V. Alternatives

V. Alternatives

1. Introduction

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

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

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

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

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

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

2. Overview of Selected Alternatives

As set forth in Section II, Project Description, of this Recirculated Draft EIR, the Project proposes two development options – Option A and Option B.

Option A proposes the development of 658 multi-family residential units and up to 27,300 square feet of neighborhood-serving commercial uses, including up to 13,650 square feet of retail space and up to 13,650 square feet of restaurant space. The multi-family residential and commercial uses proposed under Option A would be provided within three seven-story buildings with a maximum height of 77 feet. The proposed uses would be supported by 1,217 vehicle parking spaces located in two subterranean parking levels and two above-grade parking levels located within each of the three buildings. Option A would provide up to approximately 70,175 square feet of open space and recreational amenities, including paved plazas with seating, landscaped paseos, and landscaped open space at the ground level that would be privately maintained and publicly accessible. Overall, Option A would remove approximately 100,781 square feet of existing commercial floor area and construct up to 674,329 square feet of new residential and commercial floor area, resulting in a net increase of up to 573,548 square feet of net new floor area within the Project Site for a maximum total floor area ratio (FAR) of 2.6 to 1.

Option B proposes the development of 425 multi-family residential units, 90,000 square feet of office space, and 40,00 square feet of neighborhood-serving commercial uses, including approximately 20,000 square feet of retail space and approximately 20,000 square feet of restaurant space. The proposed uses would be provided within four buildings. The proposed multi-family residential uses would be located within two six-story buildings with a height of up to 69 feet and one seven-story building with a height of up to 79 feet. The office uses would be provided within a four-story building (three stories of office space above one level of ground floor commercial space) with a height of up to 69 feet. The proposed commercial uses would be provided at the

ground floor of two of the three residential buildings and the proposed office building. The proposed uses would be supported by 1,287 parking spaces that would be distributed throughout the Project Site in three subterranean levels, one above grade parking level, and a small surface parking area. Option B would provide up to approximately 109,745 square feet of open space and recreational amenities, including a large publicly accessible open space area along Glencoe Avenue, paved plazas with seating, courtyards, rooftop decks, and private balconies. Overall, Option B would remove approximately 100,781 square feet of existing floor area and construct 558,994 square feet of new floor area, resulting in a net increase of 458,213 square feet of net new floor area within the Project Site for a maximum total FAR of 2.15 to 1.

As described above, the total floor area, building heights, massing, and footprint would differ between the two development options. The analysis provided below accounts for both development options and, generally, the term "Project" is used unless stated otherwise.

As indicated above, the intent of the alternatives is to reduce the significant impacts of a project. Based on the analyses provided in Section IV, Environmental Impact Analysis, of this Recirculated Draft EIR, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with respect to noise during on-site construction activities, and vibration from on-site and off-site construction with respect to human annoyance. Furthermore, as evaluated in Section IV, Environmental Impact Analysis, of this Recirculated Draft EIR, the following cumulative impacts would be significant and unavoidable: cumulative construction noise impacts from on-site and off-site noise sources and cumulative off-site construction vibration impacts with respect to human annoyance.

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

- Alternative 1: No Project/No Build Alternative
- Alternative 2: Development in Accordance with Existing Zoning Alternative
- Alternative 3: Reduced Development Alternative
- Alternative 4: Reduced Excavation Alternative

Each of these alternatives is described in the sections that follow. In addition, CEQA Guidelines Section 15126.6(c) requires that an EIR identify any alternatives that were

considered for analysis but rejected as infeasible. Such potential alternatives are described 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:

- **Alternatives to Eliminate Significant Noise and Vibration Impacts During Construction:** Alternatives were considered to eliminate the significant short-term construction noise and vibration impacts. As discussed in Section IV.I, Noise, of this Recirculated Draft EIR, significant noise and vibration impacts would occur during Project construction for limited durations. Significant construction noise and vibration impacts within the Project Site would be expected to occur with most reduced development scenarios because construction activities, and the need to grade and excavate the Project Site followed by building construction, would inherently generate noise and vibration levels above the significance criteria for noise and human annoyance given the proximity of sensitive uses. Thus, reducing temporary vibration impacts below a level of significance at adjacent uses would not be possible while still achieving the Project's objectives as a significant reduction in the proposed uses would be required. Furthermore, any reduction in the intensity of construction activities on daily basis would actually increase the overall duration of the construction period. Therefore, alternatives to eliminate the Project's short-term noise and vibration impacts during construction were rejected as infeasible.

- **Alternative Project Site:** The results of a search to find an alternative site within the Palms-Mar Vista-Del Rey Community Plan area on which the Project could be built determined that suitable similar locations are not available to meet the underlying purpose and objectives of the Project to locate new housing and employment opportunities in a manner that reduces vehicular trips by providing onsite housing in combination with on-site community-serving commercial and recreational amenities and within walking distance to existing off-site commercial uses and amenities. Further, it is not expected that the Applicant can reasonably acquire, control, or have access to an alternative site of similar size that is located adjacent to other land that is owned and has been developed by the Applicant. Therefore, an alternative site is not considered feasible as it is not expected that the Applicant can reasonably acquire, control or have access to a

suitable alternative site that would provide for the uses and square footage proposed by the Project. In addition, a suitable alternative site would not be likely to avoid the significant impacts of the Project as there are no comparable sites in the general area that are not near noise and/or vibration sensitive receptors. Thus, in accordance with Section 15126.6(f) of the State CEQA Guidelines, 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 (and as appropriate, the two development scenarios—Option A and Option B). Furthermore, each alternative is evaluated to determine whether the Project's basic objectives, identified in Section II, Project Description, of this Recirculated Draft EIR, would be substantially attained by the alternative.[1] 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 Recirculated 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 Recirculated Draft EIR.

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."

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

[1] *State of California, CEQA Guidelines Section 15126.6(c).*

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

A summary matrix that compares the impacts associated with the Project with the impacts of each of the analyzed alternatives is provided in Table V-1 on page V-7. As evaluated in the Initial Study prepared for the Project included in Appendix A of this Recirculated Draft EIR, the Project would not result in significant impacts related to agriculture and forestry resources, biological resources, cultural resources, mineral resources, and population and housing. Therefore, no further analysis of these topics in this Recirculated Draft EIR is required or provided and these topics are not considered with respect to any of the alternatives considered.

Table V-1
Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project

Impact Area	Project (Option A and Option B)	Alternative 1: No Project/No Build Alternative	Alternative 2: Development in Accordance with Existing Zoning Alternative	Alternative 3: Reduced Development Alternative	Alternative 4: Reduced Excavation Alternative
A. AESTHETICS					
Conflict with Zoning and Regulations Governing Scenic Quality	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Light and Glare					
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
B. AIR QUALITY					
Construction					
Regional Emissions	Less Than Significant with Mitigation	Less (No Impact)	Less (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)
Localized Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
Toxic Air Contaminants	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
Operation					
Regional Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Localized Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	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)	Less (Less Than Significant)
C. ENERGY					
Wasteful, inefficient, or unnecessary consumption of Energy Resources					
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
Conflict with Plans for Renewable Energy or Energy Efficiency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
D. GEOLOGY AND SOILS					
Geology and Soils	Less Than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
E. GREENHOUSE GAS EMISSIONS					
Greenhouse Gas Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)

Table V-1 (Continued)
Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project

Impact Area	Project (Option A and Option B)	Alternative 1: No Project/No Build Alternative	Alternative 2: Development in Accordance with Existing Zoning Alternative	Alternative 3: Reduced Development Alternative	Alternative 4: Reduced Excavation Alternative
F. HAZARDS AND HAZARDOUS MATERIALS					
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
G. HYDROLOGY AND WATER QUALITY					
Surface Water Quality					
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Greater (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Groundwater Quality					
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Surface Water Hydrology					
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Similar (Less Than Significant)	Greater (Less Than Significant)
Groundwater Hydrology					
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Greater (Less Than Significant)	Greater (Less Than Significant)	Similar (Less Than Significant)	Greater (Less Than Significant)
H. LAND USE AND PLANNING					
Conflict with Land Use Plans	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
I. NOISE					
Construction					
On-Site Noise	Significant and Unavoidable	Less (No Impact)	Less (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Less (Significant and Unavoidable)
Off-Site Noise	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
On-Site Vibration (Building Damage)	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)

Table V-1 (Continued)
Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project

Impact Area	Project (Option A and Option B)	Alternative 1: No Project/No Build Alternative	Alternative 2: Development in Accordance with Existing Zoning Alternative	Alternative 3: Reduced Development Alternative	Alternative 4: Reduced Excavation Alternative
On-Site Vibration (Human Annoyance)	Significant and Unavoidable	Less (No Impact)	Less (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Less (Significant and Unavoidable)
Off-Site Vibration (Building Damage)	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
Off-Site Vibration (Human Annoyance)	Significant and Unavoidable	Less (No Impact)	Less (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Less (Significant and Unavoidable)
Operation					
On-Site Noise	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	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)	Less (Less Than Significant)
Vibration	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
J. PUBLIC SERVICES					
Fire Protection					
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Police Protection					
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant) Greater (Less Than Significant) – Option B	Less (Less Than Significant) – Option A Greater (Less Than Significant) – Option B	Less (Less Than Significant) – Option A Greater (Less Than Significant) – Option B
Schools					
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant) – Option A Greater (Less Than Significant) – Option B	Less (Less Than Significant) – Option A Greater (Less Than Significant) – Option B
Parks and Recreation					
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)

Table V-1 (Continued)
Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project

Impact Area	Project (Option A and Option B)	Alternative 1: No Project/No Build Alternative	Alternative 2: Development in Accordance with Existing Zoning Alternative	Alternative 3: Reduced Development Alternative	Alternative 4: Reduced Excavation Alternative
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant) – Option A Greater (Less Than Significant) – Option B	Less (Less Than Significant) – Option A Greater (Less Than Significant) – Option B
Libraries					
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant) – Option A Greater (Less Than Significant) – Option B	Less (Less Than Significant) – Option A Greater (Less Than Significant) – Option B
K. TRANSPORTATION					
Conflict with Plans	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Vehicle Miles Traveled	Less Than Significant (Option A) Less Than Significant with Mitigation (Option B)	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Freeway Safety Analysis	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Inadequate Emergency Access	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
L. TRIBAL CULTURAL RESOURCES					
Tribal Cultural Resources	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
M. UTILITIES AND SERVICE SYSTEMS					
Water Supply and Infrastructure					
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Wastewater					
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)

Table V-1 (Continued)
Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project

Impact Area	Project (Option A and Option B)	Alternative 1: No Project/No Build Alternative	Alternative 2: Development in Accordance with Existing Zoning Alternative	Alternative 3: Reduced Development Alternative	Alternative 4: Reduced Excavation Alternative
Solid Waste					
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Energy					
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)

Source: Eyestone Environmental, 2023.

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 the project does not proceed. Section 15126.6(c)(3)(B) of the CEQA Guidelines states in part that, "in certain instances, the No Project/No Build Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, Alternative 1, the No Project/No Build Alternative, assumes that the Project would not be approved, no new permanent development would occur within the Project Site, and the existing environment would be maintained. Thus, the physical conditions of the Project Site would generally remain as they are today. Specifically, the three existing structures, including the two-story Barnes & Noble bookstore, the single-story commercial building, and the two-story commercial building, as well as the surface parking spaces, would remain on the Project Site, and no new construction would occur.

2. Environmental Impacts

a. Aesthetics

(1) Conflict with Zoning and Regulations Governing Scenic Quality

Under Alternative 1, no construction activities would occur and the existing buildings and uses would remain. Therefore, Alternative 1 would have no potential to conflict with applicable zoning and other regulations governing scenic quality. No impacts would occur, and such impacts would be less compared to the less-than-significant impacts of the Project.

(2) Light and Glare

(a) Construction

Alternative 1 would not involve the construction of any new development on-site. Therefore, Alternative 1 would not introduce new light sources associated with construction equipment or construction-related equipment and materials with the potential to cause

glare. As such, no impacts related to light and glare associated with construction activities would occur under Alternative 1. Thus, light and glare impacts during construction would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 would not alter the existing uses on the Project Site, introduce any new sources of light or glare on the Project Site, or otherwise increase the amount of activity occurring on-site. Therefore, Alternative 1 would not change the existing lighting environment on the Project Site. No operation-related light and glare impacts would occur under Alternative 1. Thus, impacts related to operational light and glare under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

b. Air Quality

(1) Construction

(a) Regional Emissions

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

(b) Localized Emissions

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

(c) Toxic Air Contaminants

Since construction activities would not occur on the Project Site, Alternative 1 would not result in diesel particulate emissions during construction that could generate substantial toxic air contaminants (TACs). 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.

(2) Operation

(a) Regional Emissions

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

(b) Localized Emissions

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

(c) Toxic Air Contaminants

As set forth in Section IV.B, Air Quality, of this Recirculated Draft EIR, the Project would result in some TAC emissions, primarily from mobile sources. Since Alternative 1 would not result in new development or increase the intensity of the existing uses on the Project Site, no new increase in mobile source emissions 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 the Project.

c. Energy

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

(a) Construction

Construction activities would not occur under the No Project/No Build Alternative. Therefore, Alternative 1 would not generate a short-term demand for energy during construction, which could result in the wasteful, inefficient, or unnecessary consumption of energy resources. Thus, construction-related impacts to energy would not occur. As such,

impacts under the No Project/No Build Alternative would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

The No Project/No Build Alternative would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the long-term energy demand on the Project Site and would have no potential to result in the wasteful, inefficient, or unnecessary consumption of energy resources. It is noted however that the Project would replace existing older buildings with modern buildings incorporating the latest City Green Building Code requirements, thereby improving the energy efficiency of buildings. Notwithstanding, no operational impacts related to energy would occur under the No Project/No Build Alternative, and impacts would be less when compared to the less-than-significant impacts of the Project.

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

The No Project/No Build Alternative would not involve any new development. As such, Alternative 1 would not have the potential to conflict with plans for renewable energy or energy efficiency. No impacts related to renewable energy or energy efficiency plans would occur under the No Project/No Build Alternative, and impacts would be less when compared to the less-than-significant impacts of the Project.

d. Geology and Soils

The No Project/No Build Alternative would not result in development on the Project Site that would require grading or other earthwork activities. Therefore, Alternative 1 would not cause or accelerate geologic hazards related to fault rupture, strong seismic shaking, liquefaction, soil erosion, subsidence, expansive soils, or other geologic conditions, including corrosive soils, oil wells, methane, and land form alteration, which could result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. As such, no impacts related to geology and soils would occur under Alternative 1, and such impacts would be less than 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 occur under Alternative 1, and 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

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

g. Hydrology and Water Quality

(1) Surface Water Quality

(a) Construction

As no new development would occur, Alternative 1 would not have the potential to contribute to pollutant loading in stormwater runoff associated with construction activities. Therefore, no construction-related impacts to surface water quality would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Under Alternative 1, no new permanent development would occur, and existing development would remain on-site. Therefore, Alternative 1 would not increase the volume of runoff generated from the Project Site. However, Alternative 1 would not implement the BMPs proposed under the Project to improve the quantity and quality of stormwater runoff from the overall Project Site. Specifically, as discussed in Section IV.G, Hydrology and Water Quality, of this Recirculated Draft EIR, implementation of the Project and associated BMPs would result in a slight decrease in stormwater runoff from the Project Site. Without implementation of BMPs as part of this alternative, there would be no reduction in stormwater runoff compared to the Project. Therefore, impacts to surface water quality during operation under Alternative 1 would be greater when compared to the Project but would be less than significant.

(2) Groundwater Quality

(a) Construction

No grading or excavation would occur under Alternative 1. Therefore, there would be no potential to increase groundwater contamination or cause regulatory water quality standards at an existing production well to be violated. Thus, no construction-related impacts to groundwater quality would occur under this alternative, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Under Alternative 1, no new permanent development would occur that could result in new or increased use of potentially hazardous materials. Therefore, there would be no potential for Alternative 1 to release contaminants into the groundwater that could affect existing groundwater quality, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well. Thus, no operational impacts to groundwater quality would occur, and impacts would be less when compared to the less-than-significant impacts of the Project.

(3) Surface Water Hydrology

(a) Construction

As no new development would occur, Alternative 1 would not have the potential to temporarily alter existing surface drainage patterns and flows. Therefore, no impacts to surface water hydrology during construction would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Under Alternative 1, no new permanent development would occur, and existing development would remain on-site. Therefore, Alternative 1 would not alter the amount of pervious surfaces on the Project Site, and no modifications to the existing drainage patterns or increase in the volume of runoff generated from the Project Site would occur. As such, no impacts to surface water hydrology during operation would occur under Alternative 1, and such impacts would be less when compared to the less-than-significant impacts of the Project.

(4) Groundwater Hydrology

(a) Construction

No grading or excavation would occur under Alternative 1. Therefore, there would be no potential to encounter groundwater beneath the Project Site, and no dewatering associated with construction would be necessary. Thus, no construction-related impacts to groundwater hydrology would occur, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Under Alternative 1, no new permanent development would occur, and no increase in impervious surfaces on the Project Site would occur that could affect groundwater recharge rates on-site. However, Alternative 1 would not increase pervious surfaces or implement an infiltration system as under the Project that would improve groundwater recharge capacity compared to existing conditions. Thus, while impacts to groundwater hydrology during operation of Alternative 1 would be less than significant, such impacts would be greater when compared to the less-than-significant impacts of the Project.

h. Land Use and Planning

Under Alternative 1, there would be no changes to the physical or operational characteristics of the existing Project Site. No land use approvals or permits would be required, and Alternative 1 would not result in any inconsistencies with existing land use plans and policies that govern the Project Site. Therefore, Alternative 1 would have no potential to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. No impacts associated with a conflict with land use plans, policies, or regulations would occur, and impacts would be less when compared to the less-than-significant impacts of the Project. However, it should be noted that, unlike the Project, Alternative 1 would not advance local and regional planning objectives that promote the development of new housing to meet housing demand, infill mixed-use developments, and pedestrian-oriented improvements. Specifically, the Project Site would remain a low-rise commercial shopping center with surface parking areas. There would be no new development on-site that would provide much-needed housing along with neighborhood-serving retail and restaurant uses.

i. Noise

(1) Construction

No new construction activities would occur under Alternative 1. Therefore, no construction-related noise or vibration would be generated on-site or off-site. As such, no

on-site or off-site noise or vibration impacts would occur under Alternative 1, and impacts would be less when compared to those of the Project, which would be significant and unavoidable for on-site construction noise, less than significant for off-site construction noise, less than significant for on-site and off-site construction vibration related to building damage, and significant and unavoidable for on-site and off-site construction vibration related to human annoyance. This alternative would eliminate the Project's significant and unavoidable impacts with respect to on-site construction noise and on-site and off-site construction vibration related to human annoyance.

(2) Operation

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

j. Public Services

(1) Fire Protection

(a) Construction

As Alternative 1 would not require construction, Alternative 1 would not have the potential for construction activities to expose people to the risk of fire or explosion related to the use of hazardous materials or to potentially impact the provision of fire protection services in the vicinity of the Project Site. Thus, no construction-related fire protection impacts would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

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

(2) Police Protection

(a) Construction

As Alternative 1 would not require construction, Alternative 1 would not have the potential for construction to create sources of nuisances and hazards or potentially impact police protection services in the vicinity of the Project Site. Therefore, Alternative 1 would not result in any police protection impacts due to construction, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

No changes to existing land uses or operations on-site would occur under Alternative 1. Therefore, there would be no potential to increase the service population on-site or have the potential to increase calls for police protection services from the Los Angeles Police Department (LAPD). No impacts to police protection services would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(3) Schools

(a) Construction

As Alternative 1 would not require construction, this alternative would not have the potential for construction employment to result in an increase in the resident population or corresponding demand for schools in the vicinity of the Project Site. Therefore, Alternative 1 would not result in any school impacts due to construction, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

No changes to existing land uses or operations on-site would occur under Alternative 1. Therefore, there would be no potential to increase the population of school-aged children in the attendance boundaries of the schools that serve the Project Site. No impacts to schools would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(4) Parks and Recreation

(a) Construction

As Alternative 1 would not require construction, this alternative would not have the potential for construction employment to result in a notable increase in the resident population or corresponding permanent demand for parks and recreational facilities in the

vicinity of the Project Site. Therefore, Alternative 1 would not result in any impacts to parks and recreation due to construction, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

No changes to existing land uses or operations on-site would occur under Alternative 1. Therefore, there would be no potential to generate additional demand for parks and recreational facilities in the vicinity of the Project Site. No impacts to parks and recreational facilities would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(5) Libraries

(a) Construction

As Alternative 1 would not require construction, this alternative would not have the potential for construction employment to result in an increase in the resident population or corresponding demand for libraries in the vicinity of the Project Site. Therefore, Alternative 1 would not result in any library impacts due to construction, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

No changes to existing land uses or operations on-site would occur under Alternative 1. Therefore, there would be no potential to generate additional demand for libraries in the vicinity of the Project Site. No impacts to libraries would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

k. Transportation

Since the No Project/No Build Alternative 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 operational traffic, including conflicts with programs, plans, ordinances, or policies addressing the circulation system; vehicle miles traveled (VMT); hazardous design features; emergency access; and freeway safety. Overall, impacts under Alternative 1 would be less when compared to the Project, which would be less than significant under Option A and less than significant with mitigation incorporated under Option B.

l. Tribal Cultural Resources

No grading or earthwork activities would 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 impacts of the Project, which would be less than significant with mitigation.

m. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

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

(b) Operation

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

(2) Wastewater

(a) Construction

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

(b) Operation

Alternative 1 would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the wastewater flow on the Project Site. No operational impacts related to wastewater conveyance or treatment would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(3) Solid Waste

(a) Construction

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

(b) Operation

Alternative 1 would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the operational solid waste production on the Project Site. No operational impacts to solid waste collection or disposal facilities would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(4) Energy Infrastructure

(a) Construction

Construction activities would not occur under Alternative 1. Therefore, Alternative 1 would not generate a short-term demand for energy during construction that would reduce existing energy infrastructure capacity, 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.

(b) Operation

Alternative 1 would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the long-term energy demand on the Project Site. No operational 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

Alternative 1 would eliminate the Project's significant and unavoidable environmental impacts, including those related to noise from on-site construction activities and vibration from on-site and off-site construction with respect to human annoyance. Furthermore, Alternative 1 would avoid the significant and unavoidable cumulative construction noise impacts from on-site and off-site noise sources and cumulative off-site construction vibration impacts with respect to human annoyance. Alternative 1 would also eliminate all

of the Project's remaining impacts that are less-than-significant and less-than-significant with mitigation as no changes to the existing conditions would occur.

4. Relationship of the Alternative to Project Objectives

Under the No Project/No Build Alternative, the existing buildings and surface parking areas 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 or any of the Project's basic objectives. Specifically, Alternative 1 would not:

- Provide for the development of new housing to meet the diverse economic and physical needs of the existing residents and projected population, provide a new mix of housing options, including different sizes and configurations, as well as provide affordable housing units.

- Provide upgraded neighborhood-serving retail and restaurant uses to provide a strong and competitive commercial sector that promotes economic vitality and serves the needs of the Project residents, visitors, and the surrounding community.

- Reduce vehicular trips and congestion by developing new housing in proximity to services and facilities, locate new housing and employment opportunities in a manner that reduces vehicular trips by providing onsite housing in combination with onsite community-serving commercial and recreational amenities and within walking distance to existing offsite commercial uses and amenities.

- Preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods, provide buildings with varied design elements and transitioning heights to respect the scale of the surrounding buildings.

- Enhance walkability by providing neighborhood-serving ground-floor retail and restaurant uses along street frontages and creating landscaped plazas, courtyards, and streetscapes that are connected by landscaped paseos across the site.

The No Project/No Build Alternative also would not meet the objectives that apply to Option B only:

- Provide opportunities for new commercial development and services through the development of modern office uses with a combination of indoor and outdoor collaborative spaces that can attract professional and creative office tenants.

- Locate employment and residential uses near one another 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 mixed-use project with sufficient density to facilitate a healthy job-housing balance.

Overall, the No Project/No Build Alternative would not meet the Project's underlying purpose to provide a mixed-use development that includes new multi-family housing opportunities that accommodate a range of income needs, provide walkable neighborhood-serving retail and restaurant uses, and provide expanded recreational amenities that serve the community and promote walkability.

V. Alternatives

B. Alternative 2: Development in Accordance with Existing Zoning

1. Description of the Alternative

Alternative 2, the Development in Accordance with Existing Zoning Alternative, considers development of the Project Site in accordance with the parameters set forth by the existing zoning on the Project Site, which is [Q]M1-1 (Qualified Limited Industrial, Height District 1).

As discussed in Section II, Project Description, of this Recirculated Draft EIR, the Limited Industrial zone permits a wide array of land uses, including any commercial land use permitted in the MR1 and C2 zones, in addition to other specified uses including (but not limited to) foundry, rental of equipment commonly used by contractors, stadiums, arenas, auditoriums, and indoor swap meets. Residential uses are generally not permitted. Height District 1 within the M1 zone normally imposes no height limitation and a maximum FAR of 1.5:1. However, pursuant to Ordinance No. 167,962, adopted in 1992, the Q conditions for the Project Site restrict building heights to 45 feet. The Q Conditions also provide that if any use not permitted in the MR1 zone is developed on the Project Site, the FAR for such uses shall be limited to 0.5 to 1. In addition, per Ordinance No. 167,962, no portion of a building or structure shall exceed 35 feet in height within 50 feet of the Glencoe Avenue right-of-way. The Q conditions also establish recycling and graffiti removal requirements for the Project Site.

