

V. Alternatives

V. Alternatives

1. Introduction

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

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

An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed 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 should be based primarily on the ability to avoid or substantially lessen significant impacts relative to the proposed project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. The CEQA Guidelines further direct that the range of alternatives be guided by a “rule of reason,” such that only those alternatives necessary to permit a reasoned choice are addressed. In selecting project alternatives for analysis, potential alternatives must be feasible. CEQA Guidelines Section 15126.6(f)(1) states that:

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

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

2. Overview of Selected Alternatives

As indicated above, the intent of the Alternatives analysis is to avoid or substantially lessen any of the significant effects of a project. Based on the analysis in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with regard to on-site construction noise, on-site construction vibration associated with human annoyance, and vehicle miles traveled. Implementation of the Project would also result in significant cumulative impacts that cannot be feasibly mitigated with regard to on-site construction noise and operational noise. Accordingly, the following Alternatives to the Project have been selected for evaluation based on the significant environmental impacts of the Project, the objectives established for the Project (listed in Section II, Project Description, of this Draft EIR), the feasibility of the Alternatives considered, public input received during the scoping period, and the existing zoning designation on the Project Site:

- Alternative 1: No Project/No Build Alternative
- Alternative 2: Zoning Compliant All Commercial Alternative
- Alternative 3: Reduced Density, FAR, and Programming Alternative
- Alternative 4: DTLA 2040 Community Plan Update Mixed-Use 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, and such alternatives are also discussed below.

3. Alternatives Considered and Rejected as Infeasible

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

- **Alternative Project Site:** The Project Applicant already owns the Project Site, and its location is conducive to the development of a mixed-use project. The Project Site is located in the Arts District which is characterized by a mix of uses including residential, commercial, office, and industrial uses. These uses make the Project Site particularly suitable for development of a mixed-use development that provides new live-work units, office space, and retail/restaurant uses that serve the community and promote walkability. The Project Site is also well-served by transit. Furthermore, the Project Applicant cannot reasonably acquire, control, or access an alternative site in a timely fashion that would result in implementation of a project with similar uses and square footage. Given its urban location, if an alternative site in the Arts District area that could accommodate the Project could be found, it would be expected that the significant and unavoidable impacts associated with construction noise and vibration, cumulative operational noise, and traffic would also occur, similar to the proposed Project on the Project Site. Additionally, considering the mix of uses in the Arts District, which include sensitive uses, it is possible that/ development of the Project at an alternative site could potentially be closer to sensitive uses and thus may produce other environmental impacts that would otherwise not occur at the current Project Site or result in greater environmental impacts when compared with the Project. Therefore, an alternative site is not considered feasible as the Project Applicant does not own another suitable site that would achieve the underlying purpose and objectives of the Project, and an alternative site would not likely avoid the Project's significant impacts. Thus, this alternative was rejected from further consideration.
- **Alternatives to Eliminate Significant Noise and Vibration Impacts During Construction:** Various alternatives were considered with the goal of eliminating the Project's significant construction noise and vibration impacts. Significant noise and vibration impacts would occur during Project construction for limited durations from the operation of construction equipment. Significant construction noise and vibration impacts within the Project Site would be expected to occur with any development scenario because any scenario would need to utilize that same construction equipment to demolish the existing buildings and grade and excavate the Project Site, which would inherently generate noise vibration levels

above the significance criteria given the proximity of uses that would be sensitive to noise and vibration. Thus, reducing temporary noise and vibration impacts below a level of significance at adjacent uses would not be possible. 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 based on the inability to avoid significant environmental impacts.

4. Alternatives Analysis Format

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the project objectives, identified in Section II, Project Description, of this Draft EIR, would be substantially attained by the alternative.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 Draft EIR, assuming that the alternative would implement the same project design features and mitigation measures identified in Section IV, Environmental Impact Analysis, of this Draft EIR, as applicable.
- b. Post-mitigation significant and non-significant environmental impacts of the alternative and the Project are compared for each environmental issue area as follows:
 - Less: Where the net impact of the alternative would be clearly less adverse or more beneficial than the impact of the Project, the comparative impact is said to be "less."
 - Greater: Where the net impact of the alternative would clearly be more adverse or less beneficial than the Project, the comparative impact is said to be "greater."
 - 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 below in Table V-1 on page V-6.

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning Compliant All Commercial Alternative	Alternative 3: Reduced Density, FAR, and Programming Alternative	Alternative 4: DTLA 2040 Community Plan Update Mixed-Use Alternative
A. AIR QUALITY					
<i>Construction</i>					
<i>Regional and Localized Emissions</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Toxic Air Contaminants</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>					
<i>Regional and Localized Emissions</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Toxic Air Contaminants</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
B. CULTURAL RESOURCES					
<i>Historic Resources</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Archaeological Resources</i>	Less Than Significant With Mitigation	Less (No Impact)	Less (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning Compliant All Commercial Alternative	Alternative 3: Reduced Density, FAR, and Programming Alternative	Alternative 4: DTLA 2040 Community Plan Update Mixed-Use Alternative
C. ENERGY					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Greater (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
D. GEOLOGY AND SOILS					
<i>Paleontological Resources</i>	Less Than Significant With Mitigation	Less (No Impact)	Less (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)
E. GREENHOUSE GAS EMISSIONS					
<i>Greenhouse Gas Emissions</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
F. LAND USE					
<i>Physical Division of a Community</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Conflict with Land Use Plans</i>	Less Than Significant	Less (No Impact)	Less (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	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning Compliant All Commercial Alternative	Alternative 3: Reduced Density, FAR, and Programming Alternative	Alternative 4: DTLA 2040 Community Plan Update Mixed-Use Alternative
G. NOISE					
<i>Construction</i>					
<i>On-Site Noise</i>	Significant and Unavoidable ²	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
<i>Off-Site Noise</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>On-Site Vibration</i>	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
<i>Off-Site Vibration</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>					
<i>On-Site Noise</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Off-Site Noise</i>	Less Than Significant ³	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)

² Cumulative on-site construction noise would be significant and unavoidable.

³ Cumulative operational noise associated with off-site traffic would be significant and unavoidable.

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning Compliant All Commercial Alternative	Alternative 3: Reduced Density, FAR, and Programming Alternative	Alternative 4: DTLA 2040 Community Plan Update Mixed-Use Alternative
H. PUBLIC SERVICES					
<i>Fire Protection</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)
<i>Police Protection</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Schools</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	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	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning Compliant All Commercial Alternative	Alternative 3: Reduced Density, FAR, and Programming Alternative	Alternative 4: DTLA 2040 Community Plan Update Mixed-Use Alternative
<i>Libraries</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Parks and Recreation</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
I. TRANSPORTATION					
<i>Conflict with Plans</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Vehicle Miles Traveled</i>	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Less (Significant and Unavoidable)
<i>Geometric Design Features</i>	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	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning Compliant All Commercial Alternative	Alternative 3: Reduced Density, FAR, and Programming Alternative	Alternative 4: DTLA 2040 Community Plan Update Mixed-Use Alternative
<i>Emergency Access</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
J. TRIBAL CULTURAL RESOURCES					
<i>Tribal Cultural Resources</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
K. UTILITIES AND SERVICE SYSTEMS					
<i>Water Supply and Infrastructure</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Wastewater</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	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	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning Compliant All Commercial Alternative	Alternative 3: Reduced Density, FAR, and Programming Alternative	Alternative 4: DTLA 2040 Community Plan Update Mixed-Use Alternative
<i>Energy Infrastructure</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)
<hr/> <i>Source: Eyestone Environmental, 2020.</i>					

5. Project Objectives

CEQA Guidelines Section 15124(b) states that the project description shall contain “a statement of the objectives sought by the proposed project.” Section 15124(b) of the CEQA Guidelines further states that “the statement of objectives should include the underlying purpose of the project.” The underlying purpose of the Project is to redevelop vacant parcels into a high-density, mixed-use development that provides housing and jobs in the Arts District within the Central City North Community Plan area. As set forth in the CEQA Guidelines, the Project’s basic and fundamental objectives are provided below:

- To support the Central City North Community Plan’s Objective 1-4 to promote and ensure the provision of adequate housing for all persons, by providing new market-rate and affordable live-work units in various types and configurations.
- To support the Central City North Community Plan Objective 2-1 to conserve and strengthen viable commercial development by retaining the existing retail/restaurant and office spaces, and developing new office space and new retail/restaurant space.
- To promote local and regional mobility objectives by providing a mix of residential and neighborhood-serving commercial and office uses in an area that is in close proximity to public transportation in order to reduce vehicular trips.
- To create a pedestrian-friendly project by creating a street-level identity for the Project Site and improving the pedestrian experience through the introduction of commercial uses on the ground floor level and the incorporation of a pedestrian paseo and courtyard/plaza to connect the existing uses with the new development.

V. Alternatives

A. Alternative 1: No Project/No Build Alternative

1. Description of the Alternative

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which a proposed project does not proceed. CEQA Guidelines Section 15126.6(e)(3)(B) states that “in certain instances, the No Project Alternative means ‘no build’ wherein the existing environmental setting is maintained.” Accordingly, for purposes of this analysis, Alternative 1, the No Project/No Build Alternative, assumes that the Project would not be approved and no new development would occur within the Project Site. Thus, the physical conditions of the Project Site would generally remain as they are today. Under Alternative 1, the Project Site would continue to be developed with seven buildings that comprise approximately 63,530 square feet of floor area and range in height from one to three stories. These buildings would continue to be used for 6,983 square feet of office uses, 25,739 square feet of retail uses, 2,109 square of warehouse uses, and 10 live-work units comprised of 28,699 square feet. In addition, two sheds and surface parking areas generally located on the southern half of the Project Site would remain. No new construction would occur.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

The No Project/No Build Alternative would not alter the existing uses or require any construction activities on the Project Site. Therefore, no construction-related air quality impacts associated with regional and localized emissions would occur under Alternative 1, and impacts would be less than the Project’s impacts, which are less than significant.

(b) Toxic Air Contaminants

Since construction activities would not occur on the Project Site, the No Project/No Build Alternative 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 the No Project/No Build Alternative would be less when compared to the less-than-significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

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

(b) Toxic Air Contaminants

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

b. Cultural Resources

(1) Historical Resources

Building C on the Project Site was identified as a historic resource by SurveyLA. However, no demolition, grading, or other earthwork activities that could potentially affect this or any nearby historical resources would occur under the No Project/No Build Alternative. Therefore, impacts to historical resources would not occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Archaeological Resources

No grading or earthwork activities would occur under the No Project/No Build Alternative. Therefore, there would be no potential for Alternative 1 to uncover subsurface archaeological resources. As such, no impacts to archaeological resources would occur, and impacts would be less when compared to the Project, which would be less than significant with mitigation.

c. Energy

(1) 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, and 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.

(2) 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. However, unlike the Project, Alternative 1 would not include new buildings meeting updated energy efficiency targets such as the applicable 2019 CalGreen requirements and the Los Angeles Green Building Code, nor would exceed Title 24 energy efficiency requirements by 10 percent like the Project. Specifically, the Project Site would continue to operate with seven buildings constructed between 1918 and 1952. Impacts with respect to wasteful, inefficient, and unnecessary use of energy would be less than significant, but greater than the less-than-significant impacts of the Project.

d. Geology and Soils—Paleontological Resources

Grading and other earthwork activities would not occur under the No Project/No Build Alternative. Therefore, there would be no potential for Alternative 1 to uncover subsurface paleontological resources. As such, no impacts to paleontological resources would occur, and impacts would be less when compared to the Project, which would be less than significant with mitigation.

e. Greenhouse Gas Emissions

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

f. Land Use

(1) Physical Division of a Community

Since the No Project/No Build Alternative would not develop new land uses on the Project Site, the existing on-site and/or off-site land uses would not be altered, and existing land use relationships would remain. Therefore, no impacts related to physical division of a community would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Conflict With Land Use Plans

Under the No Project/No Build Alternative, there would be no changes to the physical or operational characteristics of the existing on-site uses. No land use approvals or permits would be required. Therefore, Alternative 1 would not result in any inconsistencies with existing land use plans and policies that govern the Project Site, including those that were adopted for the purpose of avoiding or mitigating an environmental effect. No impacts associated with conflicts with land use regulations and plans would occur, and impacts would be less than the less-than-significant impacts of the Project.

g. Noise

(1) Construction

Construction activities would not occur on the Project Site under the No Project/No Build Alternative. Therefore, no construction-related noise or vibration would be generated on-site or off-site. As such, Alternative 1 would avoid the Project's significant and unavoidable on-site noise impacts during construction and on-site vibration impacts during construction (pursuant to the threshold for human annoyance) during construction. Alternative 1 would also avoid the Project's cumulative impacts with respect to on- and off-site construction noise. No impacts associated with construction noise and vibration would occur under Alternative 1, and such impacts would be less when compared to the significant and unavoidable impacts of the Project.

(2) Operation

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

Alternative 1 would, however, avoid the Project's significant and unavoidable cumulative off-site operational noise impact.

h. Public Services

(1) Fire Protection

No construction or changes to existing land uses and operations on-site would occur under Alternative 1. Therefore, there would be no changes to current conditions, introduction of novel uses, or alterations to the public right of way necessitating the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service. 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

No construction or changes to existing land uses and operations on-site would occur under Alternative 1. Therefore, there would be no changes to current conditions, introduction of novel uses, or alterations to the public right of way necessitating the addition of a new police station or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service. 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

The No Project/No Build Alternative would not construct new development or increase operations on-site. Therefore, there would be no potential to increase the population of school-aged children in the attendance boundaries of the schools within the Los Angeles Unified School District (LAUSD) that serve the Project Site such that the addition of new school facilities or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service. Accordingly, no impacts to school services would occur under Alternative 1, and impacts would be less than the Project's less-than-significant impact on school services.

(4) Libraries

The No Project/No Build Alternative would not construct new development or increase operations on-site. Therefore, Alternative 1 would not increase the library service population such that the addition of new library facilities or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service. No impacts

to library services would occur under the No Project/No Build Alternative, and impacts would be less than the Project's less-than-significant impact on libraries.

(5) Parks and Recreation

The No Project/No Build Alternative would not construct new development or increase operations on-site. Therefore, Alternative 1 would not generate additional demand for parks and recreational facilities in the Project Site vicinity such that the addition of new parks and recreational facilities or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service. No impacts to parks and recreational facilities would occur under the No Project/No Build Alternative, and impacts would be less than the Project's less-than-significant impact on parks and recreational facilities.

i. 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 potential conflicts with programs, plans, ordinances, or policies addressing the circulation system; vehicle miles traveled (VMT); hazardous geometric design features; and emergency access. Alternative 1 would avoid the Project's significant and unavoidable VMT impacts. Therefore, impacts under the No Project/No Build Alternative would be less when compared to the Project, which would be significant and unavoidable.

j. Tribal Cultural Resources

Grading and other earthwork activities would not occur under the No Project/No Build Alternative. 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 those of the Project, which would be less than significant.

k. Utilities and Service Systems

(1) Water Supply

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 water demand on the Project Site. No impacts to water supply and water infrastructure

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) Wastewater

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 wastewater flow on the Project Site. No impacts related to wastewater conveyance or treatment 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.

(3) Energy Infrastructure

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 no new or upgraded infrastructure would be required. No operational impacts related to energy infrastructure 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.

