

V. Alternatives

1. Introduction

Under CEQA, and as indicated in California Public Resources Code (PRC) Section 21002.1(a), the identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process intended to consider ways to mitigate or avoid the significant environmental effects of a project.

Guidance regarding the definition of project alternatives is provided in CEQA Guidelines Section 15126.6(a) and is summarized in part in the excerpt below:

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.

The CEQA Guidelines emphasize that the selection of project alternatives should be based primarily on the ability of the alternative 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.”¹ 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 analyzed.²

The project alternatives selected for analysis in an EIR, must be potentially 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 (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).

CEQA Guidelines Section 15626.6(e) requires the analysis of a “no project” alternative and, depending on the circumstances, evaluation of alternative location(s) for the project, if feasible.³ Based on the alternatives analysis, an environmentally superior alternative is to be designated. In general, the environmentally superior alternative is the alternative

¹ CEQA Guidelines Section 15126.6(b).

² CEQA Guidelines Section 15126.6(f).

³ CEQA Guidelines Sections 15126.6(e), 15126.6(f)(1).

with the least adverse impacts on the environment. If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify another environmentally superior alternative among the other alternatives.⁴

CEQA Guidelines Section 15126.6(d) states that the EIR is required to provide sufficient information about each alternative to allow meaningful evaluation, analysis and comparison with the proposed project. It further states that, if an alternative would cause one or more significant effects in addition to those that would be caused by the proposed project, the alternatives analysis need not discuss those effects in the same level of detail as the significant effects of the proposed project are discussed.

2. Objectives of the Project

Chapter II, *Project Description*, of this Draft EIR sets forth the Project Objectives defined by the Applicant and the Lead Agency. The underlying purpose of the Project is to create a vibrant, mixed-use development that enlivens the eastern edge of the Arts District by facilitating resident, hotel guest, employee, and visitor activity, serving as a gateway between the Arts District and the Los Angeles River/Boyle Heights, and improving public connectivity in a way that complements the Ribbon of Light Bridge, the City’s proposed PARC Improvements, and the 7th Street Bridge.

The Project’s specific objectives are as follows:

1. Develop a mixed-use infill Project that can accommodate creative office, commercial, and residential uses.
2. Redevelop the site with high-jobs-producing land uses that increase economic activity on the Project Site and in the Project area.
3. Provide much-needed market-rate and affordable multi-family housing.
4. Provide needed hotel rooms in an underserved part of Downtown Los Angeles.
5. Provide a wide range of entertainment, restaurant, and recreational amenities for Downtown residents and visitors from throughout the City.
6. Provide innovative architectural design in a unique, prominent location along the Los Angeles River, between the Ribbon of Light Bridge and the City’s proposed PARC Improvements, and the historic 7th Street Bridge.
7. Provide a variety of publicly accessible at-grade and generous above-grade open spaces for Project occupants that take advantage of the Project’s stepped building design, Los Angeles River frontage, nearby public improvements and opportunities for river access and panoramic views.
8. Create pedestrian and bicycle connections that link the 7th Street Bridge with landscaped open space within the Project Site and the City’s proposed PARC Improvements, Ribbon of Light Bridge, and potential future Metro Arts District/6th Street Station, to reduce travel time, unite the Arts District neighborhoods and

⁴ CEQA Guidelines Section 15126.6(e)(2).

Boyle Heights communities, while increasing physical and visual access to the Los Angeles River.

9. Create a sign district encompassing the Project Site that: complements the Ribbon of Light Bridge and proposed PARC Improvements, highlights the presence of and connectivity to the Los Angeles River, helps to establish the Ribbon of Light Bridge and 7th Street Bridge as a gateway from the eastern side of the Los Angeles to the Arts District, ensures the economic vitality of the Project tenants, thereby contributing to the City's economic base, and builds off of the artistic character of the neighborhood.
10. Maximize the opportunity to construct a multi-use deck over the Railway Properties, along the Los Angeles River, that would connect the 7th Street Bridge with the City's Ribbon of Light Bridge and proposed PARC Improvements that would open space for the Arts District and Boyle Heights, complementing future public programming and enhancing public views of the Los Angeles River.

3. Overview of Alternatives Selected for Analysis

As stated above, the intent of the alternatives analysis is to determine if there are feasible alternatives that would avoid or substantially reduce the significant impacts of a proposed project. Based on the analysis in Chapter IV, *Environmental Impact Analysis*, of this Draft EIR, the Project would result in significant and unavoidable impacts on construction and operational air quality, on-site construction noise and vibration, vehicle miles traveled (VMT) related to retail uses, and freeway safety.

The following alternatives to the Project have been selected to inform evaluation of the Project in light of the significant environmental impacts of the Project, the objectives established for the Project (listed above), the feasibility of the alternatives considered, and public input received during the scoping period:

a) Alternative 1: No Project/No Build Alternative

Pursuant to CEQA Guidelines Section 15126.6(e), Alternative 1, the No Project/No Build Alternative, assumes that no new development would occur within the Project Site. The existing use of the Project Site, including the operation of a one- to four-story freezer and cold and dry storage warehouses with associated office space, loading docks, and surface parking, would continue as under existing conditions.

b) Alternative 2: Reduced Retail and Increased Office with Charter School Alternative

Alternative 2, the Reduced Retail and Increased Office with Charter School Alternative, would have the same floor area (1,792,103 square feet) and FAR (7.5:1) as the Project, but would substantially reduce retail floor area from 136,152 square feet to 11,664 square feet; restaurant floor area would decrease from the Project's 89,577 square feet to 59,700 square feet; studio/event/gallery/potential floor area would decrease from the Project's

93,617 square feet to 44,069 square feet; and gym floor area would decrease from the Project's 62,148 square feet to 44,069 square feet. Conversely, residential units would increase from the Project's 308 units to 420 units. Alternative 2 would increase the Project's office floor area from 944,055 square feet to 1,000,666 square feet. Alternative 2 would also incorporate a charter elementary school comprising 32,150 square feet. Alternative 2 would increase the Project's hotel floor area from 158,647 square feet to 209,560 square feet (still including 236 rooms as under the Project). The Project's deck would be reduced from 132,000 square feet to 75,000 square feet.

c) Alternative 3: Reduced Retail and Increased Office and Gym Use Alternative

Alternative 3, the Reduced Retail and Increased Office and Gym Use Alternative, would have the same floor area (1,792,103 square feet) and FAR (7.5:1) as the Project, but would substantially reduce retail floor area from 136,152 square feet to 14,208 square feet; restaurant floor area would decrease from the Project's 89,577 square feet to 66,000 square feet; studio/event/gallery/potential floor area would decrease from the Project's 93,617 square feet to 60,100 square feet. Conversely, residential units would increase from the Project's 308 units to 420 units. Alternative 3 would increase the Project's office floor area from 944,055 square feet to 973,153 square feet; increase the Project's hotel floor area from 158,647 square feet to 228,670 square feet (still including 236 rooms as under the Project); and increase the Project's gym floor area from 62,148 square feet to 68,102 square feet. The Project's deck would be reduced from 132,000 square feet to 75,000 square feet.

d) Alternative 4: No Residential/Reduced Intensity Alternative

Alternative 4, the No Residential/Reduced Intensity Alternative would reduce the Project's floor area from 1,792,103 square feet to 1,149,820 square feet, and reduce the Project's FAR from 7.5:1 to 4.8:1. However Alternative 4 would not provide any residential units or hotel use. Alternative 4 would maintain the same office floor area (944,055 square feet) as under the Project. Alternative 4 would also maintain the same studio/event/gallery/potential museum floor area (93,617 square feet) and gym floor area (62,148 square feet) as under the Project. Alternative 4 would substantially reduce retail floor area from 136,152 square feet to 10,000 square feet, and restaurant floor area would decrease from the Project's 89,577 square feet to 40,000 square feet. The Project's deck would be eliminated due to the changed nature of uses (i.e., elimination of residential and hotel uses) and overall reduction in the Project's size and density.

The alternatives considered for evaluation are compared to the Project, as summarized in **Table V-1, Overview of the Project Alternatives**.

**TABLE V-1
OVERVIEW OF THE ANALYZED ALTERNATIVES**

Component	Project	Alternative 1: No Project/ No Build Alternative	Alternative 2: Reduced Retail and Increased Office with Charter School Alternative	Alternative 3: Reduced Retail and Increased Office and Gym Use Alternative	Alternative 4: No Residential/ Reduced Intensity Alternative
Residential Dwelling Units	308 du	0 du	420 du	420 du	0 du
Office Floor Area	944,055 sf	0 sf	1,000,666 sf	973,153 sf	944,055 sf
Retail Floor Area	136,152 sf	0 sf	11,664 sf	14,208 sf	10,000 sf
Restaurant Floor Area	89,577 sf	0 sf	59,700 sf	66,000 sf	40,000 sf
Hotel (236 rooms)	158,647 sf	0 sf	209,560 sf	228,670 sf	0 sf
Studio/Event/Gallery/Potential Museum	93,617 sf	0 sf	44,069 sf	60,100 sf	93,617 sf
Gym	62,148 sf	0 sf	52,424 sf	68,102 sf	62,148 sf
School	0 sf	0 sf	32,150 sf	0 sf	0 sf
Total Developed Floor Area	1,792,103 sf	0 sf	1,792,103 sf	1,792,103 sf	1,149,820 sf
FAR	7.5:1	0	7.5:1	7.5:1	4.8:1
Provided Open Space	141,876 sf	0 sf	213,139 sf	214,414 sf	131,353 sf
Provided Open Space under Project with the Deck Concept ^a	273,876 sf	0 sf	213,139 sf	214,414 sf	131,353 sf
Deck Capacity = 1 person/15 sf	132,000 sf (8,800 ppl)	0 sf	75,000 sf (5,000 ppl)	75,000 sf (5,000 ppl)	No Deck
Vehicle Parking	2,000–3,500 spaces	0 spaces	2,000–3,500 spaces	2,000–3,500 spaces	1,300–2,275 spaces

NOTE(S):

du = dwelling unit; sf = square feet; FAR = Floor Area Ratio

^a Under Alternative 2 and Alternative 3, it is assumed that the 75,000 square foot Deck would be constructed as part of the alternative. Therefore, the square footage provided for the Provided Open Space for Alternatives 2 and 3 is inclusive of the proposed 75,000 square foot Deck. Due to the changed nature of uses (i.e., elimination of residential and hotel uses) and overall reduction in the Project's size and density, no Deck would be included in Alternative 4.

SOURCE: ESA, 2021.

4. Alternatives Considered and Rejected

CEQA Guidelines Section 15126.6(c) describes that an EIR should identify alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the CEQA Guidelines, the following factors may be used to eliminate alternatives from detailed consideration: 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 that have been considered and rejected from detailed consideration are discussed below.

a) Alternative Off-Site Location

According to the guidance provided by CEQA Guidelines Section 15126.6(f)(2), one or more alternative location(s) for a proposed project should be considered if placing the proposed project in the alternative location would avoid or substantially lessen any of the significant effects of the project to be avoided or substantially lessened; if the EIR concludes that no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion. The factors that may be considered when addressing the feasibility of an alternative site are suitability, economic viability, availability of infrastructure, general plan consistency, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site.

Significant and unavoidable freeway safety impacts would occur due to Project traffic causing a potential safety issue at the US-101 Southbound Off-ramp to 7th Street and the recommended Mitigation Measure TRAF-MM-2 not being guaranteed due to the intersection being within the jurisdiction of another public agency (California Department of Transportation [Caltrans]). Impacts with respect to congested freeway ramps would potentially occur at other available and similarly sized sites in the Central City North vicinity because of the proximity of larger industrial sites to freeway routes and other congested freeway ramps in the area. In addition, because of the highly urbanized character of the Downtown, larger available sites are anticipated to also be near existing or proposed residential uses or other noise-sensitive uses. The Project's significant and unavoidable impacts, including construction and operational air quality, on-site construction noise, and VMT related to retail uses would be expected to occur at other available locations in the area. Therefore, moving the location of the Project to another site would not necessarily reduce the nature and extent of such impacts. Accordingly, given the nature of the Project's significant unavoidable impacts, evaluation of an alternate location was not pursued as it would be likely to shift these impacts to another location rather than helping avoid or substantially lessen the significant effects of the Project.

In addition to considering whether an alternative site would avoid or substantially lessen impacts, various factors may be considered when addressing the feasibility of an alternative site. Factors considered may include general suitability, economic viability,

availability of infrastructure, general plan consistency, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site.⁵

The 5.45-acre Project Site flanks Mesquit Street on the east and west between the former 6th Street Viaduct right-of-way (ROW) on the north and the 7th Street Bridge on the south. The Project Site is located in a Transit Priority Area (TPA), which is suitable for a high-density, mixed-use development in an area well-served by public transit, compared to a location that is not within a TPA. The Project Site's location within a TPA would allow for commercial and high-density residential uses in close proximity to public transit, including the existing Los Angeles County Metropolitan Transportation Authority (Metro) bus lines and potential future Arts District/6th Street Station that is currently undergoing the environmental review process.

An off-site location would not meet the Project Objective to provide innovative architectural design in a unique, prominent location along the Los Angeles River, between the Ribbon of Light Bridge and the City's proposed PARC Improvements, and the historic 7th Street Bridge. An off-site location would not meet any of the Project Objectives related to providing improvements and accessibility for Project residents to the Los Angeles River frontage, the Ribbon of Light Bridge, the proposed PARC Improvements, and the potential future Arts District/6th Street Station. An off-site location would also not support the Project Objective to highlight the presence of and connectivity to the Los Angeles River, as well as to establish the Ribbon of Light Bridge and 7th Street Bridge as a gateway from the eastern side of the Los Angeles River to the Arts District. Finally, an off-site location would not meet the Project Objective to maximize the opportunity to construct a multi-use deck over the Railway Properties, along the Los Angeles River, that would connect the 7th Street Bridge and PARC Improvements that would create 12 acres of open space for the Arts District and Boyle Heights, complement future public programming, and enhance public views of the Los Angeles River. Available building sites of a size to accommodate the scale and density of the Project within the TPA are scarce. It is not anticipated that the Applicant would be able to find an equivalent-sized building site that is not the subject of another building project in similar proximity to transit that qualify the area as a TPA. The Project Site is located within one-half mile of the intersection of 7th Street and S. Santa Fe Avenue, which qualifies as a major transit stop, as it is served by two eligible bus lines (Metro local bus routes 18 and 60) with headways of 15 minutes or less during morning and afternoon peak periods. Accordingly, the Project Site is located within a TPA. In general, the Project Site is located in proximity to existing public transit options, including various bus stops and light rail stations, as well as the potential future Metro Arts District/6th Street light rail station.

In addition, the Applicant does not have ownership or control of any other suitable site, or the foreseeable ability to acquire an alternative site within a reasonable timeframe, in the Central City North Community Plan area. Therefore, the flexibility to develop a similar

⁵ CEQA Guidelines Sections 15126.6(f)(1) and 15126.6(f)(2).

project on the same or similar scale at another location in proximity to public transit is not feasible.

For all of the reasons stated above, an off-site location alternative is not expected to meaningfully reduce the significant impacts of the Project, would not meet several of the Project's objectives, and a feasible alternate location for the Project has not been identified. Accordingly, an off-site alternative has not been carried forward for further analysis.

b) Alternatives to Eliminate Significant Noise and Vibration Impacts During Construction

As discussed in Section IV.I, *Noise*, of this Draft EIR, the Project and Project with the Deck Concept would result in short-term significant and unavoidable project-level construction-related noise and vibration (human annoyance and structural) impacts. In addition, if construction of one or more of the identified related projects were to overlap with construction, the Project's or Project with the Deck Concept's contribution to cumulative construction noise from on-site equipment would be cumulatively considerable and would represent a significant and unavoidable cumulative impact at nearby noise sensitive locations. Further, the Project has no control over the number of trucks that related projects would require and which routes they would take. There are no feasible mitigation measures to reduce the cumulative off-site construction noise and cumulative impacts would be significant and unavoidable at eight roadways segments in local vicinity under both the Project and the Project with the Deck Concept.

It is acknowledged that under both the Project and the Project with the Deck Concept, short term construction groundborne vibration impacts associated with structural damage would be less than significant with mitigation incorporated for the majority of on-site construction activities, but would be significant and unavoidable for temporary shoring activities and installation of shoring infrastructure for receptor V1 (Multi-family residential uses to the west of the Project site at 2101 E. 7th Street) as consent for inspections and repair on receptor V1 may not be granted.

As such, the following alternative approaches to Project construction were considered to determine if they could feasibly substantially reduce or avoid these significant impacts.

- Approach (a) – Extended Construction Duration: An approach that extends the construction period, thus reducing the amount of daily construction activity that would occur under the Project was evaluated. This approach was rejected for the following reasons.
 - Construction noise levels are dependent on the amount and type of construction equipment (on-site equipment or off-site construction trucks). With respect to on-site construction, a reduction in the amount of equipment in use on a daily basis would result in a reduction in off-site construction noise, that would be somewhat less than the Project (depending on the amount of reduction). However, due to the close proximity of the off-site noise sensitive

- receptors to Project construction (e.g., receptor locations R1 and R4 within five feet of the Project Site), it would not be practical to reduce the construction noise levels to below the significance threshold as a single piece of heavy construction equipment, such as a concrete saw, excavator, or crane, would result in noise levels above the significance threshold (refer to Table IV.I-6, *Project Construction Equipment and Associated Noise Levels*, in Section IV.6, *Noise*, of this EIR). This approach would also be inefficient and of little to no benefit as achieving a slight reduction in noise on a daily basis by reducing the intensity of construction would increase the number of days that sensitive receptors would be subject to high noise levels from construction activities. As such, the on-site construction noise impacts under this alternative approach would not be substantially less than the Project, would remain significant, and would affect noise sensitive receptors for a greater period of time. For example, reducing the on-site construction equipment by half (i.e., 50 percent reduction) would reduce the construction noise by 3 dBA at the offsite receptors (i.e., a halving of sound energy corresponds to a 3 dBA decrease). The mitigated on-site construction noise levels with a 50 percent reduction in the number of pieces of construction equipment would still exceed the significance threshold by up to 9.3 dBA Leq and 12.5 dBA Leq during the daytime and nighttime, respectively, at receptor location R1 and 15.2 dBA Leq and 32.9 dBA Leq during the daytime and nighttime, respectively, at receptor location R4. Therefore, the construction noise levels under this approach (both on- and off-site construction noise) would be 3 dBA less than the Project but would still exceed the significance threshold.
- The on-site construction vibration impacts (structural damage and human annoyance) would be significant at the adjacent residential structure (receptor location V1), similar to the Project, as the vibration impact analysis is based on the peak vibration level generated by individual construction equipment, and the approach would utilize similar construction equipment (e.g., drill rig and other shoring equipment). Therefore, as use of other equipment would not be feasible, vibration from on-site construction due to shoring would remain significant and unavoidable at the adjacent residential structure (receptor location V1).
 - Approach (b) – Central Location of Development: An approach where the physical form of proposed development is moved closer to the center of the Project Site, thus pulling back development and associated construction activities from off-site noise sensitive receptors, in order to avoid temporary impacts, was reviewed and rejected for the following reasons.
 - Construction noise levels can be reduced by providing an additional buffer zone between the receptor and the construction equipment. Noise levels from construction equipment would attenuate approximately 6 dBA per doubling of distance. The construction noise levels associated with the building phases for the proposed buildings placed closer to the center of the Project Site would be lower than the noise levels under the Project. For the nearest sensitive receptors R1 and R4, construction noise level reductions of approximately 13-

- 14 dBA, 16-20 dBA, and 17-25 dBA could be achieved if the developed is moved 25 feet, 50 feet, or 100 feet, respectively, towards the center of the Project Site. Construction noise levels at these distances would be reduced through distance attenuation, but would still exceed the significance thresholds at R1 and R4. However, the noise level reduction, depending upon the setback from the property line, would be limited due to the narrow orientation of the Project Site. The east-west extent of the Project Site in some areas is less than 100 feet and is approximately 350 feet at its widest point at the southern end. Thus, eliminating development within the above distances from sensitive receptors would require the elimination of proposed buildings and features and would render portions of the Project Site as unable to be developed. In addition, as indicated above, noise levels during the site demolition, site preparation, and grading would still exceed the significance thresholds. As such, the on-site construction noise impacts under this approach would remain significant, as under the Project.
- Similar to the Project, the on-site construction vibration impacts (structural damage and human annoyance) of this approach would be significant when located at the adjacent residential structure (receptor location V1) as heavy construction equipment (e.g., drill rig and other shoring equipment) used for Project construction would still operate near the property line and adjacent sensitive uses. Construction vibration levels at distances of 25 feet or more from V1 and V6 would be reduced through distance attenuation to below the significance thresholds (see Table IV.I-38 and Table IV.I-39 in Section IV.I, *Noise*, of this Draft EIR). However, eliminating development within the above distance (or a greater distance) from sensitive receptors would require the elimination of proposed buildings and features and would render portions of the Project Site as unable to be developed.
 - Approach (c) – Significantly Reduced Development: An approach that would significantly reduce the amount of development that would occur under the Project, to the extent that the significant construction-related noise and vibration impacts of the Project would be avoided or substantially reduced, was also considered. However, due to the close proximity of the sensitive receptors (i.e., within five feet of the Project Site) and a narrow orientation of the Project Site (the east-west extent of the Project Site in some areas is less than 100 feet and is approximately 350 feet at its widest point at the southern end) that does not have the space to create a meaningful buffer zone without the elimination of proposed buildings and features render portions of the Project Site as unable to be developed, the construction of a significantly smaller project would not mitigate the on-site construction noise impacts of the Project as discussed above in Approach (b). In addition, the on-site construction vibration impacts (structural damage and human annoyance) associated with this approach would still be significant since the vibration impact analysis is based on the peak vibration level generated by individual construction equipment pieces that would still be required near the perimeter of the Project Site. Therefore, on-site construction vibration impacts would remain significant, similar to the Project.