Based on the existing zoning of the Project Site described above, Alternative 2 would include the development of 370,274 square feet of office uses in accordance with the office uses permitted in the MR1 zone.[2] As with the Project, the existing shopping center-related buildings within the Project Site that together comprise approximately 100,781 square feet would be removed. Overall, Alternative 2 would construct 269,493 square feet of net new floor area within the Project Site for a total floor area ratio of 1.5:1 (a reduction of 304,055 square feet compared to Option A's 573,548 square feet of

[2] *The MR1 zone permits corporate headquarters, record-keeping and computer support facilities for the processing of retrievable information and systems control, and office buildings if used only for offices of industrial firms, industrial engineering firms, and other professional, administrative, and clerical services needed by industries in the area.*

net new floor area and a reduction in FAR from 2.6:1 to 1.5:1 and a reduction of 188,720 square feet compared to Option B's 458,213 square feet of net new floor area and a reduction in FAR from 2.15:1 to 1.5:1). A conceptual site plan of Alternative 2 is provided in Figure V-1 on page V-28.

As shown in Figure V-1, the proposed office uses would be located within two three-story buildings. One building would be located generally along the western half of the Project Site, while the other building would be situated generally along the eastern portion of the Project Site, along Glencoe Avenue. The proposed buildings would be 35 feet to 45 feet in height, consistent with the existing zoning, and would be reduced compared to the seven-story (77- to 79-foot maximum height) buildings proposed as part of the Project. The architectural features, lighting and signage, and sustainability intent of Alternative 2 would be similar to that of the Project.

With regard to vehicular parking, 741 parking spaces would be required and would be provided in accordance with the requirements of the LAMC. These parking spaces would be provided in one and one-half levels of subterranean parking below the proposed buildings (compared to the two subterranean levels proposed as part of Option A and three subterranean parking levels proposed as part of Option B). As shown in Figure V-1, vehicular access to the proposed parking garage would be provided via one entry/exit driveway along the private driveway west of the Project Site and along Glencoe Avenue. Pedestrian and bicycle access would be provided along the perimeters of the Project Site.

As shown in Figure V-1, Alternative 2 would provide a landscaped Office Plaza in the center of the Project Site and smaller landscaped courtyards at building perimeters. As office uses are not required to provide open space, the open space to be provided as part of Alternative 2 would be substantially reduced compared to the Project. Trees and other landscaping features would also be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue to activate these streets and provide a pedestrian-friendly environment.

Similar to the Project, construction of Alternative 2 would be developed in one phase. However, given the reduced subterranean parking proposed as part of Alternative 2, the amount of export would be reduced from 241,800 cubic yards under Option A and 251,000 cubic yards under Option B to approximately 181,350 cubic yards (a reduction of approximately 60,450 cubic yards compared to Option A and a reduction of approximately 69,650 cubic yards compared to Option B). Similarly, due to the reduction in excavation and export associated with a reduced subterranean parking garage and the reduction in floor area, the overall construction period would be reduced compared to that of the Project.

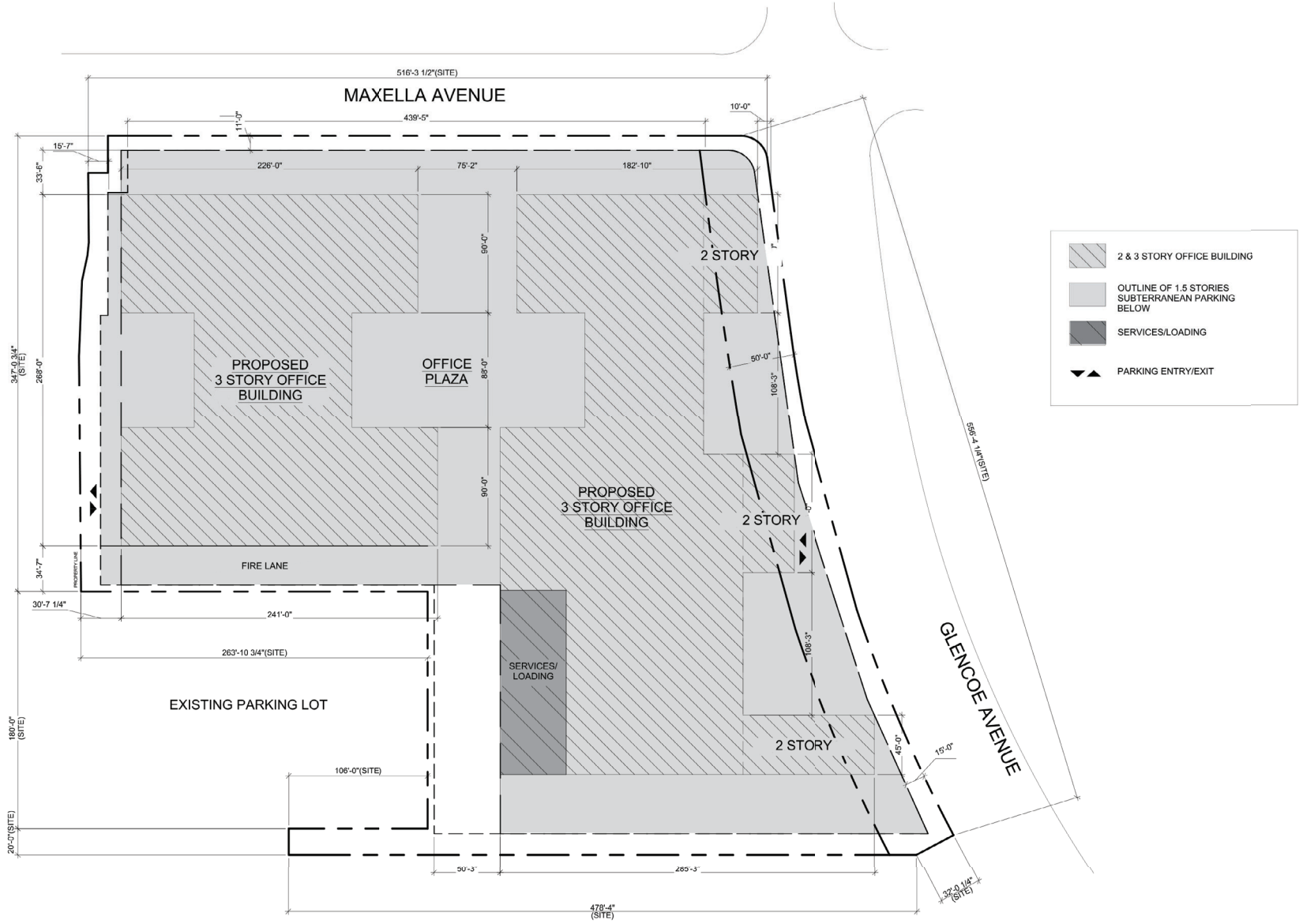

Figure V-1
Alternative 2 Conceptual Site Plan

Source: TCA Architects, 2018.

As with the Project, Alternative 2 would require a Coastal Development Permit, and a Vesting Tentative Tract Map and haul route. In lieu of the Project's Site Plan Review, Alternative 2 would require a Major Development Project Conditional Use Permit. However, Alternative 2 would not require a General Plan Amendment, Vesting Zone and Height District Change, Mello Act Compliance Review, and Master Conditional Use Permit as would the Project.

2. Environmental Impacts

a. Aesthetics

(1) Conflict with Applicable Regulations Governing Scenic Quality

As discussed in Section IV.A, Aesthetics, of this Recirculated Draft EIR, a number of local plans, policies, and regulations related to scenic quality are applicable to the Project, including the City of Los Angeles General Plan Framework Element and Conservation Element, the Community Plan, the Citywide Urban Design Guidelines, the LAMC, and Title 24 of the California Code of Regulations. As concluded in Section IV.A, Aesthetics, of this Recirculated Draft EIR, the Project under either Option A or Option B would not conflict with the zoning and other regulations governing scenic quality.

Alternative 2, the Development in Accordance with Existing Zoning Alternative, considers development of the Project Site in accordance with the parameters set forth by the existing zoning of the Project Site, which is [Q]M1-1 (Qualified Limited Industrial, Height District 1). As indicated previously, the Limited Industrial zone permits a wide array of land uses, including any commercial land use permitted in the MR1 and C2 zones, in addition to other specified uses including (but not limited to) foundry, rental of equipment commonly used by contractors, stadiums, arenas, auditoriums, and indoor swap meets. Height District 1 within the M1 zone normally imposes no height limitation and would permit a maximum FAR of 1.5:1. However, the Q conditions for the Project Site restrict building heights to 45 feet. Accordingly, Alternative 2 would include the development of 370,274 square feet of office uses in accordance with the office uses permitted in the MR1 zone.[3] The proposed office uses would be located within two three-story buildings. The proposed buildings would be 35 feet to 45 feet in height, consistent with the existing zoning.

[3] *The MR1 zone permits corporate headquarters, record-keeping and computer support facilities for the processing of retrievable information and systems control, and office buildings if used only for offices of industrial firms, industrial engineering firms, and other professional, administrative, and clerical services needed by industries in the area.*

Based on the zoning and land use designation of the Project Site, the proposed office uses are permitted on the Project Site and such uses, as proposed by Alternative 2, would not conflict any regulations governing scenic quality under the existing zoning. Nor would Alternative 2 conflict with any other regulations governing scenic quality. Therefore, the impacts of Alternative 2 related to potential conflicts with zoning and other regulations governing scenic quality would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project.

(2) Light and Glare

(a) Construction

As with the Project, while the majority of construction under Alternative 2 would occur during daylight hours (during a typical eight-hour work day), construction activities could potentially require the use of artificial lighting if construction were to occur in the evening until 9:00 P.M., as permitted per the LAMC. Additionally, artificial lighting may be required during the winter months when daylight is no longer sufficient earlier in the day. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of construction. In addition, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements, and lighting would be shielded and/or aimed so that no direct beam illumination is provided outside of the Project Site boundary. Therefore, similar to the Project, light resulting from construction activities under Alternative 2 would not significantly impact off-site sensitive uses, substantially alter the character of off-site areas surrounding the construction area, adversely impact day or nighttime views in the area, or substantially interfere with the performance of an off-site activity.

Also similar to the Project, any glare generated within the Project Site during construction of Alternative 2 would be transitory and short-term given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities. Furthermore, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Therefore, similar to the Project, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur under Alternative 2.

Based on the above, light and glare associated with construction of Alternative 2 would not substantially alter the character of off-site areas surrounding the Project Site or adversely impact day or nighttime views in the area. Impacts related to light and glare during construction of Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the shortened construction duration.

(b) Operation

Similar to the Project, Alternative 2 would replace the existing on-site buildings and parking areas and would increase the number of vehicle trips to and from the Project Site. However, as with the Project, Alternative 2 would eliminate sources of glare associated with the existing surface parking lots.

Similar to the Project, the proposed lighting sources under Alternative 2 would be similar to other lighting sources in the Project Site vicinity and would not generate artificial light levels that are out of character with the surrounding area. All exterior lights would be directed toward the interior of the Project Site to avoid light spillover onto adjacent sensitive uses. The design of the proposed structures would further ensure that lighting is concentrated in the central portion of the buildings and would provide space along the building edges to serve as a buffer for rooftop light spillover. Lighting under Alternative 2 would also meet all applicable LAMC lighting standards.

Signage under Alternative 2 would include building identity signage and general ground level and wayfinding pedestrian signage. No off premises or billboard advertising is proposed as part of the alternative. Alternative 2 would also not include signage with flashing, mechanical, or strobe lights. In general, new signage would be architecturally integrated into the design of the proposed building and would establish appropriate identification for the office uses. Signage on the Project Site would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off-site glare. Illumination used for signage under Alternative 2 would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

With regard to glare, the office buildings under Alternative 2 would be designed in a contemporary architectural style and would feature various surface materials. Building materials could include tile or stone veneer, storefront windows, aluminum louvers, wood or simulated wood, exterior plaster, and glass railings. Alternative 2 would implement similar design features as the Project that would require the use of non-reflective glass or glass that has been treated with a non-reflective coating in all exterior windows and building surfaces to reduce potential glare from reflected sunlight. Therefore, these materials would not have the potential to produce a substantial degree of glare. In addition, the proposed parking garage would be below grade, which would eliminate the reflection potential from parked cars as viewed from surrounding areas and roadways during the day and night, and would substantially reduce lighting levels from vehicle headlights during the night compared to existing conditions.

Based on the above, lighting and glare associated with operation of Alternative 2 would not result in a new source of substantial light or glare, which would adversely affect

day or nighttime views in the area. Therefore, operational light and glare impacts under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in building square footage, height, and massing of the structures proposed under Alternative 2.

b. Air Quality

(1) Construction

(a) Regional Emissions

As with the Project, construction of Alternative 2 has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.B, Air Quality, of this Recirculated 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 construction activities and construction duration would be reduced in comparison to the Project due to the reduction in development and the reduction in excavation and export-related construction activities associated with the reduced subterranean parking proposed under this alternative. Specifically, under Alternative 2, total excavation quantities would be reduced by approximately 25 percent compared to Option A (a reduction of approximately 60,450 cubic yards) and approximately 28 percent compared to Option B (a reduction of approximately 69,650 cubic yards). However, the intensity of air emissions and fugitive dust from site preparation and construction activities under Alternative 2 would be similar to the project on peak construction days because the maximum number of trucks and equipment that could be accommodated within the construction site and that would be operating during the excavation phase would be similar to the Project on a daily basis (i.e., there would be no change to the intensity of construction activities on days in which maximum construction activities would occur). As such, air emissions during maximum activity days, which is a metric used for measuring impact significance, would be similar to those of the Project. It is noted however that with the reduced duration of the excavation phase, which would be shortened by approximately 25 to 28 percent (based on the corresponding 25-percent to 28-percent reduction in excavation quantities), the Project's regional air emissions impact would occur for a shorter duration compared to the Project. Thus, the duration of the Project's regional air emissions impact would be less under Alternative 2. Overall, the reduction in development and excavation activities under Alternative 2 would lessen impacts associated with regional daily emissions as compared to the Project. Therefore, as with the Project, Alternative 2 would result in regional construction emissions impacts

that would be less than significant with incorporation of mitigation, and such impacts would be less than those of the Project.

(b) Localized Emissions

On-site construction activities under Alternative 2 would be located at similar distances from sensitive receptors as the Project. As previously discussed above, although Alternative 2 would result in a reduction in the amount of proposed development and excavation compared to the Project, the intensity of construction activities would be similar on days with maximum construction activities (i.e., there would be no change to the intensity of construction activities on days in which maximum construction activities would occur). As such, air emissions during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. It is noted however that with the reduced duration of the excavation phase, which would be shortened by approximately 25 to 28 percent (based on the corresponding 25-percent to 28-percent reduction in excavation quantities), the Project's localized air emissions impact would occur for a shorter duration compared to the Project. Overall, the reduction in development and excavation activities would reduce impacts associated with localized emissions as compared to the Project; as such, impacts under Alternative 2, like the Project, would be less than significant, with the degree of the impact less than that of the Project.

(c) Toxic Air Contaminants

As with the Project, construction of Alternative 2 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for toxic air contaminant emissions. As discussed in Section IV.B, Air Quality, of this Recirculated Draft EIR, the Project would result in less-than-significant impacts with regard to construction TAC emissions. Overall construction TAC emissions generated by Alternative 2 would be less than to those of the Project due to the reduction in total floor area and excavation activities. As with the Project, the construction phases which require the most heavy-duty diesel vehicle usage, such as site grading, would last for a short duration. Thus, construction of Alternative 2 also would not result in a substantial, long-term (i.e., 70-year) source of TAC emissions, and impacts due to TAC emissions under Alternative 2 would be less than significant. Such impacts would be less than the less-than-significant impacts of the Project.

(2) Operation

(a) Regional Emissions

As previously discussed, the development proposed under Alternative 2 would be reduced compared to the Project. As such, the number of net new daily trips generated by

Alternative 2 would be less than the number of net new daily trips generated by the Project. Operational regional air pollutant emissions associated with Alternative 2 would be generated by vehicle trips to the Project Site, which are the largest contributors to operational air pollutant emissions, and by the consumption of electricity and natural gas. As vehicular emissions depend on the number of trips, the overall pollutant emissions generated by this alternative would be less than the emissions generated by the Project because the number of vehicular trips would be less. With the elimination of residential and retail uses and reduction of overall floor area, both area sources and stationary sources would also generate less on-site operational air emissions compared to those of the Project. Therefore, under Alternative 2, total contributions to regional air pollutant emissions during operation would be less than the Project's contributions. Accordingly, regional air quality impacts under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Localized Emissions

As previously discussed, the development proposed under Alternative 2 would be reduced compared to the Project. With the elimination of residential and retail uses and reduction of overall floor area, vehicular emissions, area and stationary sources would generate less on-site operational air emissions compared to those of the Project. In addition, as with the Project, Alternative 2 would not introduce any new major sources of air pollution within the Project Site. Therefore, under Alternative 2, total contributions to localized air pollutant emissions during operation would be less than the Project's contributions. Accordingly, localized air quality impacts under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(c) Toxic Air Contaminants

As set forth in Section IV.B, Air Quality, of this Recirculated Draft EIR, the primary sources of potential TACs associated with Project operations would include diesel particulate matter from delivery trucks. Alternative 2 would eliminate the residential and retail uses proposed by the Project and introduce a new office development to the Project Site with a reduced floor area compared to the Project. Consequently, Alternative 2 would result in a reduction in the number of deliveries and diesel particulate matter emissions. Similar to the Project, the land uses proposed under Alternative 2 are not considered land uses that generate substantial TAC emissions. Therefore, Alternative 2 would not release substantial amounts of TACs. Impacts under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

c. Energy

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

(a) Construction

Similar to the Project, construction activities associated with Alternative 2 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. Also similar to the Project, construction activities associated with Alternative 2 would not involve the consumption of natural gas. As with the Project, Alternative 2 would generate a demand for transportation energy associated with on- and off-road vehicles. However, the energy consumed during construction of Alternative 2 would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. As with the Project, the electricity demand during construction of Alternative 2 would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Construction equipment used during construction of Alternative 2 would also comply with Title 24 requirements where applicable, similar to the Project. With regard to transportation fuels, trucks and equipment used during construction of Alternative 2 would comply with CARB's anti-idling regulations, as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. Therefore, as with the Project, construction activities would use energy that is not wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project due to the reduction in construction activities and duration.

(b) Operation

As with the Project, operation of Alternative 2 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions. Although the office uses proposed for Alternative 2 would have a greater demand for electricity compared to the Project, office uses typically have a reduced demand for natural gas compared to residential uses as office uses do not typically

consume natural gas associated with kitchen uses.[4] In addition, as previously discussed, the office uses would generate fewer net daily vehicle trips compared to the Project. Thus, the associated consumption of petroleum-based fuels under Alternative 2 would be reduced when compared to the Project. Accordingly, under Alternative 2, the overall energy consumption would be less than that of the Project. Alternative 2 would implement similar design features as the Project, which would improve energy efficiency and reduce impacts on consumption of energy resources. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 2 would not be wasteful, inefficient, or unnecessary. Therefore, impacts related to energy use under Alternative 2 would be less than significant and less to the less-than-significant impacts of the Project.

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

As discussed in Section IV.C, Energy, of this Draft EIR, the current City of LA Green Building Code requires compliance with CalGreen and California's Building Energy Efficiency Standards (Title 24). Like the Project, Alternative 2 would comply with the City's Green Building Code, as well as be capable of achieving LEED® Silver Certified equivalency. Therefore, similar to the Project, Alternative 2 would incorporate measures that are beyond current State and City energy conservation requirements. Also similar to the Project, Alternative 2 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2019 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code. Based on the above, Alternative 2, as with the Project, would not conflict with applicable plans for renewable energy or energy efficiency. Furthermore, as with the Project, Alternative 2 would represent urban infill development in close proximity to transit, which would reduce vehicle trips, VMT, per capita VMT, and associated fuel usage in accordance with the SB 375 and SCAG's RTP/SCS. As with the Project, Alternative 2 would also be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction which would save transportation energy.

With regard to transportation related energy usage, Alternative 2 would also comply with goals of the SCAG's RTP/SCS which incorporates VMT targets established by SB 375. As with the Project, the uses proposed under Alternative 2 would introduce new job opportunities consistent with numerous policies in the 2020-2045 RTP/SCS related to locating new jobs near transit. In addition, vehicle trips generated during Project operations would comply with CAFE fuel economy standards. As with the Project, Alternative 2 would

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

be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction

Therefore, Alternative 2, like the Project, would not conflict with plans for renewable energy or energy efficiency. The impacts of Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

d. Geology and Soils

Under Alternative 2, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, liquefaction, soil erosion, subsidence, expansive soils, corrosive soils, oil wells, methane, and landform alterations would be similar to those under the Project because such impacts are a function of the Project Site's underlying geologic conditions rather than the type of land use proposed. Alternative 2 would be developed within the same site as the Project and would comply with the same regulatory requirements as the Project to ensure that the soils underlying the Project Site can adequately support the proposed development. As with the Project, Alternative 2 would be designed and constructed to conform to the current seismic design provisions of the California Building Code and the Los Angeles Building Code. Alternative 2 would also comply with the same regulatory requirements as the Project, which require the preparation of a final design-level geotechnical engineering report to identify and minimize seismic risks. In addition, Alternative 2 would comply with the same mitigation measures as the Project to reduce impacts associated with liquefaction and any associated settlement. Impacts related to geology and soils under Alternative 2 would be less than significant with mitigation and similar to the impacts of the Project, which are also less than significant with mitigation.

e. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily trips generated and energy consumption from proposed land uses. Under Alternative 2, the trip generation and energy and water consumption by the proposed land uses would be reduced compared to the Project due to the reduction in development and the types of land uses proposed. Thus, the amount of GHG emissions generated by Alternative 2 would be less than the amount generated by the Project. 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. Alternative 2 would also incorporate design features to reduce GHG emissions and be capable of meeting the standards of LEED Silver or equivalent green building standards. With compliance with the CALGreen Code and the Los Angeles Green Building Code, and with the implementation of comparable sustainability features as the Project, it is anticipated that Alternative 2 would be consistent with the GHG reduction goals and objectives included in adopted State, regional, and local

regulatory plans. Thus, impacts related to GHG emissions under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

f. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, the construction of Alternative 2 would require the demolition of the existing on-site buildings and surface parking areas, which could result in potential impacts related to the disturbance of asbestos containing material and lead based paint during construction due to the age of the buildings. As with the Project, Alternative 2 would comply with relevant regulations and requirements related to asbestos containing material and lead based paint, including SCAQMD Rule 1403, to ensure that impacts would be less than significant. As discussed in detail in Section IV.F, Hazards and Hazardous Materials, of this Recirculated Draft EIR, according to the Phase I ESA and Phase I ESA Update, during the Project Site reconnaissance, no evidence of existing underground storage tanks or aboveground storage tanks were observed on the Project Site. In addition, while three vaulted transformers were observed on-site, no leaks or stains were observed on the ground beneath the transformers and, as such, are unlikely to present an environmental concern. As with the Project, in the event that polychlorinated biphenyls (PCBs) are found within areas proposed for demolition during construction of Alternative 2, suspect materials would be removed in accordance with all applicable federal, State, and local regulations. Furthermore, during demolition, on-site grading, and building construction, fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, would be used, handled, and stored on the Project Site and would, therefore, require proper management and disposal. Alternative 2 would comply with relevant regulations and requirements related to asbestos containing material and lead based paint to ensure that impacts would be less than significant. Alternative 2 would also fully comply with all applicable federal, State, and local requirements, as well as the manufacturer's instructions concerning the use, handling, storage, and disposal of hazardous materials. Additionally, if previously unidentified wells are encountered during construction of Alternative 2, adherence to all applicable regulatory compliance measures would ensure impacts associated with previously unidentified oil wells or oil production facilities would be less than significant. Moreover, Alternative 2 would comply with the City of Los Angeles' Methane Mitigation Ordinance No. 175790, which would reduce impacts associated with methane gas during demolition and building construction of Alternative 2.

With regard to emergency response, construction activities for Alternative 2 would be primarily confined to the Project Site and would only include minor off-site work for installation of utility connections, similar to the Project. In addition, similar to the Project, a Construction Staging and Traffic Management Plan would be implemented during

construction of Alternative 2 to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The Construction Staging and Traffic Management Plan would include street closure information, traffic controls to direct traffic, a detour plan, haul routes, and a staging plan.

Based on the above, potential construction-related impacts associated with hazards and hazardous materials under Alternative 2 would be less than significant. Such impacts would be less when compared to the less-than-significant impacts of the Project due to the shortened construction duration and reduction of overall construction activities.

(2) Operation

Similar to the Project, Alternative 2 would not include the use of materials that would contain asbestos, lead based paint, or PCBs. In addition, Alternative 2 would not propose the installation of underground or aboveground storage tanks. The operation of Alternative 2 would involve the limited use of potentially hazardous materials typical of those used in offices, including cleaning agents, paints, pesticides, and other materials used for landscaping. As with the Project, all hazardous materials on the Project Site would be acquired, handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, State, and local requirements. In addition, as with the Project, Alternative 2 would comply with the City of Los Angeles' Methane Mitigation Ordinance No. 175790.

With regard to emergency response plans, Alternative 2 would not involve any activities that would impede public access or travel along the public right-of-way or interfere with an adopted emergency response or evacuation plan. In addition, similar to the Project, the increase in traffic generated by Alternative 2 would not significantly impact emergency vehicle response to the Project Site and surrounding uses, including along City-designated disaster routes, since the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Accordingly, operation of Alternative 2 would not cause a substantial effect on emergency response as a result of increased traffic congestion. Furthermore, as Alternative 2 would reduce overall daily traffic as compared to the Project, Alternative 2 would have a lesser impact on emergency response within, and in, the vicinity of the Project Site compared to the Project, and such impacts would also be less than significant.

Based on the above, potential impacts related to hazards and hazardous materials during operation of Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in total floor area.

g. Hydrology and Water Quality

(1) Surface Water Quality

(a) Construction

Under Alternative 2, the degree to which new pollutants could be introduced to the Project Site during construction would be reduced compared to the Project as Alternative 2 would include less construction activities and would occur for a shorter duration. As with the Project, a SWPPP would be prepared for Alternative 2 and would specify BMPs to be used during construction. While excavation activities under Alternative 2 would be slightly reduced compared to the Project, Alternative 2 could potentially require a temporary dewatering system during construction, similar to the Project. The temporary dewatering systems would be utilized in compliance with the NPDES permit and with all relevant NPDES requirements related to construction and discharges from dewatering operations.