3. Comparison of Impacts

As evaluated above and shown in Table V-1 on page V-6, the No Project/No Build Alternative would avoid the Project's significant and unavoidable impacts with respect to on-site noise and vibration during construction and VMT. Alternative 1 would also eliminate the Project's significant and unavoidable cumulative impacts with respect to on-site construction noise and operational noise due to traffic. Impacts associated with the remaining environmental issues would be less than those of the Project.

4. Relationship of the Alternative to Project Objectives

Under the No Project/No Build Alternative, the existing uses 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 the Project objectives. Specifically, Alternative 1 would not meet the following Project objectives:

- To support the Central City North Community Plan's Objective 1-4 to promote and ensure the provision of adequate housing for all persons, by providing new market-rate and affordable live-work units in various types and configurations.

- To support the Central City North Community Plan Objective 2-1 to conserve and strengthen viable commercial development by retaining the existing retail/restaurant and office spaces, and developing new office space and new retail/restaurant space.
- To promote local and regional mobility objectives by providing a mix of residential and neighborhood-serving commercial and office uses in an area that is in close proximity to public transportation in order to reduce vehicular trips.
- To create a pedestrian-friendly project by creating a street-level identity for the Project Site and improving the pedestrian experience through the introduction of commercial uses on the ground floor level and the incorporation of a pedestrian paseo and courtyard/plaza to connect the existing uses with the new development.

Overall, the No Project/No Build Alternative would not meet the Project's underlying purpose to redevelop vacant parcels into a high-density, mixed-use development that provides housing and jobs in the Arts District area within the Central City North Community Plan area.

V. Alternatives

B. Alternative 2: Zoning Compliant All Commercial Alternative

1. Description of the Alternative

Under this Alternative, the Project Site would be developed with all commercial uses in accordance with the existing M3-1-RIO (Heavy Industrial, Height District 1, River Improvement Overlay) zoning for the Project Site. Height District 1 within the M3 zone imposes no height limitation, but provides for a maximum FAR of 1.5:1. Thus, Alternative 2 would develop approximately 14,253 square feet of ground floor retail and 128,169 square feet of office space, compared to 347 new live-work units, 187,374 square feet of office space, 21,858 square feet of new retail/restaurant floor area, and 926 square feet of artist production amenity space with the Project. The proposed uses would be located in a six-story, 99-foot-tall building, as compared to a 36-story residential tower with a maximum height of 425 feet and an eight-story, 131-foot-tall office building with the Project. Similar to the Project, Alternative 2 would demolish buildings D, E, F, and H on the Project Site, and five existing buildings within the northern portion of the Project Site that comprise approximately 56,686 square feet, as well as their 24 parking spaces, would be retained with office, retail, restaurant, warehouse, and live-work units. The Zoning Compliant All Commercial Alternative would not be required to include open space but would include the same pedestrian paseo connecting the existing and proposed buildings, as well as new landscaped areas. A total of 285 vehicle parking spaces would be provided in three subterranean parking levels, compared to 828 vehicle parking spaces within six subterranean levels with the Project. Alternative 2 would provide 53 bicycle parking spaces with 20 short-term spaces and 33 long-term spaces located within three subterranean levels, compared to 257 bicycle parking spaces in six subterranean levels with the Project. Like the Project, vehicular access would be provided via a driveway located at the southeastern corner of the Project Site along Violet Street. Primary pedestrian access to the proposed building would be from an office lobby located along Violet Street within the northeastern corner of the Project Site and via several entrances along the paseo.

As noted above, Alternative 2 would develop only one building compared to the Project, however the building design would be similar to the office building proposed with the Project, though the height would be reduced. Alternative 2 would also implement similar signage, lighting, vehicular and pedestrian access, setbacks, and sustainability features as those proposed for the Project. Alternative 2 would require fewer discretionary approvals as the Project because no residential uses are proposed. Construction would be

generally similar to the Project, but shorter in overall duration due to the reduced amount of development.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

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

Under Alternative 2, the overall amount of construction would be reduced in comparison to the Project because three fewer subterranean parking levels would be developed. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, regional and localized impacts on these days would be similar to the less-than-significant impacts of the Project.

(b) 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 TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. Overall construction emissions generated by Alternative 2 would be less than those of the Project because Alternative 2 would require less overall construction and three fewer subterranean parking levels. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 2 would be less when compared to the less-than-significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Similar to the Project, operational regional air pollutant emissions associated with Alternative 2 would be generated by vehicle trips to the Project Site and the consumption of electricity and natural gas. As discussed below, development of Alternative 2 would result in fewer daily trips than the Project. As vehicular emissions depend on the number of trips, vehicular sources would result in a smaller increase in air emissions compared to the Project. In addition, because the overall square footage would be reduced when compared to the Project, demand for electricity and natural gas would be less than the Project. Therefore, impacts associated with regional operational emissions would be less than significant and less than the less-than-significant impacts of the Project.

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 2 would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, localized impacts from on-site emission sources associated with Alternative 2 would also be less than significant. Such impacts would be less than those of the Project due to the overall decrease in building area. Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. As discussed further below, the number of net new peak-hour trips generated with Alternative 2 would be less than the Project. Therefore, impacts would be less than significant and less than the Project's less-than-significant impacts.

(b) Toxic Air Contaminants

As discussed in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include diesel particulate matter from delivery trucks. As this alternative would be smaller in size, the number of delivery trucks would also be reduced in comparison to the Project. Additionally, the types of uses proposed with both the Project and Alternative 2 are not considered land uses that generate substantial TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not proposed by the Project or Alternative 2. Similar to the Project, Alternative 2 would not release substantial amounts of TACs and would be consistent with California Air Resources Board (CARB) and South Coast Air Quality Management District (SCAQMD) guidelines regarding TAC sources in proximity to existing sensitive land uses. Thus, as with the Project, potential TAC impacts under Alternative 2 would be less than significant, and less than the less-than-significant impacts of the Project.

b. Cultural Resources

(1) Historical Resources

Like the Project, Alternative 2 would require the demolition of buildings D, E, G, and H on the Project Site, however these buildings are not historic resources. Alternative 2's design would retain the pedestrian-level, street-facing setting of Buildings A, B, and C along East 7th Place to the driveway along the eastern side of Building C. These buildings would be retained, maintaining the fabric of the neighborhood, and no changes are proposed to the use of these buildings. Alternative 2's design would be compatible with Building C, which was previously identified by SurveyLA as a historic resource. The design is also compatible with the existing streetscape along East 7th Place. The buildings that would be retained do not exceed three stories in height. The new building would be physically separated from the older buildings that would be retained and Alternative 2 would integrate new construction with a design that acknowledges the existing building heights and irregular site plans. Because the design of Alternative 2 is compatible with Building C and is physically separated from buildings that would be retained, Alternative 2 would not cause a direct impact to the setting of the existing buildings, including Building C. Accordingly, impacts to historical resources would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Archaeological Resources

Alternative 2 would construct three subterranean parking levels compared to six with the Project. Therefore, the potential for Alternative 2 to uncover subsurface archaeological resources would be reduced when compared to that of the Project. Nevertheless, Alternative 2 would comply with the same regulatory requirements and would implement the same mitigation measure as the Project in the event that archaeological resources are uncovered during site grading activities. Therefore, impacts to archeological resources would remain less than significant with mitigation, and would be less than the Project, which would also be less than significant with mitigation.

c. Energy

(1) 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. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. In addition, LADWP has confirmed that the supply and existing infrastructure

in the Project area would have the capacity to serve the Project Site. Furthermore, as with the Project, construction activities would require energy demand that is not wasteful, inefficient, or unnecessary and would not be expected to have an adverse impact on available energy resources because like the Project, construction of the Alternative would comply with all applicable requirements relating to energy use. Therefore, short-term construction impacts associated with the wasteful, inefficient, and unnecessary use of energy would be less than significant under Alternative 2 and similar to the less-than-significant impacts of the Project.

(2) Operation

As with the Project, operation of Alternative 2 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels compared to existing conditions. Alternative 2 would result in a reduction in floor area compared to that of the Project, and Alternative 2's proposed uses are not those that could result in significantly increased demand for energy. Therefore, the reduced size of Alternative 2 would result in a lower net increase in electricity and natural gas consumption, and it is anticipated that the existing distribution facilities in the Project Site area would have the capability to serve a reduced project under Alternative 2 given the fact that existing service lines in the Project Site area would have sufficient capacity to serve the Project, as discussed in Section IV.C, Energy, of this Draft EIR. Furthermore, Alternative 2 would implement similar project design features as the Project to reduce energy usage. In terms of petroleum-based fuel usage, the number of daily trips generated by this alternative would be lower in comparison to the Project due to the reduction in square footage. Like the Project, the consumption of electricity, natural gas, and petroleum-based fuels under this alternative would not be wasteful, inefficient, or unnecessary because operation of the Alternative would comply with all applicable requirements relating to energy use. Therefore, operational impacts associated with the wasteful, inefficient, and unnecessary use of energy would be less than significant and similar to the less-than-significant impacts of the Project.

d. Geology and Soils—Paleontological Resources

Alternative 2 would construct three subterranean parking levels compared to six with the Project. Therefore, the potential for Alternative 2 to uncover subsurface paleontological resources would be reduced when compared to that of the Project. Nevertheless, Alternative 2 would comply with the same regulatory requirements and would implement the same mitigation measure as the Project in the event paleontological resources are uncovered during site grading activities. Therefore, impacts to paleontological resources would remain less than significant with mitigation, but would be less than the impacts of the Project, which also would be 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. As discussed above, unlike the Project which includes residential uses, Alternative 2 would only include commercial uses, but would reduce the total amount of development on the Project Site by 427,026 square feet. Therefore, under Alternative 2, the total energy and water consumption would be reduced compared to the Project. Additionally, as discussed in Section V.B.2.i.(2), the number of vehicle trips generated by Alternative 2 would be less than the number of trips generated by the Project. 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 incorporate project design features to reduce GHG emissions and would be designed to comply with the City's Green Building Ordinance, as applicable. With compliance with the City's Green Building Ordinance and 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 than the less-than-significant impacts of the Project.

f. Land Use

(1) Physically Divide a Community

Alternative 2 would be developed with all commercial uses in accordance with the existing M3-1-RIO (Heavy Industrial, Height District 1, River Improvement Overlay) zoning for the Project Site. The proposed uses under Alternative 2 would be compatible with and would complement existing and future development in the Project area, which is generally comprised of industrial, commercial, and residential uses. Therefore, similar to the Project, Alternative 2 would not disrupt, divide, or isolate any existing neighborhoods or communities and impacts associated with the physical division of a community would be less than significant and similar to the impacts of the Project.

(2) Conflict With Land Use Plans

As previously described, Alternative 2 would develop a six-story, 99-foot-tall commercial building on the Project Site. Alternative 2 would comply with the Project Site's existing Heavy Manufacturing land use designation under the General Plan, Heavy Industrial land use designation under the Community Plan, and M3-1-RIO (Heavy Industrial, Height District 1, River Improvement Overlay) zoning which permits a wide variety of industrial, manufacturing, and storage uses, as well as office and commercial uses. Since Alternative 2 would comply with the permitted land use and existing zoning

requirements, Alternative 2 would also be generally consistent with the overall intent of the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site and that were adopted to avoid or mitigate an environmental effect, including SCAG's regional plans, the General Plan Framework Element, the Central City North Community Plan, and the LAMC. Therefore, impacts related to conflicts with land use plans would be less than significant and less than the less-than-significant impacts of the Project since Alternative 2 would require fewer discretionary actions.

g. Noise

(1) Construction

Alternative 2 would involve the same general phases of construction as the Project (i.e., demolition, site grading, building construction, and finishing/landscape installation), but would not require the amount of excavation and soil export as the Project since Alternative 2 would have three fewer subterranean parking levels. 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. Since Alternative 2 would not require the extent of site excavation and soil export necessary under the Project, the overall duration of construction would be reduced. Notwithstanding, on-site construction activities and the associated construction noise and vibration levels would be expected to be similar during maximum activity days since only the overall duration, and not the daily intensity of construction activities and associated equipment noise, would decrease under Alternative 2 when compared to the Project. Noise and vibration levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Furthermore, like the Project, Alternative 2 would require demolition of existing buildings on-site. Therefore, noise and vibration impacts due to on-site construction activities under Alternative 2 would also be similar to those that would occur under the Project. Alternative 2 would comply with the same applicable regulatory requirements and implement the same project design features and mitigation measures as the Project to reduce on-site noise and vibration levels pursuant to the threshold for human annoyance and building damage during construction. However, as with the Project, construction of Alternative 2 would result in significant and unavoidable impacts with respect to on-site noise and vibration pursuant to the human annoyance threshold during construction. Cumulative on-site noise would also remain significant and unavoidable, similar to the Project.

As discussed in Section IV.G, Noise, of this Draft EIR, the highest number of construction trucks would occur during the grading/excavation phase. Although the overall number of construction haul trucks and trips would be reduced under Alternative 2, the maximum number of daily truck trips would be similar to the Project. Thus, it can be

reasonably concluded that temporary noise and vibration impacts from offsite construction traffic generated by Alternative 2 would also be similar to the Project and impacts would be less than significant. However, cumulative noise due to construction truck traffic from Alternative 2 and other related projects would likely exceed the ambient noise levels along the haul route by 5 dBA. As such, cumulative noise impacts from off-site construction would be significant and unavoidable, similar to the Project.

(2) Operation

As described in Section IV.G, Noise, of this Draft EIR, sources of operational noise include: (a) on-site stationary noise sources such as outdoor mechanical equipment (i.e., HVAC equipment), activities associated with the outdoor courtyards, parking facilities, and loading dock/trash collection areas; and (b) off-site mobile (roadway traffic) noise sources. Similar to the Project, on-site mechanical equipment used during operation of Alternative 2 would comply with the regulations under LAMC Section 112.02. In addition, under Alternative 2, the proposed loading dock and trash collection areas would be located on Level 1 and screened from off-site noise sensitive receptors. Thus, noise impacts from mechanical equipment, loading docks, and trash collection areas would also be similar to the Project. Although no open space is required, Alternative 2 would include the same pedestrian paseo and new landscaped areas as the Project. Therefore, outside noise sources associated with outdoor areas would be similar to the Project because these areas would include the same uses and would be located at similar distances from sensitive receptors as the Project, though noise levels would be lower than the Project because Alternative 2 would result in fewer employees and no residents. Alternative 2 would provide fewer vehicle parking spaces than the Project; however, since the parking structure would be designed similar to the Project, potential noise associated with parking facilities would be substantially similar to that of the Project. The overall composite noise levels generated by Alternative 2 would be substantially similar to the Project. As such, on-site noise impacts under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project because fewer users of the outdoor areas are anticipated.

As discussed further below, Alternative 2 would result in approximately 51 percent fewer daily vehicle trips than the Project. Accordingly, off-site noise impacts associated with traffic would be less than the Project's less-than-significant impacts. However, like the Project, potential impacts associated with cumulative off-site traffic noise would remain significant and unavoidable, as the majority of the cumulative off-site traffic volume increase is due to the ambient growth and other related projects.

h. Public Services

(1) Fire Protection

(a) Construction

As discussed in Section IV.H.1, Public Services—Fire Protection, of this Draft EIR, construction activities 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. However, as with the Project, construction of Alternative 2 would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, as with the Project, compliance with regulatory requirements would reduce the potential for construction activities of Alternative 2 to expose people to the risk of fire or explosion related to hazardous materials.