As discussed, none of the above approaches would substantially reduce or avoid the significant and unavoidable construction-related on-site noise and construction groundborne vibration and groundborne noise (structural damage and human annoyance) impacts of the Project. This is because the significant and unavoidable construction-related noise and vibration impacts of the Project, which is an infill development in an urban area, are heavily influenced by the proximity of the Project Site to existing noise- and vibration-sensitive uses rather than the amount or duration of the Project's construction activities. Therefore, an alternative that includes one or more of these approaches would not substantially reduce or eliminate the significant and unavoidable construction noise and vibration impacts of the Project and no further consideration of these approaches in the EIR is required.

c) Alternative On-Site Uses

(1) DTLA 2040 Uses Alternative

The Central City and Central City North Community Plans are currently being consolidated as part of the City's *DTLA 2040 Plan*, which will establish future land use designations, in conjunction with the City's comprehensive update to the Zoning Code. The City has published a draft of the Community Plan text and interactive land use designation maps.^{6,7} Because the Project's the Vesting Tentative Tract Map application has been deemed complete, the Project would not be governed by the Community Plan update. In addition, the DTLA 2040 Plan has not been approved by the City Council. Public and property owner comments, which are required prior to approval, have not yet been fully received by the City Council and its Planning and Land Use Management Committee and there is potential for the Plan's proposed policies to change. Therefore, for the purpose of a Project Alternative, the presumption of the policies to be adopted would be speculative.

Nonetheless, and despite the fact that the DTLA 2040 Plan has not been adopted, the DTLA 2040 Plan's preliminary land use designation for the Project Site would be Hybrid Industrial, which would allow for a mix of light industrial, commercial, and office, with selective live/work uses and residential uses.⁸

Under the DTLA 2040 Plan, the proposed draft zones for the Project Site are [MB3-CDF1-5] [IX4-FA] [CPIO] (west of Mesquit St), [MM1-CDR1-5] [IX4-FA] [CPIO] (east of Mesquit St), and [MB2-CDR1-5] [IX4-FA] [CPIO] (Railroad Properties).

MB3, west of Mesquit St., is for Mid-Rise Broad 3 form district, which allows for 90 percent lot coverage, a base maximum FAR of 1.5, a bonus maximum FAR of up to 6.0, and a

⁶ City of Los Angeles Department of City Planning, *Downtown Community Plan – Proposed Draft Spring 2021*, June 2021.

⁷ City of Los Angeles Department of City Planning, *Draft General Plan Land Use Designation Map – Downtown Community Plan, City Planning Commission Draft*, June 2021.

⁸ City of Los Angeles Department of City Planning, *Downtown Community Plan – Proposed Draft Spring 2021*, June 2021.

maximum building width of 280 feet. CDF1 is for the Daylight Factory character frontage, which specifies the primary and side build-to requirements, parking setbacks, frontage landscaping, ground floor elevations, ground story height, articulation, entrance spacing, ground and upper story transparency, and exterior materials. The 5 is for Development Standard District 5 which imposes standards related to pedestrian access, automobile access, automobile parking, parking area design, signage, and development review.⁹ IX4 is for the Industrial-Mixed 4 use district, which supports office and commercial uses, as well as research and development, wholesale, and light industrial uses. The IX4 use district allows for a limited amount of live/work units at a minimum unit size of 1,000 square feet, but general residential uses are not permitted.¹⁰ FA is Limited by Floor Area density, which indicates that density is limited by permitted floor area of development rather than lot area.¹¹

MM1, east of Mesquit St., is for Mid-Rise Medium 1 form district, which allows for 90 percent lot coverage, a base maximum FAR of up to 1.5, a bonus maximum FAR of up to 4.5, a base maximum height of 15 stories, a bonus maximum height of 18 stories, a maximum building width of 160 feet, and a minimum river setback of 20 feet. CDR1 is for the Daylight Factory/River character frontage, which specifies the primary, side, and river build-to requirements, parking setbacks, frontage landscaping, ground floor elevations, ground story height, articulation, entrance spacing, ground and upper story transparency, and exterior materials.¹² The 5 is for Development Standard District 5 which imposes standards related to pedestrian access, automobile access, automobile parking, parking area design, signage, and development review.¹³ IX4 is for the Industrial-Mixed 4 use district, which supports office and commercial uses, as well as research and development, wholesale, and light industrial uses. The IX4 use district allows for a limited amount of live/work units at a minimum unit size of 1,000 square feet, but general residential uses are not permitted.¹⁴ FA is Limited by Floor Area density, which indicates that density is limited by permitted floor area of development rather than lot area.¹⁵

MB2, for the Railroad Properties, is for Mid-Rise Broad 2 form district, which allows for 90 percent lot coverage, a base maximum FAR of 1.5, a bonus maximum FAR of up to 3.0, a maximum height of 5 stories, a maximum building width of 280 feet, and a minimum river setback of 20 feet.¹⁶

CDR1 is for the Daylight Factory/River character frontage, which specifies the primary, side, and river build-to requirements, parking setbacks, frontage landscaping, ground

⁹ City of Los Angeles Department of City Planning, Article 4, Development Standards, Proposed Draft, June 1, 2021.

¹⁰ City of Los Angeles Department of City Planning, Article 5, Use, Proposed Draft, June 1, 2021.

¹¹ City of Los Angeles Department of City Planning, Article 6, Density, Proposed Draft, June 1, 2021.

¹² City of Los Angeles Department of City Planning, Article 3, Frontage, Proposed Draft, June 1, 2021

¹³ City of Los Angeles Department of City Planning, Article 4, Development Standards, Proposed Draft, June 1, 2021.

¹⁴ City of Los Angeles Department of City Planning, Article 5, Use, Proposed Draft, June 1, 2021.

¹⁵ City of Los Angeles Department of City Planning, Article 6, Density, Proposed Draft, June 1, 2021.

¹⁶ City of Los Angeles Department of City Planning, Article 2, Form, Proposed Draft, June 1, 2021.

floor elevations, ground story heights, articulation, entrance spacing, ground and upper story transparency, and exterior materials.¹⁷ The 5 is for Development Standard District 5 which imposes standards related to pedestrian access, automobile parking, parking area design, signage, and development review.¹⁸ IX4 is for the Industrial-Mixed 4 use district, which supports office and commercial uses, as well as research and development, wholesale, and light industrial uses. The IX4 use district allows for a limited amount of live/work units at a minimum unit size of 1,000 square feet, but general residential uses are not permitted.¹⁹ FA is Limited by Floor Area density, which indicates that density is limited by permitted floor area of development rather than lot area.²⁰

A Project Alternative consistent with the above draft zoning standards would not meet most of the Project's Objectives. The Project Site could potentially develop up to 301,726 square feet of floor area based on the base maximum FAR of 1.5. Taking advantage of all bonus FAR of up to 6.0 (west of Mesquit Street) and 4.5 (East of Mesquit St), up to 961,444.5 square feet of floor area could be developed, a maximum height of five stories, a maximum building width of 280 feet, and a minimum river setback of 20 feet under the DTLA 2040 Plan, as currently drafted.²¹ In comparison to the up to 1,792,103 square feet for the proposed Project, the restricted amount of development permitted on the Project Site under the proposed DTLA 2040 Plan based on the MB3 and MB1 designations would not allow for the Project Site to be developed at a scale and intensity that would accommodate a project that would meet most of the Project's Objectives, as the higher bonus FAR would still represent an approximate 46% reduction relative to the Project. The FAR restrictions under the draft DTLA 2040 Plan would significantly reduce the inclusion of Project components that provide jobs and amenities, such as creative office space, retail, restaurants, and entertainment. Therefore, the alternative would not meet the Project Objectives to redevelop the Site with high-jobs-producing land uses that increase economic activity on the Project Site and in the Project area and to provide a wide range of entertainment, restaurant, and recreational amenities for Downtown residents and visitors from throughout the City. Furthermore, as the proposed IX4 designation would significantly reduce and restrict the density of proposed residential uses, the development consistent with the DTLA 2040 Plan would also not be able to meet Project Objectives to provide much-needed market-rate and affordable multi-family housing and to develop a mixed-use infill Project that can accommodate creative office, commercial, and residential uses.

Finally, the setback and design standards precluding development of structures within 20 feet of the Los Angeles River could also conflict with the proposed Project with the Deck Concept architectural plans. The provisions of the proposed DTLA 2040 Plan may not accommodate a deck that extends across lot lines into the airspace of the freight and

¹⁷ City of Los Angeles Department of City Planning, Article 3, Frontage, Proposed Draft, June 1, 2021

¹⁸ City of Los Angeles Department of City Planning, Article 4, Development Standards, Proposed Draft, June 1, 2021.

¹⁹ City of Los Angeles Department of City Planning, Article 5, Use, Proposed Draft, June 1, 2021.

²⁰ City of Los Angeles Department of City Planning, Article 6, Density, Proposed Draft, June 1, 2021.

²¹ Potential amount of developed floor area is based on the 201,151-square-foot existing Project Site.

passenger rail lines and rail yards east of the Project Site, and, therefore, an alternative that would comply consistent with proposed DTLA 2040 zoning designations would not meet the Project Objective to maximize the opportunity to construct a multi-use deck over the Railway Properties, along the Los Angeles River, that would connect the 7th Street Bridge with the City's Ribbon of Light Bridge and proposed PARC Improvements that would create open space for the Arts District and Boyle Heights, complementing future public programming and enhancing public views of the Los Angeles River. Without the ability to construct the deck over the rail lines, a project consistent with the DTLA 2040 Plan would not be able to afford the public with the proposed expanded access to the Los Angeles River. Such an alternative would also not fully meet the project objective to provide a variety of publicly accessible at-grade and generous above-grade open spaces for Project occupants that take advantage of the Project's stepped building design, Los Angeles River frontage, nearby public improvements and opportunities for river access and panoramic views.

For the reasons stated above, an alternative consistent with the draft Plan designation under DTLA 2040 would fail to meet most of the Project Objectives. Accordingly, this alternative has not been carried forward for further analysis.

(2) Office Use/No Deck Alternative

An alternative with only office uses was considered for development on the Project Site. However, developing the Project Site solely with office uses would not meet the underlying purpose and primary objective of the Project to create a vibrant, mixed-use development that enlivens the eastern edge of the Arts District by facilitating resident, hotel guest, employee, and visitor activity, serving as a gateway between the Arts District and the Los Angeles River/Boyle Heights, and improving public connectivity in a way that complements the Ribbon of Light Bridge, the City's proposed PARC Improvements, and the 7th Street Bridge. An office use-only alternative would not meet the Project's objectives related to development of a mixed-use infill Project that can accommodate studio, event, gallery, potential museum and gym uses. An office-only alternative would, similar to the Project, still include the same construction related impacts that would occur under the Project, including impacts associated with construction air quality, on-site construction noise and vibration. Furthermore, development of an office only alternative would not eliminate, and could increase the significant VMT impact associated with the Project's retail uses. Accordingly, an office-only alternative has not been carried forward for further analysis.

(3) Residential Use Alternative

An alternative with only residential uses was considered for development on the Project Site. However, similar to an office-only use alternative discussed above, developing the Project Site solely with residential uses would not meet the underlying purpose and primary objective of the Project to create a vibrant, mixed-use development that enlivens the eastern edge of the Arts District by facilitating resident, hotel guest, employee, and visitor activity, serving as a gateway between the Arts District and the Los Angeles

River/Boyle Heights, and improving public connectivity in a way that complements the Ribbon of Light Bridge, the City's proposed PARC Improvements, and the 7th Street Bridge. Furthermore, a residential use only alternative would not meet most of the Project's objectives such as those focused on: development of a mixed-use infill Project that can accommodate creative office, commercial, and residential uses; redeveloping the site with high-jobs-producing land uses that increase economic activity on the Project Site and in the Project area; providing needed hotel rooms in an underserved part of Downtown Los Angeles; and providing a wide range of entertainment, restaurant, and recreational amenities for Downtown residents and visitors from throughout the City. A residential only alternative would, similar to the Project, still include impacts associated with construction and operational air quality, and on-site construction noise and vibration. In addition, a residential only alternative would not realize reductions in daily trips and VMT due to internal capture between Project land uses or fulfill 2020–2045 RTP/SCS strategies such as those promoting more compact, infill, walkable and mixed-use development to accommodate regional growth, as well as the priority for including job growth within high quality transit areas (HQTAs). Accordingly, a residential only alternative has not been carried forward for further analysis.

(4) Industrial Use Alternative

An alternative with only industrial uses was considered for development on the Project Site. However, an industrial use alternative would not meet the underlying purpose and primary objective of the Project, nor would it meet any of the other Project objectives. An industrial-only use would not create a vibrant, mixed-use development that enlivens the eastern edge of the Arts District by facilitating resident, hotel guest, employee, and visitor activity. Further, an all-industrial redevelopment of the Project Site would likely increase truck traffic, air pollutant and diesel emissions compared to the Project, and also would not reduce the Project's construction noise and vibration and freeway safety impacts. In addition, analysis regarding an industrial use alternative at the same intensity of the existing on-site uses would be similar to the analysis provided below under Alternative 1: No Project/No Build Alternative. Accordingly, an industrial-use only alternative has not been carried forward for further analysis.

5. Analysis Format

According to the guidance provided by CEQA Guidelines Section 15126.6(d), the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. Each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less than, similar to, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the Project Objectives, identified above, would be substantially attained by the alternative. The evaluation of each of the alternatives follows the process described below:

- A description of the alternative.

- The environmental impacts of the alternative before and after implementation of feasible mitigation measures for each environmental topic area analyzed in Chapter IV of this Draft EIR are described. Where appropriate, the evaluation is divided between temporary impacts that would occur during the alternative project's construction phase and operational phase.
- Environmental impacts of each alternative as compared to the Project are identified for each environmental topic area addressed in this Draft EIR. Where the impact of the alternative would be clearly less than the impact of the Project, the comparative impact is said to be "less than the Project." Where the alternative's impact would clearly be more than the Project, the comparative impact is said to be "greater than the Project." Where the impacts of the alternative and the Project would be roughly equivalent, the comparative impact is said to be "similar to the Project." The evaluation also documents whether an impact would be entirely avoided and whether a significant impact could be reduced to a less-than-significant level when compared to the Project.
- The comparative analysis of the impacts is followed by a general discussion of the extent to which the underlying purpose and Project Objectives are attained by the alternative.

Because there are differences between the Project and the Project with the Deck Concept, the analysis separately presents and discusses the environmental analysis and conclusions for each of these two scenarios. At the end of this chapter, a relative comparison of each alternative's impacts and their ability to achieve Project Objectives, is provided. Additionally, pursuant to CEQA Guidelines Section 15126.6(e)(2), an "Environmentally Superior Alternative" is identified.

6. Alternatives Analysis

a) Alternative 1: No Project/No Build Alternative

(1) Description of the Alternative

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. CEQA Guidelines Section 15126.6(e)(3)(B) states that, "in certain instances, the No Project/No Build Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, the No Project/No Build Alternative (Alternative 1) assumes that no new development would occur within the Project Site. The Project Site would continue to be developed with existing one- to four-story freezer, cold storage, and dry storage warehouses with associated office space, loading docks, and surface parking.

(2) Environmental Impacts

(a) *Air Quality*

(i) *Conflict with Air Quality Management Plan*

(a) Project

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, Project construction would not increase the frequency or severity of an existing violation or cause or contribute to new violations for nonattainment pollutants. Project construction would increase localized emissions of NO_x, CO, PM₁₀, and PM_{2.5}, but would not exceed the SCAQMD-recommended localized significance threshold concentrations at sensitive receptors in proximity to the Project Site and impacts would be less than significant. Project construction would also comply with the California Air Resources Board (CARB) requirements to minimize short-term emissions from on-road and off-road diesel equipment, SCAQMD Rule 403 requirements to control fugitive dust, SCAQMD Rule 1113 for controlling VOC emissions from architectural coatings, and the Airborne Toxic Control Measure (ATCM), such that the Project would meet or exceed Air Quality Management Plan (AQMP) requirements to reduce emissions from construction equipment and activities. Project operations would not conflict with the 2016 AQMP in regard to transportation control strategies from the Southern California Association of Governments (SCAG) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) that are intended to reduce VMT and regional mobile source emissions. Project operation would also be consistent with, and would not conflict with, applicable air quality policies of the General Plan’s Air Quality Element. Project operations would also not result in an increase in localized emissions of NO_x, CO, PM₁₀, and PM_{2.5} in excess of the SCAQMD-recommended localized significance thresholds at sensitive receptors in proximity to the Project Site and impacts would be less than significant.

The No Project/No Build Alternative would not involve any new construction or change current activities on the Project Site. Since new development would not occur, the No Project/No Build Alternative would not generate new emissions or cause the Air Basin’s criteria pollutant emissions to worsen so as to impede the objectives of the AQMP. Existing emissions from diesel trucks traveling to and from the existing cold storage facility would be unchanged. Accordingly, because the No Project/No Build Alternative would not result in any new emissions, no air quality impacts would occur. Thus, impacts with regard to conflicts with air quality management plans would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would be consistent with the goals of the AQMP regarding transportation control strategies for emissions reduction during construction and operation; it would be consistent with the City’s Air Quality Element that supports

pedestrian activity and growth within a TPA; it would implement CARB requirements to minimize short-term emissions from on-road and off-road diesel equipment, as well as implement all applicable SCAQMD Rules. Operation of the Project with the Deck Concept would also not result in an increase in localized emissions of NO_x, CO, PM₁₀, and PM_{2.5} in excess of the SCAQMD-recommended localized significance thresholds at sensitive receptors in proximity to the Project Site. Because the Project with the Deck Concept would not conflict with air quality management plans, impacts would be less than significant.

However, for the same reasons discussed under the Project, the No Project/No Build Alternative would result in no impacts related to conflicts with air quality management plans. Thus, impacts with regard to conflicts with air quality management plans would be less under the No Project/No Build Alternative compared to the Project with the Deck Concept.

(ii) *Cumulative Increase in Criteria Pollutants/Violation of Air Quality Standards*

(a) Construction

(i) *Project*

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, air emissions from Project construction on a maximum construction activity day would exceed the SCAQMD's regional significance thresholds for NO_x, and even with implementation of feasible mitigation measures, impacts would remain significant and unavoidable.

The No Project/No Build Alternative would not involve construction or generate any new criteria pollutants; therefore, no air quality impacts would occur. As such, the No Project/No Build Alternative would avoid the Project's potential exceedance of daily NO_x emissions during construction, which would remain significant and unavoidable after implementation of Mitigation Measure AQ-MM-1. Thus, impacts with regard to air quality thresholds would be less under the No Project/No Build Alternative than the Project.

(ii) *Project with the Deck Concept*

The Project with the Deck Concept would exceed SCAQMD's regional numerical significance thresholds for NO_x on a maximum construction activity day, even with implementation of Mitigation Measure AQ-MM-1. The Project with the Deck Concept would result in significant and unavoidable impacts with respect to air quality standards.

For the same reasons discussed under the Project, above, the No Project/No Build Alternative would avoid the Project with the Deck Concept's significant and unavoidable impacts. Thus, impacts with regard to air quality thresholds would be less under the No Project/No Build Alternative compared to the Project with the Deck Concept.

(b) Operation

(i) *Project*

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, the Project's operation would not cause an exceedance of SCAQMD numerical significance thresholds for NO_x, CO, SO_x, PM₁₀, and PM_{2.5}, and impacts would be less than significant. Volatile organic compounds (VOCs) emissions would be 84 pounds per day for the Project, which would exceed the daily impact threshold of 55 pounds per day, and Project impacts would be potentially significant. Even with implementation of feasible mitigation measures (Mitigation Measures AQ-MM-2 through AQ-MM-3 and TRAF-MM-1), which would reduce Project VOC emissions to 77 pounds per day, associated Project impacts would remain significant and unavoidable.

The No Project/No Build Alternative would not result in any new emissions over existing conditions and would have no impact relative to threshold standards. As such, the No Project/No Build Alternative would avoid the Project's significant impact related to daily VOCs during operation, which would remain significant and unavoidable after implementation of Mitigation Measures AQ-MM-2 through AQ-MM-3 and TRAF-MM-1. Thus, impacts with regard to air quality thresholds would be less under the No Project/No Build Alternative compared to the Project.

(ii) *Project with the Deck Concept*

The Project with the Deck Concept would emit criteria pollutants from mobile, stationary, and area sources. The Project with the Deck Concept would comprise the same residential and commercial uses as the Project, and include a 132,000-square-foot Deck. In addition to source and mobile emissions from the residential and commercial uses, the Deck would emit source emissions related to coatings and landscaping, as well as generate mobile emissions related to intermittent programmed activities. Unmitigated VOC emissions from these uses would be 88 pounds per day, thus, exceeding the daily impact threshold of 55 pounds per day. Even with implementation of feasible mitigation measures (Mitigation Measures AQ-MM-2 through AQ-MM-3 and TRAF-MM-1), which would reduce the Project with the Deck Concept's VOC emissions to 81 pounds per day, VOC levels would still exceed the impact threshold. Impacts under the Project with the Deck Concept would therefore remain significant and unavoidable.

For the same reasons discussed for the Project, above, the No Project/No Build Alternative would not result in any new emissions over existing conditions and would have no impact relative to the threshold standards. Therefore, the No Project/No Build Alternative would avoid the Project with the Deck Concept's significant and unavoidable impacts related to VOC emissions during operation. Thus, impacts with regard to cumulative increase in criteria pollutants and air quality standards would be less under the No Project/No Build Alternative than under the Project with the Deck Concept.

(iii) *Exposure of Sensitive Receptors to Pollutant Concentrations*

(a) Localized Emissions

(i) *Construction*

Project

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, given that NO_x, PM₁₀ and PM_{2.5} emissions would exceed the SCAQMD's localized thresholds, Project impacts would be potentially significant and would require implementation of Mitigation Measure AQ-MM-1 for impacts to be reduced to less-than-significant levels. The No Project/No Build Alternative would not involve any construction or increased activity at the Project Site compared to existing conditions. Accordingly, the No Project/No Build Alternative would not generate any localized emissions and would have no impact related to localized emissions. As such, impacts from the No Project/No Build Alternative would be less when compared to the impacts of the Project, which would be less than significant with mitigation. Thus, impacts with respect to localized emissions under the No Project/No Build Alternative would be less than the Project.