With the implementation of site-specific BMPs included as part of the SWPPP, Alternative 2 would reduce or eliminate the discharge of potential pollutants from stormwater runoff. In addition, construction of Alternative 2 would be required to comply with City grading permit regulations, which require necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspection to reduce sedimentation and erosion. Therefore, with compliance with NPDES requirements and City of Los Angeles grading permit regulations, construction of Alternative 2 would not result in discharge that would violate any water quality standard or waste discharge requirements, or otherwise substantially degrade water quality. Furthermore, construction of Alternative 2 would not result in discharges that would cause regulatory standards to be violated in the Ballona Creek and Marina del Rey Watersheds. Therefore, as with the Project, construction-related impacts to surface water quality under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in excavation and overall construction activities.

(b) Operation

Similar to the Project, Alternative 2 would implement BMPs for managing stormwater runoff in accordance with current City LID Ordinance requirements. The BMPs would control stormwater runoff with no increase in runoff resulting from the alternative. As with the Project, a combination of gravity flows, pumps and splitter boxes would be used to route flows to either the infiltration BMP or to the adjacent streets. Due to the incorporation of the LID BMPs, operation of Alternative 2 would not result in discharges that would violate any water quality standard or waste discharge requirements, or otherwise substantially degrade water quality. Thus, as with the Project, impacts to surface water quality during

operation of Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in development.

(2) Groundwater Quality

(a) Construction

Similar to the Project, Alternative 2 could require dewatering during construction. As with the Project, any discharge of groundwater during construction of Alternative 2 would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements. Pursuant to such requirements, the groundwater extracted would be chemically analyzed to determine the appropriate treatment and/or disposal methods.

During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would, therefore, require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials to be released into groundwater. As this alternative would require less construction activities and of shorter duration when compared to the Project, the use of hazardous materials would be reduced. In addition, compliance with all applicable federal, State, and local requirements concerning the handling, storage and disposal of hazardous waste, would reduce the potential for the construction of Alternative 2 to release contaminants into groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well downstream. Furthermore, as there are no groundwater production wells or public water supply wells on-site or within 1 mile of the Project Site, construction activities would not be anticipated to affect existing wells.

Based on the above, as with the Project, impacts with respect to groundwater quality during construction under Alternative 2 would be less than significant andless when compared to the less-than-significant impacts of the Project due to a reduction in excavation and overall construction activities and a shorter construction duration.

(b) Operation

Similar to the Project, Alternative 2 would not include the installation or operation of water wells, or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well or spreading ground facility. In addition, Alternative 2 would not include surface or subsurface application or introduction of potential contaminants or waste materials. Furthermore, Alternative 2 is not anticipated to result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater

through percolation. Therefore, as with the Project, impacts with respect to groundwater quality during operation of Alternative 2 would be less than significant and less when compared to the less-than-significant impacts the Project due to the reduction in the proposed development.

(3) Surface Water Hydrology

(a) Construction

Similar to the Project, construction activities for Alternative 2 would include demolition of the existing buildings and surface parking areas. Construction of Alternative 2 would require less excavation and building construction compared to the Project. However, Alternative 2 would disturb the same surface area as the Project. As with the Project, these activities would have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Similar to the Project, Alternative 2 would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, Alternative 2 would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. In addition, Alternative 2 would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion, similar to the Project. Thus, through compliance with all NPDES Construction General Permit requirements, including preparation of a SWPPP, implementation of BMPs, and compliance with applicable City grading regulations, Alternative 2 would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, or flooding on- or off-site. Similarly, with adherence to standard compliance measures, construction activities would not cause flooding, substantially increase or decrease the amount of surface water flow from the Project Site into a water body or result in a permanent, adverse change to the movement of surface water. Therefore, construction-related impacts to surface water hydrology under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 2 would include development of new buildings, paved areas, and landscaped areas. As with the Project, implementation of Alternative 2 would reduce the amount of impervious surfaces as compared to the Project Site's existing impervious surfaces. However, Alternative 2 would not reduce existing impervious areas to the same extent as the Project, as Alternative 2 would include less open space than the Project. As discussed in Section IV.G, Hydrology and Water Quality, of this Recirculated Draft EIR, the street capacity calculations for both Glencoe Avenue and Maxella Avenue determined that both roadways can handle the proposed 10-year flows associated with the

Project, along with street flows already in the roadways. As this alternative would not reduce existing impervious areas to the same extent as the Project due to the reduction in open space, it is assumed that Alternative 2 would result in greater flows than the Project. However, such flows would not exceed existing flows, in accordance with the City's LID Ordinance. Thus, the street capacity would be sufficient to handle the flows from Alternative 2.

Based on the above, Alternative 2 would not impact existing storm drain infrastructure serving the Project Site, and runoff would continue to follow the same discharge paths and drain to the same storm systems. Consequently, Alternative 2 would not cause flooding during the 50-year developed storm event, would not create runoff that would exceed the capacity of existing or planned drainage systems, would not require construction of new stormwater drainage facilities or expansion of existing facilities, would not substantially reduce or increase the amount of surface water in a water body, or result in a permanent adverse change to the movement of surface water. Therefore, operational impacts to surface water hydrology under Alternative 2 would be less than significant but greater when compared to the less-than-significant impacts of the Project due to the reduction in pervious surface areas and associated increase in runoff flows as compared to the Project.

(4) Groundwater Hydrology

(a) Construction

As previously discussed, as with the Project, Alternative 2 could require a temporary dewatering system during construction. Similar to the Project, in the event dewatering is required during construction of Alternative 2, a temporary dewatering system would be installed and operated in accordance with NPDES General Construction Permit requirements. Any discharge of groundwater during construction of Alternative 2 would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements. As discussed in Section IV.G, Hydrology and Water Quality, of this Recirculated Draft EIR, no water supply wells are located at the Project Site or within 1 mile of the Project Site that could be impacted by construction. In addition, as with the Project, Alternative 2 would not include the construction of water supply wells. Therefore, as with the Project, construction impacts on groundwater hydrology during construction of Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in excavation and overall construction activities.

(b) Operation

As with the Project, the subterranean parking proposed by Alternative 2 would be designed such that it is able to withstand hydrostatic forces and would incorporate

comprehensive waterproofing systems in accordance with current industry standards and construction methods. As such, similar to the Project, permanent dewatering operations are not expected during operation of Alternative 2. As discussed in Section IV.G, Hydrology and Water Quality, of this Recirculated Draft EIR, the Project Site is currently 96 percent impervious, and, as such, minimal groundwater recharge occurs. Similar to the Project, Alternative 2's increase in pervious area along with the proposed infiltration system would improve the groundwater recharge capacity of the Project Site compared to existing conditions. However, the extent to which groundwater recharge capacity would be improved would be less under this alternative, since Alternative 2 would include less open space and, therefore, less pervious areas compared to the Project. Therefore, impacts to groundwater hydrology during operation of Alternative 2 would be less than significant but greater when compared to the less-than-significant impacts of the Project.

h. Land Use and Planning

Alternative 2 includes the development of a five-story office building and associated parking structure. Alternative 2 would comply with the Project Site's existing Limited Manufacturing land use designation and [Q]M1-1 (Qualified Limited Industrial, Height District 1) zoning. The proposed building under Alternative 2 would have a maximum height of 35 feet to 45 feet, which is permitted under the [Q]M1-1 zone. Alternative 2 would also comply with the maximum floor area ratio of 1.5:1 imposed by the Project Site's zoning. Since Alternative 2 would comply with the permitted land use and existing zoning requirements and would not include housing or the sale of alcohol, development of Alternative 2 would not require a General Plan Amendment, Zone and Height District Change, Mello Act Compliance, or Master Conditional Use Permit as would the Project. Alternative 2 would require discretionary and ministerial approvals, including a Coastal Development Permit, and Vesting Tentative Tract Map and haul route, similar to the Project. In lieu of the Project's Site Plan Review, Alternative 2 would require a Major Development Project Conditional Use Permit. Based on the zoning and land use designation of the Project Site, the proposed office uses are permitted on the Project Site. In addition, as Alternative 2 would construct a project consistent with the existing zoning of the Project Site, this alternative would not conflict with the applicable plans, policies, and regulations that were adopted for the purpose of avoiding or mitigating an environmental effect, including but not limited to the City's General Plan Framework Element, Community Plan, LAMC, and SCAG's 2020-2045 RTP/SCS. Thus, the impacts of Alternative 2 related to potential conflicts with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant and less when compared to the less-than-significant impacts of the Project as this alternative would develop the Project Site under its current zoning and land use designation.

i. Noise

(1) Noise

(a) Construction

Alternative 2 would involve the same general phases of construction as the Project (i.e., site grading and excavation, building construction, and finishing/landscape installation). In addition, the types of construction activities required for Alternative 2 would be substantially similar to the Project. However, Alternative 2 would require less excavation and soil export compared to the Project since Alternative 2 would construct less subterranean parking. In addition, the amount of development proposed by Alternative 2 would also be reduced compared to the Project. As with the Project, construction of Alternative 2 would generate noise from the use of heavy-duty construction equipment, as well as from haul truck and construction worker trips. While the overall amount and duration of construction would be reduced, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to the Project during maximum activity days during the excavation phase (i.e., there would be no change to the intensity of construction activities on days in which maximum construction activities would occur). However, as previously noted, the excavation phase under Alternative 2 would be shortened by approximately 25 percent to 28 percent. As such, the impact experienced during this peak construction phase would occur over a shorter period as compared to the Project. As such, noise levels during maximum activity days, which is a metric used for measuring impact significance, would be similar to those of the Project; however, the duration of noise level increases, which is another metric used for measuring impacts significance, would be less compared to the Project. Alternative 2 would also implement similar design features and mitigation measures as the Project to reduce noise and vibration levels during construction. Similar to the Project, on-site construction noise under Alternative 2 would be significant and unavoidable, and off-site construction noise would be less than significant. Overall, impacts under Alternative 2 would be less than those of the Project as the duration of construction activities and, particularly, excavation activities, would be reduced.

(b) Operation

As discussed in Section IV.I, Noise, of this Recirculated Draft EIR, sources of operational noise include (a) on-site stationary noise sources, such as mechanical equipment, activities associated with the proposed outdoor spaces, parking facilities, and loading dock and trash collection areas, and (b) off-site mobile (roadway traffic) noise sources. Alternative 2 would introduce noise from similar on-site and off-site noise sources to the Project Site. The mechanical equipment, outdoor spaces, parking facilities, and loading dock and trash collection areas, as well as vehicular trips, associated with these uses have been considered as part of the overall development under this alternative.

Similar to the Project, Alternative 2 would include Project Design Features NOI-PDF-2 and NOI-PDF-4 that respectively require screening of mechanical equipment and loading docks, including enclosing or screening loading and trash collection areas from off-site noise-sensitive receptors and specifying sound levels for outdoor sound systems. With regard to noise generated from on-site stationary sources, it is anticipated that noise associated with outdoor spaces would be reduced under Alternative 2, and loading docks and trash collection areas would be located in the center of the Project Site. As such, impacts would be less than those of the Project.

With regard to off-site noise sources, Alternative 2 would result in a reduction in daily trips compared to the Project, and as such, noise associated with off-site traffic would be less than those of the Project. Therefore, on- and 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 vibration from the use of heavy-duty construction equipment as well as from truck trips. While the overall amount of construction activities (including excavation) would be reduced under Alternative 2, on- and off-site construction activities and the associated construction on- and off-site vibration levels would be expected to be similar to those of the Project as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment (i.e., there would be no change to the intensity of construction activities on days in which maximum construction activities would occur). However, as previously noted, the excavation phase under Alternative 2 would be shortened by approximately 25 percent to 28 percent. As such, the impact experienced during this peak construction phase would occur over a shorter period as compared to the Project. Peak vibration levels generated by construction equipment and construction truck trips would be similar to those of the Project. Accordingly, as with the Project, vibration impacts due to on- and off-site construction activities under Alternative 2 would similarly be less than significant for on-site and off-site construction vibration pursuant to the significance threshold for building damage and significant and unavoidable for on-site and off-site construction vibration pursuant to the significance threshold for human annoyance. However, as Alternative 2's construction duration would be less (including reduced excavation activities) as compared to the Project, the Project's on-site and off-site construction vibration impacts would be less under Alternative 2.

(b) Operation

As described in Section IV.I, Noise, of this Recirculated Draft EIR, operation of Alternative 2 would not generate high levels of vibration. The primary sources of the vibration would include vehicular operation within the parking garage and building mechanical equipment, which would not result in excessive vibration levels at the off-site vibration-sensitive receptors. 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, and, as such, vibration impacts associated with building damage and human annoyance during operation of the Alternative 2 would also be less than significant. Such impacts would be less than those of the Project due to the reduced development proposed by Alternative 2.

j. Public Services

(1) Fire Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 2 would be similar to those of the Project. However, the overall duration of construction would be reduced compared to the Project due to the reduced amount of development and excavation. Similar to the Project, construction activities under Alternative 2 would have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. As with the Project, construction activities under Alternative 2 would comply with the safety and health provisions of OSHA. Construction would occur in compliance with all applicable federal, State, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, compliance with regulatory requirements would effectively reduce the potential for construction activities to expose people to the risk of fire or explosion related to hazardous materials.

Additionally, while construction activities would primarily be contained within the boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by temporary lane closures, roadway/access improvements, and the construction of utility line connections. Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and

construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term and temporary for the area, construction activities under Alternative 2 could temporarily affect emergency response along Lincoln Boulevard, and other main connectors due to potential traffic impacts during the alternative's construction phase. However, as with the Project, construction-related traffic, including hauling activities and construction worker trips, under Alternative 2 would occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts. In addition, as with the Project, a Construction Staging and Traffic Management Plan would also be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Therefore, construction-related impacts related to fire protection services under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in construction activities and duration.

(b) Operation

As discussed in Section IV.I.1, Public Services—Fire Protection of this Draft EIR, the Project Site would be served by Fire Station No. 67. Alternative 2 would develop office uses on the Project Site and would not include any residential uses. Therefore, Alternative 2 would not generate a new residential population in the service area of Fire Station No. 67 that would demand fire protection and emergency medical services provided by the LAFD. However, based on the generation rates provided by the City of Los Angeles VMT Calculator Documentation, Alternative 2 would generate approximately 1,481 new employees on-site, which would result in a smaller fire service population than Option A's service population of 1,563 persons (1,481 residents and 82 employees) and Option B's service population of 1,437 persons (957 residents and 480 employees).[5] Thus, this alternative would generate a reduced demand for LAFD fire protection services compared to Option A and Option B. Similar to the Project, Alternative 2 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. As with the Project, compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection, would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment. Alternative 2 would also include the installation of automatic fire sprinklers within all proposed buildings.

[5] *Based on the City of Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. The rate of 4 employees per 1,000 square feet for "General Office" land use is applied to the 370,274 square feet.*

As with the Project, Alternative 2 would have the potential to affect emergency response to the Project Site and surrounding properties due to additional traffic. However, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, the increase in traffic generated by Alternative 2 would not significantly impact emergency vehicle response to the Project Site and surrounding area. Furthermore, the driveways and internal circulation under Alternative 2 would be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. As with the Project, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for Alternative 2. Therefore, impacts related to fire protection services under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project due to a decrease in the fire service population compared to the Option A and Option B.

(2) Police Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 2 would be similar to those of the Project. However, the overall duration of construction would be reduced compared to the Project due to the reduced amount of development and excavation. Similar to the Project, the demand for police protection services during construction of Alternative 2 would be offset by the removal of the existing commercial uses on the Project Site. Alternative 2 would also implement similar project design features as the Project, which includes temporary security measures such as security fencing, lighting, and locked entry to reduce the potential for theft and vandalism on the Project Site, thereby reducing the demand for police protection services.

Construction activities under Alternative 2 could also affect access and thereby temporarily affect police response along Lincoln Boulevard, Maxella Avenue, and other main connectors due to potential traffic impacts during the construction phase. However, given the permitted hours of construction and nature of construction projects, most, if not all, of the construction worker and haul truck trips would occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts. In addition, similar to the Project, a Construction Staging and Traffic Management Plan would be implemented to ensure that adequate and safe access is available within and near the Project Site during construction activities. Furthermore, construction-related traffic generated by the Project would not significantly impact LAPD response in the vicinity of the Project Site as emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, construction-related impacts to police protection services under Alternative 2 would be less than significant and less when compared to the

less-than-significant impacts of the Project due to the reduced construction activities and duration.

(b) Operation

Alternative 2 would develop 370,274 square feet of office uses on the Project Site and not include any residential uses; therefore, Alternative 2 would not generate a new residential population requiring police protection services. Based on the employee generation rates provided by the City of Los Angeles VMT Calculator Documentation, Alternative 2 would generate a police service population of approximately 1,481 persons, which would be less than Option A's service population of 1,563 persons (1,481 residents and 82 employees) and greater than Option B's service population of 1,437 persons (957 residents and 480 employees).[6] Therefore, while Alternative 2 would increase the existing police service population of the Pacific Area compared to existing conditions, the increase would be less than that of Option A and greater than Option B. Alternative 2 would implement similar design features as the Project requiring on-site security, appropriate lighting to ensure security, and the prevention of concealed spaces. The design features would help offset the increase in demand for police protection services generated by Alternative 2. Thus, as with the Project, Alternative 2 would not result in the need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service. Moreover, although traffic generated by Alternative 2 would have the potential to affect emergency vehicle response to the Project Site and surrounding properties due to additional traffic, drivers of police emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Therefore, the impact on police protection services under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project since the police service population generated by Alternative 2 would be less than that of the Option A, but would be greater to the less-than-significant impacts of Option B, since the police service population generated by Alternative 2 would be greater than that of the Option B.

(3) Schools

(a) Construction

Similar to the Project, Alternative 2 would generate part-time and full-time jobs associated with construction of the alternative between the start of construction and

[6] *Based on the City of Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. The rate of 4 employees per 1,000 square feet for "General Office" land use is applied to the 370,274 square feet.*

buildout of the development proposed under Alternative 2. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the alternative. Therefore, the construction employment generated by Alternative 2 would not result in a notable increase in the resident population or in a corresponding increase in demand for schools in the vicinity of the Project Site. Impacts on school facilities during construction under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

Alternative 2 does not include the development of residential uses. Thus, Alternative 2 would not directly generate school-aged children and a corresponding demand for school services. Therefore, implementation of Alternative 2 would not result in a direct increase in the number of students within the service area of the LAUSD. As such, the increased demand for school services provided by the LAUSD would be reduced under Alternative 2 compared to the Project. In addition, the number of students that could be indirectly generated by Alternative 2 as a result of employment opportunities associated with the proposed office uses would not be anticipated to be substantial because some employees would likely reside in the Project Site vicinity and would already be served by the schools serving the Project Site. Furthermore, pursuant to Senate Bill 50, the Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of project-related school impacts. Therefore, payment of applicable development school fees to the LAUSD would offset the impact of additional student enrollment at schools serving the Project Site area. Impacts related to schools under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the elimination of the development of residential uses under this alternative.

(4) Parks and Recreation

(a) Construction

Similar to the Project, construction of Alternative 2 would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, the likelihood that construction workers would relocate their households as a consequence of working on Alternative 2 is negligible. Therefore, the construction workers associated with Alternative 2 would not result in a notable increase in the residential population, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site.

During construction of Alternative 2, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. However, any resulting increase in the use of such parks and recreational facilities would be temporary and negligible.

Similar to the Project, there are no parks or recreational facilities located adjacent to the proposed haul routes or adjacent to the Project Site such that access to those facilities would be impaired during construction of Alternative 2. Therefore, use of haul routes would not be expected to result in access restrictions to City parks and recreation facilities in the vicinity of the Project Site.

Based on the above, construction-related impacts on parks and recreational facilities under Alternative 2 would be less than significant, and similar to the less-than-significant impacts of the Project.

(b) Operation

Residents are considered the primary users of parks and recreation facilities. Alternative 2 would develop office uses and would not include the development of residential uses. Thus, implementation of Alternative 2 would not result in on-site residents who would utilize nearby parks and/or recreational facilities. In addition, while it is possible that employees of Alternative 2 may utilize local parks and recreational facilities, the increased demand would be negligible and would be partially offset by the reduction in employees attributed to the removal of the existing uses on the Project Site. Therefore, Alternative 2 would result in a reduced demand for public parks and recreation services compared to the Project, and the operation of Alternative 2 would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services or interfere with existing park usage. Therefore, impacts to park and recreation facilities under Alternative 2 would be less than significant, and less when compared to the less-than-significant impacts of the Project due to the elimination of the development of residential uses under this alternative.

(5) Libraries

(a) Construction

Similar to the Project, construction of Alternative 2 would result in a temporary increase of construction workers on the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of construction. Therefore, construction employment generated by

Alternative 2 would not result in a material increase in the resident population or a corresponding demand for library services in the vicinity of the Project Site.

In addition, it is unlikely that construction workers would visit Project area libraries on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Furthermore, it is unlikely that construction workers would utilize library facilities at the end of the work day and would instead likely use library facilities near their place of residence. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. Impacts to library facilities during construction under Alternative 2 would be less than significant, and similar to the less-than-significant impacts of the Project.

(b) Operation

Residents are considered the primary users of library facilities. Alternative 2 would develop office uses and would not include the development of residential uses. Thus, implementation of Alternative 2 would not result in a direct increase in the number of residents. In addition, as employees of Alternative 2 would be more likely to use library facilities near their homes during non-work hours and given that some of the employment opportunities generated by Alternative 2 would be filled by people already residing in the vicinity of the Project Site, employees and the potential indirect population generation attributable to those employees would generate minimal demand for library services. Employees at the Project Site would also have internet access, which provides information and research capabilities and reduces the demand at physical library locations. As such, any indirect or direct demand for library services generated by the employees of Alternative 2 would be negligible. Therefore, impacts on libraries facilities and services under Alternative 2 would be less than significant, and less when compared to the less-than-significant impacts of the Project due to the elimination of the development of residential uses under this alternative.

k. Transportation

As previously described, Alternative 2 would be developed within the same Project Site as the Project. As such, the plans, policies, and programs applicable to the Project would also apply to Alternative 2. As discussed above, while Alternative 2 would eliminate the residential uses and reduce the commercial square footage proposed by both development options, Alternative 2 would feature similar vehicular, pedestrian, and bicycle access as the Project. In addition, parking would generally be provided in a similar manner

to the Project. Therefore, overall, as with the Project, Alternative 2 would be consistent with the goals, policies, and requirements of the applicable plans. Specifically, Alternative 2 also aims to balance the needs of various users and trip purposes through a multimodal transportation network that includes features such as vehicle charging areas and bike sharing. Alternative 2 also discourages utilizing land for parking that could be used for other valuable uses as all parking provided for Alternative 2 would be located within a subterranean parking garage. Therefore, Alternative 2 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Thus, impacts would be less than significant and similar to the impacts of the Project.

With respect to VMT, Alternative 2 does not include residential uses and would not result in any household VMT per capita. When accounting for the same project design features as the Project as well as the vehicle trips generated by the existing shopping center uses on the site to be removed, the proposed uses under Alternative 2 would result in a net reduction of 643 vehicle trips per day (refer to Appendix N of this Recirculated Draft EIR). Based on the LADOT *Transportation Analysis Guidelines*, Alternative 2 would screen-out from preparing a VMT analysis because it would generate fewer than 250 net new daily vehicle trips. Therefore, impacts with respect to conflicts with CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant and less than the less-than-significant impacts of the Project.

Regarding freeway safety, as discussed in Section IV.K, Transportation, of this Recirculated Draft EIR, the Project would not add 25 or more trips to any nearby freeway off-ramp serving the Project Site in either the morning or afternoon peak hour. As Alternative 2 would generate fewer trips than the Project, Alternative 2 also would not add 25 or more trips to any nearby freeway off-ramps, and no further freeway safety analysis is required. As such, impacts regarding freeway safety would also be less than significant, and similar to the impacts of the Project.

Regarding emergency access, as with the Project, construction activities associated with Alternative 2 could potentially impact the provision of emergency services by the LAFD and the LAPD in the vicinity of the Project Site as a result of reduced or altered access around the Project Site. However, like the Project, Alternative 2 also would not require the closure of any vehicle travel lanes. Additionally, similar to the Project, most of the construction worker trips would occur outside the weekday peak traffic periods, thereby reducing the potential for traffic-related conflicts. Alternative 2 would also include the preparation of a Construction Staging and Traffic Management Plan prior to the start of construction which would ensure that adequate and safe access remains available within and near the Project Site during construction activities. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on

adjacent rights-of-way. During operation, all driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede emergency vehicle access. As such, like the Project, emergency access to the Project Site and surrounding area under Alternative 2 would be maintained and Alternative 2 would not result in inadequate emergency access during operation. Additionally, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Based on the above, Alternative 2 would not result in inadequate emergency access during construction or operation, and impacts would be less than significant. Such impacts would be less than those of the Project due to the reduced construction and duration of construction.

l. Tribal Cultural Resources

Alternative 2 would construct less subterranean parking levels compared to the Project. Therefore, the potential for Alternative 2 to uncover subsurface tribal cultural resources would be reduced when compared to that of the Project. Accordingly, impacts to tribal cultural resources under Alternative 2 would be less-than-significant, and less when compared to the less-than-significant impacts of the Project.

m. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 2 would generate a short-term demand for water. This demand would be less than the Project due to the reduction in the amount of excavation and duration of construction that would be required under Alternative 2. Additionally, like the Project, any water demand generated by Alternative 2 would be offset by the removal of the existing uses onsite. As evaluated in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Recirculated Draft EIR, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of construction.