Peak daily and peak-hour construction traffic would be similar to the Project and construction of Alternative 2 could also potentially impact the provision of Los Angeles Fire Department (LAFD) services in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker trips. Although construction activities would be short-term and temporary, travel time delays caused by the increase in traffic during construction of Alternative 2 could temporarily affect emergency vehicle response to the Project Site and surrounding uses, including along City-designated disaster routes. However, as with the Project, a Construction 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. Therefore, construction of Alternative 2 would not result in the need for new or altered government facilities (i.e. fire stations). Impacts would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As discussed in Section IV.H.1, Public Services—Fire Protection, of this Draft EIR, the Project Site would be served by Fire Station No. 17, the “first-in” station, as well as Fire Station Nos. 9, 4, 15, and 2. Alternative 2 would develop retail and office uses, but unlike the Project would not include residential uses. Total development would be reduced by 427,026 square feet (approximately 75-percent). Therefore, the resulting increase in

service population would be reduced when compared to the Project. Specifically, the fire service population would be 653 persons, consisting solely of employees,⁴ which is less than the Project's service population of 1,801, consisting of 840 residents⁵ and 961 employees. Thus, the demand for fire protection and emergency medical services would be reduced compared to the Project. In addition, similar to the Project, Alternative 2 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc.

As with the Project, domestic and fire water service to the Project Site under Alternative 2 would continue to be supplied by Los Angeles Department of Water and Power (LADWP). As discussed in Section IV.H.1, Public Services—Fire Protection, of this Draft EIR, the Fire Flow Availability Report indicates adequate hydrant pressure and flow is not currently available at the Project Site. However, like the Project, Alternative 2 would include necessary upgrades to improve the surrounding water mains that would facilities flow and pressure requirements.

Based on the above, operation of Alternative 2 would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service. Therefore, impacts associated with new or physically altered government facilities would be less than significant and less than the less-than-significant impacts of the Project due to the reduction in residents and overall size of Alternative 2.

(2) Police Protection

(a) Construction

Similar to the Project, construction of Alternative 2 can create demand for police services. However, as with the Project, Alternative 2 would incorporate Project Design Feature POL-PDF-1 into its design to implement temporary security measures, including security fencing, lighting, and locked entry to secure the Project Site during construction which would reduce demand for police protection services. Similar to the Project, with implementation of this Project Design Feature, potential impacts associated with theft and vandalism during construction activities under this Alternative would be less than significant.

⁴ Based on employee generation rates included in the Los Angeles Unified School District's (LAUSD) 2018 Developer Fee Justification Study, March 2018.

⁵ Based on a rate of 2.42 persons per multi-family unit based on the 2017 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019.

Additionally, as noted above, peak daily and peak-hour construction traffic would be similar to the Project. With regard to emergency vehicle access, as with the Project, a Construction 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. Accordingly, the construction-related impacts of Alternative 2 would be minimized and would not generate a demand for additional police protection services that would substantially exceed the capability of the LAPD to serve the Project Site. Construction of Alternative 2 would not necessitate the provision of new or physically altered facilities in order to maintain the LAPD's capability to serve the Project Site (i.e., Alternative 2 would not result in adverse physical impacts associated with the construction of new or altered facilities). Therefore, impacts would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

Like the Project, Alternative 2 would introduce additional employees and visitors to the Project Site and increase the service population of the Newton Community Police Station service area, but would not include new residential uses. As shown in Table V-2 on page V-33, compared to existing conditions, Alternative 2 would generate a net increase in service population of approximately 297 persons at the Project Site, consisting solely of employees. Therefore, Alternative 2 would not result in an increase in the existing LAPD residential service population, compared to a net increase of 1,089 residents with the Project. Similarly, under Alternative 2, the officer-to-resident ratio would not decrease compared to a decrease from 2.15 to 2.14 officers per 1,000 residents with the Project.

As shown in Table V-2, because the LAPD calculates crime rates based on only residential populations, Alternative 2 would not directly generate any crimes, compared to the Project's estimated 31 crimes per year. The total annual number of reported crimes in the service area of the Newton Community Police Station would, therefore, remain at approximately 4,317 crimes. Therefore, Alternative 2 would not result in a significant increase in the existing officer-to-resident ratio or significantly increase the number of crimes within the Newton Community Police Station's service area.

In addition, similar to the Project, Alternative 2 would implement Project Design Features POL-PDF-2 through POL-PDF-7, which are related to a security program, provision of sufficient lighting, and a design that increases open views and reduces areas of concealment. These project design features would help reduce the increase in demand for police services under Alternative 2. Based on the analysis above, the increase in demand associated with Alternative 2 would not necessitate the provision of new or physically altered facilities in order to maintain the LAPD's capability to serve the Project Site. Accordingly, Alternative 2 would not result in adverse physical impacts associated with the construction of new or physically altered government facilities. Therefore,

**Table V-2
Impacts of Alternative 2 on Police Protection Services and Comparison to the Project**

	Alternative 2	Project	Difference
Service Population^a			
Proposed Service Population	442 persons total (0 residents)	1,946 persons total (1,119 residents)	-1,504 persons (-1,119 residents)
Existing Service Population	145 persons total (30 residents)	145 persons total (30 residents)	145 persons total (30 residents)
Net Service Population	297 persons total (0 residents)	1,801 persons total (1,089 residents)	-1,504 persons (-1,089 residents)
Net Crimes Generated^b	0 crimes	31 crimes	-31 crimes
<p><i>Numbers may not total due to rounding.</i></p> <p>^a <i>The following L.A. CEQA Thresholds Guide, K. Police Service Population Generation Factors were applied to the proposed uses of Alternative 2: Retail/Restaurant: 3 persons/1,000 sf; Office): 4 persons/1,000 sf.</i></p> <p>^b <i>Based on the 2018 residential service population, there were approximately 28.8 crimes per 1,000 residents (i.e., 0.288 crime per capita).</i></p> <p><i>Source: Eyestone Environmental, 2019.</i></p>			

Alternative 2's impacts related to police protection services would be less than significant and less than the less-than-significant impacts of the Project due to the overall size of Alternative 2 and lack of residential uses.

(3) Schools

(a) Construction

Similar to the Project, Alternative 2 would generate part-time and full-time jobs associated with its construction between the start of construction and full buildout. 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 2. Therefore, the construction employment generated by Alternative 2 would not result in a notable increase in the resident population or a corresponding 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 Project's less-than-significant impacts.

(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, retail, and restaurant uses would not be anticipated to be substantial because most employees would likely reside in the vicinity of the Project Site. Furthermore, pursuant to Senate Bill (SB) 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 area. Impacts related to schools would be less than significant under Alternative 2 and less than the less-than-significant impacts of the Project.

(4) Libraries

(a) Construction

Similar to the Project, Alternative 2 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. Therefore, construction employment generated by Alternative 2 would not result in a notable increase in the resident population or a corresponding demand for library services in the vicinity of the Project Site. As such, impacts to library facilities during construction of 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 retail and 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. Similar to the Project, it is anticipated that new jobs generated by Alternative 2 would typically be filled by persons already residing in the vicinity of the workplace and who already generate a demand for the libraries in the vicinity of the Project Site and any

indirect or direct new demand for library services generated by employees under this alternative would already be taken into account in library services provisions.

Therefore, as with the Project, operation of Alternative 2 would not exceed the capacity of local libraries to adequately serve the existing residential population based on target service populations or as defined by the LAPL, or substantially increase the demand for library services. As such, Alternative 2 would not result in the need for new or altered library facilities. Therefore, impacts related to the provision of new or physically altered government facilities under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project due to the elimination of residential uses in Alternative 2.

(5) Parks and Recreation

(a) Construction

Construction of Alternative 2 would result in a temporary increase in the number of construction workers at the Project Site. As described above, 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 low. Therefore, the construction workers associated with Alternative 2 would not result in a notable increase in the residential population of the Project area, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site. As such, similar to the Project, construction 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 on parks and recreational facilities during construction of 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 retail and 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. Because no residential uses are proposed, Alternative 2 would not be required to pay parks fees associated with residential construction. 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 would require the provision of new or physically altered government facilities, impacts would be less than significant under Alternative 2 and less than the less-than-significant impacts of the Project.

i. Transportation

Similar to the Project, Alternative 2 would generally support multimodal transportation options. Like the Project, Alternative 2 would include passenger drop-offs to minimize impacts to the public right of way and enhance the user experience by integrating multi-modal transportation options. This alternative would also include the same new sidewalks, street trees, and pedestrian lighting as the Project, and would include short-term and long-term bicycle parking in accordance with the Los Angeles Municipal Code (LAMC). Specifically, Alternative 2 would include 53 bicycle parking spaces with 20 short-term spaces and 33 long-term spaces located within three subterranean levels to facilitate bicycle use. Alternative 2 would also provide a pedestrian paseo connecting the existing and proposed buildings, similar to the Project. Therefore, Alternative 2 would not conflict with a program, plan, ordinance, or policy addressing the circulation system and impacts would be similar to the Project.

With respect to VMT, Alternative 2 would not include residential uses and therefore would not result in any residential VMT. The proposed commercial uses under Alternative 2 would result in a work VMT of 9.3 per employee, which exceeds the threshold for the Central Area Planning Commission (APC) of 7.6 VMT per employee.⁶ With the application of Transportation Demand Management (TDM) measures similar to the Project, the work VMT per employee would be reduced to 7.7, which would still exceed the Central APC threshold of 7.6 VMT per employee. Therefore, similar to the Project, impacts would be significant and unavoidable.

Alternative 2 would not introduce hazardous geometric design features, and as is the case with the Project, all driveways would be designed to Los Angeles Department of Transportation (LADOT) standards. Impacts would be less than significant, similar to the Project.

Lastly, similar to the Project, Alternative 2 would not interfere with emergency access and impacts would be less than significant, but impacts would be less than the Project because fewer daily trips are anticipated (2,632 daily trips compared to 4,926 daily trips with the Project).⁷

⁶ *Fehr & Peers, VMT Calculator Results for 2143 Violet Alternative 2, November 25, 2019.*

⁷ *Fehr & Peers, VMT Calculator Results for 2143 Violet Alternative 2, November 25, 2019.*

j. Tribal Cultural Resources

Alternative 2 would construct three fewer subterranean parking levels than the Project. Therefore, the potential for Alternative 2 to uncover subsurface tribal cultural resources would be reduced when compared to that of the Project. In addition, as discussed in Section IV.J, Tribal Cultural Resources, of this Draft EIR, results of the records searches (i.e., SCCIC and NAHC) conducted for the Project Site and the independent analysis of correspondence and materials relative to potential tribal cultural resources on the Project Site (included in the TCR Report) demonstrate that there is no record or evidence of tribal cultural resources on the Project Site or in its vicinity. Accordingly, impacts to tribal cultural resources would be less than the less-than-significant impacts of the Project.

k. Utilities and Service Systems

(1) Water Supply

(a) Construction

Similar to the Project, construction activities for Alternative 2 would result in a temporary demand for water associated with soil compaction and earthwork, dust control, mixing and placement of concrete, equipment and site cleanup, irrigation for plant and landscaping establishment, testing of water connections and flushing, and other short-term related activities. These activities would occur incrementally throughout construction of Alternative 2. The amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed. However, given the temporary nature of construction activities, water use during construction of Alternative 2 would be short-term and intermittent. As with the Project, water for construction activities of Alternative 2 would be conveyed using the existing water infrastructure at the Project Site, and no infrastructure upgrades would be needed to provide water during construction.

As discussed above, Alternative 2 would reduce the total amount of development on the Project Site by 427,026 square feet. Therefore, the water demand generated by construction activities for Alternative 2 would be less than the net water consumption of the Project during construction. Overall, construction activities associated with Alternative 2 would not require or result in the construction of new water facilities or expansion of existing facilities that could have a significant impact on the environment. Thus, construction-related impacts to water demand and infrastructure under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

(b) Operation

As previously discussed, Alternative 2 would develop 14,253 square feet of ground floor retail uses and 128,169 square feet of office uses. As shown in Table V-3 on page V-39, Alternative 2 would result in a net increase in demand for water from the Project Site of 30,903 gallons per day (gpd), which is less than the 109,015 gpd in net water demand generated by the Project. In addition, the estimated increase in water demand from Alternative 2 is conservative in that it does not account for mandatory or voluntary water demand reductions, although Alternative 2 would comply with applicable ordinances and would implement the same water conservation features as the Project, as detailed in Project Design Feature WAT-PDF-1. As with the Project, domestic and fire water service to the Project Site under Alternative 2 would continue to be supplied by LADWP. Similar to the Project, it is anticipated that LADWP would also be able to meet the water demand of Alternative 2.

Like the Project, it is anticipated that the Project Site would not have adequate fire flow to serve Alternative 2. Therefore, Alternative 2 would include necessary upgrades to the surrounding water mains to facilitate the necessary flow and pressure requirements, and Alternative 2 would also incorporate a fire sprinkler suppression system to reduce or eliminate the public hydrant demands. Upon completion, water supply infrastructure would also be able to meet the reduced demand under Alternative 2. The Project Applicant would also construct the necessary on-site infrastructure and connections to the LADWP system pursuant to applicable City requirements under this Alternative.

Based on the above, the estimated water demand for Alternative 2 would not exceed the available supplies projected by LADWP or the available capacity within the distribution infrastructure that would serve the Project Site. Therefore, operational impacts of Alternative 2 on water supply and water infrastructure would be less than significant and less than the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, during construction of Alternative 2, existing sewer laterals would be capped and no sewage would enter the public sewer system. Temporary facilities such as portable toilet and hand wash areas would be provided by the contractor at the Project Site, and sewage from these facilities would be collected and hauled off-site. As such, wastewater generation from construction activities associated with Alternative 2 would be less than existing conditions, and would not cause a measurable increase in wastewater flows. Therefore, construction of the Project would not substantially or incrementally exceed the future scheduled capacity of any one treatment plant by

**Table V-3
Estimated Water Consumption/Wastewater Generation for Alternative 2**

Land Use	Unit	Generation Factor ^a	Total Water Demand/ Wastewater Generation (gpd)
Existing			
Existing Buildings	6,844 sf	N/A	2,382
<i>Subtotal</i>			2,382
Proposed			
Retail	14,253 sf	25 gpd/ksf	356
Office	128,169 sf	120 gpd/ksf	15,380
Base Demand Adjustment (Commercial) ^b			2,124
Parking	115,151 sf	20 gpd/ksf	2,303
Cooling Tower ^c	700 tons		12,285 ^a
Landscaping ^d	8,952 sf		836 ^a
<i>Subtotal</i>			33,600
Total Net Water Demand			30,903
Total Net Wastewater Generation^e			27,764
<p><i>gpd/ksf = gallons per day per 1,000 square feet</i> <i>sf = square feet</i></p> <p>^a Based on the Water Supply Assessment (WSA) prepared for the Project by LADWP, included as Appendix P of this Draft EIR. The rates published in the WSA are based on Sewer Generation Rates provided by City of Los Angeles Bureau of Sanitation (LASAN).</p> <p>^b Base Demand Adjustment is the estimated savings due to Ordinance No. 180,822 accounted for in the current version of LASAN Sewer Generation Rates. Base Demand Adjustment for Alternative 2 was calculated based on the reduction in square footage compared to the Project.</p> <p>^c Conservatively assumes the same size cooling tower as the Project's office building.</p> <p>^d Conservatively assumes the same square footage of landscaping as the Project.</p> <p>^e Wastewater generation equals 100 percent of water demand less water for the parking structure which would flow to the storm drain and water for landscaping.</p> <p>Source: Eyestone Environmental, 2019.</p>			

generating flows greater than those anticipated in the City's Integrated Resources Plan (IRP). 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

As previously discussed, Alternative 2 would develop 14,253 square feet of ground floor retail uses and 128,169 square feet of office uses. As shown in Table V-3, Alternative 2 would result in a net increase in wastewater flows from the Project Site. However, the

net wastewater generated by Alternative 2 of 27,764 gpd would be lower than the net 109,015 gpd in wastewater generated by the Project. In addition, the estimated increase in wastewater generation from Alternative 2 is conservative in that it does not account for mandatory or voluntary water demand reductions, although Alternative 2 would comply with applicable ordinances and would implement the same water conservation features as the Project, as detailed in Project Design Feature WAT-PDF-1. Similar to the Project, the wastewater generated by Alternative 2 would be accommodated by the existing capacity of the Hyperion Water Reclamation Plant (HWRP), and Alternative 2 would not result in a determination by the wastewater treatment provider that it does not have adequate capacity to serve the increase in demand. 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 in the vicinity of the Project Site. As discussed in Section IV.K.2, Utilities and Infrastructure—Wastewater, the existing 8-inch sewer line in 7th Place would have adequate capacity to serve the Project. Given that Alternative 2 would result in less daily wastewater compared to that of the Project, the sewer system would also have capacity to serve 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 than the less-than-significant impacts of the Project.