Project with the Deck Concept

Maximum daily construction activities under the Project with the Deck Concept would exceed the SCAQMD's localized emission thresholds for NO_x, PM₁₀ and PM_{2.5}, a potentially significant impact to sensitive receptors. This impact would be addressed through implementation of Mitigation Measure AQ-MM-1, which would reduce localized emission levels to levels that are less than significant.

For the same reasons discussed under the Project, above, the No Project/No Build Alternative would result in no impacts related to the exposure of sensitive receptors to substantial pollutant concentrations during construction. Such impacts would be less when compared to the impacts of the Project with the Deck Concept, which would be less than significant with mitigation. Thus, impacts with regard to conflicts with localized emission thresholds would be less under the No Project/No Build Alternative than under the Project with the Deck Concept.

(ii) *Operation*

Project

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, Project operation would not exceed the localized thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. Therefore, Project impacts related to localized operational emissions would be less than significant. As the No Project/No Build Alternative would not involve any changes to the existing uses on the Project Site, operation of the No Project/No Build Alternative would result in no localized

operational emissions and would have no impact. Therefore, operational impacts under the No Project/No Build Alternative would be less than the Project.

Project with the Deck Concept

The Project with the Deck Concept would emit criteria pollutants from mobile, stationary, and area sources. In addition to source and mobile emissions from residential and commercial uses, the Project with the Deck Concept would emit source emissions from the Deck, including architectural coating, consumer products and landscaping, and mobile emissions related to visitors to programmatic activities on the Deck. The operation of the Project with the Deck Concept would not exceed localized thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. Impacts under the Project with the Deck Concept with respect to localized emissions would be less than significant.

For the same reasons discussed under the Project, above, operation of the No Project/No Build Alternative would result in no localized operational emissions and would have no impact. Thus, impacts with regard to conflicts with localized emission thresholds would be less under the No Project/No Build Alternative than under the Project with the Deck Concept.

(b) Carbon Monoxide Hotspots

(i) *Project*

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, the Project's 27,040 daily vehicle trips and residential and commercial uses would not generate CO hotspots that would exceed emission thresholds. Impacts with respect to CO hotspots would be less than significant.

The No Project/No Build Alternative would not increase traffic or other activity at the Project Site compared to existing conditions. Accordingly, the No Project/No Build Alternative would not generate any emissions that would contribute to CO hotspots and would have no impact related to CO hotspots. Thus, impacts with respect to CO hotspots under the No Project/No Build Alternative would be less than the Project.

(ii) *Project with the Deck Concept*

Operation of the Project with the Deck Concept would emit CO pollutants from mobile, stationary, and area sources. Mobile source emissions under the Project with the Deck Concept would comprise 27,493 trips per day. The Project with the Deck Concept's daily vehicle trips and residential and commercial uses would not generate CO hotspots that would exceed emission thresholds. Impacts with respect to CO hotspots would be less than significant.

For the same reasons discussed under the Project, above, the No Project/No Build Alternative would not generate any emissions that would contribute to CO hotspots and would have no impact related to CO hotspots. Thus, impacts with regard to conflicts with

air quality thresholds would be less under the No Project/No Build Alternative than under the Project with the Deck Concept.

(c) Toxic Air Contaminants

(i) *Construction*

Project

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, the construction of the Project would result in diesel particulate matter (DPM) emissions resulting in toxic air contaminant (TAC) emissions adjacent to sensitive residential receptors. TAC levels under the Project would not exceed SCAQMD thresholds and, as such, sensitive receptors would not be exposed to substantial TAC concentrations. Impacts related to TAC emissions and health risk impacts would be less than significant. The No Project/No Build Alternative would not involve any construction, would not generate any TAC emissions during construction, and would have no impact related to TAC emissions. As such, impacts with regard to TAC emissions would be less under the No Project/No Build Alternative than the Project.

Project with the Deck Concept

Under the Project with the Deck Concept, maximum daily construction activity would generate DPM emissions resulting in TAC emissions adjacent to sensitive residential receptors. TAC levels, however, would not exceed SCAQMD thresholds and, as such, sensitive receptors would not be exposed to substantial TAC concentrations. Impacts related to TAC emissions and health risk impacts would be less than significant under the Project with the Deck Concept.

For the same reasons discussed under the Project, above, No Project/No Build Alternative would not involve any construction, would not generate any TAC emissions during construction, and would have no impact related to TAC emissions. Thus, impacts with regard to TAC emissions would be less under the No Project/No Build Alternative than under the Project with the Deck Concept.

(ii) *Operation*

Project

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, based on the uses expected on the Project Site, potential long-term operational impacts associated with the release of TACs would be minimal, regulated, and controlled, and would not be expected to exceed the SCAQMD significance threshold during operation, and Project impacts would be less than significant. The No Project/No Build Alternative would not involve any new or increased activity at the Project Site compared to existing conditions. Accordingly, the No Project/No Build Alternative would not generate any TAC emissions during operation and would have no impact related to TAC emissions. As such, impacts with regard to TAC emissions would be less under the No Project/No Build Alternative than the Project.

Project with the Deck Concept

During operation the Project with the Deck Concept would emit CO pollutants associated with stationary and area sources and mobile emissions. However, the release of TACs under the Project with the Deck Concept would be minimal, regulated, and controlled. Thus TACs would not exceed the SCAQMD significance threshold and impacts would be less than significant.

For the same reasons discussed under the Project, above, the No Project/No Build Alternative would not generate any TAC emissions during operation and would have no impact related to TAC emissions. Thus, impacts with regard to TAC emissions would be less under the No Project/No Build Alternative than under the Project with the Deck Concept.

(b) *Cultural Resources*

(i) *Historical Resources*

(a) Project

As discussed in Section IV.B, *Cultural Resources*, of this Draft EIR, there are no historical resources present on the Project Site. Regarding historical resources adjacent to the Project Site, under the Project, there would be potential for structural damage in addition to modifications to the 7th Street Bridge, and impacts on the 7th Street Bridge would be potentially significant. With implementation of Mitigation Measures CUL-MM-1 through CUL-MM-4 and NOISE-MM-6 through NOISE-MM-8, the Project would have less-than-significant direct and indirect impacts on the 7th Street Bridge.

The No Project/No Build Alternative would not change conditions on the Project Site. Therefore, the No Project/No Build Alternative would have no impact to historical resources, including the 7th Street Bridge. As such, impacts to historical resources would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

To accommodate Deck and roadway construction, the Project with the Deck Concept would require the removal of 291 linear feet of existing character-defining railing at the historic 7th Street Bridge, resulting in a potentially significant historical resources impact. Construction vibration could also impact the structural integrity of the 7th Street Bridge. Implementation of Mitigation Measures CUL-MM-1 through CUL-MM-4 and NOISE-MM-6 through NOISE-MM-8 would reduce these impacts to levels that would be less than significant.

For the same reasons discussed under the Project, above, the No Project/No Build Alternative would have no impact to historical resources, including the 7th Street Bridge. Thus, impacts with regard to historical resources would be less under the No Project/No Build Alternative than under the Project with the Deck Concept.

(ii) *Archaeological Resources*

(a) Project

As discussed in Section IV.B, *Cultural Resources*, of this Draft EIR, there are no known archaeological resources identified within the Project Site. Nonetheless, due to the Project Site's proximity to the Los Angeles River (which is a known landmark for prehistoric habitation), soil matrices, past historic-period uses, and only moderate past disturbances, grading and excavation for the Project's subterranean garage may encounter unknown archaeological resources. Therefore, excavation activities have the potential to disturb, damage, or degrade archaeological resources that could be encountered during construction, thus resulting in a substantial adverse change in the significance of an archaeological resource qualifying as a historical resource or unique archaeological resources pursuant to CEQA Guidelines Section 15064.5. Mitigation Measures CUL-MM-5 through CUL-MM-7 would be required to address potential environmental effects. With implementation of mitigation measures, Project impacts related to archaeological resources would be reduced to less-than-significant levels.

The No Project/No Build Alternative would not require any excavation activities with potential to encounter previously undiscovered archaeological resources. Accordingly, because the No Project/No Build Alternative would involve no excavation or ground disturbance, it would have no impact on archaeological resources. Thus, impacts related to archaeological resources would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

Excavation for the Project's with the Deck Concept's subterranean garage would constitute the vast majority of Project with the Deck Concept's excavation activity. A relatively limited amount of excavation would be required to install the piers that would support the Deck. Grading and excavation for the Project with the Deck Concept could encounter unknown archaeological resources. As such, the Project with the Deck Concept has the potential to disturb, damage, or degrade archaeological resources that could be encountered during excavation. Mitigation Measures CUL-MM-5 through CUL-MM-7 would be required to reduce impacts to archaeological resources under the Project with the Deck Concept. With implementation of these mitigation measures, impacts would be reduced to less than significant levels.

For the same reasons discussed under the Project, above, as the No Project/No Build Alternative would involve no excavation or ground disturbance, it would have no impact on archaeological resources. Thus, impacts with regard to archaeological resources would be less under the No Project/No Build Alternative than under the Project with the Deck Concept.

*(iii) Human Remains**(a) Project*

The Project would excavate to six subterranean levels. As discussed in Section IV.B, *Cultural Resources*, of this Draft EIR, no human remains were identified during the pedestrian survey of the Project Site, and no known human remains have been recorded within the Project Site or a 0.5-mile radius. In addition, with implementation of procedures codified in PRC Section 5097.98 and State Health and Safety Code Section 7050.5, impacts under the Project would be less than significant.

The No Project/No Build Alternative would involve no construction or excavation; therefore, it would have no potential to encounter human remains. Accordingly, because the No Project/No Build Alternative would involve no excavation or ground disturbance, it would have no impact on human remains. Thus, impacts related to human remains would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would excavate to six subterranean levels. A relatively limited amount of excavation would be required to install the piers that would support the Deck. Although no human remains have been recorded within the Project Site or within a 0.5-mile radius of the Project Site, all excavation activity has the potential to encounter unrecorded human remains. In the event that any human remains are recovered, the Project with the Deck Concept would implement procedures codified in PRC Section 5097.98 and State Health and Safety Code Section 7050.5. Implementation of these procedures would ensure appropriate handling of any recovered human remains and that any impacts to human remains would be less than significant.

For the same reasons discussed under the Project, above, the No Project/No Build Alternative would result in no impacts to human remains. Thus, impacts with regard to human remains would be less under the No Project/No Build Alternative than under the Project with the Deck Concept.

*(c) Energy**(i) Efficient Energy Consumption**(a) Project*

As discussed in Section IV.C, *Energy*, of this Draft EIR, construction of the Project would utilize fuel-efficient equipment consistent with State and federal regulations, such as fuel efficiency regulations in accordance with the CARB Pavley Phase II standards, the anti-idling regulation in accordance with CCR Title 13, Section 2485 and fuel requirements in accordance with CCR Title 17, Section 93115, and would comply with State measures to reduce the inefficient, wasteful, and unnecessary consumption of energy, such as petroleum-based transportation fuels. Construction would utilize energy only for

necessary on-site activities and to transport construction materials and demolition debris to and from the Project Site, and impacts would be less than significant. During operation, the Project incorporates Project Design Feature GHG-PDF-1 (Green Building Features), which includes building features to achieve the Leadership in Energy and Environmental Design (LEED) Silver Certification level or equivalent green building standards. The Project would incorporate Project Design Feature WS-PDF-1 (Water Conservation Features) to minimize water demand and associated energy needed for water conveyance. The Project would provide for the installation of the conduit and panel capacity to accommodate future electric vehicle (EV) charging stations. Additionally, the Project's mixed-use design and its increase in density on an infill site within an HQTAs and in proximity to transit would achieve a reduction in VMT. Therefore, operation of the Project would not result in wasteful, inefficient, and unnecessary consumption of energy, and impacts would be less than significant.

The No Project/No Build Alternative would not involve any changes on the Project Site that would increase demand for energy compared to existing conditions. Accordingly, because the No Project/No Build Alternative would not involve any new development or increase energy use, it would have no impact regarding energy consumption. Thus, impacts with regard to energy consumption would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would require electricity and natural gas for operation of facilities, electricity for outdoor lighting associated with the temporary programming on the Deck, and fuel for transportation. With the addition of the Deck during the last phase of construction, the Project with the Deck Concept would continue to use energy related to construction activities longer than under the Project. The Project with the Deck Concept would also incorporate Project Design Feature GHG-PDF-1 (Green Building Features), which includes building features to achieve the LEED Silver Certification level or equivalent green building standards. The Project with the Deck Concept would also incorporate Project Design Feature WS-PDF-1 (Water Conservation Features) to minimize water demand and associated energy needed for water conveyance. The Project with the Deck Concept would provide for the installation of the conduit and panel capacity to accommodate future EV charging stations. Additionally, the Project with the Deck Concept's mixed-use design and its increase in density on an infill site within an HQTAs and in proximity to transit would achieve a reduction in VMT. Therefore, operation of the Project with the Deck Concept would not result in wasteful, inefficient, and unnecessary consumption of energy, and impacts would be less than significant.

For the same reasons discussed under the Project, above, because the No Project/No Build Alternative would not involve any new development or increase energy use, it would have no impact regarding energy consumption. Thus, impacts with regard to the efficient use of energy would be less under the No Project/No Build Alternative than the Project with the Deck Concept.

(ii) *Conflict with Plans for Renewable Energy or Energy Efficiency*

(a) Project

As discussed in Section IV.C, *Energy*, of this Draft EIR, the Project's design would comply with existing energy standards and incorporate project design features to reduce energy consumption. The Project would support and promote the use of renewable energy and energy efficiency and would result in less-than-significant impacts. The Project would be consistent with and not conflict with regional planning strategies that address energy conservation. Therefore, impacts would be less than significant.

The No Project/No Build Alternative would not be subject to review pursuant to plans for renewable energy and energy efficiency, and, therefore, no impact regarding conflict with such plans would occur. As such, impacts with respect to conflicts with plans for renewable energy or energy efficiency would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would comply with existing energy standards and incorporate design features to reduce energy consumption. The Project with the Deck Concept would support and promote the use of renewable energy and energy efficiency and impacts as discussed above. As such, the Project with the Deck Concept would be consistent and not conflict with regional planning strategies that address energy conservation. Impacts relating to renewable energy and energy efficiency plans would be less than significant.

For the same reasons discussed under the Project, above, the No Project/No Build Alternative would not be subject to review pursuant to plans for renewable energy and energy efficiency, and, therefore, no impact regarding conflict with such plans would occur. Thus, impacts with regard to the conflict with plans for renewable energy or energy efficiency would be less under the No Project/No Build Alternative.

(d) *Geology and Soils*

(i) *Seismic Hazards*

(a) Project

As discussed in Section IV.D, *Geology and Soils*, of this Draft EIR, the Project Site is not located within an Alquist-Priolo Special Studies Zone (earthquake fault zone) or in proximity to any identified active faults. The Project would implement the Los Angeles Building Code's seismic safety regulations, as well as California Building Code (CBC) regulations related to specific seismic zones. Because of the Project Site's distance from active faults and the Los Angeles Department of Building and Safety's enforcement of state and local seismic safety regulations in building design, the Project would not directly

or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault; strong seismic ground shaking; seismic-related ground failure; and landslides. Therefore, Project impacts would be less than significant.

The No Project/No Build Alternative would not require any new development at the Project Site or increase or change exposure to existing environmental conditions, such as fault rupture, seismic shaking, liquefaction, or other geologic hazards. Accordingly, because the No Project/No Build Alternative would not require any new development or earthwork, it would not change the existing exposure to geologic conditions and no impacts would occur. Thus, impacts related to seismic hazards would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

The Project Site is not located within an Alquist-Priolo Special Studies Zone (earthquake fault zone) or in proximity to any identified active faults. The Project with the Deck Concept would implement the Los Angeles Building Code's seismic safety regulations, as well as CBC regulations related to specific seismic zones. Because of the Project Site's distance from active faults and the Los Angeles Department of Building and Safety's enforcement of state and local seismic safety regulations in building design, including the design of the Deck structure, impacts with respect to earthquake fault rupture, ground shaking, or fault-induced landslide under the Project with the Deck Concept would be less than significant.

For the reasons discussed under the Project, above, because the No Project/No Build Alternative would not require any new development or earthwork, it would not change the existing exposure to geologic conditions and no impacts would occur. Thus, impacts with regard to seismic hazards would be less under the No Project/No Build Alternative than under the Project with the Deck Concept.

(ii) *Soil Erosion or Loss of Topsoil*

(a) Project

As discussed in Section IV.D, *Geology and Soils*, of this Draft EIR, Project construction increase the exposure of excavated soils to potential erosion. The Project would comply with applicable code and regulatory requirements, including Best Management Practices (BMPs) as required under the Stormwater Pollution Prevention Plan (SWPPP) that control erosion of soils. With such compliance, impacts associated with substantial erosion or loss of topsoil during Project construction would be less than significant. Project operation would have no impact related to erosion and loss of topsoil.

The No Project/No Build Alternative would not require any new construction activity or exposure of soils due to construction. Accordingly, because the No Project/No Build Alternative would not involve any construction activity or earthwork, it would not cause the potential exposure of soil or loss of topsoil, and no impacts would occur. Thus, impacts

related to soil erosion or loss of topsoil would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

Construction activities under the Project with the Deck Concept would increase the exposure of excavated soils to potential erosion. The Project with the Deck Concept would comply with code and regulatory requirements related to grading and reduction of exposures and loss of soils. These include BMPs associated with the SWPPP required for grading operations on the Project Site. The SWPPP includes measures to control erosion of all exposed soils. With compliance with regulations, impacts associated with substantial erosion or loss of topsoil under the Project with the Deck Concept during construction would be less than significant. Operation of the Project with the Deck Concept would have no impact related to erosion and loss of topsoil.

For the reasons discussed under the Project, above, the No Project/No Build Alternative would not require any construction activity or result in an increase in exposure to soils and no impacts would occur. Thus, impacts with regard to soil erosion or loss of top soil would be less under the No Project/No Build Alternative than under the Project with the Deck Concept.

(iii) *Unstable Geologic Units*

(a) Project

As discussed in Section IV.D, *Geology and Soils*, of this Draft EIR, the Project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, Project impacts would be less than significant.

The No Project/No Build Alternative would not include any new development that would expose more people or structures to unstable geologic units, such as localized raveling or caving of excavated areas. Accordingly, because the No Project/No Build Alternative would not involve any new structures or excavation activity, it would not expose people or structures to unstable geologic units, and no impacts would occur. Thus, impacts related to unstable geologic units would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

As discussed in Section IV.D, *Geology and Soils*, of this Draft EIR, the Project with the Deck Concept would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project with the Deck Concept, or potentially result in soil or earth failures, such as on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, impacts related to unstable geologic units under the Project with the Deck Concept would be less than significant.

For the reasons discussed under the Project, above, the No Project/No Build Alternative would not cause any construction activity or result in an increase in exposure to geologic conditions and, as such, no impacts would occur. Thus, impacts with regard to unstable geologic units would be less under the No Project/No Build Alternative than under the Project with the Deck Concept.

(iv) *Expansive Soils*

(a) Project

As discussed in Section IV.D, *Geology and Soils*, of this Draft EIR, the Project would not be located on expansive soil creating substantial risks to life or property caused in whole or in part by its exacerbating the expansive soil conditions, and impacts would be less than significant.

The No Project/No Build Alternative would not include any new development that would expose more people or structures to geologic hazards, such as expansive soils. Accordingly, because the No Project/No Build Alternative would not involve any new structures on the Project Site, it would not expose people or structures to geologic hazards, such as expansive soils, and no impacts would occur. Thus, impacts related to expansive soils would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would not be located on expansive soils or be subject to foundation and infrastructure failure associated with expansive soils. No expansion-prone (clay-containing) soils are located within the Project Site. Impacts related to expansive soils under the Project with the Deck Concept would be less than significant.

For the reasons discussed under the Project, above, the No Project/No Build Alternative would not require any construction activity or result in an increase in exposure to soil conditions, and no impacts would occur. Thus, impacts with regard to expansive soils would be less under the No Project/No Build Alternative than under the Project with the Deck Concept.

(v) *Paleontological Resources*

(a) Project

As discussed in Section IV.D, *Geology and Soils*, of this Draft EIR, Project-related grading and excavation for the subterranean parking structure may encounter native soils and sediment. These soils and sediment have a high potential for containing previously unknown buried paleontological resources and, as such, excavation could directly or indirectly destroy a unique paleontological resource. Mitigation would be required and, with implementation of Mitigation Measures GEO-MM-1 through GEO-MM-4, Project impacts would be reduced to a level that would be less than significant.

The No Project/No Build Alternative would not require any construction activities; therefore, it would have no potential to encounter previously undiscovered paleontological resources, and there would be no impact on paleontological resources. Thus, impacts related to paleontological resources would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

Grading and excavation for the Project with the Deck Concept may encounter unknown paleontological resources. As such, excavation for the Project with the Deck Concept has the potential to disturb, damage, or degrade paleontological resources that could be encountered during construction and, thus, could result in a substantial adverse change in the significance of a paleontological resource. Mitigation would be required and, with implementation of Mitigation Measures GEO-MM-1 through GEO-MM-4 under the Project with the Deck Concept, impacts to paleontological resources resulting in a substantial adverse change in the significance of a paleontological resource would be less than significant.

For the same reasons discussed under the Project, above, the No Project/No Build Alternative would not require any construction activities; therefore, it would have no potential to encounter previously undiscovered paleontological resources, and there would be no impact on paleontological resources. Thus, impacts with regard to paleontological resources would be less under the No Project/No Build Alternative than under the Project with the Deck Concept.