Since the water demand for construction activities would be reduced, the temporary and intermittent demand for water during construction under Alternative 2 would also be expected to be met by the City's available water supplies. Similarly, the existing City of Los Angeles Department of Water and Power (LADWP) water infrastructure would be adequate to provide the water flow necessary to serve Alternative 2. Furthermore, as with the Project, the design and installation of new service connections under Alternative 2 would be required to meet applicable City standards. Therefore, impacts on water supply and infrastructure associated with short-term construction activities under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 2 would develop approximately 370,274 square feet of office uses on the Project Site. As shown in Table V-2 on page V-57, Alternative 2 would generate a net water demand of approximately 39,138 gallons per day (gpd), which is lower than the net water demand generated by Option A of approximately 71,837 gpd and the net water demand generated by Option B of approximately 69,297 gpd, as provided in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Recirculated Draft EIR. The estimated water demand for the Project would not exceed the available supplies projected by LADWP. Therefore, the estimated net water demand under Alternative 2 would also be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040. In addition, the existing water distribution infrastructure would be adequate to serve Alternative 2 since the water demand would be lower than the Project uses. Furthermore, similar to the Project, the Project Applicant would construct the necessary on-site water infrastructure and off-site connections to the LADWP water system pursuant to applicable City requirements under Alternative 2 to accommodate the new buildings. Thus, impacts to water supply and infrastructure under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, construction activities for Alternative 2 would result in wastewater generation from construction workers on-site. However, wastewater generation during construction of Alternative 2 would be temporary and nominal when compared with the Project Site's wastewater generation under existing conditions. Furthermore, construction workers would typically utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. Thus, wastewater generation from construction activities under Alternative 2 would not cause a measurable increase in wastewater flows.

Table V-2
Estimated Water Consumption/Wastewater Generation for Alternative 2

Land Use	Unit	Generation Factor[a]	Total Water Demand/ Wastewater Generation (gpd)
Existing			
Commercial	100,781 sf		5,295[b]
Subtotal			*5,295*
Proposed			
Office	370,274 sf	0.12 gpd/sf	44,433
Subtotal			*44,433*
Total Net Water Demand/ Wastewater Generation			**39,138**

gpd = gallons per day

sf = square feet

[a] *Based on sewage generation rates provided by the City of Los Angeles Bureau of Sanitation (2012).*

[b] *Existing water demand is based on LADWP billing data (annual average from 2011 to 2017).*

Source: Eyestone Environmental, 2023.

Additionally, as with the Project, Alternative 2 would require construction of new on-site infrastructure to serve new buildings, and potential upgrades and/or relocations of existing infrastructure. Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to the public infrastructure. Although no upgrades to the public main are anticipated, minor off-site work would be required in order to connect the on-site distribution system to the public main. Similar to the Project, a Construction Staging and Traffic Management Plan would be implemented during construction of Alternative 2 to reduce any temporary pedestrian and traffic impacts resulting from the minor off-site work. Therefore, construction-related impacts to the wastewater system under Alternative 2 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

Alternative 2 would develop approximately 370,274 square feet of office uses on the Project Site. As shown in Table V-2, development of Alternative 2 would result in a net reduction in wastewater flows from the Project Site when compared to the Project. Alternative 2 would generate approximately 39,138 gallons per day of wastewater due to the proposed office use, which is lower than the approximately 93,759 gpd of net wastewater generated by Option A and 88,103 gpd of net wastewater generated by Option B, as provided in Section IV.M.2, Utilities and Service Systems—Wastewater, of this

Recirculated Draft EIR. Similar to the Project, the wastewater generated by Alternative 2 would be accommodated by the existing capacity of the Hyperion Water Reclamation Plant, and impacts with respect to treatment capacity would be less than significant.

As with the Project, sewer service for Alternative 2 would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site, which include an 8-inch main on Glencoe Avenue and an 8-inch main along the north side of SR-90. Given that Alternative 2 would result in a net reduction in total average daily wastewater compared to that of the Project, it is anticipated that there would be sufficient capacity within the sewer lines in Glencoe Avenue and along the north side of SR-90 to serve the wastewater flows of Alternative 2. Furthermore, additional detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for Alternative 2 during the permitting process. All related sanitary sewer connections and on-site infrastructure under Alternative 2 would be designed and constructed in accordance with applicable standards.

Thus, impacts with regard to wastewater generation and infrastructure capacity under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(3) Solid Waste

(a) Construction

Construction of Alternative 2 would involve demolition and building construction activities. The amount of demolition and construction waste generated by Alternative 2 would be similar to the Project as Alternative 2 would involve demolition of the same structures and areas as the Project, while the amount of construction waste would be less due to the reduction in total floor area to be constructed. These activities would generate construction and demolition wastes that would be recycled or collected by private waste haulers contracted by the Applicant and other developers and taken to City-certified waste processing facilities for sorting and final distribution, including disposal at the County's unclassified landfill. Since construction and demolition waste would be hauled by a private construction contractor permitted by the City, Alternative 2 would not result in the need for an additional solid waste collection route. Given that the demolition waste would be similar and construction waste would be less than that of the Project, it is reasonable to assume that the Azusa Land Reclamation Landfill would be capable of accommodating the demolition and construction waste from Alternative 2. Similar to the Project, construction of Alternative 2 would not conflict with any applicable State or City solid waste regulations. Additionally, in the event that any asbestos or asbestos-containing materials (ACMs), LBP, and PCBs are found in the buildings proposed for demolition, suspect materials would be removed in accordance with all applicable local, State, and

federal regulations prior to demolition activities. As such, solid waste impacts during construction of Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Operation

During its operation, Alternative 2 would generate municipal solid waste typical of an office development. Similar to the Project, solid waste generated by Alternative 2 would be recycled or collected by private waste haulers contracted by the Applicant and permitted by the City and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles. The transport of solid waste generated by Alternative 2 to waste management/disposal facilities would continue to occur along existing solid waste routes of travel. As such, as with the Project, Alternative 2 would not result in the need for additional solid waste collection routes to adequately handle waste generated by operations under Alternative 2.

With the proposed office uses, Alternative 2 would generate overall less solid waste compared to the Project as this alternative would eliminate the residential and retail uses, which generate higher amounts of solid waste. Therefore, as with the Project, the existing landfills serving the Project Site would have adequate capacity to accommodate the disposal needs of Alternative 2. Since the solid waste generated by Alternative 2 would be less than that of the Project, Alternative 2 would not result in the need for an additional recycling or disposal facility to adequately handle waste generated. Furthermore, as with the Project, Alternative 2 would not conflict with solid waste policies and objectives in the City of Los Angeles Source Reduction and Recycling Element or its updates, the City of Los Angeles Solid Waste Management Policy Plan, the City of Los Angeles General Plan Framework Element or the Curbside Recycling Program, or the County Integrated Waste Management Plan. As such, solid waste impacts during operation under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(4) Energy Infrastructure

(a) Construction

As discussed above, Alternative 2 would reduce the amount of energy needed for construction activities based on the reduction in development. As discussed in Section IV.C, Energy, of this Recirculated Draft EIR, the estimated energy usage of the Project during construction would be within the available capacity and supply of the existing infrastructure. Since Alternative 2 would generate a reduced demand for energy during construction compared to the Project due to less overall construction, the energy demand of Alternative 2 would similarly be within the available capacity of the existing infrastructure.

Therefore, impacts to energy infrastructure capacity 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. However, based on the elimination of the residential uses proposed by Option A and Option B, the total energy consumption of Alternative 2 would be less than the total energy consumption of the Project. Therefore, impacts to infrastructure capacity under Alternative 2 would be less than significant, and less than the less-than-significant impacts of the Project.

3. Comparison of Impacts

As provided above, Alternative 2 would not eliminate the Project's significant and unavoidable impacts related to noise from on-site construction and vibration and off-site construction with respect to human annoyance. Furthermore, the following impact areas would be greater than the impacts of the Project under Option B: police protection during operation. Alternative 2 also would not eliminate the Project's significant and unavoidable cumulative impacts related to construction noise from on-site and off-site noise sources and off-site construction vibration with respect to human annoyance. However, Alternative 2 would reduce the peak excavation construction phase of the Project such that these impacts occur for a shorter duration as compared to the Project and the overall impact from these significant and unavoidable impacts of the Project would be less under Alternative 2, while remaining significant and unavoidable. The following impact areas would be greater than the impacts of the Project: surface water hydrology and groundwater hydrology. The remaining impacts would be similar to or less than those of the Project.

4. Relationship of the Alternative to Project Objectives

Without development of residential and retail/restaurant uses, Alternative 2, the Development in Accordance with Existing Zoning Alternative, would not meet the underlying purpose of the Project to provide a mixed-use development that includes new multi-family housing opportunities that accommodate a range of income needs, provides walkable neighborhood-serving retail and restaurant uses, and provides expanded recreational amenities that serve the community and promote walkability. In addition, Alternative 2 would not achieve the following Project objectives:

- Provide for the development of new housing to meet the diverse economic and physical needs of the existing residents and projected population, provide a new

mix of housing options, including different sizes and configurations, as well as provided affordable housing units.

- Provide upgraded neighborhood-serving retail and restaurant uses to provide a strong and competitive commercial sector that promotes economic vitality and serves the needs of the Project residents, visitors, and the surrounding community.

- Reduce vehicular trips and congestion by developing new housing in proximity to services and facilities, locate new housing and employment opportunities in a manner that reduces vehicular trips by providing onsite housing in combination with onsite community-serving commercial and recreational amenities and within walking distance to existing offsite commercial uses and amenities.

- Enhance walkability by providing neighborhood-serving ground-floor retail and restaurant uses along street frontages and creating landscaped plazas, courtyards, and streetscapes that are connected by landscaped paseos across the site.

Alternative 2 would only partially achieve the following Project objectives due to the elimination of residential and retail/restaurant uses:

- Preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods, provide buildings with varied design elements and transitioning heights to respect the scale of the surrounding buildings.

- Locate employment and residential uses near one another to promote sustainability and reduce vehicle miles traveled, with associated reductions in air quality and greenhouse gas emissions.

Additionally, Alternative 2 would not meet the following objectives that apply to Option B of the Project due to the elimination of residential and retail/restaurant uses:

- Provide opportunities for new commercial development and services through the development of modern office uses with a combination of indoor and outdoor collaborative spaces that can attract professional and creative office tenants.

- To create a dynamic and economically viable mixed-use project with sufficient density to facilitate a healthy job-housing balance.

V. Alternatives

C. Alternative 3: Reduced Development Alternative

1. Description of the Alternative

Alternative 3, the Reduced Development Alternative, would reduce both the residential and neighborhood-serving commercial uses proposed by Option A and would reduce the neighborhood-serving commercial uses proposed by Option B while providing additional residential units compared to Option B and eliminating the office uses proposed by Option B. Specifically, Alternative 3 proposes the development of 494 dwelling units (a reduction of 165 units compared to Option A and an increase of 69 units compared to Option B) and 20,475 square feet of neighborhood-serving commercial uses (a reduction of 6,825 square feet compared to Option A and a reduction of 19,525 compared to Option B). Overall, the Reduced Development Alternative would construct 505,747 square feet of new floor area (a reduction of 168,582 square feet compared to Option A and a reduction of 53,247 square feet compared to Option B). A conceptual site plan for Alternative 3 is provided in Figure V-2 on page V-63.

As shown in Figure V-2, under Alternative 3, the Project Site would be developed similar to Option A. Specifically, the proposed multi-family residential and neighborhood-serving commercial uses would be provided within three mixed-use buildings (herein referred to as Building 1, Building 2, and Building 3) that would be organized around an outdoor pedestrian paseo. Similar to Option A, the proposed pedestrian paseo would be orientated both east–west across the Project Site and north–south through the center of the Project Site and connect to a public plaza along the northwestern portion of the Project Site and a publicly accessible, privately maintained open space area along the southwestern portion of the Project Site that would include an amenity building. However, the height of the buildings would be reduced from seven stories and a height of 77 feet to six stories with an approximate height of 67 feet. The overall design of the buildings under Alternative 3, including architectural features, lighting and signage, and sustainability, would be similar to that of Option A. Similarly, Alternative 3 would feature similar vehicular, pedestrian, and bicycle access as Option A.

With regard to vehicular parking, given the reduction in residential units and commercial square footage under this alternative, 913 parking spaces would be required and would be provided in accordance with the requirements set forth in the LAMC. As with

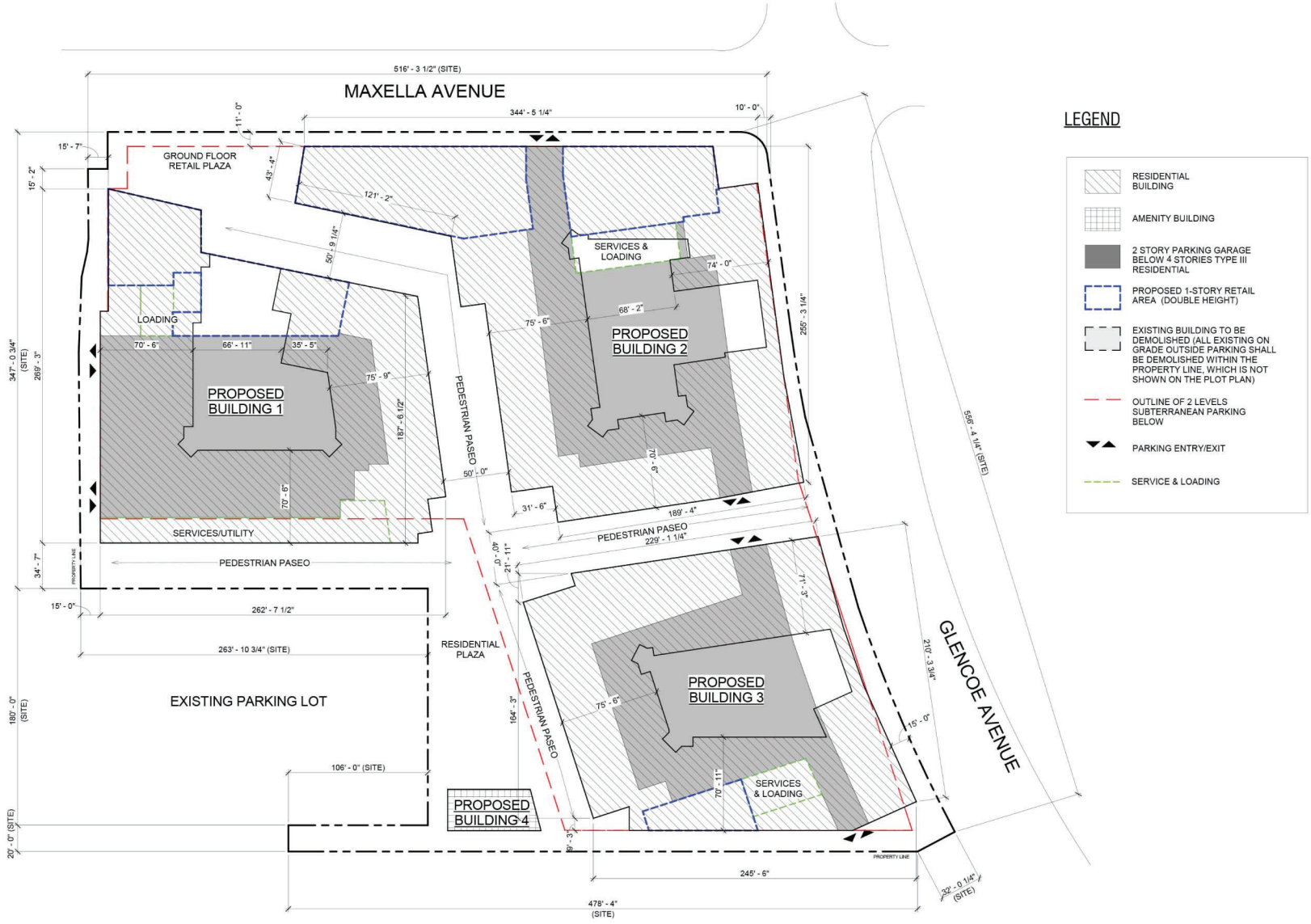

Figure V-2
Alternative 3 Conceptual Site Plan

Source: TCA Architects, 2018.

Option A, the parking spaces would be distributed throughout the Project Site in two subterranean levels that would extend to a depth of approximately 28 feet and in two above-grade parking levels located within each of the three buildings.

As with the Project, Alternative 3 would provide a variety of open space and recreational amenities. In addition, to enhance the streetscape, a landscaped public plaza would be provided at the northwest corner of the Project Site, along Maxella Avenue, that would connect to the proposed landscaped pedestrian paseo. Trees and other landscaping features would also be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue to activate these streets and provide a pedestrian-friendly environment. In total, Alternative 3 would provide 52,631 square feet of open space and recreational amenities in accordance with the open space requirements set forth in the LAMC (a reduction of 17,544 square feet compared to Option A's 70,175 square feet of open space and recreational amenities and a reduction of 57,114 square feet compared to Option B's 109,745 square feet of open space and recreational amenities).

Similar to the Project, to provide for development of Alternative 3, demolition of the existing uses would occur. In addition, as with the Project, construction of Alternative 3 would be developed in one phase. Furthermore, as Alternative 3 would include two levels of subterranean parking similar to Option A, Alternative 3 would require similar excavation and export as Option A, and less excavation and export compared to Option B, which would include three subterranean parking levels. However, given the overall reduction in uses, the overall construction period would be reduced compared to that of the Project.

As with the Project, Alternative 3 would require a General Plan Amendment to the Palms–Mar Vista–Del Rey Community Plan to change the Community Plan land use designation from Limited Manufacturing to General Commercial; a Vesting Zone and Height District Change from [Q]M1-1 to (T)(Q)C2-2D; Site Plan Review; a Master Conditional Use Permit to allow the on-site and off-site sale of a full line of alcoholic beverages; Coastal Development Permit; Mello Act Compliance Review; and Vesting Tentative Tract Map and haul route.

2. Environmental Impacts

a. Aesthetics

(1) Conflict with Applicable Regulations Governing Scenic Quality

As discussed in Section IV.A, Aesthetics, of this Recirculated Draft EIR, a number of local plans, policies, and regulations related to scenic quality are applicable to the Project, including the City of Los Angeles General Plan Framework Element and Conservation Element, the Community Plan, the Citywide Urban Design Guidelines, the LAMC, and Title

24 of the California Code of Regulations. As concluded in Section IV.A, Aesthetics, of this Recirculated Draft EIR, the Project under either Option A or Option B would not conflict with the zoning and other regulations governing scenic quality.

As previously described, Alternative 3, the Reduced Development Alternative, would include similar uses as the Project at a reduced scale. In addition, Alternative 3 would continue to be constructed within the same Project Site. As such, the same local plans applicable to the Project would be applicable to Alternative 3. Overall, with the development of similar uses as the Project and a similar design as that of the Project but with a reduction in proposed development, Alternative 3 would not conflict with the proposed zoning and other regulations governing scenic quality. Therefore, the impacts of Alternative 3 related to potential conflicts with the zoning and other regulations governing scenic quality would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project due to the reduction in uses proposed.

(2) Light and Glare

(a) Construction

As with the Project, while the majority of construction under Alternative 3 would occur during daylight hours (during a typical eight-hour work day), construction activities could potentially require the use of artificial lighting if construction were to occur in the evening until 9:00 P.M., as permitted per the LAMC. Additionally, artificial lighting may be required during the winter months when daylight is no longer sufficient earlier in the day. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of construction. In addition, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. Alternative 3 would also implement similar design features as the Project that would provide that lighting be shielded and/or aimed so that no direct beam illumination is provided outside of the Project Site boundary. Therefore, similar to the Project, light resulting from construction activities under Alternative 3 would not significantly impact off-site sensitive uses, substantially alter the character of off-site areas surrounding the construction area, adversely impact day or nighttime views in the area, or substantially interfere with the performance of an off-site activity.

Also similar to the Project, any glare generated within the Project Site during construction of Alternative 3 would be transitory and short-term given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Therefore, similar to the Project, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur under Alternative 3.

Based on the above, light and glare associated with construction of Alternative 3 would not substantially alter the character of off-site areas surrounding the Project Site or adversely impact day or nighttime views in the area. Impacts related to light and glare during construction of Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduced overall construction activities and construction duration.

(b) Operation

Similar to the Project, Alternative 3 would replace the existing on-site buildings and parking areas and would increase the number of vehicle trips to and from the Project Site. However, as with the Project, Alternative 3 would eliminate sources of glare associated with the existing surface parking lots.

Similar to the Project, proposed lighting sources under Alternative 3 would be similar to other lighting sources in the Project Site vicinity and would not generate artificial light levels that are out of character with the surrounding area. All exterior lights would be directed toward the interior of the Project Site to avoid light spillover onto adjacent sensitive uses. The design of the proposed buildings similar to the Project would also ensure that lighting on the upper levels and the podium is concentrated in the central portion of the buildings and would provide space along the building edges to serve as a buffer for rooftop light spillover. Proposed lighting would also meet all applicable LAMC lighting standards. Similarly, signage under Alternative 3 would include building identity signage and general ground level and wayfinding pedestrian signage. No off premises or billboard advertising is proposed as part of this alternative. Alternative 3 would also not include signage with flashing, mechanical, or strobe lights. New signage would be architecturally integrated into the design of the proposed buildings and would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off-site glare. Illumination used for signage under Alternative 3 would also comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

With regard to glare, the buildings proposed under Alternative 3 would feature similar building materials as the Project. Alternative 3 would also implement similar design features as the Project, including the use of non-reflective glass or glass that has been treated with a non-reflective coating in all exterior windows and building surfaces to reduce potential glare from sunlight. Also, as with the Project, metal building surfaces would be used as accent materials and would not cover expansive spaces. Therefore, as with the Project, the proposed building materials would not have the potential to produce a substantial degree of glare. In addition, since the proposed parking areas would also be enclosed under this alternative, the reflection potential from parked cars as viewed from surrounding areas and roadways during the day and night would be eliminated.

Based on the above, lighting and glare associated with operation of Alternative 3 would not result in a new source of substantial light or glare, which would adversely affect day or nighttime views in the area. Therefore, operational light and glare impacts under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the overall reduction in the scale of the buildings.

b. Air Quality

(1) Construction

(a) Regional Emissions

As with the Project, construction of Alternative 3 has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.B, Air Quality, of this Recirculated 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, it is anticipated that overall construction activities and construction duration would be reduced in comparison to the Project due to the reduction in overall development. However, the intensity of air emissions and fugitive dust from site preparation and construction activities under Alternative 3 would be similar to the Project on days with maximum (peak) construction activities because while the overall amount and duration of construction activities would decrease, Alternative 3 would not decrease the daily intensity of construction activities when compared to the Project. As such, air emissions during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Therefore, as with the Project, Alternative 3 would result in regional construction emissions impacts that would be less than significant with incorporation of mitigation, and such impacts would be similar to those of the Project during peak construction activity.

(b) Localized Emissions

As Alternative 3 would develop the Project Site similar to the Project and construct the proposed uses under Alternative 3 within the same footprint as the Project, construction activities associated with Alternative 3 would be located at similar distances from sensitive receptors as the Project. Since air emissions and fugitive dust from construction activities would be similar to those of the Project on maximum construction activity days, localized emissions under Alternative 3 would also be similar to those of the Project. Although Alternative 3 would result in a reduction in the amount of proposed development compared

to the Project, as discussed above, the intensity of construction activities would be similar on days with maximum construction activities. Therefore, while the reduction in development would reduce impacts associated with localized emissions as compared to the Project, impacts under Alternative 3, like the Project, would be less than significant, with the degree of the impact similar to that of the Project during peak construction activity.

(c) Toxic Air Contaminants

As with the Project, construction of Alternative 3 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.B, Air Quality, of this Recirculated Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. Overall construction TAC emissions generated by Alternative 3 would be similar to those of the Project since grading and excavation activities required during construction of Alternative 3 would be comparable to the Project. As with the Project, the construction phases which require the most heavy-duty diesel vehicle usage, such as site grading, would last for a short duration. Thus, construction of Alternative 3 also would not result in a substantial, long-term (i.e., 70-year) source of TAC emissions. Thus, impacts due to TAC emissions under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Operation

(a) Regional Emissions

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

(b) Localized Emissions

Localized operational impacts are determined primarily by peak-hour intersection traffic volumes. As discussed above, the number of net new peak-hour trips generated by Alternative 3 would be less than the net new peak-hour trips generated by the Project. In addition, as with the Project, Alternative 3 would not introduce any new major sources of air pollution within the Project Site. Because the localized impacts analysis from on-site operational activities and the localized CO hotspot analysis associated with off-site operational activities for the Project did not result in any significant impacts, localized impacts under Alternative 3 also would be less than significant and less when compared to the less-than-significant impacts of the Project.

(c) Toxic Air Contaminants

As set forth in Section IV.B, Air Quality, of this Recirculated Draft EIR, the primary sources of potential TACs associated with Project operations would include diesel particulate matter from delivery trucks. Under Alternative 3, the overall increase in the number of deliveries and associated diesel particulate matter emissions would be reduced compared to the Project due to the reduction in the number of residential units and square footage of commercial uses. Similar to the Project, the land uses proposed under Alternative 3 are not considered land uses that generate substantial TAC emissions. Therefore, Alternative 3 would not release substantial amounts of TACs, and impacts would be less than significant. Such impacts would be less when compared to the less-than-significant impacts of the Project.

c. Energy

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

(a) Construction

Similar to the Project, construction activities associated with Alternative 3 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. Also similar to the Project, construction activities associated with Alternative 3 would not involve the consumption of natural gas. As with the Project, Alternative 3 would also generate a demand for transportation energy associated with on- and off-road vehicles. However, the energy consumed during construction of Alternative 3 would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. As with the Project, the electricity demand during construction of Alternative 3 would vary throughout the construction period based on the construction activities being performed and would cease upon completion of

construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Construction equipment used during construction of Alternative 3 would also comply with Title 24 requirements where applicable, similar to the Project. With regard to transportation fuels, trucks and equipment used during construction of Alternative 3 would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. Therefore, as with the Project, construction activities would use energy that is not wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 3 and less than the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 3 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions. However, based on the reduction in total development proposed by Alternative 3, electricity, natural gas, and petroleum-based fuel consumption for Alternative 3 would be less than the Project's estimated increase in energy consumption. Specifically, the consumption of electricity and natural gas would be reduced due to the reduction in residential units and commercial square footage. In addition, as previously discussed, Alternative 3 would generate fewer daily trips than the Project. Furthermore, similar to the Project, Alternative 3 would implement design features, which would improve energy efficiency and reduce impacts on consumption of energy resources. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 3 would not be wasteful, inefficient, or unnecessary. Therefore, impacts related to energy use under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

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

As discussed in Section IV.C, Energy, of this Recirculated Draft EIR, the current City of LA Green Building Code requires compliance with CalGreen and Title 24. Like the Project, Alternative 3 would comply with the City's Green Building Code, as well as be capable of achieving LEED® Silver Certified equivalency. Therefore, similar to the Project, Alternative 3 would incorporate measures that are beyond current State and City energy conservation requirements. Also similar to the Project, Alternative 3 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2019 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code.