(3) Energy Infrastructure

(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. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. Therefore, impacts on energy infrastructure associated with short-term construction activities would be less than significant under Alternative 2 and less than the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 2 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions. However, the proposed uses would result in less electricity and natural gas consumption when compared to the uses proposed by the Project. Specifically, Alternative 2 would develop approximately 14,253 square feet of ground floor retail and 128,169 square feet of office space, compared to 347 new live-work units, 187,374 square feet of office space, 21,858 square feet of new retail/restaurant floor area, and 926 square feet of artist production amenity space with the Project, which would result in a reduction in the consumption of electricity and natural gas. Thus, the associated consumption of electricity and natural gas under Alternative 2 would be reduced, and the corresponding impact on energy infrastructure would be less than the Project. Therefore, impacts to energy infrastructure under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above and shown in Table V-1 on page V-6, Alternative 2 would reduce, but not eliminate, the Project's significant and unavoidable cumulative impacts associated with operational noise due to traffic. All other impacts would be less than or similar to those of the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 2 would develop all commercial uses in accordance with the existing M3-1-RIO zoning for the Project Site. Unlike the Project, no residential uses would be constructed and total development would be reduced by 427,026 square feet. Specifically, Alternative 2 would develop approximately 14,253 square feet of ground floor retail and 128,169 square feet of office space, compared to 347 new live-work units, 187,374 square feet of office space, 21,858 square feet of new retail/restaurant floor area, and 926 square feet of artist production amenity space with the Project. Therefore, as no housing would be included, Alternative 2 would only partially meet the Project's underlying objective to redevelop vacant parcels into a high-density, mixed-use development that provides housing and jobs in the Arts District within the Central City North Community Plan area. Additionally, without new housing, Alternative 2 would not meet the following Project objectives:

- To support the Central City North Community Plan's Objective 1-4 to promote and ensure the provision of adequate housing for all persons, by providing new market-rate and affordable live-work units in various types and configurations.

- To promote local and regional mobility objectives by providing a mix of residential and neighborhood-serving commercial and office uses in an area that is in close proximity to public transportation in order to reduce vehicular trips.

Alternative 2 would meet the following objective, though to a lesser extent than the Project due to the reduced square footage:

- To support the Central City North Community Plan Objective 2-1 to conserve and strengthen viable commercial development by retaining the existing retail/restaurant and office spaces, and developing new office space and new retail/restaurant space.

Alternative 2 would, however, meet the following objective to the same extent than the Project:

- To create a pedestrian-friendly project by creating a street-level identity for the Project Site and improving the pedestrian experience through the introduction of commercial uses on the ground floor level and the incorporation of a pedestrian paseo and courtyard/plaza to connect the existing uses with the new development.

V. Alternatives

C. Alternative 3: Reduced Density, FAR, and Programming Alternative

1. Description of the Alternative

Alternative 3 would develop the same mix of uses as the Project, but all development would be reduced by approximately 25 percent. Specifically, under this Alternative, the proposed live-work units would be reduced from 347 to 230, the proposed office would be reduced from 187,374 square feet to 140,530 square feet, and the proposed retail/restaurant space would be reduced from 21,858 square feet to 16,394 square feet. Total floor area under Alternative 3 would be reduced from 569,448 square feet to 441,258 square feet, resulting in a FAR of 4.65:1 compared to a 6:1 with the Project. Like the Project, this alternative would develop two new buildings: a 27-story residential tower with a maximum height of 319 feet and a six-story office building with a maximum height of 98 feet. These buildings would be shorter than the 425-foot residential tower and 8-story office building proposed by the Project. Similar to the Project, Alternative 3 would demolish buildings D, E, F, and H on the Project Site and five existing buildings within the northern portion of the Project Site that comprise approximately 56,686 square feet, as well as their 24 parking spaces, would be retained with office, retail, restaurant, warehouse, and live-work units. Alternative 3 would provide approximately 28,350 square feet of open space, which is less than the 71,719 square feet of open space provided by the Project. The open space in Alternative 3 would include the same amenities as the Project. A total of 574 vehicle parking spaces would be provided in five subterranean parking levels, compared to 828 vehicle parking spaces within six levels with the Project. Alternative 3 would provide 203 bicycle parking spaces, consisting of 35 short-term spaces and 168 long-term spaces, compared to 257 bicycle parking spaces with the Project. Vehicular access to the residential subterranean parking would be provided via a driveway accessible through the alleyway on the western side of the Project Site. Residential loading docks and loading area would be located immediately south of the residential parking entrance. Vehicular access to the office subterranean parking would be provided via a driveway located at the southeastern corner of the Project Site along Violet Street. Commercial loading dock and loading areas would be located immediately adjacent to the office parking entrance. Pedestrian access would be provided via a new paseo that connects the existing buildings with the proposed buildings. The entrance to the residential lobby would be located on the eastern side of the residential tower. Primary pedestrian access to the office component would be from an office lobby located along

Violet Street within the northeastern corner of the Project site. Access to the retail/restaurant spaces would be provided via several entrances throughout the paseo.

This alternative would implement a similar building design as the Project, though the heights would be reduced. Alternative 3 would also implement similar signage, lighting, vehicular and pedestrian access, setbacks, and sustainability features as those proposed for the Project. Alternative 3 would require the same discretionary approvals as the Project. Due to the reduced amount of construction, the duration of construction would be less than the Project.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

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

Under Alternative 3, the overall amount of construction would be reduced in comparison to the Project because one less subterranean parking level would be developed. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, regional and localized impacts on these days would be similar to the less-than-significant impacts of the Project.

(b) 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.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. Overall construction emissions generated by Alternative 3 would be less than those of the Project because Alternative 3

would require less overall construction and one less subterranean parking level. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 3 would be less when compared to the less-than-significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Similar to the Project, operational regional air pollutant emissions associated with Alternative 3 would be generated by vehicle trips to the Project Site and the consumption of electricity and natural gas. As discussed below, development of Alternative 3 would result in fewer daily trips than the Project. As vehicular emissions depend on the number of trips, vehicular sources would result in a reduction in air emissions compared to the Project. In addition, because the overall square footage would be reduced when compared to the Project, demand for electricity and natural gas would be less than the Project. Therefore, impacts associated with regional operational emissions would be less than significant and less than the less-than-significant impacts of the Project.

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 3 would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, localized impacts from on-site emission sources associated with Alternative 3 would also be less than significant. Such impacts would be less than those of the Project due to the overall decrease in building area. Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. As discussed further below, the number of net new peak-hour trips generated with Alternative 3 would be less than the Project. Therefore, impacts would be less than significant and less than the Project's less-than-significant impacts.

(b) Toxic Air Contaminants

As discussed in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include diesel particulate matter from delivery trucks. As this alternative would be smaller in size, the number of delivery trucks would also be reduced in comparison to the Project. Additionally, the types of uses proposed with both the Project and Alternative 3 are not considered land uses that generate substantial TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not proposed by the Project or Alternative 3. Similar to the Project, Alternative 3 would not release substantial amounts of TACs and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Thus, as with the Project, potential TAC impacts under Alternative 3 would be less than significant, and less than the less-than-significant impacts of the Project.

b. Cultural Resources

(1) Historical Resources

Like the Project, Alternative 3 would require the demolition of buildings D, E, G, and H on the Project Site, however these buildings are not historic resources. Alternative 3's design would retain the pedestrian-level, street-facing setting of Buildings A, B, and C along East 7th Place to the driveway along the eastern side of Building C. These buildings would be retained, maintaining the fabric of the neighborhood and no changes are proposed to the use of these buildings. Alternative 3's design would be compatible with Building C, which was previously identified by SurveyLA as a historic resource. The design of Alternative 3 would also be compatible with the existing streetscape along East 7th Place. The buildings that would be retained do not exceed three stories in height. The new buildings would be physically separated from the older buildings that would be retained and Alternative 3 would integrate new construction with a design that acknowledges the existing building heights and irregular site plans. Because the design of Alternative 3 is compatible with Building C and is physically separated from buildings that would be retained, Alternative 3 would not cause a direct impact to the setting of the existing buildings, including Building C. Accordingly, impacts to historical resources would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Archaeological Resources

Alternative 3 would construct three subterranean parking levels compared to six with the Project. Therefore, the potential for Alternative 3 to uncover subsurface archaeological resources would be reduced when compared to that of the Project. Nevertheless, Alternative 3 would comply with the same regulatory requirements and would implement the same mitigation measure as the Project in the event that archaeological resources are uncovered during site grading activities. Therefore, impacts to archaeological resources would remain less than significant with mitigation, and would be less than the Project, which would also be less than significant with mitigation.

c. Energy

(1) 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. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. In addition, LADWP has confirmed that the supply and existing infrastructure

in the Project area would have the capacity to serve the Project Site. Furthermore, as with the Project, construction activities would require energy demand that is not wasteful, inefficient, or unnecessary and would not be expected to have an adverse impact on available energy resources because construction of the Alternative would comply with all applicable requirements relating to energy use. Therefore, short-term construction impacts associated with the wasteful, inefficient, and unnecessary use of energy would be less than significant under Alternative 3 and similar to the less-than-significant impacts of the Project.

(2) Operation

As with the Project, operation of Alternative 3 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels compared to existing conditions. Alternative 3 would result in a reduction in floor area compared to that of the Project. Therefore, the reduced size of Alternative 3 would result in a lower net increase in electricity and natural gas consumption, and it is anticipated that the existing distribution facilities in the Project Site area would have the capability to serve a reduced project under Alternative 3 given the fact that existing service lines in the Project Site area would have sufficient capacity to serve the Project. Furthermore, Alternative 3 would implement the same project design features as the Project to reduce energy usage. In terms of petroleum-based fuel usage, the number of daily trips generated by this alternative would be lower in comparison to the Project due to the reduction in square footage. Like the Project, the consumption of electricity, natural gas, and petroleum-based fuels under this alternative would not be wasteful, inefficient, or unnecessary because operation of the Alternative would comply with all applicable requirements relating to energy use. Therefore, operational impacts associated with the wasteful, inefficient, and unnecessary use of energy under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

d. Geology and Soils—Paleontological Resources

Alternative 3 would construct three subterranean parking levels compared to six with the Project. Therefore, the potential for Alternative 3 to uncover subsurface paleontological resources would be reduced when compared to that of the Project. Nevertheless, Alternative 3 would comply with the same regulatory requirements and would implement the same mitigation measure as the Project in the event paleontological resources are uncovered during site grading activities. Therefore, impacts to paleontological resources would remain less than significant with mitigation, but would be less than the impacts of the Project, which also would be 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. As discussed above, Alternative 3 would include a similar mix of uses as the Project, but the total amount of development on the Project Site would be reduced by 128,190 square feet. Therefore, under Alternative 3, the total energy and water consumption would be reduced compared to the Project. Additionally, as discussed below, the number of vehicle trips generated by Alternative 3 would be less than the number of vehicle trips generated by the Project. 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 incorporate project design features to reduce GHG emissions and would be designed to comply with the City's Green Building Ordinance, as applicable. With compliance with the City's Green Building Ordinance and 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 than the less-than-significant impacts of the Project.

f. Land Use

(1) Physically Divide a Community

Alternative 3 would develop the same mix of uses as the Project (i.e., residential, office, and retail/restaurant), but all development would be reduced by approximately 25 percent. The proposed uses under Alternative 3 would be compatible with and would complement existing and future development in the Project area, which is generally comprised of industrial, commercial, and residential uses. Therefore, similar to the Project, Alternative 3 would not disrupt, divide, or isolate any existing neighborhoods or communities and impacts associated with the physical division of a community would be less than significant and similar to the impacts of the Project.

(2) Conflict With Land Use Plans

As previously described, Alternative 3 would develop a 27-story residential tower with a maximum height of 319 feet and a six-story office building with a maximum height of 98 feet. Alternative 3 would require the same discretionary approvals as the Project, including a General Plan Amendment and Zone Change, to permit the proposed residential uses. Like the Project, following approval of the General Plan amendment and zone changes, Alternative 3 would be generally consistent with the overall intent of the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site and that were adopted to avoid or mitigate an

environmental effect, including SCAG's regional plans, the General Plan Framework Element, the Central City North Community Plan, and the LAMC. Therefore, impacts related to conflicts with land use plans would be less than significant and similar to the less-than-significant impacts of the Project since Alternative 3 would require the same discretionary actions.

g. Noise

(1) Construction

Alternative 3 would involve the same general phases of construction as the Project (i.e., demolition, site grading, building construction, and finishing/landscape installation), but would not require the amount of excavation and soil export as the Project since Alternative 3 would have one less subterranean parking level. 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. Since Alternative 3 would not require the extent of site excavation and soil export necessary under the Project, the overall duration of construction would be reduced. Notwithstanding, on-site construction activities and the associated construction noise and vibration levels would be expected to be similar during maximum activity days since only the overall duration, and not the daily intensity of construction activities and associated equipment noise, would decrease under Alternative 3 when compared to the Project. Noise and vibration levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Furthermore, like the Project, Alternative 3 would require demolition of existing buildings on-site. Therefore, noise and vibration impacts due to on-site construction activities under Alternative 3 would be similar to those that would occur under the Project. Alternative 3 would comply with the same applicable regulatory requirements and implement the same project design features and mitigation measures as the Project to reduce on-site noise and vibration levels pursuant to the threshold for human annoyance and building damage during construction. However, as with the Project, construction of Alternative 3 would result in significant and unavoidable impacts with respect to on-site noise and vibration pursuant to the human annoyance threshold during construction. Cumulative on-site noise would also remain significant and unavoidable similar to the Project.

