor air sampling events, with the second event occurring approximately six months after the first.

The monitoring event shall involve the use of a portable gas meter and VOC detector to screen for vapors and steel canisters for the collection of air samples to evaluate the indoor air at each level of the proposed subterranean parking structure and the building's first occupied space (assumed to be the ground floor).

The sampling activities will also include the collection of outdoor (ambient) air samples to provide a background comparison of indoor and ambient air.

If the indoor air samples indicate exceedances to applicable regulatory thresholds under the DTSC 2023 Guidance, engineering controls shall be implemented to reduce the levels of those contaminants. These engineering controls may include one or more of the following actions:

- Increasing ventilation rates in the subterranean parking and ground floor levels.
- Installing inline carbon filters within the building HVAC system.
- Repairing any gaps or cracks around concrete penetrations.
- Converting the passive system to an active mitigation system.

The use of the engineering controls shall be in consultation with a qualified environmental professional. Following implementation of any engineering controls, a new monitoring event of indoor and ambient air shall be conducted to confirm that the contaminants of potential concern have been reduced to an acceptable level per the DTSC 2023 Guidance.

d. Noise

Mitigation Measure NOI-MM-1: A temporary and impermeable sound barrier shall be erected along the Project’s northern property line between the construction areas and the potential future residential uses along the north side of College Street (receptor location R3). The temporary sound barrier shall be designed to provide a minimum 12-dBA noise reduction at the ground level of receptor location R3. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

In the event the proposed residential development at receptor location R3 is not completed and occupied prior to or during Project construction, this mitigation measure shall not be required because impacts on the existing (i.e., non-residential non-sensitive use) would be less than significant without mitigation.

e. Transportation

Mitigation Measure TR-MM-1: The Project shall implement the following Transportation Demand Management policy:

- Implement a ride-share program by matching interested employees with similar commutes into carpools and vanpools. The Project shall provide designated parking areas and safe and convenient passenger loading areas for employee carpools/vanpools on-site and along Bruno Street.

f. Tribal Cultural Resources

Mitigation Measure TCR-MM-1: Monitor Retention. Prior to commencing any Ground Disturbance Activities (as defined below) at the Project Site and affected off-site areas, the Applicant, or its successor, shall retain a qualified tribal monitor from and approved by the Gabrieleño Band of Mission Indians—Kizh Nation (the Tribe) and a qualified archaeological monitor. Ground Disturbance Activities shall include demolition, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil, potholing, pavement removal, grubbing, tree removals, boring, or a similar activity at the Project Site and affected off-site areas. A qualified archaeological monitor shall be identified as principal personnel who must meet the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation, have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in Southern California, and shall ensure that all other personnel associated with and hired for the archaeological monitoring are appropriately trained and qualified. The Applicant, or its successor, the archaeological monitor, and the tribal monitor shall execute a monitoring agreement prior to the earlier of the commencement of any Ground Disturbing Activity, or the issuance of any permit necessary to commence a Ground Disturbing Activity.

Mitigation Measure TCR-MM-2: WEAP. Prior to commencing any Ground Disturbance Activities, the archaeological monitor, in consultation with the tribal monitor, shall provide Worker Environmental Awareness Program (WEAP) training to construction crews involved in Ground Disturbance Activities that includes information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover tribal cultural resources during Ground Disturbance Activities. In addition, workers will be shown examples of the types of resources that would require notification of the archaeological monitor and tribal monitor(s). The Applicant, or its successor, shall maintain on the Project Site, for potential City inspection, documentation establishing the WEAP training was completed for all members of the construction crew involved in Ground Disturbance Activities.