With regard to transportation related energy usage, Alternative 3 would also comply with goals of the SCAG's RTP/SCS which incorporates VMT targets established by SB 375. As with the Project, the uses proposed under Alternative 3 would introduce new job opportunities consistent with numerous policies in the 2020-2045 RTP/SCS related to locating new jobs near transit. In addition, vehicle trips generated during Project operations would comply with CAFE fuel economy standards. 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.

Based on the above, Alternative 3 would not conflict with plans for renewable energy or energy efficiency. No impacts related to renewable energy or energy efficiency plans would occur under Alternative 3, and impacts would be similar to the less-than-significant impacts of the Project.

d. Geology and Soils

Under Alternative 3, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, liquefaction, soil erosion, subsidence, expansive soils, corrosive soils, oil wells, methane, and landform alterations would be similar to those under the Project because such impacts are a function of the Project Site's underlying geologic conditions. Alternative 3 would be developed within the same site as the Project and would comply with the same regulatory requirements as the Project to ensure that the soils underlying the Project Site can adequately support the proposed development. As with the Project, Alternative 3 would be designed and constructed to conform to the current seismic design provisions of the California Building Code and the Los Angeles Building Code. Alternative 3 would also comply with the same regulatory requirements as the Project, which require the preparation of a final design-level geotechnical engineering report to identify and minimize seismic risks. In addition, Alternative 3 would comply with the same mitigation measures as the Project to reduce impacts associated with liquefaction and any associated settlement. Overall, impacts related to geology and soils under Alternative 3 would be less than significant with mitigation and similar to the impacts of the Project, which are also less than significant with mitigation.

e. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily trips generated and associated VMT, as well as energy consumption from proposed land uses. Under Alternative 3, the number of daily trips, daily VMT trip generation, and energy and water consumption would be reduced compared to both Project due to the reduction in development. Thus, the amount of GHG emissions generated by Alternative 3 would be less than the amount generated by the Project. 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. Alternative 3 would also incorporate design features to reduce GHG emissions and be capable of meeting the standards of LEED Silver or equivalent green building standards. With compliance with the CALGreen Code and the Los Angeles Green Building Code, and with the implementation of comparable sustainability features as the Project, it is anticipated that Alternative 3 would be consistent with the GHG reduction goals and objectives included in adopted State, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project.

f. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, construction of Alternative 3 would require the demolition of the existing on-site buildings and surface parking areas, which could encounter asbestos containing material and lead based paint due to the age of the buildings. As with the Project, Alternative 3 would comply with relevant regulations and requirements related to asbestos containing material and lead based paint, including SCAQMD Rule 1403, to ensure that impacts would be less than significant. As discussed in detail in Section IV.F, Hazards and Hazardous Materials, of this Recirculated Draft EIR, according to the Phase I ESA, during the Project Site reconnaissance, no evidence of existing underground storage tanks or aboveground storage tanks were observed on the Project Site. As such, similar to the Project, construction of Alternative 3 would not be expected to encounter underground storage tanks and would not require the removal of aboveground storage tanks. In addition, while three vaulted transformers were observed on-site, no leaks or stains were observed on the ground beneath the transformers and, as such, are unlikely to present an environmental concern. As with the Project, in the event that PCBs are found within areas proposed for demolition during construction of Alternative 3, suspect materials would be removed in accordance with all applicable federal, State, and local regulations and guidelines. Furthermore, during demolition, on-site grading, and building construction, fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, would be used, handled, and stored on the Project Site and would, therefore, require proper management and disposal. Alternative 3 would fully comply with all applicable federal, State, and local requirements, as well as the manufacturer's instructions concerning the use, handling, storage, and disposal of hazardous materials. Additionally, if previously unidentified wells are encountered during construction of Alternative 3, adherence to all applicable regulatory compliance measures would ensure impacts associated with previously unidentified oil wells or oil production facilities would be less than significant. Moreover, Alternative 3 would comply with the City of Los Angeles' Methane Mitigation Ordinance No. 175790, which would reduce impacts associated with methane gas during demolition and building construction of Alternative 3.

With regard to emergency response, construction activities for Alternative 3 would be primarily confined to the Project Site and would only include minor off-site work for installation of utility connections. In addition, similar to the Project, a Construction Staging and Traffic Management Plan would be implemented during construction of Alternative 3 to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The Construction Staging and Traffic Management Plan would include street closure information, traffic controls to direct traffic, a detour plan, haul routes, and a staging plan.

Based on the above, potential construction-related impacts associated with hazards and hazardous materials under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduced development and associated construction activities.

(2) Operation

Similar to the Project, Alternative 3 would not include the use of materials that would contain asbestos, lead based paint, or PCBs. In addition, Alternative 3 would not propose the installation of underground or aboveground storage tanks. The operation of Alternative 3 would involve the limited use of potentially hazardous materials typical of those used in residences and commercial developments, including cleaning agents, paints, pesticides, and other materials used for landscaping. As with the Project, all hazardous materials on the Project Site would be acquired, handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, State, and local requirements. In addition, as with the Project, Alternative 3 would comply with the City of Los Angeles' Methane Mitigation Ordinance No. 175790.

With regard to emergency response plans, Alternative 3 would not involve any activities that would impede public access or travel along the public right-of-way or interfere with an adopted emergency response or evacuation plan. In addition, similar to the Project, the increase in traffic generated by Alternative 3 would not significantly impact emergency vehicle response to the Project Site and surrounding uses, including along City-designated disaster routes, since the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Accordingly, operation of Alternative 3 would not cause a substantial effect on emergency response as a result of increased traffic congestion. Furthermore, as Alternative 3 would reduce traffic as compared to the Project, Alternative 3 would have a lesser impact on emergency response within, and in, the vicinity of the Project Site compared to the Project, and such impacts would also be less than significant.

Based on the above, potential impacts related to hazards and hazardous materials during operation of Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in uses.

g. Hydrology and Water Quality

(1) Surface Water Quality

(a) Construction

Under Alternative 3, the degree to which new pollutants could be introduced to the Project Site during construction would be similar to the Project as Alternative 3 would disturb the same area as the Project. In addition, as with the Project, a SWPPP would be prepared for Alternative 3 that would specify BMPs to be used during construction. As with the Project, construction of Alternative 3 would also likely require temporary dewatering systems during construction as excavation activities under this alternative would be similar to those of the Project. The temporary dewatering systems would be utilized in compliance with the NPDES permit and with all relevant NPDES requirements related to construction and discharges from dewatering operations.

With the implementation of site-specific BMPs included as part of the SWPPP, Alternative 3 would reduce or eliminate the discharge of potential pollutants from stormwater runoff. In addition, construction of Alternative 3 would be required to comply with City grading permit regulations, which require necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspection to reduce sedimentation and erosion. Therefore, with compliance with NPDES requirements and City grading permit regulations, construction of Alternative 3 would not result in discharge that would violate any water quality standard or waste discharge requirements, or otherwise substantially degrade water quality. Thus, as with the Project, construction-related impacts to surface water quality would be less than significant. Such impacts would be similar to the less-than-significant impacts of the Project.

(b) Operation

Similar to the Project, Alternative 3 would implement BMPs for managing stormwater runoff in accordance with current City LID Ordinance requirements. The BMPs would control stormwater runoff with no increase in runoff resulting from the alternative. As with the Project, a combination of gravity flows, pumps and splitter boxes would be used to route flows to either the infiltration BMP or to the adjacent streets. Due to the incorporation of LID BMPs, operation of Alternative 3 would not result in discharges that would violate any water quality standard or waste discharge requirements, or otherwise substantially degrade water quality. Thus, as with the Project, impacts to surface water quality during operation of Alternative 3 would be less than significant. Such impacts would be less when

compared to the less-than-significant impacts of the Project due to the reduction in the intensity of uses.

(2) Groundwater Quality

(a) Construction

As previously noted, the depth of excavation and associated export would be similar to the Project under Alternative 3 as this alternative would include the same number of subterranean parking levels. Therefore, as with the Project, the depth of excavation proposed under Alternative 3 would likely encounter groundwater, and dewatering is expected during construction. Similar to the Project, any discharge of groundwater during construction of Alternative 3 would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements. Pursuant to such requirements, the groundwater extracted would be chemically analyzed to determine the appropriate treatment and/or disposal methods.

During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would, therefore, require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the potential for hazardous materials releases into groundwater. Compliance with all applicable federal, State, and local requirements, concerning the handling, storage and disposal of hazardous waste, would reduce the potential for construction of Alternative 3 to release contaminants into groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well downstream. In addition, as there are no groundwater production wells or public water supply wells on-site or within 1 mile of the Project Site, construction activities would not be anticipated to affect existing wells.

Based on the above, as with the Project, impacts with respect to groundwater quality during construction of Alternative 3 would be less than significant. Such impacts would be similar to the less-than-significant impacts of the Project.

(b) Operation

Similar to the Project, Alternative 3 would not include the installation or operation of water wells, or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion. Alternative 3 also would not include the installation or operation of a municipal supply well or spreading ground facility. In addition, Alternative 3 would not include the surface or subsurface application or introduction of potential contaminants or waste materials. Alternative 3 is not anticipated to result in releases or spills of contaminants that could reach a groundwater recharge area or

spreading ground or otherwise reach groundwater through percolation. Therefore, as with the Project, impacts with respect to groundwater quality during operation of Alternative 3 would be less than significant, and such impacts would be similar to those of the Project.

(3) Surface Water Hydrology

(a) Construction

Similar to the Project, construction activities for Alternative 3 would include demolition of the existing buildings and surface parking areas. As with the Project, these activities would have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Similar to the Project, Alternative 3 would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, Alternative 3 would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. In addition, Alternative 3 would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Thus, through compliance with all NPDES Construction General Permit requirements, including preparation of a SWPPP, implementation of BMPs, and compliance with applicable City grading regulations, Alternative 3 would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, flooding on- or off-site. Similarly, with adherence to standard compliance measures, construction activities would not cause flooding, substantially increase or decrease the amount of surface water flow from the Project Site into a water body or result in a permanent, adverse change to the movement of surface water. Therefore, construction-related impacts to surface water hydrology under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 3 would include development of new buildings, paved areas, and landscaped areas. As with the Project, implementation of Alternative 3 would reduce impervious surfaces as compared to the Project Site's existing impervious area. The extent to which existing impervious surfaces would be reduced would be similar to that of the Project since Alternative 3 would also include open space to comply with the LAMC requirements. Therefore, Alternative 3 would result in similar flows as the Project. Thus, as with the Project, the flows generated by Alternative 3 would be accommodated by the existing drainage system.

Based on the above, Alternative 3 would not impact the existing storm drain infrastructure serving the Project Site. Consequently, Alternative 3 would not cause

flooding during the 50-year developed storm event, would not create runoff that would exceed the capacity of existing or planned drainage systems, would not require construction of new stormwater drainage facilities or expansion of existing facilities, would not substantially reduce or increase the amount of surface water in a water body, or result in a permanent adverse change to the movement of surface water. Therefore, operational impacts to surface water hydrology under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(4) Groundwater Hydrology

(a) Construction

As with the Project, the excavation proposed under Alternative 3 would likely encounter groundwater. Appropriate compliance and containment measures would be implemented to avoid impacts associated with potential groundwater discharges. Specifically, as with the Project, in the event dewatering is required during construction of Alternative 3, a temporary dewatering system would be installed and operated in accordance with NPDES Construction General Permit requirements. Any discharge of groundwater during construction of Alternative 3 would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements. As with the Project, it is expected that if groundwater is found during construction of Alternative 3, it would consist of finite zones of perched groundwater, and any removal of groundwater, should it be required, would only occur after the waterproofing is installed up to the groundwater table level. Therefore, if dewatering is required, operation of the temporary dewatering system would have a minimal effect on local groundwater recharge in the vicinity of the Project Site. Similar to the Project, Alternative 3 would not include the construction of water supply wells. No water supply wells are located at the Project Site or within 1 mile of the Project Site. Therefore, as with the Project, construction impacts on groundwater hydrology during construction of this alternative would be less than significant. Such impacts would be similar to the less-than-significant impacts of the Project.

(b) Operation

Similar to the Project, the subterranean levels of Alternative 3 would be designed such that they are able to withstand hydrostatic forces and incorporate comprehensive waterproofing systems in accordance with current industry standards and construction methods. As such, permanent dewatering operations are not expected. Therefore, the potential impact during operation on groundwater level under Alternative 3 would be less than significant.

As discussed in Section IV.G, Hydrology and Water Quality, of this Recirculated Draft EIR, the Project Site is currently 96 percent impervious. Therefore, there is currently a minimal groundwater recharge potential on the Project Site. As with the Project, with

implementation of Alternative 3, the amount of impervious areas would decrease compared to the Project Site's existing impervious area. Alternative 3 would also implement an infiltration system that would improve the groundwater recharge capacity of the Project Site compared to existing conditions. Therefore, potential impacts on groundwater recharge would be less than significant under Alternative 3.

Based on the above, impacts to groundwater hydrology during operation of Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

h. Land Use and Planning

As described above, Alternative 3 would develop the Project Site similar to the Project but would reduce the residential units and commercial square footage, as well as the heights of the proposed buildings. Alternative 3 would also eliminate the office uses proposed for Option B of the Project. Accordingly, the overall floor area ratio, density, and building height would be reduced compared to the Project. However, Alternative 3 would still require the same discretionary approvals as the Project. Similar to the Project, with approval of the requested discretionary approvals and implementation of design features discussed throughout this Recirculated Draft EIR (which would also be implemented as part of Alternative 3), 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, including the City's General Plan, the Community Plan, and the LAMC. As such, Alternative 3 would similarly not conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Thus, impacts related to conflicts with land use plans would be less than significant and similar to the less-than-significant impacts of the Project.

i. Noise

(1) Noise

(a) Construction

The types of construction activities under Alternative 3 would be similar to the Project, although the overall amount and duration of construction would be reduced due to the reduction in total floor area. As with the Project, construction of Alternative 3 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. While the overall amount and duration of construction would be reduced, 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 days. As such, noise levels during maximum activity days, which are used for

measuring impact significance, would be similar to those of the Project. Accordingly, noise impacts due to on- and off-site construction activities under Alternative 3 would be similar to those of the Project. Alternative 3 would comply with the same applicable regulatory requirements and implement similar design features and mitigation measures as the Project to reduce noise levels during construction. Similar to the Project, on-site construction noise under Alternative 3 would be significant and unavoidable, while off-site construction noise under Alternative 3 would be less than significant. Overall, impacts under Alternative 3 would be similar to those of the Project during peak construction activity.

(b) Operation

As discussed in Section IV.I, Noise, of this Recirculated Draft EIR, sources of operational noise under the Project include (a) on-site stationary noise sources, such as mechanical equipment, activities associated with the proposed outdoor spaces, parking facilities, and loading and trash collection areas; and (b) off-site mobile (roadway traffic) noise sources. Alternative 3 would introduce noise from similar on-site and off-site noise sources as the Project. However, it is anticipated that with the overall reduction in total floor area and uses, the noise levels from building mechanical equipment, outdoor spaces, and parking facilities would be reduced as these areas would be reduced. In addition, similar to the Project, on-site mechanical equipment used during operation of Alternative 3 would comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. The proposed loading dock and trash collection areas for Alternative 3 would be located in similar areas as the Project. Similar to the Project, Alternative 3 would include Project Design Features NOI PDF 2 and NOI-PDF-4. Thus, noise impacts from loading dock and trash collection areas would be similar to the Project. Overall, operational on-site noise impacts would be less than significant and less when compared to the less-than-significant impacts of the Project.

With regard to off-site noise sources, Alternative 3 would result in a reduction in daily vehicle trips compared to the Project. The reduction in vehicle trips would result in a decrease in off-site traffic-related noise levels under Alternative 3. Therefore, as with the Project, off-site noise impacts under Alternative 3 would be less than significant. Such impacts would be less than those of the Project due to the reduction in vehicle trips.

(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. As with the Project, construction of Alternative 3 would generate vibration from the use of heavy-duty construction equipment as well as from truck trips. While the overall amount and duration of construction would be reduced, on- and off-site construction activities and the associated construction vibration levels would be expected to be similar to those of the Project during maximum activity days. As construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment, peak vibration levels generated by the construction equipment would be similar to those of the Project. Accordingly, vibration impacts due to on- and off-site construction activities under Alternative 3 would similarly be less than significant for on-site and off-site construction vibration pursuant to the significance threshold for building damage and significant and unavoidable for on-site and off-site construction vibration pursuant to the significance threshold for human annoyance. Overall, vibration impacts under Alternative 3 would be similar to the impacts of the Project during peak construction activity.

(b) Operation

As described in Section IV.I, Noise, of this Recirculated Draft EIR, sources of vibration related to operation of the Project would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under Alternative 3. As with the Project, vehicular-induced vibration from Alternative 3, including vehicle circulation within the subterranean parking area, 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 operation of Alternative 3 would also be less than significant. Such impacts would be less than those of the Project due to the reduced development proposed by Alternative 3.

j. Public Services

(1) Fire Protection

(a) Construction

As previously discussed, the total floor area and building heights under Alternative 3 would be reduced compared to that of the Project. Therefore, the overall duration of construction for Alternative 3 would be reduced compared to the Project. As with the Project, construction activities under Alternative 3 would have the potential to result in

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

Additionally, similar to the Project, while Alternative 3 construction activities would primarily be contained within the boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by temporary lane closures, roadway/ access improvements, and the construction of utility line connections. Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term and temporary for the area, construction activities under Alternative 3 could also temporarily affect emergency response along Lincoln Boulevard, and other main connectors surrounding the Project Site due to potential traffic impacts during the construction phase. However, as with the Project, given the permitted hours of construction and nature of construction projects, most of the construction worker trips for this alternative would also occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts. Furthermore, as with the Project, a Construction Staging and Traffic Management Plan would be implemented as part of Alternative 3 to ensure that adequate and safe access for fire and emergency vehicles remains available within and near the Project Site during construction activities. Therefore, construction-related impacts related to fire protection services under Alternative 3 would be less than significant, and less when compared to the less-than-significant impacts of the Project due to the reduction in construction activities and duration.

(b) Operation

As with the Project, Alternative 3 would generate a new residential population, as well as a new visitor and employee population on the Project Site that would contribute to an increased demand for LAFD fire protection services. Specifically, based on the generation rates provided in the City of Los Angeles VMT Calculator Documentation, Alternative 3 would generate a total of 1,174 persons on-site including, approximately

1,113 residents and 61 new employees.[7,8] As such, Alternative 3 would result in a lower service population compared to Option A's service population of 1,563 persons (1,481 residents and 82 employees) and Option B's service population of 1,437 persons (957 residents and 480 employees). Thus, Alternative 3 would reduce the service population when compared to the Project In addition, similar to the Project, Alternative 3 would implement all applicable Building Code and Los Angeles Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Therefore, as with the Project, compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection, would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment. Alternative 3 would also include the installation of automatic fire sprinklers within all proposed buildings.

As with the Project, Alternative 3 would have the potential to affect emergency response to the Project Site and surrounding properties due to additional traffic. However, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, the increase in traffic generated by Alternative 3 would not significantly impact emergency vehicle response to the Project Site and surrounding area. Furthermore, the driveways and internal circulation under Alternative 3 would be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. As with the Project, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for Alternative 3. Therefore, similar to the Project, overall impacts with regard to LAFD fire protection during operation of Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in total floor area and uses.

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[7] *Based on the City of Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. The rate of 2.25 persons per unit for "Multi-Family Residential" land use is applied to the 494 residential units.*

[8] *Based on the City of Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. The rate of 2 employees per 1,000 square feet for "General Retail" land use is applied to the 10,238 square feet of retail uses and the rate 4 employees per 1,000 square feet for "High-Turnover Sit-Down Restaurant" land use is applied to the 10,238 square feet of restaurant uses.*

(2) Police Protection

(a) Construction

The types of construction activities would be similar to the Project under Alternative 3 although the extent of such activities and overall duration of construction would be reduced compared to the Project due to a reduction in total floor area and building heights. Similar to the Project, the demand for police protection services during construction of Alternative 2 would be offset by the removal of the existing commercial uses on the Project Site. Nevertheless, the potential for theft and vandalism during construction activities at the Project Site would be similar to the Project. As with the Project, Alternative 3 would implement temporary security measures to secure the Project Site during construction. With implementation of these security measures, potential impacts associated with theft and vandalism during construction activities would be less than significant.

As discussed in Section IV.J.2, Public Services—Police Protection, of this Recirculated Draft EIR, construction activities could also potentially affect LAPD response to the Project Site and surrounding area. However, as discussed in Section IV.K, Transportation, of this Recirculated Draft EIR, given the permitted hours of construction and nature of construction projects, most, if not all, of the construction worker and haul truck trips would occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts. Also, similar to the Project, Alternative 3 would implement a Construction Staging and Traffic Management Plan during construction to ensure that adequate and safe access is available within and near the Project Site during construction activities. Furthermore, construction-related traffic generated by the Project would not significantly impact LAPD response in the vicinity of the Project Site as emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, construction-related impacts to police protection services under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in construction duration.

(b) Operation

As with the Project, Alternative 3 would generate a new residential population, as well as a new visitor and employee population on the Project Site that would contribute to an increased demand for police protection services. Specifically, based on the generation rates provided in the City of Los Angeles VMT Calculator Documentation, Alternative 3 would generate approximately 1,113 residents.[9] As such, Alternative 3 would result in a

[9] *Based on the City of Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. The rate of 2.25 persons per unit for "Multi-Family Residential" land use is applied to the 494 residential units.*

lower residential service population compared to Option A's 1,481 residents and a greater residential service population compared to Option B's 957 residents. In addition, Alternative 3 would provide approximately 20,475 square feet of neighborhood-serving commercial uses, which would generate approximately 61 employees.[10] As such, Alternative 3 would result in a smaller employee service population compared to Option A's 82 employees and Option B's 480 employees. Due to the increase in residential uses compared to Option B, Alternative 3 would generate a greater overall demand on LAPD services when compared to Option B since LAPD evaluates demand based on a resident to police officer ratio, although this alternative would have a smaller service population. Accordingly, the increase in the existing police service population for the Pacific Community Police Station generated by Alternative 3 would be less than Option A and greater than Option B. As with the Project, Alternative 3 would not cause a significant change to the current officer-to-resident ratio for the Pacific Area. In addition, as with the Project, operational design features to enhance safety within and immediately surrounding the Project Site would be implemented as part of Alternative 3. The design features would help offset the increase in demand for police protection services generated by Alternative 3. Therefore, the impact on police protection services would be less than significant and less when compared to the less-than-significant impacts of the Option A due to the reduction in residential units since the police service population generated by Alternative 3 would be less than that of Option A, but would be greater to the less-than-significant impacts of Option B.

(3) Schools

(a) Construction

Similar to the Project, Alternative 3 would generate part-time and full-time jobs associated with construction between the start of construction and buildout of the development proposed under Alternative 3. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the development of Alternative 3. Therefore, the construction employment generated by Alternative 3 would not result in a notable increase in the resident population or in a corresponding increase in demand for schools in the vicinity of the Project Site. Impacts on school facilities during

[10] *Based on the City of Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. The rate of 2 employees per 1,000 square feet for "General Retail" land use is applied to the 10,238 square feet of retail uses and the rate 4 employees per 1,000 square feet for "High-Turnover Sit-Down Restaurant" land use is applied to the 10,238 square feet of restaurant uses.*

construction under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

Alternative 3 would directly generate students through the construction of 494 new residential units. Additionally, the construction of commercial uses could also indirectly generate students by potentially causing employees to relocate to the Project area. However, Alternative 3 would generate fewer school-aged children on the Project Site compared to Option A due to the reduction in the number of residential units. In addition, the number of students that could be indirectly generated by Alternative 3 as a result of employment opportunities would also be less due to the reduction in the commercial uses proposed. However, Alternative 3 would generate more school-aged children on the Project Site compared to Option B as it would increase the number of residential units. As with the Project, pursuant to Senate Bill 50, the Project Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits, and payment of these fees is considered mitigation of Project-related school impacts pursuant to Government Code Section 65995. Therefore, payment of applicable development school fees to the LAUSD would offset the impact of additional student enrollment at schools serving the Project Site area. Impacts related to schools would be less than significant under Alternative 3 and less when compared to the less-than-significant impacts of Option A, but greater than the less-than-significant impacts of Option B.

(4) Parks and Recreation

(a) Construction

Similar to the Project, construction of Alternative 3 would result in a temporary increase in the number of construction workers at the Project Site. Due to the temporary nature of construction activities, the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, the likelihood that construction workers would relocate their households as a consequence of working on Alternative 3 is negligible. Therefore, the construction workers associated with Alternative 3 would not result in a notable increase in the residential population in the vicinity of the Project Site, which would result in a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site. Additionally, during construction of Alternative 3, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to use parks and recreational facilities near their places of residence. Therefore, while there is a potential for construction workers to seek a nearby park to spend their lunch breaks, any resulting increase in the use of parks and recreational facilities would be temporary and negligible. Furthermore, use of haul routes would not be expected to result in access restrictions to City parks and recreation facilities in the vicinity

of the Project Site or interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks.