As discussed in Section IV.G, Noise, of this Draft EIR, the highest number of construction trucks would occur during the grading/excavation phase. Although the overall number of construction haul trucks and trips would be reduced under Alternative 3, the maximum number of daily truck trips would be similar to the Project. Thus, it can be reasonably concluded that temporary noise and vibration impacts from offsite construction traffic generated by Alternative 3 would also be similar to the Project and impacts would be less than significant. However, cumulative noise due to construction truck traffic from

Alternative 3 and other related projects would likely exceed the ambient noise levels along the haul route by 5 dBA. As such, cumulative noise impacts from off-site construction would be significant and unavoidable, similar to the Project.

(2) Operation

As described in Section IV.G, Noise, of this Draft EIR, sources of operational noise include: (a) on-site stationary noise sources such as outdoor mechanical equipment (i.e., HVAC equipment), activities associated with the outdoor courtyards, parking facilities, and loading dock/trash collection areas; and (b) off-site mobile (roadway traffic) noise sources. 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 decibels (dBA). In addition, under Alternative 3, the proposed loading dock and trash collection areas would be located on Level 1 and screened from off-site noise sensitive receptors. Thus, noise impacts from mechanical equipment, loading docks, and trash collection areas would also be similar to the Project. As noted above, Alternative 3 would include less open space than the Project, though the types of open space provided would be similar. Therefore, noise sources associated with open space areas would be similar to the Project because these areas would include the same uses and would be located at similar distances from sensitive receptors as the Project, though noise levels would be lower than the Project because fewer residents and employees would be generated by Alternative 3. Alternative 3 would provide fewer vehicle parking spaces than the Project; however, since the parking structure would be designed similar to the Project, potential noise associated with parking facilities would be substantially similar to that of the Project. The overall composite noise levels generated by Alternative 3 would be substantially similar to the Project. As such, on-site noise impacts under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project because fewer users of the outdoor areas are anticipated.

As discussed further below, Alternative 3 would result in approximately 27-percent fewer daily vehicle trips than the Project. Accordingly, off-site noise impacts associated with traffic would be less than the Project's less-than-significant impacts. However, like the Project, potential impacts associated with cumulative off-site traffic noise would remain significant and unavoidable, as the majority of the cumulative off-site traffic volume increase is due to the ambient growth and other related projects.

h. Public Services

(1) Fire Protection

(a) Construction

As discussed in Section IV.H.1, Public Services—Fire Protection, of this Draft EIR, construction activities 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. However, as with the Project, construction of Alternative 3 would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, as with the Project, compliance with regulatory requirements would reduce the potential for construction activities of Alternative 3 to expose people to the risk of fire or explosion related to hazardous materials.

Peak daily and peak-hour construction traffic would be similar to the Project and construction of Alternative 3 could also potentially impact the provision of LAFD services in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker trips. Although construction activities would be short-term and temporary, travel time delays caused by the increase in traffic during construction of Alternative 3 could temporarily affect emergency vehicle response to the Project Site and surrounding uses, including along City-designated disaster routes. However, as with the Project, a Construction 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. Therefore, construction of Alternative 3 would not result in the need for new or altered government facilities (i.e. fire stations). Impacts would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As discussed in Section IV.H.1, Public Services—Fire Protection, of this Draft EIR, the Project Site would be served by Fire Station No. 17, the “first-in” station, as well as Fire Station Nos. 9, 4, 15, and 2. Alternative 3 would develop a similar mix of uses as the Project, though total development would be reduced by 128,190 square feet. Therefore, the resulting increase in service population would be reduced when compared to the Project. Specifically, the fire service population would be 1,210 persons, consisting of

559 residents⁸ and 557 employees,⁹ which is less than the Project's service population of 1,801, consisting of 840 residents and 961 employees. Thus, the demand for fire protection and emergency medical services would be reduced compared to the Project. In addition, similar to the Project, Alternative 3 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc.

As with the Project, domestic and fire water service to the Project Site under Alternative 3 would continue to be supplied by LADWP. As discussed in Section IV.H.1, Public Services—Fire Protection, of this Draft EIR, the Fire Flow Availability Report indicates adequate hydrant pressure and flow is not currently available at the Project Site. However, like the Project, Alternative 3 would include necessary upgrades to improve the surrounding water mains that would facilities flow and pressure requirements.

Based on the above, operation of Alternative 3 would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service. Therefore, impacts associated with new or physically altered government facilities would be less than significant and less than the less-than-significant impacts of the Project due to the reduction in residents and overall size of Alternative 3.

(2) Police Protection

(a) Construction

Similar to the Project, construction of Alternative 3 could generate demand for police services. However, as with the Project, Alternative 3 would incorporate Project Design Feature POL-PDF-1 into its design to implement temporary security measures, including security fencing, lighting, and locked entry to secure the Project Site during construction which would reduce demand for police protection services.

Additionally, as noted above, peak daily and peak-hour construction traffic would be similar to the Project. With regard to emergency vehicle access, as with the Project, a Construction Traffic Management Plan would be implemented during construction of Alternative 3 to ensure that adequate and safe access remains available within and near

⁸ Based on a rate of 2.42 persons per multi-family unit based on the 2017 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019.

⁹ Based on employee generation rates included in the LAUSD 2018 Developer Fee Justification Study, March 2018.

the Project Site during construction. Accordingly, the construction-related impacts of Alternative 3 would be minimized and would not generate a demand for additional police protection services that would substantially exceed the capability of the LAPD to serve the Project Site. Construction of Alternative 3 would not necessitate the provision of new or physically altered facilities in order to maintain the LAPD's capability to serve the Project Site (i.e., Alternative 3 would not result in adverse physical impacts associated with the construction of new or altered facilities). Therefore, impacts would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

Like the Project, Alternative 3 would introduce additional residents, employees, and visitors to the Project Site and increase the overall service population of the Newton Community Police Station service area. As shown in Table V-4 on page V-54, compared to existing uses, Alternative 3 would generate a net increase in service population of approximately 1,216 persons at the Project Site, including 698 residents, compared to a net increase in service population of 1,801, including 1,089 residents with the Project. As such, Alternative 3 would reduce the officer-to-resident ratio of 9.25 officers per 1,000 residents to a lesser degree than the Project.¹⁰

As shown in Table V-4, Alternative 3 would also result in fewer crimes than the Project. Specifically, Alternative 3 would result in an estimated 20 crimes compared to 31 crimes with the Project. Therefore, as with the Project, Alternative 3 would not result in a significant increase in the existing officer-to-resident ratio or significantly increase the number of crimes within the Newton Community Police Station's service area.

In addition, similar to the Project, Alternative 3 would implement Project Design Features POL-PDF-2 through POL-PDF-7, which are related to a security program, provision of sufficient lighting, and a design that increases open views and reduces areas of concealment. These project design features would help reduce the increase in demand for police services under Alternative 3.

Based on the analysis above, the increase in demand associated with Alternative 3 would not necessitate the provision of new or physically altered facilities in order to maintain the LAPD's capability to serve the Project Site. Accordingly, Alternative 3 would not result in adverse physical impacts associated with the construction of new or physically altered government facilities. Therefore, Alternative 3's impacts related to police protection

¹⁰ The LAPD calculates officer to resident ratios based on only residential populations.

**Table V-4
Impacts of Alternative 3 on Police Protection Services and Comparison to the Project**

	Alternative 3	Project	Difference
Service Population^a			
Proposed Service Population	1,170 persons total (728 residents)	1,946 persons total (1,119 residents)	-776 persons (-391 residents)
Existing Service Population	145 persons total (30 residents)	145 persons total (30 residents)	145 persons total (30 residents)
Net Service Population	1,216 persons total (698 residents)	1,801 persons total (1,089 residents)	-585 persons (-391 residents)
Net Crimes Generated^c	20 crimes	31 crimes	-11 crimes
<p><i>Numbers may not total due to rounding.</i></p> <p>^a <i>The following L.A. CEQA Thresholds Guide, K. Police Service Population Generation Factors were applied to the proposed uses of Alternative 3: Residential (studio, one-, and two-bedroom units): 3 persons/unit; Residential (three- and four-bedroom units): 4 persons/unit; Office: 4 persons/1,000 sf; Retail: 3 persons/1,000 sf.</i></p> <p>^b <i>Based on the 2018 residential service population, there were approximately 28.8 crimes per 1,000 residents (i.e., 0.288 crime per capita).</i></p> <p><i>Source: Eyestone Environmental, 2019.</i></p>			

services would be less than significant and less than the less-than-significant impacts of the Project due to the reduction in service population.

(3) Schools

(a) Construction

Similar to the Project, Alternative 3 would generate part-time and full-time jobs associated with its construction between the start of construction and full buildout. 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, the construction employment generated by Alternative 3 would not result in a notable increase in the resident population or a corresponding demand for schools in the vicinity of the Project Site. Impacts on school facilities during construction under Alternative 3 would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

Alternative 3 would develop a similar mix of uses as the Project, but total development would be reduced by 128,190 square feet, including a reduction in the number of new live-work units from 347 to 230. Because residential uses are the greatest driver of student generation, the total number of students generated would be reduced compared to the Project. Specifically, the 230 live-work units, 140,530 square feet of office uses, and 16,394 square feet of retail/restaurant uses proposed by Alternative 3 would generate a net increase of 229 students consisting of 124 elementary school students, 33 middle school students, and 72 high school students. In comparison, the Project would generate a net increase of 361 students consisting of 211 elementary school students, 57 middle school students, and 120 high school students. Thus, the increased demand for school services provided by LAUSD would be reduced under Alternative 3 compared to the Project. Furthermore, pursuant to SB 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 area. Impacts related to schools would be less than significant under Alternative 3 and less than the less-than-significant impacts of the Project.

(4) Libraries*(a) Construction*

Similar to the Project, 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. Therefore, construction employment generated by Alternative 3 would not result in a notable increase in the resident population or a corresponding demand for library services in the vicinity of the Project Site. As such, impacts to library facilities during construction of Alternative 3 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 3 would develop fewer residential units than the Project, and would therefore have a smaller service population. Specifically, the 230 live-work units developed under Alternative 3 would result in approximately 559 residents compared to the 843 residents generated by the Project. In addition, the proposed retail/restaurant and office uses in Alternative 3 would generate

fewer employees than the proposed retail/restaurant and office uses included in the Project (i.e., 653 employees vs. 961 employees). Thus, both direct and indirect demand for library services under Alternative 3 would be less than the Project.

Therefore, as with the Project, operation of Alternative 3 would not exceed the capacity of local libraries to adequately serve the existing residential population based on target service populations or as defined by the LAPL, or substantially increase the demand for library services. As such, Alternative 3 would not result in the need for new or altered library facilities. Therefore, impacts related to the provision of new or physical altered government facilities under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project due to the reduction of residential uses in Alternative 3.

(5) Parks and Recreation

(a) Construction

Construction of Alternative 3 would result in a temporary increase in the number of construction workers at the Project Site. As described above, 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 3 is low. Therefore, the construction workers associated with Alternative 3 would not result in a notable increase in the residential population of the Project Site area, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site. As such, similar to the Project, construction of Alternative 3 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 on parks and recreational facilities during construction of Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

Based on the reduced number of live-work units, Alternative 3 would be required to provide less open space than the Project. Specifically, per LAMC Section 12.21G, Alternative 3 would be required to provide 28,350 square feet of open space, which is less than the 42,775 square feet required by the Project. Alternative 3 would provide 28,350 square feet of open space, which meets this requirement. For comparison, the Project would exceed LAMC requirements by providing 71,719 square feet of open space. 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, under Alternative 3 the applicant would be required to pay park and recreation fees to the City that could be use

add or improve park facilities in the project vicinity. Therefore, impacts to park and recreation facilities would be less than significant under Alternative 3, and less than the less-than-significant impacts of the Project.

i. Transportation

Similar to the Project, Alternative 3 would generally support multimodal transportation options. Like the Project, Alternative 3 would include passenger drop-offs to minimize impacts to the public right of way and enhance the user experience by integrating multi-modal transportation options. This alternative would also include the same new sidewalks, street trees, and pedestrian lighting as the Project, and would include short-term and long-term bicycle parking in accordance with the LAMC. Specifically, Alternative 3 include 203 bicycle parking spaces, consisting of 35 short-term spaces and 168 long-term spaces within five subterranean levels to facilitate bicycle use. Alternative 3 would also provide a pedestrian paseo connecting the existing and proposed buildings, similar to the Project. Therefore, Alternative 3 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be similar to the Project.

With respect to VMT, the proposed residential uses under Alternative 3 would result in 9.4 VMT per capita and the proposed commercial uses would result in 9.1 VMT per employee, both of which exceed the Central APC thresholds of 6.0 and 7.6, respectively.¹¹ With the application of TDM measures similar to the Project, the household VMT would be reduced to 7.7 VMT per capita and the work VMT would be reduced to 7.5 VMT per employee, which is identical to the Project with household VMT exceeding the Central APC threshold of 6.0. Therefore, similar to the Project, household VMT impacts would be significant and unavoidable.

Alternative 3 would not introduce hazardous geometric design features, and as is the case with the Project, all driveways would be designed to LADOT standards. Impacts would be less than significant, similar to the Project.

Lastly, similar to the Project, Alternative 3 would not interfere with emergency access and impacts would be less than significant, but impacts would be less than the Project because fewer daily trips are anticipated (3,595 daily trips compared to 4,926 daily trips with the Project).¹²

¹¹ *Fehr & Peers, VMT Calculator Results for 2143 Violet Alternative 3, November 25, 2019.*

¹² *Fehr & Peers, VMT Calculator Results for 2143 Violet Alternative 3, November 25, 2019.*

j. Tribal Cultural Resources

Alternative 3 would construct one less subterranean parking level than the Project. Therefore, the potential for Alternative 3 to uncover subsurface tribal cultural resources would be reduced when compared to that of the Project. In addition, as discussed in Section IV.J, Tribal Cultural Resources, of this Draft EIR, results of the records searches (i.e., SCCIC and NAHC) conducted for the Project Site and the independent analysis of correspondence and materials relative to potential tribal cultural resources on the Project Site (included in the TCR Report) demonstrate that there is no record or evidence of tribal cultural resources on the Project Site or in its vicinity. Accordingly, impacts to tribal cultural resources would be less than the less-than-significant impacts of the Project.

k. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities for Alternative 3 would result in a temporary demand for water associated with soil compaction and earthwork, dust control, mixing and placement of concrete, equipment and site cleanup, irrigation for plant and landscaping establishment, testing of water connections and flushing, and other short-term related activities. These activities would occur incrementally throughout construction of Alternative 3. The amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed. However, given the temporary nature of construction activities, water use during construction of Alternative 3 would be short-term and intermittent. As with the Project, water for construction activities of Alternative 3 would be conveyed using the existing water infrastructure at the Project Site, and no infrastructure upgrades would be needed to provide water during construction.