(e) *Greenhouse Gas Emissions*

(i) *Conflict with Applicable Plans, Policies, Regulations, or Recommendations*

(a) Project

As discussed in Section IV.E, *Greenhouse Gas Emissions*, of this Draft EIR, the Project would be generally consistent with regulations and policies and comply with or exceed the regulations and reduction actions/strategies outlined in the Climate Change Scoping Plan, 2020–2045 RTP/SCS, the L.A.’s Green New Deal (Sustainable City pLAn 2019), and the Los Angeles Green Building Code. Impacts related to GHG emissions would be less than significant.

Because the No Project/No Build Alternative would not involve new construction or a change in GHG emission-producing activity over existing conditions, it would result in no impacts regarding conflicts with applicable plans, policies, or regulations adopted for the purpose of reducing GHGs. Thus, impacts related to GHGs would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would be consistent with applicable regulations and policies and comply with or exceed the regulations and reduction actions/strategies outlined in the Climate Change Scoping Plan, 2020–2045 RTP/SCS, the L.A.’s Green New Deal (Sustainable City pLAn 2019), and the Los Angeles Green Building Code. Impacts related to GHG policies under the Project with the Deck Concept would be less than significant.

For the same reasons discussed under the Project, above, as the No Project/No Build Alternative would not involve new construction or a change in GHG emission-producing activity over existing conditions, it would result in no impacts regarding conflicts with applicable plans, policies, or regulations adopted for the purpose of reducing GHGs. Thus, impacts with regard to the conflict with GHG plans, policies, regulations, and recommendations would be less under the No Project/No Build Alternative.

(f) *Hazards and Hazardous Materials*(i) *Hazard to the Public or the Environment through the Routine Transport, Use, or Disposal of Hazardous Materials*

(a) Project

As discussed in Section IV.F, *Hazards and Hazardous Materials*, of this Draft EIR, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Construction and occupancy of the Project would include demolition of existing structures, which may contain asbestos and other hazardous materials; construction equipment and materials, which may contain oils, paints, caustics, and other hazardous materials; and the limited use of potentially hazardous materials typically used in residences, offices, and restaurants. Such materials would be used, stored, and disposed of in consumer quantities and in accordance with applicable laws and regulations and manufacturers’ instructions and impacts would be less than significant. The No Project/No Build Alternative would not involve any changes in existing conditions or the use, transport, or disposal of hazardous materials. Accordingly, because the No Project/No Build Alternative would not involve new construction or changes in site activity over existing conditions, it would result in no impacts regarding potential hazards to the public or the environment through the routing transport, use, or disposal of hazardous materials. Thus, impacts related to hazardous materials would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. As with the Project, impacts related to hazards and hazardous materials under the Project with the Deck Concept would be less than significant.

For the same reasons discussed under the Project, above, the No Project/No Build Alternative would not involve any changes in existing conditions or the use, transport, or disposal of hazardous materials. Accordingly, because the No Project/No Build Alternative would not involve new construction or changes in site activity over existing conditions, it would result in no impacts regarding potential hazards to the public or the environment through the routing transport, use, or disposal of hazardous materials. Thus, impacts with regard to transport, use, and handling of hazardous would be less under the No Project/No Build Alternative than the Project with the Deck Concept.

(ii) *Hazard to the Public or Environment Involving the Accidental Release of Hazardous Materials into the Environment*

(a) Project

As discussed in Section IV.F, *Hazards and Hazardous Materials*, of this Draft EIR, soil excavation at the Project Site during construction could expose construction workers and the environment to elevated concentrations of hazardous materials present in the soil. As such, impacts would be potentially significant. The Project would require the implementation of Mitigation Measures HAZ-MM-1 and HAZ-MM-2, which would ensure the proper management of contaminated soils and to reduce the risk of impacts to construction workers, the public, and the environment, and impacts would be reduced to a less-than-significant level.

The No Project/No Build Alternative would not involve construction or alter existing activities on the Project Site; therefore, it would not change the potential for an accidental release of hazardous materials into the environment compared to existing conditions. Accordingly, because the No Project/No Build Alternative would not involve new construction, activity, or uses that would create a hazard to the public involving the accidental release of hazardous materials into the environment, it would have no impact related to this hazard. Thus, impacts related to hazardous materials release would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

In addition to potential impacts on the Project Site associated with elevated concentrations of hazardous materials present in the soil, additional contaminated soil impacts may occur in the Railway Properties which could potentially contain herbicides, hydrocarbons, metals, creosote, naphthalene associated with railroad activities. The Project with the Deck Concept would implement Mitigation Measure HAZ-MM-3 to address additional unknown contamination or soil gas levels during performed earthwork at the Railway Properties. Mitigation Measure HAZ-MM-3 requires soil sampling at the Railway Properties prior to construction of the Deck. The Project with the Deck Concept would also implement Mitigation Measures HAZ-MM-1 and HAZ-MM-2 in the event of elevated contaminant levels that exceed applicable regulatory standards. With the implementation of mitigation measures, impacts related to release of hazardous materials

into the environment under the Project with the Deck Concept would be less than significant.

For the reasons discussed under the Project above, because the No Project/No Build Alternative would not involve new construction, activity, or uses that would create a hazard to the public involving the accidental release of hazardous materials into the environment, it would have no impact related to this hazard. Thus, impacts related to the accidental release of hazardous materials would be less under the No Project/No Build Alternative.

(iii) *Hazards Resulting from Hazardous or Acutely Hazardous Materials, Substances, or Waste within One-Quarter Mile of a School*

(a) Project

As discussed in Section IV.F, *Hazards and Hazardous Materials*, of this Draft EIR, there are no existing or proposed schools within one-quarter mile of the Project Site. Therefore, impacts would be less than significant.

The No Project/No Build Alternative would not involve construction or alter existing activities on the Project Site, which could involve hazardous materials or emissions near a school. Accordingly, because the No Project/No Build Alternative would not require the use of hazardous materials or involve hazardous emissions, it would have no impact related to this hazard. Thus, impacts related to the release of hazardous materials or emissions near a school would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

No existing or proposed schools are located within one-quarter mile of the Project Site under the Project with the Deck Concept. Therefore, impacts related to the Project with the Deck Concept would be less than significant.

The No Project/No Build Alternative would not require the use of hazardous materials or generate hazardous emissions, it would have no impact related to this hazard, and impacts related to the release of hazardous materials or emissions near a school would be less under the No Project/No Build Alternative compared to the Project with the Deck Concept.

(iv) *Hazardous Materials Sites*

(a) Project

As discussed in Section IV.F, *Hazards and Hazardous Materials*, of the Draft EIR, although the Project Site is located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, the listing is a

permit for air emissions for a former textile manufacturing facility. The facility had no records of violations and is no longer operating at the Project Site, and impacts would be less than significant.

The No Project/No Build Alternative would not involve construction or alter existing activities on a hazardous materials site compiled pursuant to Government Code Section 65962.5. Accordingly, the No Project/No Build Alternative would have no impact with regard to development occurring on a hazardous materials site. Thus, impacts related to development on a hazardous materials site would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

The Project Site is located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The listing is a permit for air emissions for a former textile manufacturing facility. Because the facility had no record of violations and is no longer operating at the Project Site, the Project Site is not considered to be a hazardous materials site. Although the Project with Deck Concept extends the Project Site over a portion of the freight and passenger rail lines and rail yards where footings to support the Deck would be located, the Railyard Property is not identified as a listed hazardous materials violation site in the Project's Phase I Environmental Site Assessment (ESA).²² As such, impacts related to hazardous materials violation sites for the Project with the Deck Concept would be less than significant.

For the reasons discussed under the Project, above, the No Project/No Build Alternative would have no impact with regard to development occurring on a hazardous materials site. Thus, impacts related development on a hazardous materials site would be less than the Project with the Deck Concept.

(v) *Emergency Response Plan/Emergency Evacuation Plan*

(a) Project

As discussed in Section IV.F, *Hazards and Hazardous Materials*, of the Draft EIR, no City-designated Selected Disaster Routes border the Project Site, and the Project would not physically alter the City's designated disaster routes. Project construction would implement Project Design Feature TRAF-PDF-1 to ensure that adequate access for emergency vehicles would be maintained. Project operation would ensure that site accessibility and design would be reviewed and approved by the Los Angeles Fire Department (LAFD) to ensure that emergency response and access would be maintained. Impacts would be less than significant.

²² Rincon Consultants, Inc., *Phase I ESA*, September 6, 2016, page 10, Table 2, EDR Listing of Select Sites within One-Eighth Mile of the Subject Site, Appendix G-1, of this EIR.

The No Project/No Build Alternative would not require any new construction activities or occupancy of the Project Site that would affect an existing Emergency Operations Plan or the City's established disaster routes. Accordingly, because the No Project/No Build Alternative would not involve any new development, and would not change existing conditions or affect the implementation of the City's emergency response or evacuation plans, no impacts would occur. Thus, impacts related to emergency response and evacuation plans would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

No City-designated Selected Disaster Routes border the Project Site, and the Project with the Deck Concept would not physically alter the City's designated disaster routes. The Project with the Deck Concept would implement Project Design Feature TRAF-PDF-1 to ensure that adequate access for emergency vehicles. Project plans would be reviewed and approved by the LAFD to ensure that emergency response and access would be maintained. Impacts under the Project with the Deck Concept would be less than significant.

For the reasons described under the Project, above, the No Project/No Build Alternative would have no impact on existing Emergency Operations Plan or the City's established disaster routes, and impacts would be less than the Project with the Deck Concept.

(g) *Hydrology and Water Quality*

(i) *Water Quality*

(a) Construction

(i) *Project*

As stated in Section IV.G, *Hydrology and Water Quality*, of the Draft EIR, construction activities, including earth moving, maintenance/operation of construction equipment, potential dewatering, and handling/storage/disposal of materials, could contribute to pollutant loading in stormwater runoff from the construction site. Also, wind could convey exposed and stockpiled soils at the construction site into nearby storm drains during storm events, and on-site water activities for dust suppression purposes could contribute to pollutant loading in runoff from the construction site. As such, contaminated soils could be encountered during construction of the Project, and therefore, impacts would be potentially significant. The Project would implement Mitigation Measure HAZ-MM-2 to remove contaminated soil and/or groundwater encountered during construction to prevent the release of hazardous materials into the environment. The Project would also implement a SWPPP as required by the State of California for all Projects more than one acre in area. The SWPPP specifies BMPs and erosion control measures to be used during construction to prevent pollution, to contain and treat, as necessary, stormwater or construction watering on the Project Site so runoff does not impact off-site drainage facilities or receiving waters. Further, if grading activities occur during the rainy season

(October 1 through April 14), a Wet Weather Erosion Control Plan (WWECP) would be prepared that would include BMPs to address potential erosion effects. With the implementation HAZ-MM-2 and SWPPP measures, impacts related to the exposure of surface water to contamination under the Project would be less than significant.

The No Project/No Build Alternative would not involve any construction and, as such, would not cause surface or groundwater exposure to pollutants during construction that would violate water quality or waste discharge standards. Accordingly, because the No Project/No Build Alternative would not involve any construction, it would have no impact on surface or groundwater quality. Thus, impacts related to water quality during construction would be less under the No Project/No Build Alternative than the Project.

(ii) Project with the Deck Concept

Under the Project with the Deck Concept, construction activities, including earth moving, maintenance/operation of construction equipment, potential dewatering, and handling/storage/disposal of materials, could contribute to pollutant loading in stormwater runoff from the construction site. Also, wind could convey exposed and stockpiled soils at the construction site into nearby storm drains during storm events, and on-site water activities for dust suppression purposes could contribute to pollutant loading in runoff from the construction site. As such, contaminated soils could be encountered during construction of the Project with the Deck Concept and, therefore, impacts would be potentially significant. In addition, because the Project with the Deck Concept extends to the construction of footings across the railroad tracks, potential exposure of contaminated soils would be slightly greater than under the Project. The Project with the Deck Concept would implement Mitigation Measure HAZ-MM-2 to address impacts regarding water quality as well as implement a SWPPP as required by the State of California for all Projects more than one acre in area. The SWPPP specifies BMPs and erosion control measures to be used during construction to prevent pollution, to contain and treat, as necessary, stormwater or construction watering on the Project Site so runoff does not impact off-site drainage facilities or receiving waters. Further, if grading activities occur during the rainy season (October 1 through April 14), a WWECP would be prepared that would include BMPs to address potential erosion effects. With the implementation HAZ-MM-2 and SWPPP measures, impacts related to the exposure of surface water to contamination under the Project with the Deck Concept, would be less than significant.

However, because the No Project/No Build Alternative would not require any new construction activities or occupancy of the Project Site that would affect exposure of buried contaminated soils, no impacts would occur. As such, impacts under the No Project/No Build Alternative related to water quality would be less than the Project with the Deck Concept.

(b) Operation

(i) *Project*

As stated in Section IV.G, *Hydrology and Water Quality*, of the Draft EIR, the existing Project Site was developed prior to the enforcement of storm water quality BMP design, implementation, and maintenance. The Project Site currently does not implement BMPs and has no means for treatment of stormwater runoff. The Project would implement Low Impact Development (LID) BMPs to improve the quality of stormwater runoff discharged from the Project Site compared to existing conditions, and impacts would be less than significant.

The No Project/No Build Alternative would not include water treatment features and BMPs in accordance with current regulations that improve the quality of stormwater runoff. Although beneficial improvements would not occur under the No Project/No Build Alternative, because no changes or environmental impacts would occur under the No Project/No Build Alternative, impacts related to water quality during operation would be less than under the Project.

(ii) *Project with the Deck Concept*

During operation, the Project with the Deck Concept would implement LID BMPs to collect and treat surface runoff and stormwater discharged from the Project Site. Runoff from the 132,000-square-foot Deck surface would also be collected and subject to the City's water quality BMPs. Although the proposed Deck would extend over a portion of the freight and passenger rail lines and rail yards, gradient changes, collection, or other BMPs would not be provided at grade level across the railroad tracks. However, with the treatment of surface runoff and implementation of LID BMPs within the Project Site and Deck surface, the quality of stormwater runoff discharged from the Project Site and, ultimately, to the Los Angeles River would be substantially improved compared to existing conditions. Impacts related to water quality standards under the Project with the Deck Concept would be less than significant.

The No Project/No Build Alternative would not include water treatment features and BMPs that improve the quality of stormwater runoff. Although beneficial improvements would not occur under the No Project/No Build Alternative, because no changes or environmental impacts would occur under the No Project/No Build Alternative, impacts related to water quality during operation would be less than under the Project with the Deck Concept.

(ii) *Decreases in Groundwater Supplies or Recharge*

(a) Project

As stated in Section IV.G, *Hydrology and Water Quality*, of the Draft EIR, Project construction would not impede sustainable groundwater management of the groundwater basin. The Project would not include new injection or supply wells and does not include

the installation or operation of water wells or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well or spreading ground facility. Excavation depths for the subterranean garage under the Project would extend from 61 to 68 feet below grade and reach depths of 75 feet below grade in some areas. This depth could intercept the groundwater table, which is estimated to be 57 to 61 feet below grade. Thus, construction activities would potentially require the removal and discharge of ground water. However, dewatering during construction would be temporary and would not result in the substantial removal of groundwater that would reduce the local groundwater table. Further, dewatering would not continue during operation (post-construction). As such, the Project would not result in a substantial decrease in groundwater supplies or substantially interfere with groundwater recharge. Because groundwater removal would be temporary during construction only, impacts related to substantial decreases in groundwater supplies and recharge would be less than significant.

The No Project/No Build Alternative would result in no changes to the Project Site and, as such, would have no impact on groundwater supplies or recharge. Accordingly, because the No Project/No Build Alternative would not involve any construction, it would have no impact on groundwater supplies or recharge during construction or operation. Thus, impacts related to groundwater supplies or recharge would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

Construction of the Project with the Deck Concept would not impede sustainable groundwater management of the groundwater basin. The Project with the Deck Concept would not include new injection or supply wells. It would not involve the installation or operation of water wells or any extraction or recharge system in the vicinity of the coast or in an area of known groundwater contamination or seawater intrusion. The Project with the Deck Concept would not be located in the vicinity of a municipal supply well or spreading ground facility. The piers for the deck would potentially intercept the groundwater table. Thus, construction activities would potentially require the removal and discharge of ground water. However, dewatering during construction would be temporary and would not result in the substantial removal of groundwater that would reduce the local groundwater table. Further, dewatering would not continue during operation (post-construction). As such, the Project with the Deck Concept would not result in a decrease in groundwater supplies or substantially interfere with groundwater recharge. Because groundwater removal would be temporary during construction only, impacts related to decreases in groundwater supplies and recharge would be less than significant.

The No Project/No Build Alternative would not result in any changes to the Project Site and, as such, would have no impact on groundwater supplies or recharge during construction or operation. Accordingly, because the No Project/No Build Alternative would not involve any construction, it would have no impact on groundwater supplies or recharge during construction or operation. Thus, impacts related to groundwater supplies

or recharge would be less under the No Project/No Build Alternative than the Project with the Deck Concept.

(iii) *Alteration of Drainage Patterns*

(a) Construction

(i) *Project*

As discussed in Section IV.G, *Hydrology and Water Quality*, of this Draft EIR, during Project construction, flow directions and runoff volumes would be controlled as required under the SWPPP BMPs. In addition, the Project would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion and to control runoff from the Project Site during the construction period. The Project would adhere to compliance measurements to avoid flooding, substantially increasing or decreasing the amount of surface water flow from the Project Site into a water body, or a permanent, adverse change to the movement of surface water. No existing streams or river courses would be altered by the Project. Therefore, impacts from Project construction with respect to drainage patterns, siltation, erosion, and surface runoff would be less than significant.

The No Project/No Build Alternative would not involve any construction and, as such, would not alter existing surface runoff or drainage patterns resulting in on- or off-site erosion, siltation or flooding; increased rate or flow in surface runoff; or the exceedance of the capacity of the area's drainage system. Accordingly, the No Project/No Build Alternative would have no impact with respect to drainage patterns, siltation, erosion, and surface runoff. Thus, impacts related to drainage patterns, siltation, erosion, and surface runoff during construction would be less under the No Project/No Build Alternative than the Project.

(ii) *Project with the Deck Concept*

The Project with the Deck Concept would control flow directions and runoff volumes during construction as required under the required SWPPP BMPs and erosion control measures to manage runoff flows and avoid on- or off-site flooding. In addition, the Project with Deck Concept would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion and to control runoff from the Project Site during the construction period. The Project with the Deck Concept would adhere to compliance measurements to avoid any runoff that would substantially increase or decrease the amount of surface water flow from the Project Site into a water body or a cause a permanent, adverse change to the movement of surface water. No existing streams or river courses would be altered by the Project with the Deck Concept. Therefore, with adherence to existing regulations, impacts related to drainage patterns under the Project with the Deck Concept during construction would be less than significant.

However, for the reasons discussed for the Project above, the No Project/No Build Alternative would not involve any construction and would have no impact with respect to drainage patterns. Thus, impacts related to drainage patterns during construction would be less under the No Project/No Build Alternative than the Project with the Deck Concept.

(b) Operation

(i) *Project*

As discussed in Section IV.G, *Hydrology and Water Quality*, of this Draft EIR, Project operation would increase the peak flow rate of stormwater runoff due to the increase in impervious surfaces compared to existing conditions; however, implementation of the proposed LID BMPs would reduce the volume of stormwater runoff discharged from the Project Site and would improve the quality of stormwater runoff leaving the Project Site. Therefore, impacts from Project operation would be less than significant. During operation, the 50-year peak flow rate of stormwater runoff from the 5.46-acre Project Site would increase slightly from approximately 17.21 cfs to 17.25 cfs (a 0.04-cfs increase or 0.2 percent) due to the increase (albeit small) in impervious surfaces compared to existing conditions. However, the overall volume of stormwater runoff from the Project Site discharged to the municipal storm drain system would decrease compared to existing conditions, as a result of the implementation of LID BMPs per City requirements, which would capture, store, and infiltrate the first rainfall on-site, more than off-setting the increase in impervious area and associated runoff. In addition, this would reduce the potential for on-site and off-site flooding.

Drainage patterns for much of the Project Site would generally be unchanged, except that runoff would no longer be discharged via sheet flows off-site to the east, and the first stormwater falling on the Project Site would be directed to BMP facilities on-site.

The No Project/No Build Alternative would not change the Project Site's existing surface runoff conditions, which generally consist of impervious surface parking, buildings, and pavement for pedestrian and vehicular circulation. Accordingly, because the No Project/No Build Alternative would not involve any construction, it would have no impact related to drainage patterns, siltation, erosion, and surface runoff. However, unlike the Project, beneficial impacts related to improving the quality of stormwater runoff as a result of the implementation of water treatment features and BMPs in accordance with current regulations would not occur under the No Project/No Build Alternative. Although no benefits related to drainage patterns, siltation, erosion, and surface runoff would occur under the No Project/No Build Alternative, because the No Project/No Build Alternative would have no environmental effect during operation, impacts related to surface drainage would be less than under the Project.

(ii) *Project with the Deck Concept*

The Project with the Deck Concept would include a 132,000-square foot Deck (an approximately 3.01-acre surface area) across the Railway Properties. This area is currently considered 99 percent pervious. The Project with the Deck Concept would

increase impervious surfaces on the Project Site. Approximately 96 percent of the Project Site under the Project with Deck Concept would be impervious, leaving little opportunity for erosion or siltation. Due to the increase in impervious area resulting from construction of the Deck, the 50-year peak flow rate of stormwater runoff from the 8.47-acre area encompassing the 5.46-acre Project Site (without the Railway Properties) plus the 3.01-acre area (Railway Properties) covered by the Deck would increase from an estimated 26.31 cfs to 26.79 cfs (a 0.48 cfs or 1.8 percent increase). Some of the runoff captured and discharged from the Deck, as with Project, would be, stored and infiltrated into on-site soils by BMP facilities intended to treat the first flush of stormwater. However, as the drainage pattern of the Project Site would be substantially altered with development of the Project with the Deck Concept, potentially significant impacts could occur related to on- or off-site flooding, exceeding the capacity of existing stormwater drainage systems, or providing substantial additional sources of polluted runoff. While the Project with the Deck Concept would increase impervious surfaces on the Project Site, approximately 96 percent of the Project Site under the Project with Deck Concept would be impervious, leaving little opportunity for erosion or siltation.