Based on the above, construction-related impacts on parks and recreational facilities would be less than significant under Alternative 3 and similar to the less-than-significant impacts of the Project.

(b) Operation

Residents are considered the primary users of parks and recreational facilities. Alternative 3 would generate fewer residents at the Project Site that could demand parks and recreation services compared to Option A, but would generate more residents compared to Option B. As with the Project, Alternative 3 would provide a variety of open space and recreational amenities to comply with the open space requirements of the LAMC. Thus, Alternative 3 would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities. Similar to the Project, while it is possible that employees of Alternative 3 may utilize local parks and recreational facilities, the increased demand would be negligible as it is anticipated that employees and visitors would also primarily utilize on-site open space during their time spent at the Project Site. Therefore, impacts to park and recreation facilities would be less than significant under Alternative 3 and less when compared to the less-than-significant impacts of the Project under Option A, but would be greater compared to the less-than-significant impacts of the Project under Option B.

(5) Libraries

(a) Construction

Similar to the Project, construction of Alternative 3 would result in a temporary increase of construction workers on the Project Site. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by Alternative 3. Therefore, construction workers would not result in a material increase in the resident population within the service area of the Venice Branch Library, the Mar Vista Branch Library, or the Playa Vista Branch Library, or an overall corresponding demand for library services in the vicinity of the Project Site.

In addition, it is also unlikely that construction workers would visit library facilities in the Project area on their way to/from work or during their lunch hours. Specifically, it is unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Additionally,

lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. Furthermore, it is unlikely that construction workers would utilize library facilities at the end of the work day and would instead likely use library facilities near their place of residence. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. As such, impacts to library facilities during construction would be less than significant under Alternative 3 and similar to the less-than-significant impacts of the Project.

(b) Operation

Residents are considered the primary users of library facilities. Alternative 3 would develop fewer residential units compared to the Project under Option A and, thus, generate fewer residents at the Project Site that could demand library services compared to Option A. However, Alternative 3 would develop more residential units compared to the Project under Option B and, thus, would generate more residents at the Project Site that could demand library services compared to Option B. The number of employees generated by Alternative 3 would also be reduced compared to the Project due to the reduction in the commercial uses proposed, and the elimination of office uses proposed under Option B. Employees would generate minimal demand for library services since they would be more likely to use library facilities near their homes during non-work hours. Furthermore, any new employees generated by Alternative 3 who would move to the Project Site area would fill existing vacant units already accounted for in library service boundaries. Employees at the Project Site would also have internet access, which provides information and research capabilities and reduces the demand at physical library locations. As such, impacts on libraries facilities and services under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of Option A due to the reduction in the number of residents and employees, but would be greater than the less-than-significant impacts of Option B due to the increase in the number of residents.

k. Transportation

As previously described, Alternative 3 would be developed within the same Project Site as the Project and would include a mix of uses similar to Option A of the Project. As such, the plans, policies, and programs applicable to the Project would also apply to Alternative 3. As discussed above, while Alternative 3 would include a reduction in residential uses and square footage proposed by both development options, Alternative 3 would feature similar vehicular, pedestrian, and bicycle access as Option A. In addition, parking would generally be provided in a similar manner to Option A. Therefore, overall, as with the Project, Alternative 3 would be consistent with the goals, policies, and requirements of the applicable plans. Specifically, Alternative 3 also aims to balance the needs of various users and trip purposes through a multimodal transportation network through a multimodal transportation network that includes features such as vehicle

charging areas and bike sharing. Alternative 3 also discourages utilizing land for parking that could be used for other valuable uses, as all parking provided for Alternative 3 would be located within a subterranean/fully-enclosed above-grade parking garage. Therefore, Alternative 3 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Thus, impacts would be less than significant and similar to the impacts of the Project.

With respect to VMT, when accounting for the same project design features as the Project as well as the vehicle trips generated by the existing shopping center uses on the site to be removed, the proposed uses under Alternative 3 would result in a net increase of 164 vehicle trips per day (refer to Appendix N of this Recirculated Draft EIR). Based on the LADOT *Transportation Analysis Guidelines*, Alternative 3 would screen-out from preparing a VMT analysis because it would generate fewer than 250 net new daily vehicle trips. Therefore, impacts with respect to conflicts with CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant and less than the less-than-significant impacts of the Project.

Regarding freeway safety, as discussed in Section IV.K, Transportation, of this Recirculated Draft EIR, the Project would not add 25 or more trips to any nearby freeway off-ramp serving the Project Site in either the morning or afternoon peak hour. As Alternative 3 would generate fewer trips than the Project, Alternative 3 would not add 25 or more trips to any nearby freeway off-ramps, and no further freeway safety analysis is required. As such, impacts regarding freeway safety would also be less than significant and less than those of the Project.

Regarding emergency access, as with the Project, construction activities associated with Alternative 3 could potentially impact the provision of emergency services by the LAFD and the LAPD in the vicinity of the Project Site as a result of reduced or altered access around the Project Site. However, like the Project, Alternative 3 also would not require the closure of any vehicle travel lanes. Additionally, similar to the Project, most of the construction worker trips would occur outside the weekday peak traffic periods, thereby reducing the potential for traffic-related conflicts. Alternative 3 would also include the preparation of a Construction Traffic Management Plan prior to the start of construction which would ensure that adequate and safe access remains available within and near the Project Site during construction activities. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way.

During operation, all driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City

Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede emergency vehicle access. As such, like the Project, emergency access to the Project Site and surrounding area under Alternative 3 would be maintained and Alternative 3 would not result in inadequate emergency access during operation. Additionally, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Based on the above, Alternative 3 would not result in inadequate emergency access during construction or operation, and impacts would be less than significant. Such impacts would be less than those of the Project due to the reduced construction and duration of construction.

l. Tribal Cultural Resources

As with the Project Option A, Alternative 3 would construct two subterranean parking levels. Therefore, the potential for Alternative 3 to uncover subsurface tribal cultural resources would be similar to that of the Project. Accordingly, impacts to tribal cultural resources would be less than significant and similar to the impacts of the Project.

m. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 3 would result in a temporary demand for water associated with dust control, equipment and site cleanup, excavation and export, soil compaction and earthwork, mixing and placement of concrete, irrigation for plant and landscaping establishment, testing of water connections and flushing, and other short-term related activities. This demand would be less than the Project since the overall amount of new construction and the construction duration required under Alternative 3 would be reduced. Additionally, like the Project, any water demand generated by Alternative 2 would be offset by the removal of the existing uses on-site. As evaluated in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Recirculated Draft EIR, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of Project construction. Since the water demand for construction activities under

Alternative 3 would be less than that of the Project, the temporary and intermittent demand for water during construction under Alternative 3 would also be expected to be met by the City's available water supplies. Similarly, the existing LADWP water infrastructure would be adequate to provide the water flow necessary to serve Alternative 3. Therefore, impacts on water supply and infrastructure associated with construction activities would be less than significant under Alternative 3 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 demand for water relative to existing conditions. However, based on the reduction in total development, water demand for Alternative 3 would be less than the Project's estimated increase in water demand. Thus, the estimated net water demand under Alternative 3 would also be within the available and projected water supplies for LADWP under normal, single-dry, and multi-dry years through the year 2045. In addition, as with the Project, Alternative 3 would connect to the existing mains within the surrounding streets. As Alternative 3 would require similar fire flow requirements pursuant to the LAMC as the Project, it is assumed that sufficient infrastructure capacity would be available to provide fire water service to Alternative 3 and upgrades to the mainlines that serve the Project Site would not be required. Thus, operational impacts to water supply and infrastructure under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, construction activities for Alternative 3 would result in wastewater generation from construction workers on-site. However, as with the Project, wastewater generation during construction of Alternative 3 would be temporary and nominal when compared with the Project Site's wastewater generation under existing conditions. Furthermore, construction workers would typically utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. Thus, wastewater generation from construction activities under Alternative 3 would not cause a measurable increase in wastewater flows.

Additionally, as with the Project, Alternative 3 would require construction of new on-site infrastructure to serve new buildings, and potential upgrades and/or relocations of existing infrastructure. Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to the public infrastructure. Although no upgrades to the public main are anticipated, minor off-site work would be required in order to connect the on-site distribution system to the

public main. Similar to the Project, a Construction Staging and Traffic Management Plan would be implemented during construction of Alternative 3 to reduce any temporary pedestrian and traffic impacts resulting from the minor off-site work. Therefore, construction-related impacts to the wastewater system under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

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

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

(3) Solid Waste

(a) Construction

Construction of Alternative 3 would involve demolition and building construction activities. The amount of demolition waste generated by Alternative 3 would be similar to the Project, while the amount of construction waste would be less due to the reduction in total floor area and building heights. In accordance with City requirements, a haul permit would be obtained by the contractor or hauler to dispose of the materials at a City-certified waste processing facility. Since construction and demolition waste would be hauled by a private construction contractor permitted by the City, Alternative 3 would not result in the need for an additional solid waste collection route. Therefore, given that the demolition waste would be similar and construction waste would be less than that of the Project, it is

reasonable to assume that the Azusa Land Reclamation Landfill would be capable of accommodating the demolition and construction waste from Alternative 3. Furthermore, similar to the Project, construction of Alternative 3 would not conflict with any applicable State or City solid waste regulations. Additionally, in the event that any asbestos or asbestos-containing materials (ACMs), LBP, and PCBs are found in the buildings proposed for demolition, suspect materials would be removed in accordance with all applicable local, State, and federal regulations prior to demolition activities. As such, solid waste impacts during construction would be less than significant under Alternative 3 and less when compared to the less-than-significant impacts of the Project.

(b) Operation

During its operation, Alternative 3 would generate municipal solid waste typical of residential and commercial developments. Similar to the Project, solid waste generated by Alternative 3 would be recycled or collected by private waste haulers contracted by the Applicant and permitted by the City and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles. The transport of solid waste generated by Alternative 3 to waste management/disposal facilities would continue to occur along existing solid waste routes of travel. As such, as with the Project, Alternative 3 would not result in the need for additional solid waste collection routes to adequately handle waste generated by operations under Alternative 3.

Alternative 3 would generate overall less solid waste compared to the Project due to the reduction in the amount of residential units and commercial uses proposed. Therefore, it is reasonable to assume that the existing landfills serving the Project Site would have adequate capacity to accommodate the disposal needs of Alternative 3. Since the solid waste generated by Alternative 3 would be less than that of the Project, Alternative 3 would not result in the need for an additional recycling or disposal facility to adequately handle waste generated. Furthermore, as with the Project, Alternative 3 would not conflict with solid waste policies and objectives in the City of Los Angeles Source Reduction and Recycling Element or its updates, the City of Los Angeles Solid Waste Management Policy Plan, the City of Los Angeles General Plan Framework Element or the Curbside Recycling Program, or the County Integrated Waste Management Plan. As such, solid waste impacts during operation of Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(4) Energy Infrastructure

(a) Construction

As discussed above, Alternative 3 would reduce the amount of energy needed for construction activities based on the reduction in development. As discussed in Section IV.M, Energy, of this Recirculated Draft EIR, the estimated energy usage of the Project

during construction would be within the available capacity and supply of the existing infrastructure. Since Alternative 3 would generate a reduced demand for energy during construction compared to the Project due to less overall construction, the energy demand of Alternative 3 would similarly be within the available capacity of the existing infrastructure. Therefore, impacts to energy infrastructure capacity associated with construction of Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Operation

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

3. Comparison of Impacts

Alternative 3 would not eliminate any of the Project's significant and unavoidable impacts. Specifically, the Project's significant and unavoidable impacts related to noise from on-site construction and vibration from on-site and off-site construction with respect to human annoyance would remain with development of Alternative 3. Furthermore, the following impact areas would be greater than the impacts of the Project under Option B: police protection during operation, schools during operation, parks and creation during operation, and libraries during operation. Alternative 3 also would not eliminate the Project's significant and unavoidable cumulative impacts related to construction noise from on-site and off-site noise sources, and off-site construction vibration with respect to human annoyance. All other impacts would be similar to, or less than, those of the Project. However, it is noted that with an overall reduction in proposed development, the impacts of this alternative would be experienced for a shorter period of time compared to the Project.

4. Relationship of the Alternative to Project Objectives

With a similar mix of residential and commercial uses as the Project, Alternative 3 would mostly meet the underlying purpose of the Project to provide a mixed-use development that includes new multi-family housing opportunities that accommodate a range of income needs, walkable neighborhood-serving retail and restaurant uses, and expanded recreational amenities that serve the community and promote walkability. In addition, Alternative 3 would achieve the following Project objectives:

- Reduce vehicular trips and congestion by developing new housing in proximity to services and facilities, locate new housing and employment opportunities in a manner that reduces vehicular trips by providing onsite housing in combination with onsite community-serving commercial and recreational amenities and within walking distance to existing offsite commercial uses and amenities.

- Preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods, provide buildings with varied design elements and transitioning heights to respect the scale of the surrounding buildings.

- Enhance walkability by providing neighborhood-serving ground-floor retail and restaurant uses along street frontages and creating landscaped plazas, courtyards, and streetscapes that are connected by landscaped paseos across the site.

Alternative 3 would also meet the following objectives that only apply to the Project under Option B:

- Locate employment and residential uses near one another to promote sustainability and reduce vehicle miles traveled, with associated reductions in air quality and greenhouse gas emissions.

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

- Provide for the development of new housing to meet the diverse economic and physical needs of the existing residents and projected population, provide a new mix of housing options, including different sizes and configurations, as well as provide affordable housing units.

- To create a dynamic and economically viable mixed-use project with sufficient density to facilitate a healthy job-housing balance.

- Provide upgraded neighborhood-serving retail and restaurant to provide a strong and competitive commercial sector that promotes economic vitality and serves the needs of the Project residents, visitors, and the surrounding community.

Additionally, Alternative 3 also would not meet the following objects that only applied to Option B of the Project due to the elimination of office uses:

- Provide additional opportunities for new commercial development and services through the development of modern office uses with a combination of indoor and

outdoor collaborative spaces that can attract professional and creative office tenants.

V. Alternatives

D. Alternative 4: Reduced Excavation Alternative

1. Description of the Alternative

Alternative 4, the Reduced Excavation Alternative, would construct a mixed-use project similar to the Project but would eliminate the 90,000 square feet of office uses proposed by the Project under Option B and would reduce the number of subterranean parking levels. Specifically, Alternative 4 proposes the development of 601 dwelling units and 27,300 square feet of neighborhood-serving commercial uses. Alternative 4 would result in a reduction of 57 units compared to Option A and an increase of 176 units compared to Option B. Alternative 4 would provide the same amount of neighborhood-serving commercial uses proposed under Option A, but would reduce the amount of neighborhood-serving commercial uses by 12,700 square feet compared to Option B. Overall, the Reduced Excavation Alternative would construct 516,337 square feet of new floor area (a reduction of 57,211 square feet compared to Option A and 42,657 square feet compared to Option B). A conceptual site plan for Alternative 4 is provided in Figure V-3 on page V-97.

As shown in Figure V-3, under Alternative 4, the proposed uses would be provided within one large, five-story mixed-use building that would extend across the entire Project Site. The 601 residential dwelling units would be provided in the first through fifth stories throughout the proposed building and the neighborhood-serving commercial uses would be provided on the ground floor along Maxella Avenue. The ground floor would also include a parking area with access to services and loading areas. One large outdoor courtyard would be provided in the center of the Project Site, while three smaller outdoor courtyards would be provided along Glencoe Avenue. The height of the building would be reduced to five stories with a height of 62 feet. The overall design of the building under Alternative 4, including architectural features, lighting and signage, and sustainability features, would be similar to that of the Project. Vehicular access would be provided via several driveways off of Maxella Avenue and Glencoe Avenue. Pedestrian and bicycle access would be available throughout the Project Site.

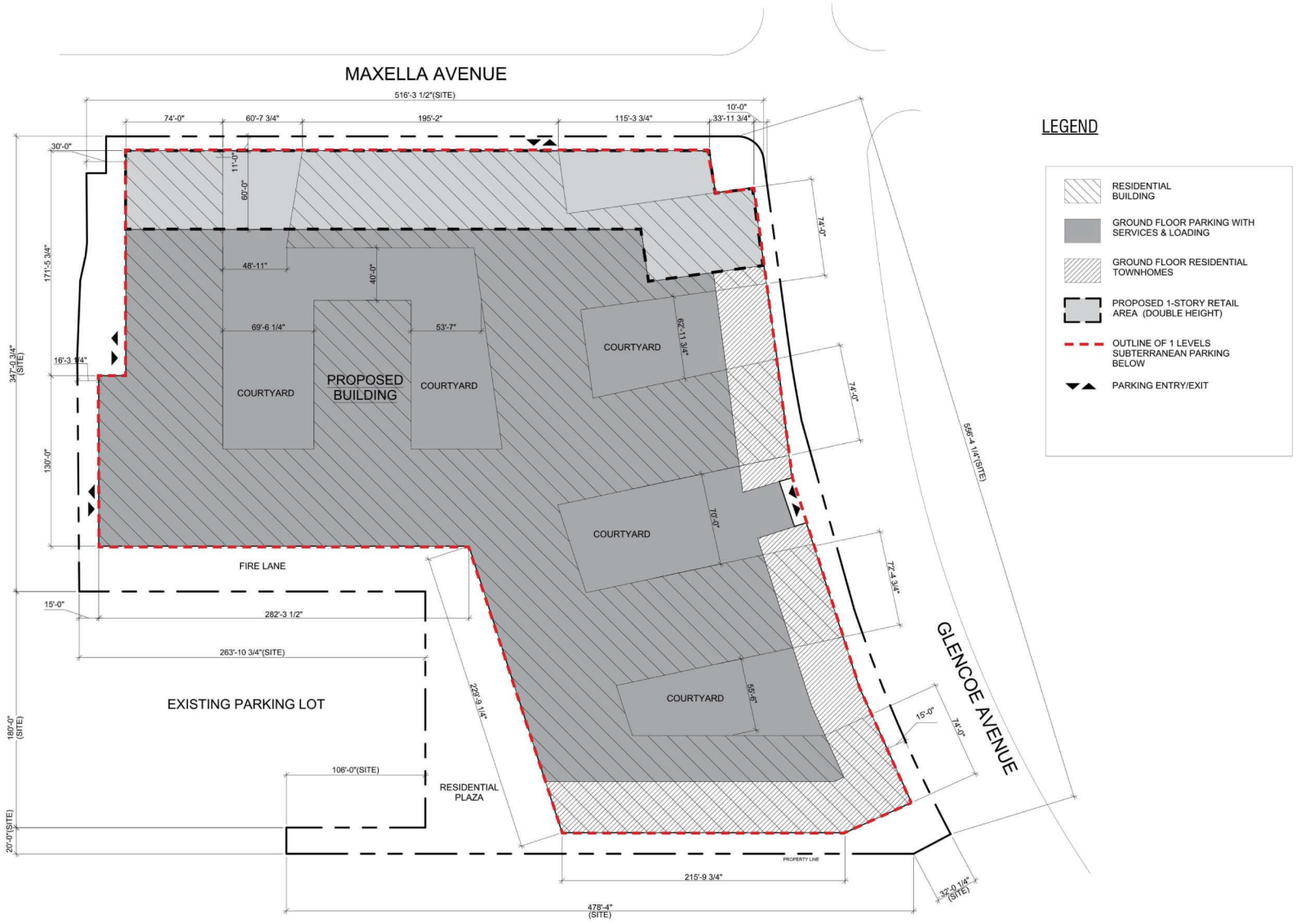

Figure V-3
Alternative 4 Conceptual Site Plan

Source: TCA Architects, 2018.

With regard to vehicular parking, given the reduction in total floor area under this alternative, 1,126 parking spaces would be required by Alternative 4, compared to 1,217 parking spaces required by Option A and 1,287 parking spaces required by Option B, and would be provided in accordance with the requirements set forth in the LAMC. The parking spaces would be distributed throughout the Project Site in one subterranean level that would extend to a depth of approximately 14 feet and on one ground floor level.

As with the Project, Alternative 4 would provide a variety of open space and recreational amenities. Trees and other landscaping features would also be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue to activate these streets and provide a pedestrian-friendly environment. In total, Alternative 4 would provide 64,000 square feet of open space and recreational amenities in accordance with the open space requirements set for in LAMC (a reduction of 6,175 square feet compared to Option A's 70,175 square feet of open space and recreational amenities and a reduction of 45,745 square feet compared to Option B's 109,745 square feet of open space and recreation amenities).

Similar to the Project, to provide for development of Alternative 4, demolition of the existing uses would occur. In addition, as with the Project, construction of Alternative 4 would be developed in one phase. However, as Alternative 4 would include one level of subterranean parking, Alternative 4 would result in a reduction in excavation and export compared to the Project. Specifically, Alternative 4 would require approximately 120,900 cubic yards of export compared to the 241,800 cubic yards under Option A and 251,000 cubic yards under Option B (a reduction of approximately 120,900 cubic yards compared to Option A and a reduction of approximately 130,100 cubic yards compared to Option B). Additionally, given the reduction in overall square footage, the building construction period may be slightly reduced compared to that of the Project.

As with the Project, Alternative 4 would require a General Plan Amendment to the Palms–Mar Vista–Del Rey Community Plan to change the Community Plan land use designation from Limited Manufacturing to General Commercial; a Vesting Zone and Height District Change from [Q]M1-1 to (T)(Q)C2-2D; Site Plan Review; a Master Conditional Use Permit to allow the onsite and offsite sale of a full line of alcoholic beverages; Coastal Development Permit; Mello Act Compliance Review; and Vesting Tentative Tract Map and haul route approval.

2. Environmental Impacts

a. Aesthetics

(1) Conflict with Applicable Regulations Governing Scenic Quality

As discussed in Section IV.A, Aesthetics, of this Recirculated Draft EIR, a number of local plans, policies, and regulations related to scenic quality are applicable to the Project, including the City of Los Angeles General Plan Framework Element and Conservation Element, the Community Plan, the Citywide Urban Design Guidelines, the LAMC, and Title 24 of the California Code of Regulations. As concluded in Section IV.A, Aesthetics, of this Recirculated Draft EIR, the Project under either Option A or Option B would not conflict with the zoning and other regulations governing scenic quality.

As previously described, Alternative 4, the Reduced Excavation Alternative, would include similar uses as the Project at a reduced scale. In addition, Alternative 4 would continue to be constructed within the same Project Site. As such, the same local plans applicable to the Project would be applicable to Alternative 4. Overall, with the development of similar uses as the Project and incorporation of similar architectural design elements as the Project as well as a reduction in proposed development, Alternative 4 would not conflict with the proposed zoning and other regulations governing scenic quality. Therefore, the impacts of Alternative 4 related to potential conflicts with the zoning and other regulations governing scenic quality would be less than significant, and such impacts would be less than the less-than-significant impacts of the Project due to the reduction in uses proposed.

(2) Light and Glare

(a) Construction

As with the Project, while the majority of construction under Alternative 4 would occur during daylight hours (during a typical eight-hour work day), construction activities could potentially require the use of artificial lighting if construction were to occur in the evening until 9:00 P.M., as permitted per the LAMC. Additionally, artificial lighting may be required during the winter months when daylight is no longer sufficient earlier in the day. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of construction. In addition, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. Alternative 4 would also implement similar design features as the Project that would provide that lighting be shielded and/or aimed so that no direct beam illumination is provided outside of the Project Site boundary. Therefore, similar to the Project, light resulting from construction activities under Alternative 4 would not significantly impact off-site sensitive uses, substantially alter the character of off-site areas

surrounding the construction area, adversely impact day or nighttime views in the area, or substantially interfere with the performance of an off-site activity.

Also similar to the Project, any glare generated within the Project Site during construction of Alternative 4 would be transitory and short-term given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Therefore, similar to the Project, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur under Alternative 4.

Based on the above, light and glare associated with construction of Alternative 4 would not substantially alter the character of off-site areas surrounding the Project Site or adversely impact day or nighttime views in the area. Impacts related to light and glare during construction of Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduced overall construction activities and construction duration.

(b) Operation

Similar to the Project, Alternative 4 would replace the existing on-site buildings and parking areas and would increase the number of vehicle trips to and from the Project Site. However, as with the Project, Alternative 4 would eliminate sources of glare associated with the existing surface parking lots.

Similar to the Project, proposed lighting sources under Alternative 4 would be similar to other lighting sources in the Project Site vicinity and would not generate artificial light levels that are out of character with the surrounding area. All exterior lights would be directed toward the interior of the Project Site to avoid light spillover onto adjacent sensitive uses. The design of the proposed building similar to the Project would also ensure that lighting on the upper levels is concentrated in the central portion of the building, and would provide space along the building edges to serve as a buffer for rooftop light spillover. Proposed lighting would also meet all applicable LAMC lighting standards. Similarly, signage under Alternative 4 would include building identity signage and general ground level and wayfinding pedestrian signage. No off premises or billboard advertising is proposed as part of this alternative. Alternative 4 would also not include signage with flashing, mechanical, or strobe lights. New signage would be architecturally integrated into the design of the proposed building and would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off-site glare. Illumination used for signage under Alternative 4 would also comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

With regard to glare, the building proposed under Alternative 4 would feature similar building materials as the Project. Alternative 4 would also implement similar design features as the Project, including the use of non-reflective glass or glass that has been treated with a non-reflective coating in all exterior windows and building surfaces to reduce potential glare from sunlight. Also, as with the Project, metal building surfaces would be used as accent materials and would not cover expansive spaces. Therefore, as with the Project, the proposed building materials would not have the potential to produce a substantial degree of glare. In addition, since the proposed parking area would also be enclosed under this alternative, the reflection potential from parked cars as viewed from surrounding areas and roadways during the day and night would be eliminated.