As discussed above, Alternative 3 would reduce the total amount of development on the Project Site by 128,190 square feet. Therefore, the water demand generated by construction activities for Alternative 3 would be less than the net water consumption of the Project during construction. Overall, construction activities associated with Alternative 3 would not require or result in the construction of new water facilities or expansion of existing facilities that could have a significant impact on the environment. Thus, construction-related impacts to water demand and infrastructure under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

(b) Operation

Alternative 3 would develop 230 live-work units, 187,374 square feet of office uses, and 16,394 square feet of retail/restaurant uses. As shown in Table V-5 on page V-59,

**Table V-5
Estimated Water Consumption/Wastewater Generation for Alternative 3**

Land Use	Unit	Generation Factor^a	Total Water Demand/ Wastewater Generation (gpd)
Existing			
Existing Buildings	6,844 sf	N/A	2,382
<i>Subtotal</i>			<i>2,382</i>
Proposed			
1 bedroom	92 du	185 gpd/du	17,020
1 bedroom + den	60 du	225 gpd/du	13,500
2 bedroom	40 du	225 gpd/du	9,000
2 bedroom + den	30 du	265 gpd/du	7,950
3 bedroom	8 du	265 gpd/du	2,120
Base Demand Adjustment (Residential) ^b			4,188
Required Ordinance Savings (Residential) ^c			(12,369)
Office	140,530 sf	120 gpd/ksf	16,864
Retail/Restaurant	656 seats	30 gpd/seat	19,680
Residential Amenities ^d			699
Base Demand Adjustment (Non-Residential) ^b			2,340
Required Ordinance Savings (Non-Residential) ^c			(17,417)
Landscaping ^e	8,952 sf		836
Parking	231,918 sf	20 gpd/ksf	4,638
Cooling Tower—Residential ^f	700 tons		5,655
Cooling Tower—Office ^f	700 tons		9,828
Cooling Tower—Retail ^f	100 tons		1,966
<i>Subtotal</i>			<i>86,499</i>
Total Net Water Demand			84,117
Total Net Wastewater Generation^g			78,643

gpd = gallons per day

sf = square feet

ksf = 1,000 square feet

^a Based on the WSA prepared for the Project by LADWP, included as Appendix P of this Draft EIR. The rates published in the WSA are based on Sewer Generation Rates provided by LASAN.

^b Base Demand Adjustment is the estimated savings due to Ordinance No. 180,822 accounted for in the current version of LASAN Sewer Generation Rates.

^c Required ordinance savings is based on the same percentage reduction applied to Project demand in the WSA.

^d Conservatively assumes the same type and amount of residential amenities as the Project, including a pool, spa, artist production space, and other indoor residential amenities.

Table V-5 (Continued)
Estimated Water Consumption/Wastewater Generation for Alternative 3

Land Use	Unit	Generation Factor ^a	Total Water Demand/ Wastewater Generation (gpd)
^e Conservatively assumes the same square footage of landscaping as the Project. ^f Assumes the same size cooling towers as the Project. Demand reflects required ordinance savings included in the WSA. ^g Wastewater generation equals 100 percent of water demand less water for the parking structure which would flow to the storm drain and water for landscaping. Source: Eyestone Environmental, 2019.			

Alternative 3 would result in a net increase in demand for water from the Project Site of 84,117 gpd, which is less than the 109,015 gpd in net water demand generated by the Project. In addition, the estimated increase in water demand from Alternative 3 is conservative in that it does not account for voluntary water demand reductions, although Alternative 3 would implement the same water conservation features as the Project, as detailed in Project Design Feature WAT-PDF-1. As with the Project, domestic and fire water service to the Project Site under Alternative 3 would continue to be supplied by LADWP. Similar to the Project, it is anticipated that LADWP would also be able to meet the water demand of Alternative 3.

Like the Project, it is anticipated that the Project Site would not have adequate fire flow to serve Alternative 2. Therefore, Alternative 3 would include necessary upgrades to the surrounding water mains to facilitate the necessary flow and pressure requirements and Alternative 3 would also incorporate a fire sprinkler suppression system to reduce or eliminate the public hydrant demands. Upon completion, water supply infrastructure would also be able to meet the reduced demand under Alternative 3. The Project Applicant would also construct the necessary on-site infrastructure and connections to the LADWP system pursuant to applicable City requirements under this Alternative.

Based on the above, the estimated water demand for Alternative 3 would not exceed the available supplies projected by LADWP or the available capacity within the distribution infrastructure that would serve the Project Site. Therefore, operational impacts of Alternative 3 on water supply and water infrastructure would be less than significant and less than the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, during construction of Alternative 3, existing sewer laterals would be capped and no sewage would enter the public sewer system. Temporary facilities such as portable toilet and hand wash areas would be provided by the contractor at the Project Site, and sewage from these facilities would be collected and hauled off-site. As such, wastewater generation from construction activities associated with Alternative 3 would be less than existing conditions, and would not cause a measurable increase in wastewater flows. Therefore, construction of the Project would not substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the City's IRP. 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

Alternative 3 would develop 230 live-work units, 187,374 square feet of office uses, and 16,394 square feet of retail/restaurant uses. As shown in Table V-5 on page V-59, Alternative 3 would result in a net increase in wastewater flows from the Project Site. However, the net wastewater generated by Alternative 3 of 78,643 gpd would be lower than the net 109,015 gpd in wastewater generated by the Project. In addition, the estimated increase in wastewater generation from Alternative 3 is conservative in that it does not account for voluntary water demand reductions, although Alternative 3 would implement the same water conservation features as the Project, as detailed in Project Design Feature WAT-PDF-1. Similar to the Project, the wastewater generated by Alternative 3 would be accommodated by the existing capacity of the HWRP, and Alternative 3 would not result in a determination by the wastewater treatment provider that it does not have adequate capacity to serve the increase in demand.

As with the Project, sewer service for Alternative 3 would be provided utilizing new or existing on-site sewer connections to the existing sewer lines in the vicinity of the Project Site. As discussed in Section IV.K.2, Utilities and Infrastructure—Wastewater, the existing 8-inch sewer line in 7th Place would have adequate capacity to serve the Project. Given that Alternative 3 would result in less daily wastewater compared to that of the Project, the sewer system would also have capacity to serve Alternative 3. 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 3 during the permitting process. All related sanitary sewer connections and on-site infrastructure under Alternative 3 would be designed and constructed in accordance with applicable standards.

Thus, impacts with regard to wastewater generation and infrastructure capacity under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

(3) Energy Infrastructure

(a) Construction

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. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. Therefore, impacts on energy infrastructure 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, the proposed uses would result in less electricity and natural gas consumption when compared to the uses proposed by the Project. Specifically, under this Alternative, the proposed live-work units would be reduced from 347 to 230, the proposed office would be reduced from 187,374 square feet to 140,530 square feet, and the proposed retail/restaurant space would be reduced from 21,858 square feet to 16,394 square feet, which would result in a reduction in the consumption of electricity and natural gas. Thus, the associated consumption of electricity and natural gas under Alternative 3 would be reduced, and the corresponding impact on energy infrastructure would be less than the Project. Therefore, impacts to energy infrastructure under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above and shown in Table V-1 on page V-6, Alternative 3 would reduce, but not eliminate, the Project's significant and unavoidable cumulative impacts associated with operational noise due to traffic. All other impacts would be less than or similar to those of the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 3 would develop 230 live-work units, 140,530 square feet of office uses, and 16,394 square feet of retail/restaurant uses, which is less than the 347 live-work units, 187,374 square feet of office uses, and 21,858 square feet of retail/restaurant uses provided by the Project. As such, Alternative 3 would meet the Project's underlying objective to redevelop vacant parcels into a high-density, mixed-use development that provides housing and jobs in the Arts District within the Central City North Community Plan area to a lesser extent than the Project. In addition, with reduced development, Alternative 3 would meet the following objectives to a lesser degree than the Project:

- To support the Central City North Community Plan's Objective 1-4 to promote and ensure the provision of adequate housing for all persons, by providing new market-rate and affordable live-work units in various types and configurations.
- To support the Central City North Community Plan Objective 2-1 to conserve and strengthen viable commercial development by retaining the existing retail/restaurant and office spaces, and developing new office space and new retail/restaurant space.
- To promote local and regional mobility objectives by providing a mix of residential and neighborhood-serving commercial and office uses in an area that is in close proximity to public transportation in order to reduce vehicular trips.

Alternative 3 would, however, meet the following objective to the same extent than the Project:

- To create a pedestrian-friendly project by creating a street-level identity for the Project Site and improving the pedestrian experience through the introduction of commercial uses on the ground floor level and the incorporation of a pedestrian paseo and courtyard/plaza to connect the existing uses with the new development.

V. Alternatives

D. Alternative 4: DTLA 2040 Community Plan Update Mixed-Use Alternative

1. Description of the Alternative

Alternative 4 would develop the same types of uses as the Project and development would comply with the proposed HI (Hybrid Industrial) zoning proposed for the Project Site under the DTLA 2040 Community Plan Update. Specifically, Alternative 4 would develop 245 live-work units, 18,858 square feet of ground floor retail uses, 245,452 square feet of office uses, and 500 square feet of on-site residential work space, compared to 347 new live-work units, 187,374 square feet of office space, 21,858 square feet of new retail/restaurant floor area, and 926 square feet of artist production amenity space with the Project. Similar to the Project, Alternative 4 would demolish buildings D, E, F, and H on the Project Site and five existing buildings within the northern portion of the Project Site that comprise approximately 56,686 square feet, as well as their 24 parking spaces, would be retained with office, retail, restaurant, warehouse, and live-work units. Total floor area under Alternative 4 would be 569,448 square feet, identical to the Project, and the resulting FAR would be 6:1. This alternative would develop two new buildings: a 30-story residential tower with a maximum height of 350 feet and an 11-story office building with a maximum height of 180 feet. Alternative 4 would provide approximately 30,025 square feet of open space, compared to 71,719 square feet of open space with the Project. The open space provided would include the same amenities as the Project. A total of 809 vehicle parking spaces would be provided in six subterranean parking levels, compared to 828 vehicle parking spaces provided in six subterranean levels with the Project. Alternative 4 would provide 241 bicycle parking spaces, consisting of 47 short-term spaces and 194 long-term spaces, compared to 257 bicycle parking spaces provided by the Project. Vehicular access to the residential subterranean parking would be provided via a driveway accessible through the alleyway on the western side of the Project Site. Residential loading docks and loading area would be located immediately south of the residential parking entrance. Vehicular access to the office subterranean parking would be provided via a driveway located at the southeastern corner of the Project Site along Violet Street. Commercial loading dock and loading area would be located immediately adjacent to the office parking entrance. Pedestrian access would be provided via a new paseo that connects the existing buildings with the proposed buildings. The entrance to the residential lobby would be located on the eastern side of the residential tower. Primary pedestrian access to the office component would be from an office lobby located along Violet Street within the northeastern corner of the Project site. Access to the retail/restaurant spaces would be provided via several entrances along the paseo.

This alternative would implement a similar building design as the Project, though the residential tower would be shorter and the office tower would be taller. Alternative 4 would also implement similar signage, lighting, vehicular and pedestrian access, setbacks, and sustainability features as those proposed for the Project. Alternative 4 would require fewer discretionary approvals than the Project because the proposed live-work units are permitted under the Project Site's proposed Hybrid Industrial zoning. In addition, the duration of construction would be similar to the Project.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

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

Under Alternative 4, the overall amount of construction would be identical to the Project (i.e., 569,448 square feet with six subterranean parking levels) and would be constructed on a similar timeline. Therefore, both the total amount of emissions as well as the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, regional and localized impacts on these days would be similar to the less-than-significant impacts of the Project.

(b) 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.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. As discussed above, overall construction emissions generated by Alternative 4 would be similar to the Project because the overall amount of development is unchanged. Thus, impacts due to TAC emissions

and the corresponding individual cancer risk under Alternative 4 would be similar to the less-than-significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Similar to the Project, operational regional air pollutant emissions associated with Alternative 4 would be generated by vehicle trips to the Project Site and the consumption of electricity and natural gas. As discussed below, development of Alternative 4 would result in fewer daily trips than the Project. As vehicular emissions depend on the number of trips, vehicular sources would result in a reduction in air emissions compared to the Project. In addition, while the overall square footage to be developed is the same as the Project, Alternative 4 would develop fewer live-work units and more office space than the Project. Accordingly, demand for electricity would be greater than the Project and natural gas would be less than the Project. Therefore, impacts associated with regional operational emissions would be less than significant and less than the less-than-significant impacts of the Project.

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 4 would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, localized impacts from on-site emission sources associated with Alternative 4 would also be less than significant. Such impacts would be similar to those of the Project because the total amount of development is the same. Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. As discussed further below, the number of net new peak-hour trips generated with Alternative 4 would be less than the Project. Therefore, impacts would be less than significant and less than the Project's less-than-significant impacts.

(b) Toxic Air Contaminants

As discussed in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include diesel particulate matter from delivery trucks associated with the Project's commercial uses. However, the uses associated with the Project, and similarly with Alternative 4, are not considered land uses that generate substantial TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not proposed by the Project or Alternative 4. Similar to the Project, Alternative 4 would not release substantial amounts of TACs and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Thus, as with the Project, potential TAC impacts under Alternative 4 would be less than significant, but greater than the less-than-significant impacts of the Project because more commercial uses are proposed.

b. Cultural Resources

(1) Historical Resources

Like the Project, Alternative 4 would require the demolition of buildings D, E, G, and H on the Project Site, however these buildings are not historic resources. Alternative 4's design would retain the pedestrian-level, street-facing setting of Buildings A, B, and C along East 7th Place to the driveway along the eastern side of Building C. These buildings would be retained, maintaining the fabric of the neighborhood and no changes are proposed to the use of these buildings. Alternative 4's design would be compatible with Building C which was previously identified by SurveyLA as a historic resource. The design is also compatible with the existing streetscape along East 7th Place. The buildings that would be retained do not exceed three stories in height. The new building would be physically separated from the older buildings that would be retained and Alternative 4 would integrate new construction with a design that acknowledges the existing building heights and irregular site plans. Because the design of Alternative 4 is compatible with Building C and is physically separated from buildings that would be retained, Alternative 4 would not cause a direct impact to the setting of the existing buildings, including Building C. Accordingly, impacts to historical resources would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Archaeological Resources

Like the Project, Alternative 4 would construct six subterranean parking levels. Therefore, the potential for Alternative 4 to uncover subsurface archaeological resources would be similar to that of the Project. In addition, Alternative 4 would comply with the same regulatory requirements and would implement the same mitigation measure as the Project in the event that archaeological resources are uncovered during site grading activities. Therefore, impacts to archeological resources would remain less than significant with mitigation, and would be similar to the Project, which would also be less than significant without mitigation.

c. Energy

(1) 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. The energy consumed would be similar to the Project due to the similar amount of construction and duration of construction. In addition, LADWP has confirmed that the supply and existing infrastructure in the Project area would have the

capacity to serve the Project Site. Furthermore, as with the Project, construction activities would require energy demand that is not wasteful, inefficient, or unnecessary and would not be expected to have an adverse impact on available energy resources because like the Project, construction of the Alternative would comply with all applicable requirements relating to energy use. Therefore, short-term construction impacts associated with the wasteful, inefficient, and unnecessary use of energy would be less than significant under Alternative 4 and similar to the less-than-significant impacts of the Project.