The remaining runoff not captured by the BMP facilities would be discharged from the Deck to the municipal storm drain system in Mesquit Street, Jesse Street, and 7th Street, and ultimately discharge to the Los Angeles River. In accordance with standard City practice, detailed drainage construction plans would be completed during the construction document development phase and, in the event this assessment identifies potential for exceedance of the capacity of the municipal stormwater drainage system, upgrades to the system would be required. Improvements could include an expanded on-site LID system, or reconstruction and upgrades to the existing catch basins in Mesquit Street, the 15-inch storm main in Jesse Street, and the 24-inch storm lateral on 7th Street. Through compliance with Bureau of Engineering (BOE) requirements during the plan check approval process, any potential for the rate or amount of surface runoff to result in flooding, would be reduced to a level that would be less than significant.

For the reasons described under the Project, above, the No Project/No Build Alternative unlike the Project would not have the beneficial impact related to water treatment features and BMPs in accordance with current regulations. Although no benefits related to surface runoff would occur under the No Project/No Build Alternative, because the No Project/No Build Alternative would have no environmental effect during operation, impacts related to surface drainage would be less than under the Project with the Deck Concept.

(iv) *Conflict with or Obstruct Implementation of Water Quality Control Plans*

(a) Project

As discussed in Section IV.G, *Hydrology and Water Quality*, of this Draft EIR, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan during operation of the Project. However, as contaminated soils could impact the groundwater that underlies the Project Site,

construction of the Project may conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and impacts would be potentially significant. Implementation of Mitigation Measure HAZ-MM-2 would reduce impacts to a less-than-significant level.

The No Project/No Build Alternative would not cause any changes in existing conditions or result in any new development of the Project Site. Accordingly, this alternative would have no potential to conflict with or obstruct the implementation of water quality control plans, the policies of which are expressed in City and State water quality regulations for the protection of water resources. Thus, impacts related to water quality control plans or sustainable groundwater management plans would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan during operation. However, as contaminated soils could impact the groundwater, construction of the Project with the Deck Concept, as with the Project, may conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and impacts would be potentially significant. With implementation of Mitigation Measure HAZ-MM-2 under the Project with the Deck Concept, impacts regarding a conflict with a water quality control plan would be less than significant.

For reasons described under the Project, above, the No Project/No Build Alternative would result in no impacts related to conflict a water quality control plan. Thus, impacts related to water quality control plans would be less under the No Project/No Build Alternative than the Project with the Deck Concept.

(h) *Land Use and Planning*

(i) *Physically Divide an Established Community*

(a) Project

As discussed in Section IV.H, *Land Use and Planning*, of this Draft EIR, Project implementation would open the Project Site to both north-south and east-west access, creating new direct connections between the Arts District neighborhoods north and south of the Project Site and between the neighborhoods west of the Project Site and the Los Angeles River and Boyle Heights to the east. The Project would not physically divide an established community, and impacts would be less than significant.

The No Project/No Build Alternative would not change the existing land use and occupancy of the Project Site. The Project Site is currently only directly accessible to vehicles and pedestrians from Mesquit Street, which is cut off on the south by the 7th Street Bridge and can only be accessed via Jesse Street at its midpoint. The Project Site has historically been accessible from the northern end of Mesquit Street near 6th Street.

However, the construction of the Ribbon of Light Bridge has temporarily blocked access to Mesquit Street at its northern end, but upon completion of the bridge, access to Mesquit Street from Santa Fe Avenue just south of 6th Street is planned to be restored. Furthermore, no east-west pedestrian or visual access exists under existing conditions between Mesquit Street and the Railway Properties or Los Angeles River, as the Project Site is currently developed with a nearly uninterrupted wall of warehouses that occupy the Project Site's eastern side and face the Los Angeles River and Boyle Heights. Moreover, direct pedestrian access does not currently exist between the Project Site and the elevated Seventh Street Bridge along the Project Site's southern property line. Therefore, the Project Site is not currently directly accessible from the east, north, or south by vehicles or pedestrians, and the No Project/No Build Alternative would retain the existing lack of connectivity. While the Project would improve connectivity throughout the Project Site, because the No Project/No Build Alternative would not change existing conditions and would have no impact, impacts related to physically dividing an established community would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would open the Project Site to both north-south and east-west access, creating new direct connections between the Arts District neighborhoods north and south of the Project Site and between the neighborhoods west of the Project Site and the Los Angeles River and Boyle Heights to the east. The Project with the Deck Concept would include the same vehicular and bicycle access to the Project Site as under the Project. Impacts related to division of an established community under the Project with the Deck Concept would be less than significant.

For the reasons described under the Project, above, the No Project/No Build Alternative would not change existing conditions or improve pedestrian connectivity. However, because the No Project/No Build Alternative would result in no change, it would have no impact. Therefore, impacts related to the physical division of an established community would be less under the No Project/No Build Alternative than the Project with the Deck Concept.

(ii) *Conflict with Applicable Land Use Plan, Policy, or Regulation*

(a) Project

The Project would develop residential, office, retail, restaurant, hotel, studio/gallery/museum, and gym uses at the Project Site. As discussed in Section IV.H, *Land Use and Planning*, of the Draft EIR, based on the analysis of Project consistency with applicable policies of SCAG's 2020–2045 RTP/SCS, the Framework Element, the Community Plan, and the LAMC, the Project would be consistent with and would not conflict with relevant land use policies and regulations adopted for the purpose of avoiding or mitigating a significant environmental effect. Approval of the Project's requested

entitlements, including the proposed Specific Plan, would bring the Project into consistency with the applicable plans and regulations. Impacts would be less than significant.

The No Project/No Build Alternative would not change the existing land use and occupancy of the Project Site. The existing uses, surface parking lot, and zoning designations would remain. Unlike the Project, the No Project/No Build Alternative would not result in any exceedances of the RIO District Ordinance's development standards, including prescribed lighting levels along the Los Angeles River. However, because this inconsistency would not result in an adverse environmental impact, the Project's inconsistency would be less than significant. As no changes would occur on the Project Site, the No Project/No Build Alternative would not conflict with any adopted plans, policies or regulations related to avoiding or reducing environmental impacts. Although the No Project/No Build Alternative would not further regional and local policies applicable to the Project Site, such as enhancing pedestrian activity or providing mixed-use infill development within an HQTAs, it would have no impacts with respect to conflicts with plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. As such, impacts related to conflicts with land use plans, policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would develop residential, office, retail, restaurant, hotel, studio/gallery/museum, and gym uses at the Project Site. In addition, the Project with the Deck Concept would include a 132,000 square foot Deck in place of the Project's Elevated Pedestrian Walkway. The Project with the Deck Concept would provide a sizeable publicly accessible open space amenity area, in addition to the open space provided under the Project, that would further enhance the new pedestrian connections and create additional opportunities for public programming. The Project with the Deck Concept would exceed the more stringent exterior lighting standards that apply to the RIO District at the Project boundary and 15 feet beyond the boundary. Although the Project with the Deck Concept would conflict with RIO District requirements regarding lighting, the level of lighting within a Transit Priority Area (TPA) under PRC Section 21099(d)(1) and City Zoning Information (ZI) File No. 2452 is not considered an impact on the environment. Furthermore, the areas where Project with the Deck Concept lighting would exceed the RIO standards include streets, rail yards, electrical switching stations, and industrial use properties and do not include natural habitat or residential uses. As such, pursuant to the 2006 L.A. CEQA Thresholds Guide, and as indicated under section IV., Biological Resources, in the Initial Study provided in Appendix A-2, Initial Study, of this Draft EIR, there would be no substantial adverse effects on light sensitive natural habitat or residential receptors. Therefore, because this inconsistency would not result in an adverse environmental impact, impacts would be less than significant. The Project with the Deck Concept would be consistent with the same applicable policies and plans of the 2020–2045 RTP/SCS, Framework Element, Central City North Community Plan, RIO

District Ordinances and the LAMC. As with the Project, approval of the requested entitlements, including the proposed Specific Plan, would bring the Project with the Deck Concept into consistency with the applicable plans and regulations. Impacts related to conflict with applicable plans, policies, and regulations adopted to avoid or mitigate environmental effects would be less than significant.

For the reasons described under the Project, above, no changes would occur on the Project Site under the No Project/No Build Alternative. Although the No Project/No Build Alternative would not further regional and local policies applicable to the Project Site, it would have no impacts related to conflicts with plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Thus, impacts related to conflicts with land use plans, policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less under the No Project/No Build Alternative than the Project with the Deck Concept.

(i) *Noise*

(i) *Noise Levels in Excess of Standards*

(a) *Construction*

(i) *Project*

As discussed in Section IV.I, *Noise*, of this Draft EIR, on-site Project construction would result in temporary increases in ambient noise that would exceed thresholds of significance at the closest off-site noise-sensitive receptors, and impacts at R1 (the three-story multi-family residential use to the west of the Project Site), R2 (the two-story multi-family residential use to the south of the Project Site), R3 (the AMP Lofts to the west of the Project Site), and R4 (the future 6th Street PARC) would be potentially significant. Implementation of Mitigation Measures NOISE-MM-1 and NOISE-MM-2 would reduce noise levels at all receptors and would reduce impacts at R2 and R3 to less-than-significant levels. However, the Project's on-site construction noise impacts would remain significant and unavoidable at R1 and R4 during daytime and nighttime periods on weekdays and weekends. Off-site construction traffic noise impacts for the Project would exceed the threshold of significance along two roadway segments (i.e., Jesse Street between Mateo Street and Santa Fe Avenue and Mateo Street between 4th Place and Willow Street) where sensitive residential uses are present. With implementation of Mitigation Measure NOISE-MM-3, off-site construction traffic noise impacts would be reduced to a less-than-significant level.

The No Project/No Build Alternative would not involve any construction activities, and, therefore, no construction noise impacts would occur. As such, the No Project/No Build Alternative would avoid the Project's significant and unavoidable noise impacts at nearby noise-sensitive receptor locations during Project construction. Thus, impacts related to construction noise would be less under the No Project/No Build Alternative than the Project.

(ii) *Project with the Deck Concept*

Maximum construction noise levels under the Project with the Deck Concept would be similar to the Project. The Project with the Deck Concept would also implement Mitigation Measures NOISE-MM-1 and NOISE-MM-2, which would reduce noise levels at all receptors and would reduce impacts at R2 and R3 to less-than-significant levels. On-site construction noise impacts under the Project with the Deck Concept, although temporary, would be significant and unavoidable at R1 and R4 during daytime and nighttime periods on weekdays and weekends. Off-site construction traffic noise impacts for the Project with the Deck Concept would exceed the threshold of significance along two roadway segments (i.e., Jesse Street between Mateo Street and Santa Fe Avenue and Mateo Street between 4th Place and Willow Street) where sensitive residential uses are present. With implementation of Mitigation Measure NOISE-MM-3, off-site construction traffic noise impacts would be reduced to less-than-significant levels. Because of the addition of the Deck, construction noise impacts would occur over a longer period of time under the Project with the Deck Concept. Impacts under the Project with the Deck Concept related to on-site construction noise, even with implementation of mitigation measures, would remain significant and unavoidable.

The No Project/No Build Alternative would not involve any construction activities, and, therefore, no construction noise impacts would occur. Therefore, the No Project/No Build Alternative would avoid the significant and unavoidable noise impacts at nearby noise-sensitive receptor locations during construction of the Project with the Deck Concept. Thus, impacts related to construction noise would be less under the No Project/No Build Alternative than the Project with the Deck Concept.

(b) Operation

(i) *Project*

As discussed in Section IV.I, *Noise*, of this Draft EIR, noise impacts during Project operation from mechanical equipment, parking structure, loading dock and trash collection areas, emergency generators, heliport, and off-site traffic noise would be less than significant and would not require mitigation. Noise impacts from daytime use of individual outdoor open spaces, specifically the River Balcony North, would be significant at R4 and the combined simultaneous use of Project open spaces would be significant at R1, R2, R3, and R4. Nighttime use of individual outdoor open spaces, specifically the 7th Street Terrace, would be significant at R2 and the combined simultaneous nighttime use of Project open spaces would be significant at receptor R2. Operational composite noise would be significant at R1. The Implementation of Mitigation Measures NOISE-MM-4 and NOISE-MM-5, which place 85 dBA limitations on amplified speakers at all outdoor spaces and a 75 dBA limitation on amplified speakers on the River Balcony North, respectively, would reduce impacts related to daytime and nighttime operation of outdoor spaces, individually and combined, to less-than-significant levels.

Occupancy and activity at the Project Site would not change under the No Project/No Build Alternative, and no operational noise impacts would occur. Thus, impacts related to operational noise would be less under the No Project/No Build Alternative than the Project.

(ii) *Project with the Deck Concept*

Noise impacts during operation of the Project with the Deck Concept resulting from mechanical equipment, parking structure, loading dock and trash collection areas, emergency generators, heliport, and off-site traffic would be less than significant and would not require mitigation. However, noise impacts from daytime use of outdoor open spaces, specifically the River Balcony North, would be significant at R4 and the combined simultaneous use of open spaces, including the Deck, would be significant at R1, R2, R3, and R4. Additionally, nighttime use of the Deck would be significant at R2 and operational composite noise under the Project with the Deck Concept would be significant at R1 and R2, combined nighttime operation of all open spaces would be significant at R2, with implementation of Mitigation Measures NOISE-MM-4 and NOISE-MM-5, open space noise from the daytime or nighttime use of open spaces, individually and combined, would not exceed the threshold of a 5 dBA increase in ambient noise. Operational noise impacts under the Project with the Deck Concept would be less than significant.

For the reasons discussed under the Project, under the No Project/No Build Alternative no operational noise impacts would occur. Impacts related to operational noise would be less under the No Project/No Build Alternative than the Project with the Deck Concept

(ii) *Groundborne Vibration*

(a) *Construction*

(i) *Project*

As discussed in Section IV.I, *Noise*, of this Draft EIR, construction activities at the Project Site have the potential to generate low levels of groundborne vibration as the operation of heavy equipment generates vibrations that propagate through the ground and diminish in intensity with distance from the source. The potential vibration impacts for structural damage due to off-site haul trucks would be less than significant for the Project. Construction activities include excavation for six levels of subterranean garages. Estimated vibration velocity levels from construction equipment for the Project would not exceed the respective significance thresholds at V2 (multi-family residential use to the south of the Project Site at 2135 E. 7th Place), V3 (AMP Lofts to the west of the Project Site), V4 (industrial building located at 640 Santa Fe Avenue), or V5 (industrial building located at 1580 Jesse Street). Vibration impacts associated with structural damage from on-site construction activities under the Project would be potentially significant for V1 (multi-family residential use to the west of the Project Site at 2101 E. 7th Street) and V6 (7th Street Bridge). With implementation of Mitigation Measure NOISE-MM-6, potential Project structural vibration impacts on receptors V1 and V6 would be mitigated to less than significant for the majority of construction activities, except for temporary shoring

activities and installation of shoring infrastructure. Mitigation Measure NOISE-MM-7 is proposed to reduce vibration velocities due to shoring; however, in the case that structural damage does occur during Project construction, it would be required to be repaired pursuant to Mitigation Measure NOISE-MM-8. With implementation of Mitigation Measures NOISE-MM-7 and NOISE-MM-8, Project impacts with regard to structural damage for the 7th Street bridge (V6) would be mitigated to a less-than-significant level for all construction activity except for temporary shoring. Similarly, with implementation of Mitigation Measures NOISE-MM-7 and NOISE-MM-8, such damage to V1 could be repaired by the Project contractor, which would reduce Project impacts to a less-than-significant level. However, because V1 is a privately owned structure, inspections and repair pursuant to Mitigation Measure NOISE-MM-7 would require the consent of the property owner, who may not agree. Thus, Project impacts to V1 would be significant and unavoidable should consent for inspections and repairs not be granted.

With respect to human annoyance, the estimated groundborne vibration levels from on-site, off-road construction equipment under the Project would exceed the significance criteria at V1, and impacts would be potentially significant. With implementation of Mitigation Measures NOISE-MM-6 through NOISE-MM-9, construction vibration impacts related to human annoyance from on-site, off-road equipment would remain significant and unavoidable with respect to exceedance of applicable thresholds. Vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from construction trucks traveling along the local roadway network would be less than significant for the Project.

The No Project/No Build Alternative would not involve any new development or construction, and, therefore, no construction vibration impacts would occur. As such, the No Project/No Build Alternative would avoid the Project's significant and unavoidable structural vibration and human annoyance impacts during on-site construction to nearby vibration-sensitive receptor locations. Thus, impacts related to construction vibration would be less under the No Project/No Build Alternative than the Project.

(ii) Project with the Deck Concept

The Project with the Deck Concept would use a similar mix of construction equipment as the Project and result in the same maximum daily construction noise levels, but would result in a greater duration of construction activity associated with Deck construction. Construction activities include excavation for six levels of subterranean garages and footings for the Deck. Because the Deck would be located on the east side of the Project Site (adjacent to the Los Angeles River), excavation locations would not be any closer to vibration sensitive uses or structures than analyzed for the Project. The analysis above for the Project assumes the construction activity would be located at a distance as near as five feet from the 7th Street Bridge (receptor V6) to account for shoring activities. This activity would also be required for construction of Project with Deck concept. With implementation of Mitigation Measure NOISE-MM-6, potential Project with the Deck Concept structural vibration impacts on receptors V1 and V6 would be mitigated to less than significant for the majority of construction activities, except for temporary shoring

activities and installation of shoring infrastructure. As with the Project, the Project with Deck Concept would require shoring activities adjacent to V6 (7th Street Bridge). Mitigation Measures NOISE-MM-7 and NOISE-MM-8 would reduce vibration impacts at the 7th Street Bridge to less-than-significant levels for all construction activity except for temporary shoring. Although damage to V1 could be repaired by the Project contractor, because V1 is a privately owned structure, inspections and repair pursuant to Mitigation Measure NOISE-MM-8 would require the consent of the property owner, who may not agree. Thus, impacts to V1 under the Project with the Deck Concept would be significant and unavoidable should consent for inspections and repairs not be granted.

Potential vibration impacts from on-site construction with respect to human annoyance would be significant prior to the implementation of mitigation measures at sensitive receptor location V1. As with the Project, with implementation of Mitigation Measures NOISE-MM-6 through NOISE-MM-9, construction vibration impacts related to human annoyance from on-site, off-road equipment would remain significant and unavoidable with respect to exceedance of applicable thresholds. Vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from construction trucks traveling along the local roadway network would be less than significant for the Project with the Deck Concept.

The No Project/No Build Alternative would not involve any new development or construction, and, therefore, no construction vibration impacts would occur. As such, the No Project/No Build Alternative would avoid the significant and unavoidable structural vibration and human annoyance impacts under the Project with the Deck Concept and impacts related to construction vibration would be less under the No Project/No Build Alternative than the Project with the Deck Concept.

(b) Operation

(i) *Project*

As discussed in Section IV.I, *Noise*, of this Draft EIR, Project operations would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce vibration at low levels that would not cause damage or annoyance impacts to the Project buildings or on-site occupants and would not cause vibration impacts to the off-site environment. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the proposed parking area. Pumps or compressors would generate groundborne vibration levels of 0.5 in/sec PPV at 1 foot, which would not generate off-site vibration. It is anticipated that Project mechanical equipment, including air handling units, condenser units, and exhaust fans, would be located on building rooftops. Therefore, groundborne vibration levels for the Project would be less than less than significant.

Occupancy and activity at the Project Site would not change under the No Project/No Build Alternative, and, therefore, no vibration impacts would occur. Thus, impacts related

to operational vibration would be less under the No Project/No Build Alternative than the Project.

(ii) *Project with the Deck Concept*

The Project with the Deck Concept operation would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce vibration at low levels that would not cause damage or annoyance impacts to the Project buildings or on-site occupants and would not cause vibration impacts to the off-site environment. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the proposed parking area. Pumps or compressors would generate groundborne vibration levels of 0.5 in/sec PPV at 1 foot, which would not generate off-site vibration. It is anticipated that Project mechanical equipment, including air handling units, condenser units, and exhaust fans, would be located on building rooftops. The Deck would be located on the east side of the Project adjacent to the Los Angeles River. Industrial and commercial uses to the east of the Los Angeles River are located at distances of a minimum of 500 feet and would not be affected by activities occurring on the Deck. Therefore, groundborne vibration levels during operation of the Project with the Deck Concept would be less than significant.

For the reasons described under the Project, above, occupancy and activity at the Project Site would not change under the No Project/No Build Alternative, and, therefore, no vibration impacts would occur. Thus, impacts related to operational vibration would be less under the No Project/No Build Alternative than the Project with the Deck Concept.

(j) *Population and Housing*

(i) *Project*

As discussed in Section IV.J, *Population and Housing*, of this Draft EIR, the Project would involve demolition of the existing warehouse buildings on the Project Site to support approximately 944,055 square feet of office space, 308 multi-family residential dwelling units, 236 hotel rooms (158,647 square feet), and a range of commercial uses, including 136,152 square feet of retail, 89,577 square feet of restaurants, 93,617 square feet of studio/event/gallery space/museum, and 62,148 square feet of gym. The Project's 308 residential units would result in an increase in 743 residents on the Project Site, and the Project's commercial uses would result in a net increase of 4,523 employees. The Project's projected growth would be within SCAG's 2020–2045 RTP/SCS projections for the City, and the Project would not induce unplanned substantial population growth in an area directly through the development of new housing and employment opportunities. Furthermore, Project operation would modify access from streets that surround the Project Site and would implement infrastructure improvements but would not extend roads into new undeveloped areas. Infrastructure improvements under the Project would not induce substantial unplanned population growth in an area, either directly or indirectly. As such, the Project would not induce substantial unplanned population growth in the

area, either directly or indirectly that cannot be reasonably accommodated, and impacts would be less than significant.