Based on the above, lighting and glare associated with operation of Alternative 4 would not result in a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Therefore, operational light and glare impacts under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the overall reduction in the height of the building.

b. Air Quality

(1) Construction

(a) Regional Emissions

As with the Project, construction of Alternative 4 has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.B, Air Quality, of this Recirculated 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 4, overall construction activities and the construction duration would be reduced in comparison to the Project due to the reduction in development and the reduction in excavation and export-related construction activities associated with the reduced subterranean parking proposed under this alternative. Specifically, under Alternative 4, total excavation quantities would be reduced by approximately 50 percent compared to Option A (a reduction of approximately 120,900 cubic yards) and approximately 52 percent compared to Option B (a reduction of approximately 130,100 cubic yards). However, the intensity of air emissions and fugitive dust from site preparation and construction activities under Alternative 4 would be similar to the Project on days with maximum construction activities because the maximum number of

construction equipment and haul trucks that could be accommodated within the construction site and that could be operating during the excavation phase would be similar to the Project on a daily basis (i.e., there would be no change to the intensity of construction activities on days in which maximum construction activities would occur). As such, air emissions during maximum activity days, which is a metric used for measuring impact significance, would be similar to those of the Project. It is noted however that with the reduced duration of the excavation phase, which would be shortened by approximately 50 to 52 percent (based on the corresponding 50 percent to 52 percent reduction in excavation quantities), the Project's regional air emissions impact would occur for a shorter duration compared to the Project. Thus, the duration of the Project's regional air emissions impact would be less under Alternative 4. Overall, the reduction in development and excavation activities under Alternative 4 would lessen impacts associated with regional daily emissions as compared to the Project. Therefore, as with the Project, Alternative 4 would result in regional construction emissions impacts that would be less than significant with incorporation of mitigation, and such impacts would be less than those of the Project.

(b) Localized Emissions

As Alternative 4 would develop the Project Site similar to the Project and construct the proposed building under Alternative 4 within the same footprint as the Project, construction activities associated with Alternative 4 would be located at similar distances from sensitive receptors as the Project. As previously discussed above, although Alternative 4 would result in a reduction in the amount of proposed development and excavation compared to the Project, the intensity of construction activities would be similar on days with maximum construction activities (i.e., there would be no change to the intensity of construction activities on days in which maximum construction activities would occur). Since air emissions and fugitive dust from construction activities would be similar to those of the Project on maximum construction activity days, localized emissions under Alternative 4 would also be similar to those of the Project. It is noted however that with the reduced duration of the excavation phase, which would be shortened by approximately 50 to 52 percent (based on the corresponding 50 percent to 52 percent reduction in excavation quantities), the Project's localized air emissions impact would occur for a shorter duration compared to the Project. Overall, the reduction in development and excavation activities would reduce impacts associated with localized emissions as compared to the Project; as such, impacts under Alternative 4, like the Project, would be less than significant, with the degree of the impact less than that of the Project.

(c) Toxic Air Contaminants

As with the Project, construction of Alternative 4 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.B, Air Quality, of this Recirculated Draft EIR, the Project would

result in less-than-significant impacts with regard to TAC emissions. Overall construction TAC emissions generated by Alternative 4 would be less than those of the Project since grading and excavation activities required during construction of Alternative 4 would be reduced. Thus, impacts due to TAC emissions under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project.

(2) Operation

(a) Regional Emissions

Operational regional air pollutant emissions associated with Alternative 4 would be generated by vehicle trips to the Project Site, which are the largest contributors to operational air pollutant emissions, and the consumption of electricity and natural gas. As Alternative 4 would result in a reduction in overall development compared to the Project, the number of net new daily vehicle trips generated by Alternative 4 would be less than the net new daily vehicle trips generated by the Project. Since the amount of vehicular emissions is based on the number of trips generated, the overall pollutant emissions generated by Alternative 4 would be less than the emissions generated by the Project. With the reduction in overall floor area, both area sources and stationary sources would also generate less on-site operational air emissions compared to the Project. Therefore, under Alternative 4, total contributions to regional air pollutant emissions during operation would be less than the Project's contribution. Therefore, impacts on regional air quality would be less than significant under Alternative 4, and such impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Localized Emissions

Localized operational CO impacts are determined primarily by traffic volumes. As discussed above, Alternative 4 would result in an overall reduction in development compared to the Project. As such, Alternative 4 would generate less daily trips compared to the Project. In addition, as with the Project, Alternative 4 would not introduce any new major sources of air pollution within the Project Site. Because the localized impacts analysis from on-site operational activities and the localized CO hotspot analysis associated with off-site operational activities for the Project did not result in any significant impacts, localized impacts under Alternative 4 also would be less than significant and less when compared to the less-than-significant impacts of the Project.

(c) Toxic Air Contaminants

As set forth in Section IV.B, Air Quality, of this Recirculated Draft EIR, the primary sources of potential TACs associated with Project operations would include diesel particulate matter from delivery trucks. Under Alternative 4, the overall increase in the number of deliveries and associated diesel particulate matter emissions would be reduced

compared to the Project due to the reduction in the number of residential units. Similar to the Project, the land uses proposed under Alternative 4 are not considered land uses that generate substantial TAC emissions. Therefore, Alternative 4 would not release substantial amounts of TACs and impacts would be less than significant. Such impacts would be less when compared to the less-than-significant impacts of the Project.

c. Energy

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

(a) Construction

Similar to the Project, construction activities associated with Alternative 4 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. Also similar to the Project, construction activities associated with Alternative 4 would not involve the consumption of natural gas. As with the Project, Alternative 4 would also generate a demand for transportation energy associated with on- and off-road vehicles. However, the energy consumed during construction of Alternative 4 would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. As with the Project, the electricity demand during construction of Alternative 4 would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Construction equipment used during construction of Alternative 4 would also comply with Title 24 requirements where applicable, similar to the Project. With regard to transportation fuels, trucks and equipment used during construction of Alternative 4 would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. Therefore, as with the Project, construction activities would use energy that is not wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities would be less than significant under the Alternative 4 and less than the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 4 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions. However, based on the reduction in total development proposed by Alternative 4, electricity, natural gas, and petroleum-based fuel consumption for Alternative 4 would be

less than the Project's estimated increase in energy consumption. Specifically, the consumption of electricity and natural gas would be reduced due to the reduction in residential units and commercial uses. In addition, as previously discussed, Alternative 4 would generate fewer daily trips than the Project. Furthermore, similar to the Project, Alternative 4 would implement similar design features to reduce GHG emissions as the Project, which would improve energy efficiency and reduce impacts on consumption of energy resources. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 4 would not be wasteful, inefficient, or unnecessary. Therefore, impacts related to energy use under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project.

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

As discussed in Section IV.C, Energy, of this Recirculated Draft EIR, the current City of LA Green Building Code requires compliance with CalGreen and Title 24. Like the Project, Alternative 4 would comply with the City's Green Building Code, as well as be capable of achieving LEED® Certified equivalency. Therefore, similar to the Project, Alternative 4 would incorporate measures that are beyond current State and City energy conservation requirements. Also similar to the Project, Alternative 4 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2019 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code.

With regard to transportation related energy usage, Alternative 4 would also comply with goals of the SCAG's RTP/SCS which incorporates VMT targets established by SB 375. As with the Project, the uses proposed under Alternative 4 would introduce new job opportunities consistent with numerous policies in the 2020-2045 RTP/SCS related to locating new jobs near transit. In addition, vehicle trips generated during Project operations would comply with CAFE fuel economy standards. As with the Project, Alternative 4 would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction.

Based on the above, Alternative 4 would not conflict with plans for renewable energy or energy efficiency. No impacts related to renewable energy or energy efficiency plans would occur under Alternative 4, and impacts would be similar to the less-than-significant impacts of the Project.

d. Geology and Soils

Under Alternative 4, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, liquefaction, subsidence, expansive soils, corrosive soils, oil wells, methane, and landform alterations would be similar to those under the Project

because such impacts are a function of the Project Site's underlying geologic conditions. However, with the reduction in excavation, this alternative's impacts related to soil erosion would be reduced compared to the Project. Alternative 4 would be developed within the same footprint as the Project and would comply with the same regulatory requirements as the Project to ensure that the soils underlying the Project Site can adequately support the proposed development. As with the Project, Alternative 4 would be designed and constructed to conform to the current seismic design provisions of the California Building Code and the Los Angeles Building Code. Alternative 4 would also comply with the same regulatory requirements as the Project, which require the preparation of a final design-level geotechnical engineering report to identify and minimize seismic risks. In addition, Alternative 4 would implement similar mitigation measures as the Project to reduce impacts associated with liquefaction and any associated settlement. As with the Project, overall impacts related to geology and soils under Alternative 4 would be less than significant with mitigation, and such impacts would be mostly similar to the impacts of the Project, except for soil erosion impacts, which would be less than the impacts of the Project due to the reduction in excavation activities.

e. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily trips generated and associated VMT, as well as energy consumption from proposed land uses. Under Alternative 4, the number of daily trips, daily VMT trip generation, and energy and water consumption under Alternative 4 would decrease compared to both Project Options due to the reduction in development. Thus, the amount of GHG emissions generated by Alternative 4 would be less than the amount generated by the Project. As with the Project, Alternative 4 would be designed to comply with the requirements of the CALGreen Code and the Los Angeles Green Building Code. Alternative 4 would also incorporate design features to reduce GHG emissions and be capable of meeting the standards of LEED Silver or equivalent green building standards. With compliance with the CALGreen Code and the Los Angeles Green Building Code, and with the implementation of comparable sustainability features as the Project, it is anticipated that Alternative 4 would be consistent with the GHG reduction goals and objectives included in adopted State, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project.

f. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, construction of Alternative 4 would require the demolition of the existing on-site buildings and surface parking areas, which could encounter asbestos

containing material and lead based paint due to the age of the buildings. As with the Project, Alternative 4 would comply with relevant regulations and requirements related to asbestos containing material and lead based paint, including SCAQMD Rule 1403, to ensure that impacts would be less than significant. As discussed in detail in Section IV.E, Hazards and Hazardous Materials, of this Recirculated Draft EIR, according to the Phase I ESA, during the Project Site reconnaissance, no evidence of existing underground storage tanks or aboveground storage tanks were observed on the Project Site. As such, similar to the Project, construction of Alternative 4 would not be expected to encounter underground storage tanks and would not require the removal of aboveground storage tanks. In addition, while three vaulted transformers were observed on-site, no leaks or stains were observed on the ground beneath the transformers and, as such, are unlikely to present an environmental concern. As with the Project, in the event that PCBs are found within areas proposed for demolition during construction of Alternative 4, suspect materials would be removed in accordance with all applicable federal, State, and local regulations and guidelines. Furthermore, during demolition, on-site grading, and building construction, fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners would be used, handled, and stored on the Project Site, and would therefore require proper management and disposal. Alternative 4 would fully comply with all applicable federal, State, and local requirements, as well as the manufacturer's instructions concerning the use, handling, storage, and disposal of hazardous materials. Additionally, if previously unidentified wells are encountered during construction of Alternative 4, adherence to all applicable regulatory compliance measures would ensure impacts associated with previously unidentified oil wells or oil production facilities would be less than significant. Furthermore, Alternative 4 would comply with the City of Los Angeles' Methane Mitigation Ordinance No. 175790, which would reduce impacts associated with methane gas during demolition and building construction of Alternative 4.

With regard to emergency response, construction activities for Alternative 4 would be primarily confined to the Project Site and would only include minor off-site work for installation of utility connections. In addition, similar to the Project, a Construction Staging and Traffic Management Plan would be implemented during construction of Alternative 4 to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The Construction Staging and Traffic Management Plan would include street closure information, traffic controls to direct traffic, a detour plan, haul routes, and a staging plan.

Based on the above, potential construction-related impacts associated with hazards and hazardous materials under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduced excavation and associated construction activities.

(2) Operation

Similar to the Project, Alternative 4 would not include the use of materials that would contain asbestos, lead based paint, or PCBs. In addition, Alternative 4 would not propose the installation of underground or aboveground storage tanks. The operation of Alternative 4 would involve the limited use of potentially hazardous materials typical of those used in residences and commercial developments, including cleaning agents, paints, pesticides, and other materials used for landscaping. As with the Project, all hazardous materials on the Project Site would be acquired, handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, State, and local requirements. In addition, as with the Project, Alternative 4 would comply with the City of Los Angeles' Methane Mitigation Ordinance No. 175790.

With regard to emergency response plans, Alternative 4 would not involve any activities that would impede public access or travel along the public right-of-way or interfere with an adopted emergency response or evacuation plan. In addition, similar to the Project, the increase in traffic generated by Alternative 4 would not significantly impact emergency vehicle response to the Project Site and surrounding uses, including along City-designated disaster routes since the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Accordingly, operation of Alternative 4 would not cause a substantial effect on emergency response as a result of increased traffic congestion. Furthermore, as Alternative 4 would reduce traffic as compared to the Project, Alternative 4 would have a lesser impact on emergency response within, and in, the vicinity of the Project Site compared to the Project.

Based on the above, potential impacts related to hazards and hazardous materials during operation of Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in uses.

g. Hydrology and Water Quality

(1) Surface Water Quality

(a) Construction

Under Alternative 4, the degree to which new pollutants could be introduced to the Project Site during construction would be similar to the Project as Alternative 4 would disturb the same area as the Project. In addition, as with the Project, a SWPPP would be prepared for Alternative 4 that would specify BMPs to be used during construction. As discussed in Section IV.G, Hydrology and Water Quality, of this Recirculated Draft EIR, based on geotechnical investigations adjacent to the Project Site, groundwater was encountered at 17 feet below ground surface. As described above, this alternative would

include excavation at a maximum depth of 14 feet below ground surface. As such, Alternative 4 would reduce the potential for dewatering during construction compared to the Project. In addition, with the implementation of site-specific BMPs included as part of the SWPPP, Alternative 4 would reduce or eliminate the discharge of potential pollutants from stormwater runoff. Construction of Alternative 4 would also be required to comply with City grading permit regulations, which require necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspection to reduce sedimentation and erosion. Therefore, with compliance with NPDES requirements and City grading permit regulations, construction of Alternative 4 would not result in discharge that would violate any water quality standard or waste discharge requirements, or otherwise substantially degrade water quality. Thus, as with the Project, construction-related impacts to surface water quality would be less than significant. Such impacts would be less than those of the Project due to the reduction in excavation activities.

(b) Operation

Similar to the Project, Alternative 4 would implement BMPs for managing stormwater runoff in accordance with current City LID Ordinance requirements. The BMPs would control stormwater runoff with no increase in runoff resulting from the alternative. As with the Project, a combination of gravity flows, pumps and splitter boxes would be used to route flows to either the infiltration BMP or to the adjacent streets. Due to the incorporation of LID BMPs, operation of Alternative 4 would not result in discharges that would violate any water quality standard or waste discharge requirements, or otherwise substantially degrade water quality. Thus, as with the Project, impacts to surface water quality during operation of Alternative 4 would be less than significant. Such impacts would be less when compared to the less-than-significant impacts of the Project due to the reduction in residential uses.

(2) Groundwater Quality

(a) Construction

As previously noted, the depth of excavation and associated export would be reduced compared to the Project under Alternative 4 as this alternative would only include one level of subterranean parking. Based on geotechnical investigations adjacent to the Project Site, groundwater was encountered at 17 feet below ground surface. Alternative 4 would include excavation at a maximum depth of 14 feet below ground surface. Therefore, the potential to encounter groundwater would be reduced by this alternative compared to the Project, and dewatering may not be required during construction. Notwithstanding, should groundwater be encountered, any discharge of groundwater during construction of Alternative 4 would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements. Pursuant to such requirements, the

groundwater extracted would be chemically analyzed to determine the appropriate treatment and/or disposal methods. Furthermore, during on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would, therefore, require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the potential for hazardous materials releases into groundwater. Compliance with all applicable federal, State, and local requirements, concerning the handling, storage and disposal of hazardous waste, would reduce the potential for construction of Alternative 4 to release contaminants into groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well downstream. In addition, as there are no groundwater production wells or public water supply wells on-site or within 1 mile of the Project Site, construction activities would not be anticipated to affect existing wells. Therefore, as with the Project, impacts with respect to groundwater quality during construction of Alternative 4 would be less than significant. Such impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Similar to the Project, Alternative 4 does not include the installation or operation of water wells, or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion. Alternative 4 also does not include the installation or operation of a municipal supply well or spreading ground facility. In addition, Alternative 4 does not include the surface or subsurface application or introduction of potential contaminants or waste materials. Alternative 4 is not anticipated to result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater through percolation. Therefore, as with the Project, impacts with respect to groundwater quality during operation of Alternative 4 would be less than significant, and such impacts would be similar to those of the Project.

(3) Surface Water Hydrology

(a) Construction

Similar to the Project, construction activities for Alternative 4 would include demolition of the existing buildings and surface parking areas. As with the Project, these activities would have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. However, as Alternative 4 would reduce the excavation proposed by the Project, Alternative 4 would disturb less soil compared to the Project. Notwithstanding, as with the Project, Alternative 4 would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, Alternative 4 would implement a SWPPP that specifies BMPs

and erosion control measures to be used during construction to manage runoff flows and prevent pollution. In addition, Alternative 4 would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Thus, through compliance with all NPDES Construction General Permit requirements, including preparation of a SWPPP, implementation of BMPs, and compliance with applicable City grading regulations, Alternative 4 would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, flooding on- or off-site. Similarly, with adherence to standard compliance measures, construction activities would not cause flooding, substantially increase or decrease the amount of surface water flow from the Project Site into a water body, or result in a permanent, adverse change to the movement of surface water. Therefore, construction-related impacts to surface water hydrology under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 4 would include development of a new building, paved areas, and landscaped areas. As with the Project, implementation of Alternative 4 would reduce impervious surfaces compared to the Project Site's existing impervious area. The extent to which existing impervious surfaces would be reduced would be less than that of the Project since Alternative 4 would include less open space as the Project. Therefore, Alternative 4 could result in greater flows compared to the Project. However, as with the Project, Alternative 4 would implement similar infiltration BMPs and design features as the Project to capture stormwater in accordance with regulatory requirements. Thus, as with the Project, the flows generated by Alternative 4 would be accommodated by the existing drainage system.

Based on the above, Alternative 4 would not impact the existing storm drain infrastructure serving the Project Site. Consequently, Alternative 4 would not cause flooding during the 50-year developed storm event, would not create runoff that would exceed the capacity of existing or planned drainage systems, would not require construction of new stormwater drainage facilities or expansion of existing facilities, would not substantially reduce or increase the amount of surface water in a water body, or result in a permanent adverse change to the movement of surface water. Therefore, operational impacts to surface water hydrology under Alternative 4 would be less than significant but greater when compared to the less-than-significant impacts of the Project.

(4) Groundwater Hydrology

(a) Construction

As previously discussed, based on geotechnical investigations adjacent to the Project Site, groundwater was encountered at 17 feet below ground surface. Alternative 4 would include excavation at a maximum depth of 14 feet below ground surface. Therefore, the potential to encounter groundwater would be reduced by this alternative compared to the Project. Notwithstanding, in the event dewatering is required during construction of Alternative 4, a temporary dewatering system would be installed and operated in accordance with NPDES Construction General Permit requirements. Any discharge of groundwater during construction of Alternative 4 would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements. Therefore, if dewatering is required, operation of the temporary dewatering system would have a minimal effect on local groundwater recharge in the vicinity of the Project Site. Additionally, if encountered, a portion of the extracted groundwater would be reused on-site for dust control, which would keep a portion of the dewatered groundwater on-site. Similar to the Project, Alternative 4 would not include the construction of water supply wells. No water supply wells are located at the Project Site or within 1 mile of the Project Site. Therefore, as with the Project, construction impacts on groundwater hydrology during construction of this alternative would be less than significant. Such impacts would be less when compared to the less-than-significant impacts of the Project due to the reduced excavation activities proposed.

(b) Operation

Given the groundwater level in the vicinity of the Project Site and the proposed excavation, permanent dewatering operations are not expected as part of this alternative. As discussed in Section IV.G, Hydrology and Water Quality, of this Recirculated Draft EIR, the Project Site is currently 96 percent impervious. Therefore, there is currently a minimal groundwater recharge potential on the Project Site. As with the Project, with implementation of Alternative 4, the amount of impervious areas would decrease compared to the Project Site's existing impervious area. However, the extent to which impervious areas would decrease would be reduced under this alternative since Alternative 4 would include less open space than the Project. As with the Project, Alternative 4 would implement an infiltration system that would improve the groundwater recharge capacity of the Project Site compared to existing conditions. Therefore, potential impacts on groundwater recharge would be less than significant under Alternative 4. Overall, impacts to groundwater hydrology during operation of Alternative 4 would be less than significant but greater when compared to the less-than-significant impacts of the Project.

h. Land Use and Planning

Alternative 4 would provide the same uses as the Project (except the office uses under Option B), but would result in an overall reduction in development. In addition, Alternative 4 would reduce the height of the proposed building compared to the Project. Accordingly, the overall floor area ratio, density, and building height would be reduced compared to the Project. However, Alternative 4 would require the same discretionary approvals as the Project. Similar to the Project, with approval of the requested discretionary approvals and implementation of design features discussed throughout this Recirculated Draft EIR (which would also be implemented as part of Alternative 4), Alternative 4 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, including the City's General Plan, the Community Plan, and the LAMC. As such, Alternative 4 would similarly not conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Thus, impacts related to conflicts with land use plans would be less than significant and similar to the less-than-significant impacts of the Project.

i. Noise

(1) Noise

(a) Construction

Alternative 4 would involve the same general phases of construction as the Project (i.e., site grading and excavation, building construction, and finishing/landscape installation). The types of construction activities under Alternative 4 also would be substantially similar to the Project. However, Alternative 4 would require less excavation and soil export compared to the Project since Alternative 4 would construct less subterranean parking. In addition, the amount of development proposed by Alternative 4 would also be reduced compared to the Project. As with the Project, construction of Alternative 4 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. While the overall amount and duration of construction would be reduced, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to that of the Project during maximum activity days during the excavation phase (i.e., there would be no change to the intensity of construction activities on days in which maximum construction activities would occur). However, as previously noted, the excavation phase under Alternative 4 would be shortened by approximately 50 percent to 52 percent. As such, the impact experienced during this peak construction phase would occur over a shorter period as compared to the Project. Therefore, noise levels during maximum activity days, which is a metric used for measuring impact significance, would be similar to those of the Project; however, the duration of noise level increases, which is another metric used for measuring

impact significance, would be less compared to the Project. Alternative 4 would also implement similar design features and mitigation measures as the Project to reduce noise levels during construction. Similar to the Project, on-site construction noise under Alternative 4 would be significant and unavoidable, while off-site construction noise under Alternative 4 would be less than significant. Overall, impacts under Alternative 4 would be less than those of the Project as the duration of construction activities and, excavation activities in particular, would be reduced.

(b) Operation

As discussed in Section IV.I, Noise, of this Recirculated Draft EIR, sources of operational noise under the Project include (a) on-site stationary noise sources, such as mechanical equipment, activities associated with the proposed outdoor spaces, parking facilities, and loading and trash collection areas; and (b) off-site mobile (roadway traffic) noise sources. Alternative 4 would introduce noise from similar on-site and off-site noise sources as the Project. However, it is anticipated that with the overall reduction in total floor area and uses, the noise levels from building mechanical equipment, outdoor spaces, and parking facilities would be reduced. In addition, similar to the Project, on-site mechanical equipment used during operation of Alternative 4 would comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. The proposed loading dock and trash collection areas for Alternative 4 would be located in similar areas as the Project. Similar to the Project, Alternative 4 would include Project Design Features NOI PDF 2 and NOI-PDF-4. Thus, noise impacts from loading dock and trash collection areas would be similar to the Project. Overall, operational on-site noise impacts would be less than significant and less when compared to the less-than-significant impacts of the Project.

With regard to off-site noise sources, Alternative 4 would result in a reduction in daily vehicle trips compared to the Project. The reduction in vehicle trips would result in a decrease in off-site traffic-related noise levels under Alternative 4. Therefore, as with the Project, off-site noise impacts under Alternative 4 would be less than significant. Such impacts would be less than those of the Project due to the reduction in vehicle trips.

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 4 would be similar to the Project, although the amount and duration of construction activities would be reduced. As with the Project, construction of Alternative 4 would generate vibration from the use of heavy-duty construction equipment as well as from truck trips. While the

overall amount of construction activities (including excavation) and duration of construction would be reduced under Alternative 4, on- and off-site construction activities and the associated construction on- and off-site vibration levels would be expected to be similar to those of the Project as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment during peak construction activity (i.e., there would be no change to the intensity of construction activities on days in which maximum construction activities would occur). Therefore, peak vibration levels generated by the construction equipment would be similar to those of the Project. Accordingly, vibration impacts due to on- and off-site construction activities under Alternative 4 would similarly be less than significant for on-site and off-site construction vibration pursuant to the significance threshold for building damage and significant and unavoidable for on-site and off-site construction vibration pursuant to the significance threshold for human annoyance. However, as previously noted, the excavation phase under Alternative 4 would be shortened by approximately 50 percent to 52 percent. As such, the impact experienced during this peak construction phase would occur over a shorter period as compared to the Project. Overall, as Alternative 4's construction duration would be less (including reduced excavation activities) as compared to the Project, the Project's on-site and off-site construction vibration impacts would be less under Alternative 4.

(b) Operation

As described in Section IV.I, Noise, of this Recirculated Draft EIR, sources of vibration related to operation of the Project would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under Alternative 4. As with the Project, vehicular-induced vibration from Alternative 4, including vehicle circulation within the subterranean parking area, would not generate perceptible vibration levels at off-site sensitive uses. In addition, like the Project, building mechanical equipment installed as part of Alternative 4 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration transmission such that the vibration would not be perceptible at the off-site sensitive receptors. Therefore, as with the Project, operation of Alternative 4 would not increase the existing vibration levels in the immediate vicinity of the Project Site. As such, vibration impacts associated with operation of Alternative 4 would also be less than significant. Such impacts would be less than those of the Project due to the reduced development proposed by Alternative 4.

j. Public Services

(1) Fire Protection

(a) Construction

As previously discussed, the total floor area and building height under Alternative 4 would be reduced compared to those of the Project. Therefore, the overall duration of construction for Alternative 4 would be slightly reduced compared to the Project. As with the Project, construction activities under Alternative 4 would have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, exposed electrical lines, chemical reactions, and lighted cigarettes. As with the Project, construction activities under Alternative 4 would comply with the safety and health provisions of OSHA. Construction would also occur in compliance with all applicable federal, State, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, compliance with regulatory requirements would effectively reduce the potential for construction activities associated with Alternative 4 to expose people to the risk of fire or explosion related to hazardous materials.