(2) Operation

As with the Project, operation of Alternative 4 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels compared to existing conditions. Alternative 4 would develop the same total amount of floor area as the Project, but would develop fewer live-work units and more office space. Accordingly, demand for electricity would be greater than the Project while natural gas consumption would be less than the Project. It is anticipated that the existing distribution facilities in the Project Site area would have the capability to serve a reduced project under Alternative 4 given the fact that existing service lines in the Project Site area would have sufficient capacity to serve the Project. Furthermore, Alternative 4 would implement the same project design features as the Project to reduce energy usage. In terms of petroleum-based fuel usage, the number of daily trips generated by this alternative would be slightly greater than the Project, which would result in greater petroleum-based fuel usage, though impacts would remain less than significant. Nevertheless, like the Project, the consumption of electricity, natural gas, and petroleum-based fuels under this alternative would not be wasteful, inefficient, or unnecessary because operation of the Alternative would comply with all applicable requirements relating to energy use. Therefore, operational impacts associated with the wasteful, inefficient, and unnecessary use of energy would be less than significant and similar to the less-than-significant impacts of the Project.

d. Geology and Soils—Paleontological Resources

Like the Project, Alternative 4 would construct six subterranean parking levels. Therefore, the potential for Alternative 4 to uncover subsurface paleontological resources would be similar to that of the Project. In addition, Alternative 4 would comply with the same regulatory requirements and would implement the same mitigation measure as the Project in the event paleontological resources are uncovered during site grading activities. Therefore, impacts to paleontological resources would remain less than significant with mitigation, but would be similar to the impacts of the Project, which also would be 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. As noted above, Alternative 4 would develop a similar mix of uses and square footage as the Project, though Alternative 4 would include fewer live-work units and more office space than the Project. Additionally, as discussed below, the number of vehicle trips generated by Alternative 4 would be less than the number of vehicle trips generated by the Project. Overall, although construction emissions generated by Alternative 4 would be similar to the Project because the total square footage is similar, operational emissions would be less than the amount generated by the Project due to the decrease in vehicle trips. In addition, as with the Project, Alternative 4 would incorporate project design features to reduce GHG emissions and would be designed to comply with the City's Green Building Ordinance, as applicable. With compliance with the City's Green Building Ordinance and 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 than the less-than-significant impacts of the Project.

f. Land Use

(1) Physically Divide a Community

Like the Project, Alternative 4 would develop live-work units, office, and retail uses on the Project Site, though no restaurant uses are proposed, and Alternative 4 would develop fewer live-work units and more office space than the Project. The proposed uses under Alternative 4 would be compatible with and would complement existing and future development in the Project area, which is generally comprised of industrial, commercial, and residential uses. Therefore, similar to the Project, Alternative 4 would not disrupt, divide, or isolate any existing neighborhoods or communities and impacts associated with the physical division of a community would be less than significant and similar to the impacts of the Project.

(2) Conflict With Land Use Plans

As previously described, Alternative 4 would develop 245 live-work units, 18,858 square feet of ground floor retail uses, 245,452 square feet of office uses, and 500 square feet of on-site residential work space. Until the DTLA 2040 Community Plan Update is adopted, Alternative 4 would require the same General Plan amendment and zone changes. Like the Project, following approval of the General Plan amendment and zone changes, 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 and that were adopted to avoid or mitigate an environmental effect, including SCAG's regional plans, the General Plan Framework Element, the Central City North Community Plan, and the LAMC. Therefore, impacts related to land use consistency would be less than significant and similar to the less-than-significant impacts of the Project.

g. Noise

(1) Construction

Alternative 4 would involve the same general phases of construction as the Project (i.e., demolition, site grading, building construction, and finishing/landscape installation), and would require the amount of excavation and soil export as the Project since Alternative 4 has the same number of subterranean parking levels. 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. Noise and vibration levels during maximum activity days, which are used for measuring impact significance, would therefore be similar to those of the Project. Furthermore, like the Project, Alternative 4 would require demolition of existing buildings on-site. Therefore, noise and vibration impacts due to on-site construction activities under Alternative 4 would also be similar to those that would occur under the Project. Alternative 4 would comply with the same applicable regulatory requirements and implement the same project design features and mitigation measures as the Project to reduce on-site noise and vibration levels pursuant to the threshold for human annoyance and building damage during construction. However, as with the Project, construction of Alternative 4 would result in significant and unavoidable impacts with respect to on-site noise and vibration pursuant to the threshold for human annoyance during construction. Cumulative on-site noise would also remain significant and unavoidable, similar to the Project.

As discussed in Section IV.G, Noise, of this Draft EIR, the highest number of construction trucks would occur during the grading/excavation phase. Since Alternative 4 would require the same amount of site excavation and soil export necessary under the Project, the number of construction haul trucks, and thereby overall trips, would be similar to the Project. Therefore, the maximum number of daily truck trips would be similar to the Project. Thus, it can be reasonably concluded that temporary noise and vibration impacts from offsite construction traffic generated by Alternative 4 would also be similar to the Project and impacts would be less than significant. However, cumulative noise due to construction truck traffic from Alternative 4 and other related projects would likely exceed the ambient noise levels along the haul route by 5 dBA. As such, cumulative noise impacts from off-site construction would be significant and unavoidable, similar to the Project.

(2) Operation

As described in Section IV.G, Noise, of this Draft EIR, sources of operational noise include: (a) on-site stationary noise sources such as outdoor mechanical equipment (i.e., HVAC equipment), activities associated with the outdoor courtyards, parking facilities, and loading dock/trash collection areas; and (b) off-site mobile (roadway traffic) noise sources. 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. In addition, under Alternative 4, the proposed loading dock and trash collection areas would be located on Level 1 and screened from off-site noise sensitive receptors. Thus, noise impacts from mechanical equipment, loading docks, and trash collection areas would also be similar to the Project. As noted above, Alternative 4 would include less open space than the Project, though the types of open space provided would be similar. Therefore, noise sources associated with open space areas would be similar to the Project because these areas would include the same uses and would be located at similar distances from sensitive receptors as the Project. Alternative 4 would provide fewer vehicle parking spaces than the Project; however, since the parking structure would be designed similar to the Project, potential noise associated with parking facilities would be substantially similar to that of the Project. The overall composite noise levels generated by Alternative 4 would be substantially similar to the Project. As such, on-site noise impacts under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

As discussed further below, Alternative 4 would result in approximately 6-percent fewer daily vehicle trips than the Project. Accordingly, off-site noise impacts associated with traffic would be less than the Project's less-than-significant impacts. However, like the Project, potential impacts associated with cumulative off-site traffic noise would remain significant and unavoidable, as the majority of the cumulative off-site traffic volume increase is due to the ambient growth and other related projects.

h. Public Services

(1) Fire Protection

(a) Construction

As discussed in Section IV.H.1, Public Services—Fire Protection, of this Draft EIR, construction activities 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. However, as with the Project, construction of Alternative 4 would occur in compliance with all applicable

federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, as with the Project, compliance with regulatory requirements would reduce the potential for construction activities of Alternative 3 to expose people to the risk of fire or explosion related to hazardous materials.

Peak daily and peak-hour construction traffic would be similar to the Project and construction of Alternative 4 could also potentially impact the provision of LAFD services in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker trips. Although construction activities would be short-term and temporary, travel time delays caused by the increase in traffic during construction of Alternative 4 could temporarily affect emergency vehicle response to the Project Site and surrounding uses, including along City-designated disaster routes. However, as with the Project, a Construction 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. Therefore, construction of Alternative 4 would not result in the need for new or altered government facilities (i.e. fire stations). Impacts would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As discussed in Section IV.H.1, Public Services—Fire Protection, of this Draft EIR, the Project Site would be served by Fire Station No. 17, the “first-in” station, as well as Fire Station Nos. 9, 4, 15, and 2. Like the Project, Alternative 4 would develop live-work units, office, and retail uses on the Project Site, though no restaurant uses are proposed, and Alternative 4 would develop fewer live-work units and more office space than the Project. Therefore, based on the increase in office uses, the resulting increase in service population would be greater than the Project. Specifically, the fire service population would be 1,820 persons, consisting of 593 residents¹³ and 1,227 employees,¹⁴ which is greater than the Project’s service population of 1,801, consisting of 840 residents and 961 employees. Thus, the demand for fire protection and emergency medical services would be increased compared to the Project. However, similar to the Project, Alternative 4 would implement all applicable City Building Code and Fire Code requirements regarding

¹³ Based on a rate of 2.42 persons per multi-family unit based on the 2017 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019.

¹⁴ Based on employee generation rates included in the LAUSD 2018 Developer Fee Justification Study, March 2018.

structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc.

As with the Project, domestic and fire water service to the Project Site under Alternative 4 would continue to be supplied by LADWP. As discussed in Section IV.H.1, Public Services—Fire Protection, of this Draft EIR, the Fire Flow Availability Report indicates adequate hydrant pressure and flow is not currently available at the Project Site. However, like the Project, Alternative 4 would include necessary upgrades to improve the surrounding water mains that would facilities flow and pressure requirements.

Based on the above, operation of Alternative 4 would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service. Therefore, impacts associated with new or physically altered government facilities would be less than significant and greater than the less-than-significant impacts of the Project due to the increase in service population.

(2) Police Protection

(a) Construction

Similar to the Project, construction of Alternative 4 can create demand for police services. However, as with the Project, Alternative 4 would incorporate Project Design Feature POL-PDF-1 into its design to implement temporary security measures, including security fencing, lighting, and locked entry to secure the Project Site during construction which would reduce demand for police protection services.

Additionally, as noted above, peak daily and peak-hour construction traffic would be similar to the Project. With regard to emergency vehicle access, as with the Project, a Construction 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. Accordingly, the construction-related impacts of Alternative 4 would be minimized and would not generate a demand for additional police protection services that would substantially exceed the capability of the LAPD to serve the Project Site. Construction of Alternative 4 would not necessitate the provision of new or physically altered facilities in order to maintain the LAPD's capability to serve the Project Site (i.e., Alternative 4 would not result in adverse physical impacts associated with the construction of new or altered facilities). Therefore, impacts would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

Like the Project, Alternative 4 would introduce new residents, employees, and visitors to the Project Site and increase the overall service population of the Newton Community Police Station service area. As shown in Table V-6 on page V-75, compared to existing conditions, Alternative 4 would generate a net increase in service population of approximately 1,439 persons at the Project Site, including 743 residents, compared to a net increase in service population of 1,801, including 1,089 residents with the Project. As such, Alternative 4 would reduce the officer-to-resident ratio of 9.25 officers per 1,000 residents to a lesser degree than the Project.¹⁵

As shown in Table V-6, Alternative 4 would also result in fewer crimes than the Project. Specifically, Alternative 4 would result in an estimated 21 crimes compared to 31 crimes with the Project. Therefore, as with the Project, Alternative 4 would not result in a significant increase in the existing officer-to-resident ratio or significantly increase the number of crimes within the Newton Community Police Station's service area.

In addition, similar to the Project, Alternative 4 would implement Project Design Features POL-PDF-2 through POL-PDF-7, which are related to a security program, provision of sufficient lighting, and a design that increases open views and reduces areas of concealment. These project design features would help reduce the increase in demand for police services under Alternative 4.

Based on the analysis above, the increase in demand associated with Alternative 4 would not necessitate the provision of new or physically altered facilities in order to maintain the LAPD's capability to serve the Project Site. Accordingly, Alternative 4 would not result in adverse physical impacts associated with the construction of new or physically altered government facilities. Therefore, Alternative 4's impacts related to police protection services would be less than significant and less than the less-than-significant impacts of the Project due to the reduction in service population.

(3) Schools

(a) Construction

Similar to the Project, Alternative 4 would generate part-time and full-time jobs associated with its construction between the start of construction and full buildout. However, due to the employment patterns of construction workers in Southern California,

¹⁵ The LAPD calculates officer to resident ratios based on only residential populations. The LAFD service population increases under this Alternative because LAFD includes both residents and employees.

**Table V-6
Impacts of Alternative 4 on Police Protection Services and Comparison to the Project**

	Alternative 4	Project	Difference
Service Population^a			
Proposed Service Population	1,584 persons total (773 residents)	1,946 persons total (1,119 residents)	-362 persons (346 residents)
Existing Service Population	145 persons total (30 residents)	145 persons total (30 residents)	145 persons total (30 residents)
Net Service Population	1,439 persons total (743 residents)	1,801 persons total (1,089 residents)	-362 persons (346 residents)
Net Crimes Generated^c	21 crimes	31 crimes	-10 crimes
<p><i>Numbers may not total due to rounding.</i></p> <p>^a <i>The following L.A. CEQA Thresholds Guide, K. Police Service Population Generation Factors were applied to the proposed uses of Alternative 3: Residential (studio, one-, and two-bedroom units): 3 persons/unit; Residential (three- and four-bedroom units): 4 persons/unit; Office: 4 persons/1,000 sf; Retail: 3 persons/1,000 sf.</i></p> <p>^b <i>Based on the 2018 residential service population, there were approximately 28.8 crimes per 1,000 residents (i.e., 0.288 crime per capita).</i></p> <p><i>Source: Eyestone Environmental, 2019.</i></p>			

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, the construction employment generated by Alternative 4 would not result in a notable increase in the resident population or a corresponding 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 Project's less-than-significant impacts.

(b) Operation

Like the Project, Alternative 4 would develop live-work units, office, and retail uses on the Project Site, though no restaurant uses are proposed, and Alternative 4 would develop fewer live-work units and more office space than the Project. Because residential uses are the greatest driver of student generation, the total number of students generated would be reduced compared to the Project. Specifically, the 245 live-work units, 245,452 square feet of office uses, and 18,858 square feet of retail uses proposed by Alternative 4 would generate a net increase of 353 students consisting of 206 elementary school students, 52 middle school students, and 110 high school students. In comparison, the Project would generate a net increase of 361 students consisting of 211 elementary school students, 57 middle school students, and 120 high school students. Thus, the increased demand for school services provided by LAUSD would be reduced under

Alternative 4 compared to the Project. Furthermore, pursuant to SB 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 area. Impacts related to schools would be less than significant under Alternative 4 and less than the less-than-significant impacts of the Project.

(4) Libraries

(a) Construction

Similar to the Project, 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. Therefore, construction employment generated by Alternative 4 would not result in a notable increase in the resident population or a corresponding demand for library services in the vicinity of the Project Site. As such, impacts to library facilities during construction of Alternative 4 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 4 would develop fewer residential units than the Project, and would therefore have a smaller residential service population. Specifically, the 245 live-work units developed under Alternative 3 would result in approximately 595 residents compared to the 843 residents generated by the Project, so direct demand for library services would be less than the Project. The proposed retail and office uses in Alternative 4 would, however, generate more employees than the Project (i.e., 1,227 employees vs. 961 employees). It is anticipated that new jobs generated by Alternative 4 would typically be filled by persons already residing in the vicinity of the workplace and who already generate a demand for the libraries in the vicinity of the Project Site. Therefore, any new indirect demand for library services generated by employees under this alternative would already be taken into account in library services provisions.

Therefore, as with the Project, operation of Alternative 4 would not exceed the capacity of local libraries to adequately serve the existing residential population based on target service populations or as defined by the LAPL, or substantially increase the demand for library services. As such, Alternative 4 would not result in the need for new or altered library facilities. Therefore, impacts related to libraries under Alternative 4 would be less

than significant and less than the less-than-significant impacts of the Project due to the reduction of live-work units included in Alternative 4 which results in less direct demand for library services.