The No Project/No Build Alternative would not change conditions on the Project Site and, as such, would not induce unplanned population growth. Accordingly, no impacts would occur. However, the No Project/No Build Alternative would not advance local and regional planning objectives that promote infill development that support and provide a mix of uses in urban centers near public transit. Also, the No Project/No Build Alternative would not assist the City in meeting its housing obligation under SCAG's RHNA allocation. Specifically, the Project Site would remain as warehouse buildings and surface parking lots. Nonetheless, because no impacts would occur, impacts related to population, housing, and employment would be less under the No Project/No Build Alternative than the Project.

(ii) *Project with the Deck Concept*

The Project with the Deck Concept would provide 308 residential units and generate a population of 743 new residents and 4,523 net new employees. The Project with the Deck Concept's projected growth would be within SCAG's 2020–2045 RTP/SCS projections for the City, and the Project with the Deck Concept would not induce unplanned substantial population growth in an area directly through the development of new housing and employment opportunities. As such, impacts related to population and housing under the Project with the Deck Concept would be less than significant.

The No Project/No Build Alternative would not change conditions on the Project Site and, as such, would not induce unplanned population growth. Accordingly, no impacts would occur. The No Project/No Build Alternative would not help the City meet its housing obligation under SCAG's RHNA allocation, or provide the type of transit oriented development encouraged in the City's General Plan and SCAG 2020–2045 RTP/SCS policies. However, because the No Project/No Build Alternative would not induce unplanned population growth or not result in any changes to population or housing, impacts related to population, housing, and employment would be less under the No Project/No Build Alternative than the Project with the Deck Concept.

(k) *Public Services*

(i) *Fire Protection*

(a) *Project*

As discussed in Section IV.K.1, *Public Services – Fire Protection*, of this Draft EIR, Project demand for fire protection and response times during construction would be less than significant. The Project would implement Project Design Feature TRAF-PDF-1 (Construction Traffic Management Plan) to minimize disruptions to through traffic flow and maintain emergency vehicle access to the Project Site and neighboring land uses. Additionally, as part of a Construction Worker Parking Plan (TRAF-PDF-2), construction worker parking would either be accommodated on the Project Site or in an alternate

location that would not affect the adjacent streets. During Project operation, the Project would comply with the applicable Building and Fire Codes, LAFD's recommendations for fire prevention and protection, and LAFD's fire/life safety inspection for new construction projects to ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment without creating the need for new or expanded fire facilities, the construction of which would result in physical environmental impacts. Impacts during Project operation would be less than significant.

The No Project/No Build Alternative would not change activity or occupancy of the Project Site or increase demand or otherwise affect fire protection services. Accordingly, because the No Project/No Build Alternative would not result in a population gain that would increase demand, it would have no impact related to fire protection services. Thus, impacts related to fire protection services would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

Construction and operation of the Project with the Deck Concept would increase fire services demand, including potential obstruction of fire services vehicles. However, during construction, fire safety features would include implementation of Project Design Feature TRAF-PDF-1 (Construction Traffic Management Plan) to minimize disruptions to through traffic flow and maintain emergency vehicle access to the Project Site and neighboring land uses during construction. During operation, highly visible building identification, installation of sprinklers throughout all inhabited spaces, and compliance with the Fire Code would reduce demand on existing stations and avoid the need to provide new or expanded facilities, the construction of which would result in physical environmental impacts. Therefore, impacts to fire services by the Project with the Deck Concept would be less than significant.

For the reasons described under the Project, above, the No Project/No Build Alternative would not result in a population gain that would increase demand and, as such, would have no impact related to fire protection services. Thus, impacts related to fire protection services would be less under the No Project/No Build Alternative than the Project with the Deck Concept.

(ii) *Police Protection*

(a) Project

As discussed in Section IV.K.2, *Public Services – Police Protection*, of this Draft EIR, Project construction would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives, and impacts would be less than significant. The Project would implement Project Design Feature POL-PDF-1 to include security measures to limit access to construction areas, which would minimize the

Project's potential need for police protection services during the construction phase. The Project would implement Project Design Feature TRAF-PDF-1 (Construction Traffic Management Plan), which would be approved by LADOT to ensure maintenance of emergency access. The various safety features that would be implemented during Project construction would reduce the potential for incidents that would require police responses. Therefore, construction of the Project would not result in substantial adverse physical impacts associated with the provision of or need for new or altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives, and impacts would be less than significant.

According to Section IV.J, *Population and Housing*, of this Draft EIR, the Project would generate a residential population increase of 743. During Project operation, the Project would implement Project Design Feature POL-PDF-2, which includes a security program with controlled access, staff training, and on-site private security. These security features would help reduce the potential for on-site crimes, including loitering, theft, and burglaries, and would reduce demand for LAPD services. Therefore, operation of the Project would not result in substantial adverse physical impacts associated with the provision of or need for new or altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives, and impacts would be less than significant.

The No Project/No Build Alternative would not cause any changes in activity or occupancy of the Project Site that would increase demand or otherwise affect police protection services. Accordingly, because the No Project/No Build Alternative would not result in a population gain that would increase demand, it would have no impact related to police protection services. Thus, impacts related to police protection services would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

Construction and operation of the Project with the Deck Concept would increase demand for police services. The Project with the Deck Concept would result in construction activities that could affect emergency access and increase demand for police protection services. During construction, implementation of Project Design Feature TRAF-PDF-1 (Construction Traffic Management Plan) would facilitate emergency access and potentially reduce traffic incidents that would require police responses. As with the Project, the Project with the Deck Concept would implement Project Design Feature POL-PDF-1 to include a number of security measures that limit access to construction areas, including private security, construction fencing, locked entry, and security lighting, and other security features. Implementation of these security features would minimize the Project with the Deck Concept's potential need for police protection services during the construction phase. The various safety features that would be implemented during Project construction would reduce the potential for incidents that would require police responses. As such, construction of the Project with the Deck Concept would not result in substantial

adverse physical impacts associated with the provision of or need for new or altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives, and impacts would be less than significant.

During operation, the Project with the Deck Concept would generate the same residential population increase of 743 as the Project, and include the same supporting safety features as the Project provided under Project Design Feature POL-PDF-2. These features include controlled entrances, security personnel, and video surveillance. As such, the Project with the Deck Concept would limit demand on Police services. Impacts to Police Services that would require the construction of new facilities or the expansion of new facilities under the Project with the Deck Concept, the construction of which would result in physical environmental impacts would be less than significant,

For the reasons described under the Project, above, the No Project/No Build Alternative would not cause any changes in activity or occupancy of the Project Site that would increase demand or otherwise affect police protection services, and no impacts would occur. Thus, impacts related to police protection services would be less under the No Project/No Build Alternative than the Project with the Deck Concept.

(iii) *Schools*

(a) *Project*

As discussed in Section IV.K.3, *Public Services – Schools*, of this Draft EIR, there are no public schools located in the immediate Project vicinity that would be affected by construction activities at the Project Site. Project construction would also not result in a notable increase in the resident population or generate new students needing to attend local schools. Therefore, Project construction would not result in the need for new or physically altered facilities, construction of which could lead to significant impacts. During operation, the Project would generate a net increase of 759 elementary school students, 212 middle school students, and 436 high school students for a total net increase of 1,407 school students. While the Project would increase demand at local schools that serve the Project Site, the Los Angeles Unified School District (LAUSD) bond program would fund improvements and upgrades to LAUSD school facilities upon review of enrollment and attendance. In addition, pursuant to Section 65995 of the California Government Code, the Project applicant would be required to pay fees in accordance with SB 50. Payment of such fees is intended for the general purpose of addressing the construction of new school facilities, whether schools serving the Project in question are at capacity or not. Pursuant to Section 65995(h) of the California Government Code, payment of such fees is deemed full mitigation of a project's development impacts. Project operational impacts to schools would be less than significant.

The No Project/No Build Alternative would not generate school-aged children because it would not include the development of any new residential units or employment opportunities at the Project Site. Thus, there would be no change in the demand for

education services at schools serving the Project Site. Accordingly, because the No Project/No Build Alternative would not result in a population that would increase the need for school services, it would have no impact on schools. Thus, impacts related to schools would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

Based on the LAUSD's 2018 Developer Fee Justification Study, the Project with the Deck Concept, as with the Project, could generate a net increase of 759 elementary school students, 212 middle school students, and 436 high school students for a total net increase of 1,407 school students. While the Project with the Deck Concept would increase demand at local schools that serve the Project Site, the LAUSD bond program would fund improvements and upgrades to LAUSD school facilities upon review of enrollment and attendance. In addition, pursuant to Section 65995 of the California Government Code, the Project applicant would be required to pay fees in accordance with SB 50. Payment of such fees is intended for the general purpose of addressing the construction of new school facilities, whether schools serving the Project in question are at capacity or not. Pursuant to Section 65995(h) of the California Government Code, payment of such fees is deemed full mitigation of a project's development impacts. Therefore, operational impacts to schools from the Project with the Deck Concept would be less than significant.

For the reasons described under the Project, above, the No Project/No Build Alternative would not generate school-aged children because it would not include the development of any new residential units or employment opportunities at the Project Site. Accordingly, because the No Project/No Build Alternative would not result in a population that would increase the need for school services, it would have no impact on schools, and impacts related to schools would be less under the No Project/No Build Alternative than the Project with the Deck Concept.

(iv) *Parks and Recreation*

(a) Project

As discussed in Section IV.K.4, *Public Services – Parks and Recreation*, of this Draft EIR, the Project would provide approximately 141,876 square feet of open space. Of the 141,876 square feet of open space, 73,848 square feet would be publicly accessible open space and would include the Northern Landscaped Area, Mesquit Paseo, River Balconies, Elevated Pedestrian Walkway connecting the River Balconies, Public Plaza Flex Deck, Fitness Deck, Sculpture Garden, Work Breakout Deck, and the Residential Pool Deck. The Project would provide open space in excess of the useable open space and landscape requirements of LAMC Section 12.21.G. Furthermore, the Applicant would pay the \$200 tax per new eligible residential unit per LAMC Section 12.33.G to support the City's acquisition of new park space, and would comply with LAMC section 17.12 (the City's parkland dedication ordinance) in accordance with the Quimby Act. The Project would largely offset demand for recreational facilities through provision of on-site

recreational and open space facilities in excess of Code requirements for the benefit of on-site residents, employees, and visitors. As such, the Project would not result in a high use of public parks and recreational facilities such that would result in the substantial deterioration of public recreational facilities, and the Project would also not require the construction of new, or expansion of existing park facilities, which could have an adverse impact on the environment. Therefore, the Project would have a less than significant impact on parks and recreation services.

The No Project/No Build Alternative would not change the current occupancy and use of the Project Site; therefore, it would not increase demand for parks and recreation services. Accordingly, since the No Project/No Build Alternative would not directly or indirectly result in a population gain that would generate demand for parks and recreation services, it would have no impact on parks and recreational facilities. Thus, impacts related to parks and recreational facilities would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would provide 141,876 square feet (3.26 acres) of open space across the Project Site. Of the 141,876 square feet of open space, 73,848 square feet would be publicly accessible open space and include the Northern Landscaped Area, Mesquit Paseo, North and South River Balconies, 7th Street Terrace, and the Public Plaza Flex Deck. The Project with the Deck Concept would also include a 132,000-square-foot Deck that would result in a total of 273,876 square feet (6.29 acres) of open space. Open spaces provided under the Project with the Deck Concept would also exceed the landscape requirements of the LAMC Section 12.21.G. and comply with LAMC section 17.12 (the City's parkland dedication ordinance) in accordance with the Quimby Act. As such, operation of the Project with the Deck Concept would not exacerbate the existing shortfalls in parkland relative to City standards to the extent that new or physically altered park or recreational facilities would need to be constructed in order to maintain service. In addition, the Project with the Deck Concept would also pay \$200 per unit for each of its 308 residential units for park fees to further reduce the City's parks and open space shortfall. The Project with Deck Concept would largely offset demand for recreational facilities through provision of recreational and open space facilities in excess of Code requirements for the benefit of on-site residents, employees, and visitors. As such, it would not result in a high use of public parks and recreational facilities that would result in the substantial deterioration of public recreational facilities requiring the construction of new, or expansion of existing, park facilities, which could have an adverse impact on the environment. Impacts with respect to parks and recreation would be less than significant under the Project with the Deck Concept.

For the reasons discussed under the Project, above, the No Project/No Build Alternative would not change the current occupancy and use of the Project Site; therefore, it would not increase demand for parks and recreation services and no impacts would occur. Impacts related to parks and recreational facilities would be less under the No Project/No Build Alternative than the Project with the Deck Concept.

(v) *Libraries*

(a) Project

As discussed in Section IV.K.5, *Public Services – Libraries*, of this Draft EIR, there are no libraries located in the immediate Project vicinity that would be affected by construction activities at the Project Site. Project construction would also not result in a notable increase in library usage at the libraries serving the Project Site. During Project operation, the Project's 308 residential units would generate an estimated 743 new residents, and 4,523 net new employees would therefore have the potential to increase demand at the libraries at the two branch libraries (Benjamin Franklin Branch Library and Little Tokyo Branch Library) with existing overcapacity conditions. However, the new level of service population at each library would not increase the population such that construction of a new branch library would be recommended according to the Los Angeles Public Library's (LAPL) standards. Therefore, the Project's increase in demand for library services would not reach the recommended level at which the LAPL would consider building a new branch library in the area, the construction of which would have an adverse physical effect on the environment. Impacts would be less than significant.

The No Project/No Build Alternative would not result in an increase in residential or employee population and, therefore, would not increase demand for library services. Accordingly, because the No Project/No Build Alternative would not result in a population gain that would generate an increase in demand for library services, it would have no impact with respect to library services. Thus, impacts related to libraries would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

Construction of the Project with the Deck Concept would not result in a notable increase in library usage by construction workers at the libraries serving the Project Site. Regarding use of libraries by the additional builders of the Deck, the construction of the deck is expected to use the same labor pools as the Project and would not generate additional demand for library services by construction employees. As such, to accommodate construction population, there would be no need for new library facilities, the construction of which would have an adverse physical effect on the environment. The Project with the Deck Concept would provide 308 residential units and generate a population of 743 new residents and 4,523 net new employees. As such the Project with the Deck Concept would increase service population and demand on library services. However, the increase in demand for library services under the Project with the Deck Concept would not reach the recommended level at which the LAPL would consider building a new branch library in the area, the construction of which would have an adverse physical effect on the environment. Therefore, impacts to libraries from the Project with the Deck Concept would be less than significant.

For the reasons described under the Project, above, the No Project/No Build Alternative would not generate additional library demand through the development of new residential

units or employment opportunities at the Project Site, and no impacts would occur. As such, impacts related to libraries would be less under the No Project/No Build Alternative than the Project with the Deck Concept.

(l) *Transportation*

(i) *Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities*

(a) *Project*

As discussed in Section IV.L, *Transportation*, of this Draft EIR, the Project, which is located within a TPA, would include roadway and sidewalk improvements that facilitate convenient access to transit. Components of the Project include the Mesquit Paseo that would improve bicyclist and pedestrian connectivity between Mesquit Street and 7th Street. The Project would include 288 short-term bicycle parking spaces and 519 long-term bicycle parking spaces. The Project would also include TDM measures to discourage single-occupancy vehicle trips. With improvements to the pedestrian system, roadways, and provision of bicycle facilities, the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, which have been adopted to protect the environment and reduce VMT. Impacts would be less than significant.

The No Project/No Build Alternative would not involve any new development and, as such, would not conflict with any programs, plans, ordinances or policies addressing the circulation system, transit, roadways, bicycle and pedestrian facilities, including those of Mobility Plan 2035, the Central City North Community Plan (Community Plan), the LADOT Manual of Policies and Procedures (MPP), Vision Zero, the Los Angeles Municipal Code, the Plan for a Healthy Los Angeles, and the Citywide Design Guidelines. Accordingly, the No Project/No Build Alternative would neither implement nor conflict with any such programs, plans, ordinances, or policies, and, as such, no impact would occur. Thus, impacts related to potential conflicts with any such programs, plans, ordinances, or policies would be less under the No Project/No Build Alternative than the Project.

(b) *Project with the Deck Concept*

The Project with the Deck Concept would include the same roadway and sidewalk improvements as the Project that would facilitate convenient access to transit. The Project with the Deck Concept would also develop a pedestrian-oriented, 132,000-square-foot Deck on the 7th Street level that would extend open space to near the Los Angeles River and enhance pedestrian access across the Project Site. The Project with the Deck Concept would also provide the Mesquit Paseo that would improve bicyclist and pedestrian connectivity between Mesquit Street and 7th Street, as with the Project. The Project with the Deck Concept would incorporate 288 short-term bicycle parking spaces and 519 long-term bicycle parking spaces, and include TDM measures provided for in

Mitigation Measure TRAF-MM-1 to discourage single-occupancy vehicle trips. With proposed improvements to the pedestrian system, roadways, and provision of bicycle facilities under the Project with the Deck Concept, impacts related to programs, plans, ordinances or policies would be less than significant.

For the reasons described under the Project, above, the No Project/No Build Alternative would not conflict with any programs addressing the circulation system. The No Project/No Build Alternative would neither implement nor conflict with any such programs and, as such, no impact would occur. Therefore, impacts would be less under the No Project/No Build Alternative than the Project with the Deck Concept.

(ii) *Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)*

(a) Project

As discussed in Section IV.L, *Transportation*, of this Draft EIR, the Project is estimated to generate a total of 27,040 daily vehicle trips and a total daily VMT of 195,304. The daily residential VMT per capita is estimated at 4.0, below the threshold of 6.0 for the Central Area Planning Commission (APC). The daily work VMT per employee is estimated at 6.6 for the Project, below the threshold of 7.6 for the Central APC. Since the retail components of the Project are greater than 50,000 square feet, they were evaluated using the City's travel demand forecasting model. The City's model estimated a total daily VMT of 96,898,000 miles within a 12-mile radius of the Project traffic analysis zone (TAZ) with all retail uses included.²³ This is a net increase of 32,000 daily miles, or a 0.03 percent increase from the network before the retail was added. This increase in VMT is considered to be a significant impact, due to the significance criteria identifying an impact when any increase in VMT due to regional-serving retail occurs. The Project would implement Mitigation Measure TRAF-MM-1 which would partially offset the increase in VMT projected for the Project's retail uses, but would not reduce the retail VMT impact to a less-than-significant level. Therefore, the Project-generated regional-serving retail VMT impact would be significant and unavoidable.

The No Project/No Build Alternative would not result in any increase in the intensity of on-site development and, thus, would result in no additional VMT over existing conditions. Accordingly, because the No Project/No Build Alternative would not result in any new VMT over existing conditions, it would have no impact with respect to consistency with CEQA Guidelines Section 15064.3(b). As such, the No Project/No Build Alternative would avoid the Project's significant and unavoidable impact related to regional-serving retail VMT. Thus, impacts related to VMT would be less under the No Project/No Build Alternative than the Project.

²³ The VMT analysis of retail uses for the Project presents a worst case scenario based on additional outdoor programming that would occur under the Project with the Deck Concept. Although the Project analysis presents a worst case scenario, the retail VMT impact findings for the Project would not be materially different if the added outdoor programming were not included.

(b) Project with the Deck Concept

The Project with the Deck Concept is estimated to generate a total of 27,493 daily vehicle trips and a total daily VMT of 198,540. The daily residential VMT per capita and daily work VMT per employee are estimated at 4.0 and 6.6, respectively. Both would be below the thresholds for the Central APC.

As indicated for the Project, under the Project with the Deck Concept the model estimated a net increase of 32,000 daily miles, or a 0.03 percent increase in VMT from the network with retail uses included. This increase in VMT is considered to be a significant impact, due to the significance criteria identifying an impact when any increase in VMT due to retail occurs. Mitigation Measure TRAF-MM-1 related to pedestrian, bicycle, and transit amenities would help to reduce retail trip making and would partially offset the increase in VMT projected for the Project with the Deck Concept's retail uses. However, impacts related to VMT would continue to be significant and unavoidable under the Project with the Deck Concept.

For the reasons described under the Project, above, the No Project/No Build Alternative would not result in any additional VMT over existing conditions. It would have no impact with respect to consistency with CEQA Guidelines Section 15064.3(b) and would avoid the Project with the Deck Concept's significant and unavoidable impact related to regional-serving retail VMT. Thus, impacts related to VMT would be less under the No Project/No Build Alternative than the Project with the Deck Concept.

(iii) *Design Hazards*

(a) Project

As discussed in Section IV.L, *Transportation*, of this Draft EIR, the Project and its proposed driveways would not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses and impacts on local safety would be less than significant. However, the Project would add car lengths to the US-101 Southbound freeway near the 7th Street Off-ramp such that it would constitute a potential safety issue. Specifically, the addition of traffic generated by the Project is projected to increase the overflow onto the mainline lanes by six cars in the AM peak hour and 2 cars in the PM peak hour (assuming an average queue storage length of 25 feet per car) for the US-101 Southbound Off-ramp to 7th Street in both Future Base (2026 and 2040) plus Project scenarios. Therefore, the Project would potentially substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses and impacts on freeway safety would be potentially significant. The Project would implement Mitigation Measure TRAF-MM-2 to signalize the intersection of the US-101 Southbound Off-ramp and 7th Street, which would sufficiently reduce the off-ramp queue and would not extend onto the freeway mainline. However, since the intersection is within the jurisdiction of another public agency (Caltrans), and the improvement would involve a decision by Caltrans, the City cannot guarantee that Caltrans will agree with implementation of this mitigation measure.

Therefore, it is conservatively concluded that the impacts related to freeway safety would remain significant and unavoidable.