Mitigation Measure TCR-MM-3: On-Site Monitoring. The archaeological and tribal monitors shall observe all Ground Disturbance Activities on the Project Site and affected off-site areas at all times any Ground Disturbance Activities are taking place. If Ground Disturbance Activities are simultaneously occurring at multiple locations on the project site, an archaeological monitor and a tribal monitor(s) shall be assigned to each location where the Ground Disturbance Activities are occurring. The tribal monitor will complete daily monitoring logs that will provide descriptions and locations of the relevant Ground Disturbing Activities, the type of construction activities performed, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered “tribal cultural resources” as defined in California Public Resources Code (PRC) Section 21074, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the Applicant and/or the City upon request to the Tribe. If any Project scheduled activities require the tribal monitor to leave the Project Site or affected off-site areas for a period of time and return, confirmation shall be submitted to the Tribe by the Applicant, or its successor, in writing, upon completion of each set of scheduled activities and five (5) days’ notice (if possible) shall be submitted to the Tribe by the Applicant, or its successor, in writing, prior to the start of each set of scheduled activities. The on-site monitoring shall end when either 1) confirmation is received from the Applicant, or its successor, in writing, that all scheduled activities pertaining to tribal monitoring and all Ground Disturbing Activities are completed; or 2) the Tribe provides a determination, in writing, that no future planned construction activity and/or development/construction phase at the Project Site or affected off-site areas possesses the potential to impact any tribal cultural resources.

Mitigation Measure TCR-MM-4: Discovery of Resources. In the event that any objects or artifacts that may be tribal cultural resources are encountered during the course of any Ground Disturbance Activities, all such activities shall temporarily cease within the area of discovery, the radius of which shall be 60 feet or otherwise determined by the archaeological monitor in consultation with the tribal monitor(s), until the potential “tribal cultural resources” are properly assessed and addressed by the archaeological monitor and the tribal monitor(s) pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all Ground Disturbance Activities in the immediate vicinity of the find (i.e. 60 feet or otherwise determined by the archaeological monitor) until the find can be assessed by the archaeological monitor and tribal monitor(s).
2. If the archaeological monitor and tribal monitor determine the resources are Native American in origin, the Tribe will recommend steps for treatment of all discovered tribal cultural resources in the form and/or manner the Tribe deems appropriate, in the Tribe’s reasonable discretion, and for any purpose the Tribe deems

appropriate, including for educational, cultural and/or historic purposes.

3. The Applicant, or its successor, shall implement the Tribe's recommendations if the archaeological monitor, in consultation with the tribal monitor, conclude that the Tribe's recommendations are reasonable and feasible.
4. In addition to any recommendations from the Tribe, the archaeological monitor shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation.
5. The Applicant, or its successor, may recommence Ground Disturbance Activities outside of the specified radius of the discovery site, so long as this radius has been reviewed by both the archaeological monitor and tribal monitor and determined to be reasonable and appropriate, and so long as the Applicant, or its successor, has complied with all of the recommendations developed and approved pursuant to the process set forth in Paragraphs 2 through 4 above.
6. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.
7. Notwithstanding Paragraph 6 above, any information that Los Angeles Department of City Planning, in consultation with the Los Angeles City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California PRC, Section 6254(r), and handled in compliance with the City's Assembly Bill 52 Confidentiality Protocols.
8. Archaeological and Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken.

12. Summary of Alternatives

This Draft EIR examined five alternatives to the Project in detail, which include Alternative 1, No Project/No Build Alternative; Alternative 2, Existing Zoning Compliant Alternative; and Alternative 3, Alternative Use Alternative. Refer to Section V, Alternatives, of this Draft EIR for a more detailed description of these alternatives, a comparative analysis of the impacts of these alternatives with those of the Project, and a description of the alternatives considered but rejected as infeasible.

a. Alternative 1: No Project/No Build Alternative

Alternative 1 assumes that the Project would not be approved, 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.

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.

b. Alternative 2: Existing Zoning Compliant Alternative

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 also conservatively includes 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 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.

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.

c. Alternative 3: 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.[4] 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.

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.

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.

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

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[4] *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 in Section V, Alternatives, of this Draft EIR 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.*

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.