(5) Parks and Recreation

(a) Construction

Construction of Alternative 4 would result in a temporary increase in the number of construction workers at the Project Site. As described above, 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 4 is low. Therefore, the construction workers associated with Alternative 4 would not result in a notable increase in the residential population of the Project Site area, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site. As such, similar to the Project, construction of Alternative 4 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 on parks and recreational facilities during construction of Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

Based on the reduced number of live-work units, Alternative 4 would be required to provide less open space than the Project. Specifically, per LAMC Section 12.21G, Alternative 4 would be required to provide 30,025 square feet of open space, which is less than the 42,775 square feet required by the Project. Alternative 4 would provide 30,025 square feet of open space, which meets this requirement. For comparison, the Project would exceed LAMC requirements by providing 71,719 square feet of open space. 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. Also similar to the Project, under Alternative 4 the applicant would be required to pay park and recreation fees to the City that could be used to add or improve park facilities in the project vicinity. Therefore, impacts to park and recreation facilities would be less than significant under Alternative 4, and less than the less-than-significant impacts of the Project.

i. Transportation

Similar to the Project, Alternative 4 would generally support multimodal transportation options. Like the Project, Alternative 4 would include passenger drop-offs to minimize impacts to the public right of way and enhance the user experience by integrating

multi-modal transportation options. This alternative would also include the same new sidewalks, street trees, and pedestrian lighting as the Project, and would include short-term and long-term bicycle parking in accordance with the LAMC. Specifically, Alternative 4 include 230 bicycle parking spaces, consisting of 45 short-term spaces and 185 long-term spaces within five subterranean levels to facilitate bicycle use. Alternative 4 would also provide a pedestrian paseo connecting the existing and proposed buildings, similar to the Project. Therefore, Alternative 4 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be similar to the Project.

With respect to VMT, the proposed residential uses under Alternative 4 would result in 9.2 VMT per capita and the proposed commercial uses would result in 8.8 VMT per employee, both of which exceed the Central APC thresholds of 6.0 and 7.6, respectively.¹⁶ With the application of TDM measures similar to the Project, the household VMT would be reduced to 7.6 VMT per capita and the work VMT would be reduced to 7.3 VMT per employee, both of which are less than the Project with household VMT exceeding the Central APC threshold of 6.0. Therefore, impacts would be less than the Project, but household VMT impacts would be significant and unavoidable.

Alternative 4 would not introduce hazardous geometric design features, and as is the case with the Project, all driveways would be designed to LADOT standards. Impacts would be less than significant, similar to the Project.

Lastly, similar to the Project, Alternative 4 would not interfere with emergency access and impacts would be less than significant, but impacts would be less than the Project because fewer daily trips are anticipated (4,619 daily trips compared to 4,926 daily trips with the Project).¹⁷

j. Tribal Cultural Resources

Alternative 4 would require the same amount of excavation for building foundations and subterranean parking. Therefore, the potential for Alternative 4 to uncover subsurface tribal cultural resources would be similar to the Project. In addition, as discussed in Section IV.J, Tribal Cultural Resources, of this Draft EIR, results of the records searches (i.e., SCCIC and NAHC) conducted for the Project Site and the independent analysis of correspondence and materials relative to potential tribal cultural resources on the Project Site (included in the TCR Report) demonstrate that there is no record or evidence of tribal

¹⁶ *Fehr & Peers, VMT Calculator Results for 2143 Violet Alternative 4, November 25, 2019.*

¹⁷ *Fehr & Peers, VMT Calculator Results for 2143 Violet Alternative 4, November 25, 2019.*

cultural resources on the Project Site or in its vicinity. Accordingly, impacts to tribal cultural resources would be similar to the less-than-significant impacts of the Project.

k. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities for Alternative 4 would result in a temporary demand for water associated with soil compaction and earthwork, dust control, mixing and placement of concrete, equipment and site cleanup, irrigation for plant and landscaping establishment, testing of water connections and flushing, and other short-term related activities. These activities would occur incrementally throughout construction of Alternative 4. The amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed. However, given the temporary nature of construction activities, water use during construction of Alternative 4 would be short-term and intermittent. As with the Project, water for construction activities of Alternative 4 would be conveyed using the existing water infrastructure at the Project Site, and no infrastructure upgrades would be needed to provide water during construction.

As discussed above, Alternative 4 would include a similar mix of uses as the Project and the total amount of construction and excavation would be the same. Therefore, the water demand generated by construction activities for Alternative 4 would be similar to the net water consumption of the Project during construction. Overall, construction activities associated with Alternative 4 would not require or result in the construction of new water facilities or expansion of existing facilities that could have a significant impact on the environment. Thus, construction-related impacts to water demand and infrastructure under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As previously discussed, Alternative 4 would develop live-work units, office, and retail uses on the Project Site, though no restaurant uses are proposed, and Alternative 4 would develop fewer live-work units and more office space than the Project. As shown in Table V-7 on page V-80, Alternative 4 would result in a net increase in demand for water from the Project Site of 87,505 gpd, which is less than the 109,015 gpd in net water demand generated by the Project. In addition, the estimated increase in water demand from Alternative 4 is conservative in that it does not account for voluntary water demand reductions, although Alternative 4 would implement the same water conservation features as the Project, as detailed in Project Design Feature WAT-PDF-1. As with the Project, domestic and fire water service to the Project Site under Alternative 4 would continue to be

**Table V-7
Estimated Water Consumption/Wastewater Generation for Alternative 4**

Land Use	Unit	Generation Factor^a	Total Water Demand/ Wastewater Generation (gpd)
Existing			
Surface Parking	6,844 sf	N/A	2,382
<i>Subtotal</i>			2,382
Proposed			
1 bedroom	100 du	185 gpd/du	18,500
1 bedroom + den	63 du	225 gpd/du	14,175
2 bedroom	44 du	225 gpd/du	9,900
2 bedroom + den	30 du	265 gpd/du	7,950
3 bedroom	8 du	265 gpd/du	2,120
Base Demand Adjustment (Residential) ^b			4,461
Required Ordinance Savings (Residential) ^c			(13,134)
Office	245,452 sf	120 gpd/ksf	29,454
Retail	18,858 sf	25 gpd/ksf	471
Residential Amenities ^d			699
Base Demand Adjustment (Non-Residential) ^b			3,942
Required Ordinance Savings (Non-Residential) ^c			(13,475)
Landscaping ^e	8,952 sf		836
Parking	326,866 sf	20 gpd/ksf	6,537
Cooling Tower—Residential ^f			5,655
Cooling Tower—Office ^f			9,828
Cooling Tower—Retail ^f			1,966
<i>Subtotal</i>			89,887
Total Net Water Demand			87,505
Total Net Wastewater Generation			80,132

du = dwelling unit

gpd = gallons per day

ksf = 1,000 square feet

sf = square feet

^a Based on the WSA prepared for the Project by LADWP, included as Appendix P of this Draft EIR. The rates published in the WSA are based on Sewer Generation Rates provided by LASAN.

^b Base Demand Adjustment is the estimated savings due to Ordinance No. 180,822 accounted for in the current version of LASAN Sewer Generation Rates.

^c Required ordinance savings is based on the same percentage reduction applied to Project demand in the WSA.

^d Conservatively assumes the same type and amount of residential amenities as the Project, including a

Table V-7 (Continued)
Estimated Water Consumption/Wastewater Generation for Alternative 4

Land Use	Unit	Generation Factor ^a	Total Water Demand/ Wastewater Generation (gpd)
<p><i>pool, spa, artist production space, and other indoor residential amenities.</i></p> <p>^e <i>Conservatively assumes the same square footage of landscaping as the Project.</i></p> <p>^f <i>Assumes the same size cooling towers as the Project. Demand reflects required ordinance savings included in the WSA.</i></p> <p>^g <i>Wastewater generation equals 100 percent of water demand less water for the parking structure which would flow to the storm drain and water for landscaping.</i></p> <p>Source: <i>Eyestone Environmental, 2019.</i></p>			

supplied by LADWP. Similar to the Project, it is anticipated that LADWP would also be able to meet the water demand of Alternative 4.

As discussed in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, the Project Site does not currently have adequate fire flow to serve the Project. However, like the Project, Alternative 4 would include necessary upgrades to the surrounding water mains to facilitate the necessary flow and pressure requirements, and Alternative 4 would also incorporate a fire sprinkler suppression system to reduce or eliminate the public hydrant demands. Upon completion, water supply infrastructure would also be able to meet the reduced demand under Alternative 4. The Project Applicant would also construct the necessary on-site infrastructure and connections to the LADWP system pursuant to applicable City requirements under this Alternative.

Based on the above, the estimated water demand for Alternative 4 would not exceed the available supplies projected by LADWP or the available capacity within the distribution infrastructure that would serve the Project Site. Therefore, operational impacts of Alternative 4 on water supply and water infrastructure would be less than significant and less than the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, during construction of Alternative 4, existing sewer laterals would be capped and no sewage would enter the public sewer system. Temporary facilities such as portable toilet and hand wash areas would be provided by the contractor at the Project Site, and sewage from these facilities would be collected and hauled off-site. As such, wastewater generation from construction activities associated with Alternative 4 would be less than existing conditions, and would not cause a measurable increase in

wastewater flows. Therefore, construction of the Project would not substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the City's IRP. 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 previously discussed, Alternative 4 would develop live-work units, office, and retail uses on the Project Site, though no restaurant uses are proposed, and Alternative 4 would develop fewer live-work units and more office space than the Project. As shown in Table V-7 on page V-80, Alternative 4 would result in a net increase in wastewater flows from the Project Site. However, the net wastewater generated by Alternative 4 of 80,132 gpd would be lower than the net 109,015 gpd in wastewater generated by the Project. In addition, the estimated increase in wastewater generation from Alternative 4 is conservative in that it does not account for voluntary water demand reductions, although Alternative 4 would implement the same water conservation features as the Project, as detailed in Project Design Feature WAT-PDF-1. Similar to the Project, the wastewater generated by Alternative 4 would be accommodated by the existing capacity of the HWRP and impacts with respect to treatment capacity would be less than significant.

As with the Project, sewer service for Alternative 4 would be provided utilizing new or existing on-site sewer connections to the existing sewer lines in the vicinity of the Project Site. As discussed in Section IV.K.2, Utilities and Infrastructure—Wastewater, the existing 8-inch sewer line in 7th Place would have adequate capacity to serve the Project. Given that Alternative 4 would result in less daily wastewater compared to that of the Project, the sewer system would also have capacity to serve Alternative 4. 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 4 during the permitting process. All related sanitary sewer connections and on-site infrastructure under Alternative 4 would be designed and constructed in accordance with applicable standards.

Thus, impacts with regard to wastewater generation and infrastructure capacity under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project.

(3) Energy Infrastructure

(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. The energy consumed would be similar to the Project due to the similar amount and duration of construction. Therefore, impacts on energy infrastructure associated with short-term construction activities would be less than significant under Alternative 2 and similar to 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, as discussed above, Alternative 4 would develop the same total amount of floor area as the Project, but would develop fewer live-work units and more office space. Accordingly, demand for electricity would be greater than the Project while natural gas consumption would be less than the Project. Thus, while the corresponding impact on natural gas infrastructure would be less than the Project, the impact on electricity infrastructure would be greater. However, like the Project, Alternative 4 would be required to coordinate with LADWP to ensure adequate electricity infrastructure would be available to serve the Project Site. Therefore, impacts to energy infrastructure under Alternative 4 would be greater than the less-than-significant impacts of the Project, but would remain less than significant.

3. Comparison of Impacts

As evaluated above and shown in Table V-1 on page V-6, Alternative 4 would reduce, but not eliminate the Project's significant and unavoidable impact with respect to operational noise and VMT. Alternative 4 would not reduce or eliminate the Project's significant and unavoidable Project-level impacts associated with on-site noise and vibration during construction and vehicle miles traveled or the Project's significant and unavoidable cumulative impacts associated with on-site noise during construction. Impacts associated with operational TAC emissions would be greater than the Project due to the increase in commercial uses, but would remain less than significant. In addition, impacts associated with fire protection would be greater than the Project due to the increase in service population, but also remain less than significant. All other impacts would be less than or similar to those of the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 4 would develop live-work units, office, and retail uses on the Project Site, though no restaurant uses are proposed, and Alternative 4 would develop fewer live-work units and more office space than the Project. The total amount of development would

be the same as the Project. As such, Alternative 4 would meet the Project's underlying objective to redevelop vacant parcels into a high-density, mixed-use development that provides housing and jobs in the Arts District within the Central City North Community Plan area to the same extent as the Project, though the balance of housing and jobs would be different. However, Alternative 4 would not meet the following objectives to the same extent as the Project because fewer live-work units are proposed:

- To support the Central City North Community Plan's Objective 1-4 to promote and ensure the provision of adequate housing for all persons, by providing new market-rate and affordable live-work units in various types and configurations.
- To promote local and regional mobility objectives by providing a mix of residential and neighborhood-serving commercial and office uses in an area that is in close proximity to public transportation in order to reduce vehicular trips.

Alternative 4 would meet the office component of the following objective to a greater extent than the Project with respect to office uses, but would meet the retail/restaurant space component to a lesser extent than the Project because less square footage and no restaurant space is proposed:

- To support the Central City North Community Plan Objective 2-1 to conserve and strengthen viable commercial development by retaining the existing retail/restaurant and office spaces, and developing new office space and new retail/restaurant space.

Alternative 4 would, however, meet the following objective to the same extent of the Project:

- To create a pedestrian-friendly project by creating a street-level identity for the Project Site and improving the pedestrian experience through the introduction of commercial uses on the ground floor level and the incorporation of a pedestrian paseo and courtyard/plaza to connect the existing uses with the new development.

V. Alternatives

E. Environmentally Superior Alternative

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

Table V-1 on page V-6 provides a summary matrix that compares the impacts associated with the Project with the impacts of each of the analyzed alternatives. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to CEQA Guidelines Section 15126.6(c), the analysis below addresses the ability of the Alternatives to “avoid or substantially lessen one or more of the significant effects” of the Project.

Alternative 1, the No Project/No Build Alternative, would avoid the Project’s significant and unavoidable impacts with respect to on-site noise and vibration during construction and vehicle miles traveled. Alternative 1 would also eliminate the Project’s significant and unavoidable cumulative impacts with respect to on- and off-site construction noise, operational noise, and vehicle miles traveled. Alternative 1 would eliminate all of the Project’s remaining less-than-significant and less-than-significant-with-mitigation impacts as no changes to the existing conditions would occur. However, Alternative 1 would not meet any of the Project objectives or the Project’s underlying purpose to redevelop vacant parcels into a high-density, mixed-use development that provides housing and jobs in the Arts District within the Central City North Community Plan area to a lesser extent than the Project.

As stated above, the CEQA Guidelines require the identification of an Environmentally Superior Alternative other than a No Project Alternative. Accordingly, in accordance with the CEQA Guidelines, a comparative evaluation of the remaining alternatives indicates that Alternative 2, the Zoning Compliant All Commercial Alternative, is the Environmentally Superior Alternative. This Alternative represents a reduced density development that is in accordance with existing zoning designation, height limit, and FAR allowed within the Project Site. However, Alternative 2 would reduce, but not eliminate, the Project’s significant and unavoidable cumulative impacts associated with operational noise due to traffic. All other impacts would be less than or similar to those of the Project.

Although Alternative 2 would reduce some of the Project's significant environmental impacts, it would not eliminate any of the Project's significant and unavoidable impacts. In addition, Alternative 2 would not provide any live-work units towards the City's housing objectives and would provide significantly less office and retail/restaurant space compared to the Project. Without new housing, Alternative 2 would not meet two of the Project's objectives pertaining to housing and with the decrease in commercial square footage, would meet the Project's commercial objective a lesser extent than the Project. Alternative 2 would, however, meet the Project's objective to create a pedestrian-friendly project by creating a street-level identity for the Project Site and improving the pedestrian experience through the introduction of neighborhood-serving commercial uses on the ground floor level and the incorporation of a pedestrian paseo and courtyard/plaza to connect the existing uses with the new development.