The No Project/No Build Alternative would not involve any new development and, thus, would not include new sidewalks, driveways, or roadway improvements in and around the Project Site. Therefore, no design hazards impacts would occur under the No Project/No Build Alternative. Additionally, the No Project/No Build Alternative would avoid the Project's significant and unavoidable impact on freeway safety. Thus, impacts related to design hazards would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would feature several points of pedestrian access that include new sidewalks and bicycle parking facilities. The Project with the Deck Concept and its driveways would not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. However, traffic generated by the Project with the Deck Concept would increase the overflow onto the freeway mainline lanes by more than two cars for the US-101 Southbound Off-ramp to 7th Street. Therefore, because the Project with the Deck Concept would potentially substantially increase geometric hazards due to a design feature, impacts on freeway safety would be potentially significant. The Project with the Deck Concept would implement Mitigation Measure TRAF-MM-2 to signalize the intersection of the US-101 Southbound Off-ramp and 7th Street. Since the intersection is within the jurisdiction of Caltrans and the improvement would involve a decision by Caltrans, the City cannot guarantee that Caltrans will agree with implementation of this mitigation measure. As such, impacts related to design hazards under the Project with the Deck Concept would be significant and unavoidable.

For the reasons discussed under the Project, above, the No Project/No Build Alternative would not involve any new development and, thus, no design hazards impacts would occur. Additionally, the No Project/No Build Alternative would avoid the Project with the Deck Concept's significant and unavoidable impact on freeway safety. Thus, impacts related to design hazards would be less under the No Project/No Build Alternative than the Project with the Deck Concept.

(iv) *Emergency Access*

(a) Project

As discussed in Section IV.L, *Transportation*, of this Draft EIR, Project construction activities would result in less than significant impacts to emergency access. The Project would also implement a Construction Traffic Management Plan (see TRAF-PDF-1). The Project's construction activities would not require a new, or significantly interfere with an existing risk management, emergency response, or evacuation plan. The Project would not result in inadequate emergency access during construction. For Project operation, the site plan for the Project would be reviewed prior to issuance of a building permit to ensure

that all Los Angeles Fire Department fire safety requirements (including those related to emergency access) are met as part of the City's standard plan check review process. Further, during operation, drivers of emergency vehicles would have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Based on the above, impacts with respect to emergency access would be less than significant.

The No Project/No Build Alternative would not change any existing conditions that would affect emergency access. Accordingly, because the No Project/No Build Alternative would not cause any changes resulting in inadequate emergency access, it would have no impact regarding emergency access. Thus, impacts related to emergency access would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

Construction activities for the Project with the Deck Concept could potentially affect emergency access to the Project Site and surrounding area. However, construction activities for the Project with the Deck Concept would not require full street closures and most activities would be confined to the Project Site. With implementation of Project Design Feature TRAF-PDF-1, Construction Traffic Management Plan, the Project with the Deck Concept's construction activities would not significantly interfere with an existing risk management, emergency response, or evacuation plan. The Project with the Deck Concept would not result in inadequate emergency access during construction. During operation, the site plan for the Project with the Deck Concept would be reviewed prior to issuance of a building permit to ensure that all Los Angeles Fire Department fire safety requirements (including those related to emergency access) are met as part of the City's standard plan check review process. Also during operation, drivers of emergency vehicles would have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Based on the above, impacts with respect to emergency access would be less than significant.

For the reasons discussed under the Project, above, the No Project/No Build Alternative would not cause any changes resulting in inadequate emergency access and would have no impact regarding emergency access. Impacts related to emergency access would be less under the No Project/No Build Alternative than the Project with the Deck Concept.

(m) *Tribal Cultural Resources*

(i) *Project*

Construction activities for the Project would involve excavation for subterranean parking and other ground-disturbing activities. As discussed in Section IV.M, *Tribal Cultural Resources*, of this Draft EIR, no known tribal cultural resources would be affected by the Project. The Los Angeles River is a known landmark for prehistoric habitation and trading, with native American trade routes leading to and from the river basin. Due to the Project Site's proximity to the river, there is the potential tribal cultural resources to be

encountered during Project construction activities. This is considered to be a potentially significant impact. Thus, mitigation measures are proposed to require monitoring for tribal cultural resources and treatment of such resources, if encountered. With implementation of the required mitigation measures, potentially significant impacts would be reduced to a less than significant level.

The No Project/No Build Alternative would not require any construction activities; therefore, it would have no potential to encounter tribal cultural resources. Accordingly, because the No Project/No Build Alternative would involve no excavation or ground disturbance or change in use of the Project Site, it would have no impact related to tribal cultural resources. Thus, impacts related to tribal cultural resources would be less under the No Project/No Build Alternative than the Project.

(ii) *Project with the Deck Concept*

Construction activities for the Project with the Deck Concept involve excavation for subterranean parking and other ground-disturbing activities. The Deck would be supported by piers that would encroach into subsurface elements. The Los Angeles River is a known landmark for prehistoric habitation and trading, with native American trade routes leading to and from the river basin. Due to the Project Site's proximity to the river, there is the potential for tribal cultural resources to be encountered during Project with the Deck Concept construction activities. This is considered to be a potentially significant impact. Thus, mitigation measures are proposed to require monitoring for tribal cultural resources and treatment of such resources, if encountered. With implementation of the required mitigation measures, potentially significant impacts would be reduced to a less than significant level.

For the reasons discussed under the Project, above, the No Project/No Build Alternative would not require any construction activities and would have no potential to encounter tribal cultural resources. Accordingly, it would have no impact related to tribal cultural resources. Thus, impacts related to tribal cultural resources would be less under the No Project/No Build Alternative than the Project with the Deck Concept.

(n) *Utilities and Service Systems*

(i) *Wastewater*

(a) *Project*

As discussed in Section IV.N.1, *Wastewater*, of this Draft EIR, Project construction would include all necessary on- and off-site sewer pipe improvements and connections to adequately connect to the City's existing sewer system. The design of the connections would be developed by a registered engineer and approved by the City of Los Angeles Bureau of Engineering (BOE). All necessary improvements would be verified through the permit approval process of obtaining a sewer connection permit from the City. Project construction would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could

cause significant environmental effects. Operation of the Project would generate approximately 558,306 gallons per day (gpd) or 0.558 million gallons per day (mgd) of wastewater. The Project would be required to pay sewer connection fees to help offset the Project's contribution to the City's wastewater collection infrastructure needs. During Project operation, the Project's increase in wastewater generation would represent a negligible increase in the wastewater volumes treated at the Hyperion Water Reclamation Plant (HWRP) and the Hyperion Sanitary Sewer System.

Therefore, Project operation would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant.

The No Project/No Build Alternative would not construct new buildings or add population to the Project Site; therefore, wastewater generation would not change compared to existing conditions on the Project Site. The No Project/No Build Alternative would not generate additional wastewater or increase demand on the existing HWRP or Hyperion Sanitary Sewer System. Accordingly, because no new demand would occur under the No Project/No Build Alternative, it would have no impact on wastewater service systems. Thus, impacts with regard to wastewater would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

The minimal wastewater generation during construction of the Project with the Deck Concept would not require the construction of new or expansion of existing facilities, and, given the small amount of wastewater, construction activities are not anticipated to exceed the capacity of existing wastewater conveyance and treatment systems. Operation of the Project with the Deck Concept would generate approximately 558,306 gpd or 0.558 mgd of wastewater. Event programming proposed under the Project with the Deck Concept would be temporary and would not occur every day and throughout the day. Therefore, it is unlikely that any wastewater generated during these events, above 0.558 mgd would be more than the current remaining capacities at the HWRP. The Project with the Deck Concept would pay the required sewer connection fees to help offset the Project with the Deck Concept's contribution to the City's wastewater collection infrastructure needs and would require approval of sewer permits prior to connection to the sewer system. Impacts to wastewater infrastructure and treatment under the Project with the Deck Concept would be, thus, less than significant.

For the reasons discussed under the Project, above, the No Project/No Build Alternative would not generate new demand and would have no impact on wastewater service systems. Thus, impacts with regard to wastewater would be less under the No Project/No Build Alternative than the Project with the Deck Concept.

(ii) *Water Supply*

(a) Project

As discussed in Section IV.N.2, *Water Supply*, of this Draft EIR, water demand during Project construction would be substantially less than the existing water consumption at the Project Site. In order to accommodate the Project's operational water use, the Project would be required to upgrade the water mains serving the Project to ensure adequate water flow, pressure, and capacity are available for the Project. Project contractors would coordinate with the Los Angeles Department of Water and Power (LADWP) to identify the locations and depth of all lines, LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. Therefore, existing water infrastructure would meet the limited and temporary water demand necessary for construction of the Project. The design and installation of new service connections are required to meet applicable City standards. Construction impacts associated with the installation of water distribution lines below surface would primarily involve trenching in order to place the water distribution lines below grade and reconnect existing domestic and fire water services for the affected surrounding properties and would be limited to on-site and minor off-site (street right-of-way and sidewalk) construction activities. Project construction would not require or result in the construction of new water facilities or expansion of existing facilities, construction of new facilities, and construction impacts on water supply would be less than significant.

In regard to Project operation, with implementation of regulatory water conservation measures, operation of the Project would result in a demand of 439,943 gpd or 492.83 acre feet per year (afy). Following installation of the new service connections to accommodate the Project's additional water and fire flow requirements, LADWP determined that the water distribution infrastructure would have sufficient capacity to serve the Project Site following installation of the new service connections to accommodate the Project's additional water and fire flow requirements. The Project's approved Water Supply Assessment (WSA) determined that there are adequate water supplies available from existing LADWP entitlements and supplies to meet the Project's projected water demand, in addition to existing and planned future demand on LADWP, annually during normal, single-dry, and multiple-dry water years over the next 20 years, as required by SB 610, as well as through at least 2040 (the planning horizon of the LADWP's 2015 UWMP). Sufficient domestic water supplies are available to service the Project and reasonably foreseeable future development during normal, dry and multiple dry-years. Operational impacts on water supply would be less than significant.

The No Project/No Build Alternative would not construct new buildings or add population to the Project Site; therefore, water demand would not change compared to existing conditions on the Project Site. Accordingly, because no new water demand would occur under the No Project/No Build Alternative, it would have no impact on water supply or infrastructure. Thus, impacts with regard to water supply and infrastructure would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

During construction of the Project with the Deck Concept, water use would be substantially less than the existing water consumption at the Project Site. The Project with the Deck Concept would, similar to the Project, be required to upgrade the water mains serving the Project with the Deck Concept to ensure adequate water flow, pressure, and capacity are available. Construction of the Project with the Deck Concept would include the same necessary on- and off-site improvements and connections as needed under the Project. With compliance with existing regulations and requirements of the LADWP, impacts on water supply resulting from construction activities would be less than significant. With implementation of regulatory water conservation measures, operation of the Project with the Deck Concept would be the same as the Project, resulting in a demand of 439,943 gpd or 492.83 afy. Additional intermittent event programming under the Project with the Deck Concept would be temporary and would not occur every day or throughout the day. Therefore, as determined by the WSA, adequate water supplies from existing LADWP entitlements and supplies would be available to meet the Project with the Deck Concept's projected water demand through at least 2040. Impacts related to water supply and infrastructure under the Project with the Deck Concept would be less than significant.

For the reasons discussed under the Project, above, the No Project/No Build Alternative would not change water supply and infrastructure demand compared to existing conditions. Accordingly, because no new demand would occur under the No Project/No Build Alternative, it would have no impact on water supply and infrastructure. As such, the No Project/No Build Alternative would avoid the Project with the Deck Concept's less-than-significant wastewater impacts. Thus, impacts with regard to water supply and infrastructure would be less under the No Project/No Build Alternative than the Project with the Deck Concept.

(iii) *Solid Waste*

(a) Project

As discussed in Section IV.N.3, *Solid Waste*, of this Draft EIR, demolition of the Project would generate approximately 203,953 tons of construction and demolition (C&D) waste. All C&D waste collected at the Project Site would be taken to a City-certified waste processing facility for sorting and final distribution and disposal. The C&D waste is anticipated to be disposed of at the County's Azusa Land Reclamation landfill or one of the Inert Debris Engineered Fill Operations located in the County that is permitted to receive C&D waste or exported to an out-of-county facility currently accepting waste from Los Angeles County, all of which have remaining disposal capacity to receive the Project's C&D waste. Therefore, Project construction would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and construction impacts on solid waste would be less than significant.

Operation of the Project's commercial and residential uses, post-diversion, would generate approximately 3,369 tons of solid waste a year and 18,462 pounds of solid waste per day. The Project's estimated annual solid waste generation would represent a negligible amount of the County's annual waste generation and remaining capacity of the County's landfills. The Project's operational waste generation would not exceed the permitted capacity of disposal facilities serving the Project and would not alter the ability of the County to address landfill needs via existing capacity and other planned strategies and measures for ensuring sufficient landfill capacity exists to meet the needs of the County. Therefore, the County's City-certified waste processing facilities would have sufficient permitted capacity to accommodate the Project's operational waste disposal needs. Project operation would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and impacts would be less than significant.

The No Project/No Build Alternative would not construct new buildings or add population to the Project Site; therefore, solid waste generation would not change compared to existing conditions on the Project Site. Accordingly, because no demolition, construction, or operation of additional uses would occur under the No Project/No Build Alternative, it would have no impact relative to solid waste. Thus, impacts with regard to solid waste would be less under the No Project/No Build Alternative than the Project.

(b) Project with Deck Concept

Demolition of the Project with the Deck Concept would generate approximately 204,116 tons of C & D waste. Operation of the Project with the Deck Operation of the Project with the Deck Concept's commercial and residential uses, post-diversion, would generate approximately 3,369 tons of solid waste a year and 18,462 pounds of solid waste per day, which would be substantially less than the remaining capacity of the landfills currently serving the Project Site. While event programming would be proposed under the Project with the Deck Concept, these events would be temporary and would not occur every day and throughout the day. Therefore, it is likely that the solid waste generated during these particular events would not be more than the current remaining capacities at the landfills, and the additional solid waste generated by the Project's temporary events would be less than what is generated by the residential and commercial components of the Project with the Deck Concept. Thus, the conclusions regarding impact significance presented above under the Project would be the same and apply to operation of the Project with the Deck Concept. Impacts related to the capacity of local infrastructure and state and local standards under the Project with the Deck Concept would be less than significant.

For reasons described under the Project, above, the No Project/No Build Alternative would not change solid waste generation compared to existing conditions. Accordingly, it would have no impact relative to solid waste. As such, solid waste impacts under the No Project/No Build Alternative would be less than the Project with the Deck Component.

(iv) *Electric Power, Natural Gas, and Telecommunications Infrastructure*

(a) Project

As discussed in Section IV.N.4, *Electric Power, Natural Gas, and Telecommunications Infrastructure*, of this Draft EIR, energy (electric power and natural gas) associated with Project construction would require the Project Applicant to coordinate any potential removals or relocations with LADWP and the Southern California Gas Company (SoCalGas). Construction impacts associated with the installation of new telecommunication infrastructure would be of short duration and would cease to occur when installation is complete. Furthermore, no upgrades to off-site telecommunication facilities are anticipated. Therefore, the construction of the Project is not anticipated to adversely affect the electric power, natural gas, and telecommunication infrastructure serving the surrounding uses or utility system capacity and would not require the construction of new energy facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects. Construction impacts would be less than significant.

As determined in Section IV.C, *Energy*, of this Draft EIR, the Project's annual net increase in operational electricity and natural gas usage would not require additional infrastructure beyond proposed utilities installed on-site during construction.

The LADWP's projected load forecasts for electricity and LADWP 2017 Power Strategic Long-Term Resource Plan identifies adequate energy resources to support future generation capacity. The Project would not require additional infrastructure (i.e., a substation) beyond proposed utilities installed on-site during construction. Therefore, during Project operations, it is expected that LADWP's existing infrastructure, planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand.

Regarding natural gas, based on the Project's small fraction of total natural gas consumption for the region, ongoing SoCalGas long-range planning efforts to provide natural gas for this service region, and sufficient existing infrastructure, it is expected that SoCalGas' existing and planned natural gas supplies and infrastructure would be sufficient to meet the Project's demand for natural gas. Furthermore, SoCalGas has stated that it has "facilities in the area" of the Project Site and that "service would be in accordance with SoCalGas' policies and extension rules on file with the California Public Utilities Commission (Commission) at the time contractual arrangements are made."²⁴

Telecommunication providers already deliver their services to a large number of commercial and residential buildings in the vicinity of the Project Site, it is anticipated that existing telecommunication facilities would be sufficient to support the Project's

²⁴ SoCalGas, Will Serve – 670 Mesquit St, Los Angeles. Included in Appendix E of this Draft EIR.

needs for telecommunication services. Therefore, the Project would not create the need for new off-site telecommunications infrastructure.

The No Project/No Build Alternative would not construct new buildings or add population to the Project Site; therefore, electric power, natural gas, and telecommunications infrastructure needs would not change compared to existing conditions on the Project Site. Accordingly, because no demolition, construction, or operation of additional uses would occur under the No Project/No Build Alternative, it would have no impact relative to electric power, natural gas, and telecommunications infrastructure. Thus, impacts with regard to electric power, natural gas, and telecommunications infrastructure would be less under the No Project/No Build Alternative than the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would result in a demand for electricity, natural gas, and telecommunication services. The LADWP's projected load forecasts for electricity and LADWP 2017 Power Strategic Long-Term Resource Plan identifies adequate energy resources to support future generation capacity throughout the City. Therefore, during operation, it is expected that existing and planned electricity (including lighting for outdoor events on the Deck), natural gas, and telecommunications infrastructure would be sufficient to support the Project with the Deck Concept's electricity demand. The Project with the Deck Concept would not require additional infrastructure (i.e., a substation) beyond proposed utilities installed on-site during construction. As natural gas and telecommunication providers already deliver their services to a large number of commercial and residential buildings in the vicinity of the Project Site, it is anticipated that existing natural gas and telecommunications facilities would be sufficient to support the Project with the Deck Concept's needs for natural gas and telecommunication services. Because natural gas, electricity, and telecommunications infrastructure is in place to serve the Project Site, the Project with the Deck Concept would not require or result in the relocation or construction of new or expanded facilities, the construction or relocation of which could cause significant effects upon the environment. Impacts under the Project with the Deck Concept would be less than significant.

The No Project/No Build Alternative would not construct new buildings or add population to the Project Site; therefore, electric power, natural gas, and telecommunications infrastructure needs would not change compared to existing conditions on the Project Site. Accordingly, because no demolition, construction, or operation of additional uses would occur under the No Project/No Build Alternative, it would have no impact relative to electric power, natural gas, and telecommunications infrastructure. Thus, impacts with regard to electric power, natural gas, and telecommunications infrastructure would be less under the No Project/No Build Alternative than the Project with the Deck Concept.

(3) Relationship of the Alternative to Project Objectives

As described above, the No Project/No Build Alternative assumes that no new development would occur on the Project Site. The on-site uses would continue to operate

similar to existing conditions. The No Project/No Build Alternative would not include a development program or meet the underlying purpose of the Project to create a vibrant, mixed-use development that enlivens the eastern edge of the Arts District by facilitating resident, hotel guest, employee, and visitor activity; serving as a gateway between the Arts District and the Los Angeles River/Boyle Heights; and improving public connectivity in a way that complements the Ribbon of Light Bridge, the City's proposed PARC Improvements, and the 7th Street Bridge. It would also not meet any of the Project's specific objectives. Therefore, the No Project/No Build Alternative would not achieve any of the Project Objectives.

b) Alternative 2: Reduced Retail and Increased Office with Charter School Alternative

(1) Description of the Alternative

Alternative 2, the Reduced Retail and Increased Office with Charter School Alternative, would relocate the hotel use from Building 1 where it is co-located with residential uses under the proposed Project, into a standalone hotel building (Building 3). Under Alternative 2, Building 1 would be comprised of residential and retail uses. Building 2 would have an increased footprint with more office floor area, less retail space, and a smaller gym. Building 3 would have a reduced footprint and would be dedicated to the hotel use. Building 4 would consist of office use, and studio/event/gallery and potential museum uses, located in Building 3 under the Project. Building 5 would, similar to the Project, be primarily office space. However, the lower floors of Building 5 would house a charter elementary school with a capacity up to 300 students. Due to the change in size for Buildings 2 and 3, the Entry Plaza and view corridor between Buildings 2 and 3 would be shifted but would remain the same width as under the Project. The building footprints for Buildings 1, 4, and 5 would remain the same under Alternative 2 as under the Project, and the maximum heights for all of the buildings would be the same as the Project.

Alternative 2 would increase the number of residential units by 112 units from 308 units under the Project to 420 units, 67 of which would be affordable units.²⁵ Alternative 2 would also increase office floor area by 56,611 square feet from 944,055 square feet under the Project to 1,000,666 square feet. Alternative 2's charter elementary school would consist of 32,150 square feet of floor area. Alternative 2 would reduce the retail floor area by 124,488 square feet from 136,152 square feet under the Project to 11,664 square feet. Alternative 2 would reduce the restaurant floor area by 29,877 square feet from 89,577 square feet under the Project to 59,700 square feet. The hotel, which would still contain 236 rooms, would increase in size by 50,913 square feet of floor area from 158,647

²⁵ Pursuant to LAMC Section 11.5.11, if a General Plan Amendment, Zone Change or Height District Change allows a residential use where not previously allowed, a rental project is required to provide five percent Extremely Low Income rental units, and either 11 percent Very Low Income rental units or 20 percent Lower Income rental units. Measure JJJ would therefore require 16 Extremely Low Income and either 34 Very Low Income units or 62 Lower Income units for the Project's 308 units.

square feet of floor area under the Project to 209,560 square feet of floor area. The space available for the studio/event/gallery/potential museum would be reduced by 49,548 square feet of floor area from 93,617 square feet of floor area under the Project to 44,069 square feet of floor area. The gym would be reduced by 9,724 square feet of floor area from 62,148 square feet of floor area under the Project to 52,424 square feet of floor area. In sum, the total commercial square footage would be reduced by 73,963 square feet from 1,484,196 square feet under the Project to 1,410,233 square feet. The total developed floor area on the Project Site would remain at 1,792,103 square feet as under the Project. Therefore, the floor area ratio (FAR) would continue to be 7.5:1 as under the Project.