Additionally, similar to the Project, while Alternative 4 construction activities would primarily be contained within the boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by temporary lane closures, roadway/ access improvements, and the construction of utility line connections. Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term and temporary for the area, construction activities under Alternative 4 could also temporarily affect emergency response along Lincoln Boulevard, and other main connectors surrounding the Project Site due to potential traffic impacts during the construction phase. However, as with the Project, given the permitted hours of construction and nature of construction projects, most of the construction worker trips for this alternative would also occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts. Furthermore, as with the Project, a Construction Staging and Traffic Management Plan would be implemented as part of Alternative 4 to ensure that adequate and safe access for fire and emergency vehicles remains available within and near the Project Site during construction activities. Therefore, construction-related impacts related to fire protection services under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in construction activities and duration.

(b) Operation

As with the Project, Alternative 4 would generate a new residential population, as well as a new visitor and employee population on the Project Site that would contribute to an increased demand for LAFD fire protection services. Specifically, based on the generation rates provided in the City of Los Angeles VMT Calculator Documentation, Alternative 4 would generate a total of 1,436 persons on-site including, approximately 1,354 residents and 82 new employees.[11,12] As such, Alternative 4 would result in a lower service population compared to Option A's service population of 1,563 persons (1,481 residents and 82 employees) and Option B's service population of 1,437 persons (957 residents and 480 employees). Thus, Alternative 4 would reduce the service population when compared to the Project. In addition, similar to the Project, Alternative 4 would implement all applicable Building Code and Los Angeles Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Therefore, as with the Project, compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection, would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment. Alternative 4 would also include the installation of automatic fire sprinklers within the proposed building. As with the Project, Alternative 4 would have the potential to affect emergency vehicle response to the Project Site and surrounding properties due to additional traffic. However, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, the increase in traffic generated by Alternative 4 would not significantly impact emergency vehicle response to the Project Site and surrounding area. Furthermore, the driveways and internal circulation under Alternative 4 would be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. As with the Project, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for Alternative 4. Therefore, similar to the Project, overall impacts with regard to LAFD fire protection during operation of Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project due to a decrease in the fire service population compared to the Option A and Option B.

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[11] *Based on the City of Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. The rate of 2.25 persons per unit for "Multi-Family Residential" land use is applied to the 601 residential units.*

[12] *Based on the City of Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. The rate of 2 employees per 1,000 square feet for "General Retail" land use is applied to the 13,650 square feet of retail uses and the rate 4 employees per 1,000 square feet for "High-Turnover Sit-Down Restaurant" land use is applied to the 13,650 square feet of restaurant uses.*

(2) Police Protection

(a) Construction

The types of construction activities would be similar to the Project under Alternative 4 although the extent of such activities and overall duration of construction would be reduced compared to the Project due to a reduction in total floor area, building height, and excavation. Nevertheless, the potential for theft and vandalism during construction activities at the Project Site would be similar to the Project. As with the Project, Alternative 4 would implement temporary security measures to secure the Project Site during construction. With implementation of these security measures, potential impacts associated with theft and vandalism during construction activities would be less than significant.

As discussed in Section IV.J.2, Public Services—Police Protection, of this Recirculated Draft EIR, construction activities could also potentially affect LAPD response to the Project Site and surrounding area. However, as discussed in Section IV.K, Transportation, of this Recirculated Draft EIR, given the permitted hours of construction and nature of construction projects, most, if not all, of the construction worker and haul truck trips would occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts. Also, similar to the Project, Alternative 4 would implement a Construction Staging and Traffic Management Plan during construction to ensure that adequate and safe access is available within and near the Project Site during construction activities. Furthermore, construction-related traffic generated by the Project would not significantly impact LAPD response in the vicinity of the Project Site as emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, construction-related impacts to police protection services under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in construction duration.

(b) Operation

As with the Project, Alternative 4 would generate a new residential population, as well as a new visitor and employee population on the Project Site that would contribute to an increase in demand for police protection services. Specifically, based on the generation rates provided in the City of Los Angeles VMT Calculator Documentation, Alternative 4 would generate approximately 1,354 residents.[13] As such, Alternative 4 would result in a

[13] *Based on the City of Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. The rate of 2.25 persons per unit for "Multi-Family Residential" land use is applied to the 601 residential units.*

lower residential service population compared to Option A's 1,481 residents and a greater residential service population compared to Option B's 957 residents. In addition, Alternative 4 would provide approximately 27,300 square feet of neighborhood-serving commercial uses, which would generate approximately 82 employees.[14] As such, Alternative 4 would result in a similar employee service population compared to Option A's 82 employees and a smaller employee service population Option B's 480 employees. Due to the increase in residential uses compared to Option B, Alternative 4 would generate a greater overall demand on LAPD services when compared to Option B since LAPD evaluates demand based on a resident to police officer ratio, although this alternative would have a smaller service population. However, as with the Project, Alternative 4 would not cause a significant change to the current officer-to-resident ratio for the Pacific Area. In addition, as with the Project, operational design features to enhance safety within and immediately surrounding the Project Site would be implemented as part of Alternative 4. The design features would help offset the increase in demand for police protection services generated by Alternative 4. Therefore, the impact on police protection services would be less than significant and less when compared to the less-than-significant impacts of Option A due to the reduction in residential units since the police service population generated by Alternative 4 would be less than that of Option A, but would be greater to the less-than-significant impacts of Option B.

(3) Schools

(a) Construction

Similar to the Project, Alternative 4 would generate part-time and full-time jobs associated with construction between the start of construction and buildout of the development proposed under Alternative 4. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the development of Alternative 4. Therefore, the construction employment generated by Alternative 4 would not result in a notable increase in the resident population or in a corresponding increase in demand for schools in the vicinity of the Project Site. Impacts on school facilities during construction under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

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[14] *Based on the City of Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. The rate of 2 employees per 1,000 square feet for "General Retail" land use is applied to the 13,650 square feet of retail uses and the rate 4 employees per 1,000 square feet for "High-Turnover Sit-Down Restaurant" land use is applied to the 13,650 square feet of restaurant uses.*

(b) Operation

Alternative 4 would directly generate students through the construction of 601 new residential units. Additionally, the construction of commercial uses could also indirectly generate students by potentially causing employees to relocate to the Project area. However, Alternative 4 would generate fewer school-aged children on the Project Site compared to Option A due to the reduction in the number of residential units, but would generate more school-aged children on the Project Site compared to Option B. The number of students that could be indirectly generated by Alternative 4 as a result of employment opportunities would be similar to Option A as the amount of commercial uses proposed would be similar. Compared to Option B, the number of students that could be indirectly generated by Alternative 4 as a result of employment opportunities would be less as the amount of commercial uses proposed would be reduced. Furthermore, as with the Project, pursuant to Senate Bill 50, the Project Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits, and payment of these fees is considered mitigation of Project-related school impacts pursuant to Government Code Section 65995. Therefore, payment of applicable development school fees to the LAUSD would offset the impact of additional student enrollment at schools serving the Project Site area. Impacts related to schools would be less than significant under Alternative 4 and less when compared to the less-than-significant impacts of Option A due to the reduction in residential units and greater than the impacts of Option B due to an increase in residential units.

(4) Parks and Recreation

(a) Construction

Similar to the Project, construction of Alternative 4 would result in a temporary increase in the number of construction workers at the Project Site. Due to the temporary nature of construction activities, the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, the likelihood that construction workers would relocate their households as a consequence of working on Alternative 4 is negligible. Therefore, the construction workers associated with Alternative 4 would not result in a notable increase in the residential population in the vicinity of the Project Site, which would result in a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site. Additionally, during construction of Alternative 4, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to use parks and recreational facilities near their places of residence. Therefore, while there is a potential for construction workers to seek a nearby park to spend their lunch breaks, any resulting increase in the use of parks and recreational facilities would be temporary and negligible. Furthermore, use of haul routes would not be expected to result in access restrictions to City parks and recreation facilities in the vicinity

of the Project Site or interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks.

Based on the above, construction-related impacts on parks and recreational facilities would be less than significant under Alternative 4 and similar to the less-than-significant impacts of the Project.

(b) Operation

Residents are considered the primary users of parks and recreational facilities. Alternative 4 would generate fewer residents at the Project Site that could demand parks and recreation services than Option A, but would generate more residents than Option B. As with the Project, Alternative 4 would provide a variety of open space and recreational amenities to comply with the open space requirements of the LAMC. Thus, Alternative 4 would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities. Similar to the Project, while it is possible that employees of Alternative 4 may utilize local parks and recreational facilities, the increased demand would be negligible as it is anticipated that employees and visitors would also primarily utilize on-site open space during their time spent at the Project Site. Therefore, impacts to park and recreation facilities would be less than significant under Alternative 4 and less when compared to the less-than-significant impacts of Option A due to the reduction in residential units, but impacts would be greater compared to the less-than-significant impacts of Option B due to an increase in residential units.

(5) Libraries

(a) Construction

Similar to the Project, construction of Alternative 4 would result in a temporary increase of construction workers on the Project Site. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by Alternative 4. Therefore, construction workers would not result in a material increase in the resident population within the service area of the Venice Branch Library, the Mar Vista Branch Library, or the Playa Vista Branch Library, or an overall corresponding demand for library services in the vicinity of the Project Site.

In addition, it is also unlikely that construction workers would visit library facilities in the Project area on their way to/from work or during their lunch hours. Specifically, it is unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Additionally,

lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. Furthermore, it is unlikely that construction workers would utilize library facilities at the end of the work day and would instead likely use library facilities near their place of residence. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. As such, impacts to library facilities during construction would be less than significant under Alternative 4 and similar to the less-than-significant impacts of the Project.

(b) Operation

Residents are considered the primary users of library facilities. Alternative 4 would develop fewer residential units compared to Option A and, thus, generate fewer residents at the Project Site that could demand library services compared to the Option A. Alternative 4, however, would develop more residential units compared to Option B and would generate more residents at the Project Site that could demand library services compared to Option B. The number of employees generated by Alternative 4 would be similar to Option A as this alternative would develop the same amount of commercial uses, but would generate less employees compared to Option B as it would develop approximately 12,700 less square feet of commercial uses and would not include office uses. Employees would generate minimal demand for library services since they would be more likely to use library facilities near their homes during non-work hours. Furthermore, any new employees generated by Alternative 4 who would move to the Project Site area would fill existing vacant units already accounted for in library service boundaries. Employees at the Project Site would also have internet access, which provides information and research capabilities and reduces the demand at physical library locations. As such, impacts on libraries facilities and services under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of Option A due to the reduction in the number of residents, but would be greater compared to the less-than-significant impacts of Option B due to the increase in residential units.

k. Transportation

As previously described, Alternative 4 would be developed within the same Project Site as the Project. As such, the plans, policies, and programs applicable to the Project would also apply to Alternative 4. As discussed above, Alternative 4 would include a reduction in residential uses compared to Option A, elimination of office uses compared to Option B, and a reduction of square footage proposed by both Project options. Alternative 4 would feature similar vehicular, pedestrian, and bicycle access as the Project. However, parking for Alternative 4 would be less than the Project. Parking under Alternative 4 would be distributed throughout the Project Site in one subterranean level that would extend to a depth of 14 feet and on ground floor ground floor level compared to the two subterranean levels that extend to a depth of approximately 28 feet and two above ground parking levels

under Option A, and the three subterranean levels that would extend to a depth of approximately 43 feet, one at grade parking level, and a small surface parking area under Option B. Overall, as with the Project, Alternative 4 would be consistent with the goals, policies, and requirements of the applicable plans. Specifically, Alternative 4 also aims to balance the needs of various users and trip purposes through a multimodal transportation network through a multimodal transportation network that includes features such as vehicle charging areas and bike sharing. Alternative 4 also discourages utilizing land for parking that could be used for other valuable uses, as all parking provided for Alternative 4 would be located within a subterranean/fully-enclosed above-grade parking garage. Therefore, Alternative 4 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Thus, impacts would be less than significant and similar to the impacts of the Project.

With respect to VMT, Alternative 4 would result in a Daily Household VMT of 7.3 per capita, which would be below the West Los Angeles APC significance threshold of 7.4 Daily Household VMT per capita (refer to Appendix N of this Recirculated Draft EIR). Additionally, because this alternative would only include residential and commercial uses, only a Daily Household VMT per Capita calculation is applicable because the commercial components are assumed to be local-serving, and therefore, Alternative 4 would not result in a work VMT impact. The degree of the impacts would be less under Alternative 4 due to the less than significant VMT per employee under this alternative.

Regarding freeway safety, as discussed in Section IV.K, Transportation, of this Recirculated Draft EIR, the Project would not add 25 or more trips to any nearby freeway off-ramp serving the Project Site in either the morning or afternoon peak hour. As Alternative 4 would generate fewer trips than the Project, Alternative 4 would not add 25 or more trips to any nearby freeway off-ramps, and no further freeway safety analysis is required. As such, impacts regarding freeway safety would be less than those of the Project and also be less than significant.

Regarding emergency access, as with the Project, construction activities associated with Alternative 4 could potentially impact the provision of emergency services by the LAFD and the LAPD in the vicinity of the Project Site as a result of reduced or altered access around the Project Site. However, like the Project, Alternative 4 also would not require the closure of any vehicle travel lanes. Additionally, similar to the Project, most of the construction worker trips would occur outside the weekday peak traffic periods, thereby reducing the potential for traffic-related conflicts. Alternative 4 would also include the preparation of a Construction Traffic Management Plan prior to the start of construction which would ensure that adequate and safe access remains available within and near the Project Site during construction activities. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to

ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way.

During operation, all driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede emergency vehicle access. As such, like the Project, emergency access to the Project Site and surrounding area under Alternative 4 would be maintained and Alternative 4 would not result in inadequate emergency access during operation. Additionally, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Based on the above, Alternative 4 would not result in inadequate emergency access during construction or operation, and impacts would be less than significant. Such impacts would be less than those of the Project due to the reduced construction and duration of construction.

l. Tribal Cultural Resources

As previously discussed, Alternative 4 would construct only one level of subterranean parking compared to the two levels proposed by Option A and three levels proposed by Option B. Therefore, the potential for Alternative 4 to uncover subsurface tribal cultural resources would be reduced when compared to that of the Project. Accordingly, impacts to tribal cultural resources under Alternative 4 would be less-than-significant and less when compared to the less-than-significant impacts of the Project.

m. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 4 would result in a temporary demand for water associated with dust control, equipment and site cleanup, excavation and export, soil compaction and earthwork, mixing and placement of

concrete, irrigation for plant and landscaping establishment, testing of water connections and flushing, and other short-term related activities. This demand would be less than the Project since the amount of new construction and the construction duration required under Alternative 4 would be reduced. Additionally, like the Project, any water demand generated by Alternative 4 would be offset by the removal of the existing uses on-site. As evaluated in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Recirculated Draft EIR, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of Project construction. Since the water demand for construction activities under Alternative 4 would be less than that of the Project, the temporary and intermittent demand for water during construction under Alternative 4 would also be expected to be met by the City's available water supplies. Similarly, the existing LADWP water infrastructure would be adequate to provide the water flow necessary to serve Alternative 4. Therefore, impacts on water supply and infrastructure associated with construction activities would be less than significant under Alternative 4 and less when compared to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 4 would generate an increased demand for water relative to existing conditions. However, based on the reduction in total development, water demand for Alternative 4 would be less than the Project's estimated increase in water demand. Thus, the estimated net water demand under Alternative 4 would also be within the available and projected water supplies for LADWP under normal, single-dry, and multi-dry years through the year 2040. In addition, as with the Project, Alternative 4 would connect to the existing mains within the surrounding streets. As Alternative 4 would require similar fire flow requirements pursuant to the LAMC as the Project, it is assumed that sufficient infrastructure capacity would be available to provide fire water service to Alternative 4 and upgrades to the mainlines that serve the Project Site would not be required. Thus, operational impacts to water supply and infrastructure under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, construction activities for Alternative 4 would result in wastewater generation from construction workers on-site. However, as with the Project, wastewater generation during construction of Alternative 4 would be temporary and nominal when compared with the Project Site's wastewater generation under existing conditions. Furthermore, construction workers would typically utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. Thus,

wastewater generation from construction activities under Alternative 4 would not cause a measurable increase in wastewater flows.

Additionally, as with the Project, Alternative 4 would require construction of new on-site infrastructure to serve new buildings, and potential upgrades and/or relocations of existing infrastructure. Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to the public infrastructure. Although no upgrades to the public main are anticipated, minor off-site work would be required in order to connect the on-site distribution system to the public main. Similar to the Project, a Construction Staging and Traffic Management Plan would be implemented during construction of Alternative 4 to reduce any temporary pedestrian and traffic impacts resulting from the minor off-site work. Therefore, construction-related impacts to the wastewater system under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 4 would generate greater wastewater flows relative to existing conditions. However, based on the reduction in total development, wastewater generation under Alternative 4 would be less than the Project's estimated wastewater flow. Since the Project's wastewater flows would be accommodated by the existing infrastructure, the wastewater generated by Alternative 4 would also be accommodated by the existing capacity of any wastewater treatment plant, including the Hyperion Water Reclamation Plant, and impacts with respect to treatment capacity would be less than significant.

Similar to the Project, sewer service for Alternative 4 would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site. Given that wastewater flows generated by Alternative 4 would be less than the estimated wastewater flow of the Project, it is anticipated that there would be sufficient capacity within the sewer lines serving the Project Site to accommodate the flows from Alternative 4. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for Alternative 4 during the permitting process. In addition, sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Thus, operational impacts with regard to wastewater generation and infrastructure capacity under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(3) Solid Waste

(a) Construction

Construction of Alternative 4 would involve demolition and building construction activities. The amount of demolition waste generated by Alternative 4 would be similar to the Project while the amount of construction waste would be less due to the reduction in total floor area and building heights. In accordance with City requirements, a haul permit would be obtained by the contractor or hauler to dispose of the materials at a City-certified waste processing facility. Since construction and demolition waste would be hauled by a private construction contractor permitted by the City, Alternative 4 would not result in the need for an additional solid waste collection route. Therefore, given that the demolition waste would be similar and construction waste would be less than that of the Project, it is reasonable to assume that the Azusa Land Reclamation Landfill would be capable of accommodating the demolition and construction waste from Alternative 4. Furthermore, similar to the Project, construction of Alternative 4 would not conflict with any applicable State or City solid waste regulations. Additionally, in the event that any asbestos or asbestos-containing materials, LBP, and PCBs are found in the buildings proposed for demolition, suspect materials would be removed in accordance with all applicable local, State, and federal regulations prior to demolition activities. As such, solid waste impacts during construction would be less than significant under Alternative 4 and less when compared to the less-than-significant impacts of the Project.

(b) Operation

During its operation, Alternative 4 would generate municipal solid waste typical of residential and commercial developments. Similar to the Project, solid waste generated by Alternative 4 would be recycled or collected by private waste haulers contracted by the Applicant and permitted by the City and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles. The transport of solid waste generated by Alternative 4 to waste management/disposal facilities would continue to occur along existing solid waste routes of travel. As such, as with the Project, Alternative 4 would not result in the need for additional solid waste collection routes to adequately handle waste generated by operations under Alternative 4.

Alternative 4 would generate overall less solid waste compared to the Project due to the reduction in the amount of residential units proposed. Therefore, it is reasonable to assume that the existing landfills serving the Project Site would have adequate capacity to accommodate the disposal needs of Alternative 4. Since the solid waste generated by Alternative 4 would be less than that of the Project, Alternative 4 would not result in the need for an additional recycling or disposal facility to adequately handle waste generated. Furthermore, as with the Project, Alternative 4 would not conflict with solid waste policies and objectives in the City of Los Angeles Source Reduction and Recycling Element or its

updates, the City of Los Angeles Solid Waste Management Policy Plan, the City of Los Angeles General Plan Framework Element or the Curbside Recycling Program, or the County Integrated Waste Management Plan. As such, solid waste impacts during operation of Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(4) Energy Infrastructure

(a) Construction

As discussed above, Alternative 4 would reduce the amount of energy needed for construction activities based on the reduction in development. As discussed in Section IV.C, Energy, of this Recirculated Draft EIR, the estimated energy usage of the Project during construction would be within the available capacity and supply of the existing infrastructure. Since Alternative 4 would generate a reduced demand for energy during construction compared to the Project due to less overall construction, the energy demand of Alternative 4 would similarly be within the available capacity of the existing infrastructure. Therefore, impacts to energy infrastructure capacity would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Operation

As previously discussed, the total energy consumption of Alternative 4 would be less than that of the Project. Therefore, as with the Project, the existing energy infrastructure would similarly have capacity to support Alternative 4. Impacts related to energy infrastructure would be less than significant under Alternative 4 and less when compared to the less-than-significant impacts of the Project.

3. Comparison of Impacts

As analyzed above, Alternative 4 would not eliminate any of the Project's significant and unavoidable impacts. Specifically, the Project's significant and unavoidable impacts related to noise from on-site construction and vibration from on-site and off-site construction with respect to human annoyance would remain with development of Alternative 4. Alternative 4 also would not eliminate the Project's significant and unavoidable cumulative impacts related to construction noise from on-site and off-site noise sources and off-site construction vibration with respect to human annoyance. However, Alternative 4 would reduce the duration of the excavation phase of the Project such that these impacts would occur for a shorter duration during this phase. Impacts on surface water hydrology and groundwater hydrology would be greater compared to the Project given the reduced open space areas to be provided by this alternative. Furthermore, the following impact areas would be greater than the impacts of the Project under Option B: fire protection during operation, police protection during operation, schools during

operation, parks and recreation during operation, and libraries during operation. The remaining impacts would be similar to, or less than, those of the Project.

4. Relationship of the Alternative to Project Objectives

With a similar mix of residential and commercial uses as the Project, Alternative 4 would mostly meet the underlying purpose of the Project to provide a mixed-use development that includes new multi-family housing opportunities that accommodate a range of income needs, provides walkable neighborhood-serving retail and restaurant uses, and provides expanded recreational amenities that serve the community and promote walkability. In addition, Alternative 4 would achieve the following Project objectives:

- Reduce vehicular trips and congestion by developing new housing in proximity to services and facilities, locate new housing and employment opportunities in a manner that reduces vehicular trips by providing onsite housing in combination with onsite community-serving commercial and recreational amenities and within walking distance to existing offsite commercial uses and amenities.

- Preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods, provide buildings with varied design elements and transitioning heights to respect the scale of the surrounding buildings.

- Enhance walkability by providing neighborhood-serving ground-floor retail and restaurant uses along street frontages and creating landscaped plazas, courtyards, and streetscapes that are connected by landscaped paseos across the site.

Alternative 4 would also meet the following objects that only apply to the Project under Option B:

- Locate employment and residential uses near one another to promote sustainability and reduce vehicle miles traveled, with associated reductions in air quality and greenhouse gas emissions.

However, Alternative 4 would not meet the following objectives to the same extent as the Project due to the reduction in uses proposed:

- Provide for the development of new housing to meet the diverse economic and physical needs of the existing residents and projected population, provide a new

mix of housing options, including different sizes and configurations, as well as provide affordable housing units.

- To create a dynamic and economically viable mixed-use project with sufficient density to facilitate a healthy job-housing balance.

- Provide upgraded neighborhood-serving retail and restaurant uses to provide a strong and competitive commercial sector that promotes economic vitality and serves the needs of the Project residents, visitors, and the surrounding community.

In addition, Alternative 4 also would not meet the following objectives specific to Option B due to the elimination of office uses:

- Provide opportunities for new commercial development and services through the development of modern office uses with a combination of indoor and outdoor collaborative spaces that can attract professional and creative office tenants.

V. Alternatives
E. Environmentally Superior Alternative

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

With respect to identifying an Environmentally Superior Alternative among those analyzed in this Recirculated Draft EIR, the range of feasible alternatives includes the No Project/No Build Alternative; the Development in Accordance with Existing Zoning Alternative; the Reduced Development Alternative; and the Reduced Excavation Alternative. Table V-1 on page V-7 provides a comparative summary of the environmental impacts anticipated under each alternative with the environmental impacts associated with the Project. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

Of the alternatives analyzed in this Recirculated Draft EIR, Alternative 1, the No Project/No Build Alternative would avoid all of the Project's significant environmental impacts, including the Project's significant and unavoidable impacts related to noise from on-site construction and vibration from on-site and off-site construction with respect to human annoyance. Alternative 1 would also avoid the Project's significant and unavoidable cumulative impacts related to construction noise from on-site and off-site noise sources and off-site construction vibration with respect to human annoyance. Alternative 1 would also reduce all of the Project's less-than-significant and less-than-significant-with-mitigation impacts. However, the No Project/No Build Alternative would not meet any of the Project's basic objectives.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project/No Build Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative 2, the Development in Accordance with Existing Zoning Alternative, would be the Environmentally Superior Alternative. As discussed above, while Alternative 2 would not eliminate any of the Project's significant and unavoidable impacts, given the reduction in uses and excavation, Alternative 2 would reduce many of the Project's less-than-significant impacts compared to

the other alternatives. In addition, Alternative 2 would lessen the Project's significant and unavoidable impacts related to construction noise from on-site and off-site noise sources and off-site construction vibration with respect to human annoyance as a result of reducing the amount and duration of the peak construction phase of the Project (the excavation phase). Thus, of the range of alternatives analyzed, Alternative 2 would be the Environmentally Superior Alternative.