Alternative 2 would provide a minimum of 2,000 traditional vehicle parking spaces, with parking for up to 3,500 vehicles using a combination of automated parking systems, valet parking, or other efficiency parking methods. As with the Project, parking would be provided in a six-level below-grade structure, and above-grade structured parking spanning the Project Site. As with the Project, a rooftop heliport would be located on Building 5 for emergency and occasional private use.

Under Alternative 2, the hotel pick-up and drop-off location would be moved from the Project's Mesquit Street pick-up in front of Building 1 to an off-street driveway on Mesquit Street adjacent to Building 3. Residential pick-up and drop-off would be on Mesquit Street in front of Building 1. Office pick-up and drop-off, along with lobby access, would be available from the Mesquit Paseo in front of Building 2. Pedestrian access to the Hotel lobby in Building 3 would be provided from Mesquit Street and from 7th Street. Additional office and event space pick-up and drop-off would be provided from two off-street driveways on 7th Street at Buildings 4 and 5.

Alternative 2 would provide a total of approximately 213,139 square feet of open space for use by Project residents, hotel guests, employees, and visitors. Proposed open space features include at-grade landscaped areas, pedestrian passageways and walkways, balconies offering views of the Los Angeles River, and above-grade landscaped terraces and pool amenity decks. Under Alternative 2, the Northern Landscaped Area, Elevated Pedestrian Walkway, North and South River Balconies, Mesquit Paseo, and Office Terraces would all remain as proposed under the Project. The residential pool deck would be moved from the northern portion of Building 2 to the southern portion of Building 1. The fitness deck would be moved from Building 3 to Building 2. The Work Breakout Deck would remain on the southern portion of Building 2. The rooftop of Building 3 would be comprised of a Hotel Garden and a hotel bar and pool deck. The rooftops of Building 4 and 5 would remain the same as under the Project. Alternative 2 would include a 75,000 square foot Deck as part of its development program, which is reduced as compared to the 132,000 square foot Deck under the Project with the Deck Concept. The Deck under Alternative 2 would extend over a portion of the Railway Properties east of the Project Site. The same types of programming and events would occur on the Project Site as under the Project. For events that would be located on the Deck, Alternative 2 would have the same type and frequency of events, but would have a reduced capacity of 5,000

people compared to the capacity of 8,800 people under the Project with the Deck Concept due to the smaller Deck under Alternative 2.

The components of Alternative 2 are compared to those of the Project in **Table V-2, Comparison of Alternative 2 to the Project.**

**TABLE V-2
COMPARISON OF ALTERNATIVE 2 TO THE PROJECT**

Component	Project	Alternative 2	Difference between Project and Alternative 2
Residential Dwelling Units	308 du	420 du	+112 du
Office	944,055 sf	1,000,666 sf	+56,611 sf
Retail	136,152 sf	11,664 sf	-124,488 sf
Restaurant	89,577 sf	59,700 sf	-29,877 sf
Hotel (236 rooms)	158,647 sf	209,560 sf	+50,913 sf
Studio/Event/Gallery/Potential Museum	93,617 sf	44,069 sf	-49,548 sf
Gym	62,148 sf	52,424 sf	-9,724 sf
Elementary School	No School	32,150 sf	+32,150 sf
Total Developed Floor Area	1,792,103 sf	1,792,103 sf	Same
FAR	7.5:1	7.5:1	Same
Provided Open Space	141,876 sf	213,139 sf	+71,263 sf
Open Space with the Deck	273,876 sf	213,139 sf	-60,737 sf
Deck & Capacity @ 1 person per 15 sf	132,000 sf/ 8,800 ppl	75,000 sf/ 5,000 ppl	-57,000 sf/ -3,800 ppl
Vehicle Parking	2,000–3,500	2,000–3,500	Same

SOURCE: ESA, 2021.

(2) Environmental Impacts

(a) Air Quality

(i) Conflict with Air Quality Management Plan

(a) Project

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, Project construction would not increase the frequency or severity of an existing violation or cause or contribute to new violations for nonattainment pollutants. Project construction would also comply with the CARB requirements to minimize short-term emissions from on-road and off-road diesel equipment, SCAQMD Rule 403 requirements to control fugitive dust, SCAQMD Rule

1113 for controlling VOC emissions from architectural coatings, and the ATCM, such that the Project would meet or exceed AQMP requirements to reduce emissions from construction equipment and activities. Project operations would not conflict with the 2016 AQMP in regard to transportation control strategies from the SCAG 2016–2040 RTP/SCS that are intended to reduce VMT and regional mobile source emissions. Project operation would also be consistent with, and would not conflict with, applicable air quality policies of the General Plan’s Air Quality Element. Project operations would also not result in an increase in localized emissions in excess of the SCAQMD-recommended localized significance thresholds at sensitive receptors in proximity to the Project Site and impacts would be less than significant.

Alternative 2, as with the Project, would include new development on the Project Site that would generate new criteria pollutant emissions. Similar to the Project, Alternative 2 would be consistent with the goals of SCAG’s 2016–2040 RTP/SCS and growth projections in the 2016 AQMP, since the growth would occur in a HQTAs and a TPA. Similar to the Project, Alternative 2 would be consistent with the AQMP in its incorporation of appropriate control strategies for emissions reduction during construction and operation. In addition, similar to the Project, Alternative 2 would also be consistent with applicable goals, objectives, and policies of the Air Quality Element of the General Plan that support and encourage pedestrian activity in the City and Community Plan area and uses that contribute to a land use pattern addressing housing needs while reducing VMT and air pollutant emissions within a TPA. For all of these reasons, impacts under Alternative 2 with respect to consistency with air quality management plans would be less than significant and similar to the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would be consistent with the goals of the AQMP regarding transportation control strategies for emissions reduction during construction and operation; it would be consistent with the City’s Air Quality Element that supports pedestrian activity and growth within a TPA; it would implement CARB requirements to minimize short-term emissions from on-road and off-road diesel equipment, as well as implement all applicable SCAQMD Rules. Operation of the Project with the Deck Concept would also not result in an increase in localized emissions that would exceed the SCAQMD-recommended localized significance threshold concentrations at sensitive receptors in proximity to the Project Site. Because the Project with the Deck Concept would not conflict with air quality management plans, impacts would be less than significant.

Similar to the Project with the Deck Concept, Alternative 2 would generate new criteria pollutant emissions. Similar to the Project with the Deck Concept, Alternative 2 would be consistent with the goals of SCAG’s 2016–2040 RTP/SCS and growth projections in the 2016 AQMP, since the growth would occur in a HQTAs and a TPA. As with the Project with the Deck Concept, Alternative 2 would be consistent with the AQMP in its incorporation of appropriate control strategies for emissions reduction during construction and operation. In addition, Similar to the Project with the Deck Concept, Alternative 2

would also be consistent with applicable goals, objectives, and policies of the Air Quality Element of the General Plan that support and encourage pedestrian activity in the City and Community Plan area and uses that contribute to a land use pattern addressing housing needs while reducing VMT and air pollutant emissions within a TPA. For all of these reasons, impacts under Alternative 2 with respect to consistency with air quality management plans would be less than significant and similar to the Project with the Deck Concept.

(ii) *Cumulative Increase in Criteria Pollutants/Violation of Air Quality Standards*

(a) Construction

(i) *Project*

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, air emissions from Project construction on a maximum construction activity day would exceed the SCAQMD's regional significance thresholds for NO_x, and even with implementation of feasible mitigation measures, impacts would remain significant and unavoidable.

Alternative 2's construction phases have the potential to generate emissions that would exceed SCAQMD air quality standards through the use of heavy-duty construction equipment, construction traffic, fugitive dust emissions, paving operation, and the application of architectural coatings and other building materials. The maximum emissions under Alternative 2 would be similar to the Project because emission levels are based on a single day in which maximum construction activity would occur. Similar to the Project, even with incorporation of Mitigation Measure AQ-MM-1, construction emissions under Alternative 2 would exceed SCAQMD numerical significance thresholds for NO_x, and impacts would be significant and unavoidable. Alternative 2's total floor area and expected duration of construction would be similar to the Project. However, with the additional construction of the Deck under Alternative 2, the potential maximum daily emission levels of criteria pollutants would be similar to the Project but occur for a slightly longer duration than under the Project. As such, impacts relative to air quality threshold standards under Alternative 2 would be greater than the Project.

(ii) *Project with the Deck Concept*

The Project with the Deck Concept would exceed SCAQMD's regional numerical significance thresholds for NO_x on a maximum construction activity day, even with implementation of Mitigation Measure AQ-MM-1. Even with implementation of all feasible mitigation measures, the Project with the Deck Concept would result in maximum daily emissions (on a maximum construction day) and significant and unavoidable impacts with respect to cumulative increase in criteria pollutants and air quality standards.

Alternative 2 would generate new criteria pollutant emissions during construction. As with the Project with the Deck Concept, Alternative 2's construction phases have the potential to generate emissions that would exceed SCAQMD air quality standards. With the

reduced Deck size compared to the Project with the Deck Concept (75,000 square feet under Alternative 2 compared to 132,000 square feet under the Project with the Deck Concept), the maximum daily emissions under Alternative 2 would be similar to the Project with the Deck Concept but would occur for fewer days due to the shorter duration of construction. Similar to the Project with the Deck Concept, even with incorporation of Mitigation Measure AQ-MM-1, maximum daily construction emissions under Alternative 2 would exceed SCAQMD numerical significance thresholds for NO_x, and impacts would be significant and unavoidable. Nonetheless, due to the shorter duration of construction under Alternative 2, impacts under Alternative 2 would be less than the Project with the Deck Concept.

(b) Operation

(i) *Project*

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, the Project's operation would not cause an exceedance of SCAQMD numerical significance thresholds for NO_x, CO, SO_x, PM₁₀, and PM_{2.5}, and impacts would be less than significant. However, VOCs emissions would be 84 pounds per day for the Project, which would exceed the daily impact threshold of 55 pounds per day, and Project impacts would be potentially significant. Even with implementation of feasible mitigation measures (Mitigation Measures AQ-MM-2 through AQ-MM-3 and TRAF-MM-1), which would reduce Project VOC emissions to 77 pounds per day, associated Project impacts would be reduced to 77 pounds per day and would remain significant and unavoidable.

During operation, Alternative 2 would generate emissions associated with vehicle trips, heating, lighting, other electric and natural gas power requirements, emergency generators, and architectural coatings. Similar to the Project, based on emissions modeling conducted for Alternative 2, provided in Appendix P of this Draft EIR, Alternative 2 would not exceed the SCAQMD numerical significance thresholds for NO_x, CO, SO_x, PM₁₀, and PM_{2.5}, and Alternative 2's emissions for those pollutants would be less than under the Project. Thus, as with the Project, impacts under Alternative 2 would be less than significant for these criteria pollutants. Alternative 2 would result in VOC emissions of 67 pounds per day, which would exceed the daily impact threshold of 55 pounds per day. Therefore, impacts under Alternative 2 would be potentially significant. With implementation of Mitigation Measures AQ-MM-2 through AQ-MM-3 and TRAF-MM-1, Alternative 2's VOC emissions would be slightly reduced but would remain at 67 pounds per day due to the increased mobile source emissions. Therefore, while VOC impacts under Alternative 2 would remain significant and unavoidable after implementation of feasible mitigation measures, the impacts would be less than the Project. Operational emissions calculations for Alternative 2 are provided in Appendix P of this Draft EIR.

(ii) Project with the Deck Concept

The Project with the Deck Concept would emit criteria pollutants from mobile, stationary, and area sources. The Project with the Deck Concept would comprise the same residential and commercial uses as the Project, and include a 132,000-square-foot Deck. In addition to source and mobile emissions from the residential and commercial uses, the Deck would emit source emissions related to coatings and landscaping, as well as generate mobile emissions related to intermittent programmed activities. Unmitigated VOC emissions from these uses would be 88 pounds per day, thus, exceeding the daily impact threshold of 55 pounds per day. Even with implementation of feasible mitigation measures (Mitigation Measures AQ-MM-2 through AQ-MM-3 and TRAF-MM-1), which would reduce the Project with the Deck Concept's VOC emissions to 81 pounds per day, VOC levels would still exceed the impact threshold. Impacts under the Project with the Deck Concept would therefore remain significant and unavoidable.

During operation, Alternative 2 would generate emissions for the reasons described under the Project, above. Similar to the Project with the Deck Concept, based on emissions modeling conducted for Alternative 2, provided in Appendix P of this Draft EIR, Alternative 2 would not exceed the SCAQMD numerical significance thresholds for NO_x, CO, SO_x, PM₁₀, and PM_{2.5}, and Alternative 2's emissions for those pollutants would be less than significant and less than under the Project with the Deck Concept. However, Alternative 2 would result in VOC emissions of 67 pounds per day, which would exceed the daily impact threshold of 55 pounds per day. With implementation of Mitigation Measures AQ-MM-2 through AQ-MM-3 and TRAF-MM-1, Alternative 2's VOC emissions would be slightly reduced but would remain at 67 pounds per day due to the increased mobile source emissions. However, mitigated VOC emissions under Alternative 2 would be less than under the Project with the Deck Concept (81 pounds per day compared to 67 pounds per day). Therefore, while VOC impacts under Alternative 2 would remain significant and unavoidable after implementation of feasible mitigation measures, VOC impacts under Alternative 2 would be less than the Project with the Deck Concept. Operational emissions calculations for Alternative 2 are provided in Appendix P of this Draft EIR.

*(iii) Exposure of Sensitive Receptors to Pollutant Concentrations**(a) Localized Emissions**(i) Construction*Project

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, given that NO_x, PM₁₀ and PM_{2.5} emissions would exceed the SCAQMD's localized thresholds, Project impacts would be potentially significant and would require implementation of Mitigation Measure AQ-MM-1 for impacts to be reduced to less-than-significant levels. Alternative 2 would

also generate localized emissions during construction. Maximum daily localized construction emissions under Alternative 2 would be similar to the Project but would occur for a longer duration than under the Project due to additional days of construction for the Deck. As with the Project, maximum localized emissions under Alternative 2 associated with grading and architectural coatings during construction would be potentially significant and would require implementation of Mitigation Measure AQ-MM-1 to reduce impacts to less-than-significant levels. Although impacts related to localized emission levels would be greater under Alternative 2 due to the increased construction duration, impacts related to exposure of sensitive receptors impacts to sensitive receptors to localized construction emissions would be reduced to a level that would be less than significant with mitigation under both Alternative 2 and the Project.

Project with the Deck Concept

Maximum daily construction activities under the Project with the Deck Concept would exceed the SCAQMD's localized emission thresholds for NO_x, PM₁₀ and PM_{2.5}, a potentially significant impact to sensitive receptors. This impact would be addressed through implementation of Mitigation Measure AQ-MM-1, which would reduce localized emission levels to levels that are less than significant.

Alternative 2 would also expose sensitive receptors to localized emissions during construction. However, with the reduction of the size of the Deck under Alternative 2, maximum daily localized construction emissions would be similar to the Project with the Deck Concept but would occur for fewer days. As with the Project with the Deck Concept, maximum localized emissions under Alternative 2 during construction would be potentially significant and would require implementation of Mitigation Measure AQ-MM-1 to reduce impacts to less-than-significant levels. With respect to localized construction emissions, impacts to sensitive receptors would be less than significant under Alternative 2 with mitigation and, because of fewer maximum construction emission days, would be less than under the Project with the Deck Concept.

(ii) *Operation*

Project

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, Project operation would not exceed the localized thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. Therefore, Project impacts related to localized operational emissions would be less than significant. Alternative 2 would have a similar scale of construction and overall building massing as the Project. Based on emissions modeling conducted for Alternative 2, provided in Appendix P of this Draft EIR and as detailed in the *Energy* analysis below for Alternative 2, Alternative 2 would have reduced localized emissions and reduced natural gas combustion compared to the Project for all criteria pollutants except CO. However, similar to the Project, Alternative 2 CO emissions would be less than the localized significance threshold. Therefore, localized operational emission impacts under Alternative 2 would be less than significant and less than the Project.

Project with the Deck Concept

The Project with the Deck Concept would emit criteria pollutants from mobile, stationary, and area sources. In addition to source and mobile emissions from residential and commercial uses, the Project with the Deck Concept would emit source emissions from the Deck, including architectural coating, consumer products and landscaping, and mobile emissions related to visitors to programmatic activities on the Deck. The operation of the Project with the Deck Concept would not exceed localized thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. Impacts under the Project with the Deck Concept with respect to localized emissions would be less than significant. Alternative 2 would have a similar scale of construction as the Project with the Deck Concept, except that Alternative 2 would reduce the scale of the Deck and certain uses. Based on emissions modeling conducted for Alternative 2, provided in Appendix P of this Draft EIR, Alternative 2 would have reduced localized operational emissions and reduced natural gas combustion compared to the Project with the Deck Concept for all criteria pollutants except CO. However, similar to the Project with the Deck Concept, Alternative 2 CO emissions would be less than the localized significance threshold. Therefore, localized operational emission impacts under Alternative 2 would be less than significant and less than the Project with the Deck Concept.

(b) Carbon Monoxide Hotspots

(i) *Project*

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, the Project's 27,040 daily vehicle trips and residential and commercial uses would not generate CO hotspots that would exceed emission thresholds. Impacts with respect to CO hotspots would be less than significant.

Vehicle trips would be approximately one to 13 percent lower under Alternative 2 than the Project.²⁶ Therefore, as Alternative 2 would generate fewer vehicle trips than the Project, CO hotspot impacts would be less than the Project and would be less than significant.

(ii) *Project with the Deck Concept*

Operation of the Project with the Deck Concept would emit CO pollutants from mobile, stationary, and area sources. Mobile source emissions under the Project with the Deck Concept would comprise 27,493 trips per day. The Project with the Deck Concept's daily vehicle trips and residential and commercial uses would not generate CO hotspots that would exceed emission thresholds. Impacts with respect to CO hotspots would be less than significant.

²⁶ Fehr & Peers, *Analysis of 670 Mesquit Project Alternatives Technical Memorandum*, October 8, 2021. Provided in Appendix P of this Draft EIR.

Vehicle trips under Alternative 2 would be approximately 9 to 18 percent lower than the Project with the Deck Concept.²⁷ Therefore, as Alternative 2 would generate fewer vehicle trips than the Project with the Deck Concept, CO hotspot impacts would be less than significant and less than the Project with the Deck Concept.

(c) Toxic Air Contaminants

(i) *Construction*

Project

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, maximum daily construction activity for the Project would generate DPM emissions resulting in TAC emissions adjacent to sensitive residential receptors. TAC levels under the Project, however, would not exceed SCAQMD thresholds and, as such, sensitive receptors would not be exposed to substantial TAC concentrations. Impacts related to TAC emissions and health risk impacts would be less than significant under the Project.

Under Alternative 2, as with the Project, TACs associated with DPM emissions from heavy construction equipment would occur adjacent to sensitive residential receptors. TAC levels under Alternative 2, however, would not exceed SCAQMD thresholds and sensitive receptors would not be exposed to substantial TAC concentrations. Impacts with respect to TACs would be less than significant under both the Project and Alternative 2. However, because of the increased duration of construction activity required for development of the Deck under Alternative 2, impacts with respect to TACs would be greater than under the Project.

Project with the Deck Concept

Under the Project with the Deck Concept, maximum daily construction activity would generate DPM emissions resulting in TAC emissions adjacent to sensitive residential receptors. However, TAC emissions would not exceed SCAQMD thresholds and health risk impacts would be less than significant under the Project with the Deck Concept.

Under Alternative 2, as with the Project with the Deck Concept, TACs associated with DPM emissions from heavy construction equipment would occur adjacent to sensitive residential receptors. TAC levels under Alternative 2, however, would not exceed SCAQMD thresholds and sensitive receptors would not be exposed to substantial TAC concentrations. Impacts with respect to TACs would be less than significant under both the Project with the Deck Concept and Alternative 2. However, because of the decreased duration of daily construction activity required for development of the reduced Deck under Alternative 2, impacts with respect to TACs would be less than under the Project with the Deck Concept.

²⁷ Fehr & Peers, *Analysis of 670 Mesquit Project Alternatives Technical Memorandum*, October 8, 2021. Provided in Appendix P of this Draft EIR.

(d) Operation

Project

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, based on the uses expected on the Project Site, potential long-term operational impacts associated with the release of TACs would be minimal, regulated, and controlled, and would not be expected to exceed the SCAQMD significance threshold during operation, and Project impacts would be less than significant.

Alternative 2, as with the Project, would use consumer products and architectural coatings or involve other sources, such as charbroiling associated with restaurant uses. TAC emissions from these sources are anticipated to be minimal and charbroiling restaurant emissions would be regulated under SCAQMD Rule 1138. In addition, as with the Project, Alternative 2 would provide stationary emergency generators for its buildings. The emergency generators would result in emissions during maintenance and testing operations, similar to the Project. Emergency generators are permitted by the SCAQMD and regulated under SCAQMD Rule 1470. Maintenance and testing would occur periodically, up to 50 hours per year per Rule 1470. Alternative 2 would generate minor amounts of diesel emissions from mobile sources, such as delivery trucks, but would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. Furthermore, trucks would be required to comply with the applicable provisions of the CARB 13 CCR, Section 2025 (Truck and Bus regulation) to minimize and reduce PM and NO_x emissions from existing diesel trucks. However, with the reduced retail component, there would be fewer delivery trucks to the Project Site under Alternative 2 than the Project. Toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the uses expected on the Project Site, as with the Project, potential long-term operational impacts associated with the release of TACs under Alternative 2 would be minimal, regulated, and controlled, and would not exceed the applicable SCAQMD significance thresholds. Operation of Alternative 2, as with the Project, would therefore not expose sensitive receptors to substantial TAC concentrations. Operational impacts would be less than significant. However, because of potentially fewer delivery trucks during operation under Alternative 2, impacts would be less than under the Project.

Project with the Deck Concept

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, based on the uses expected on the Project Site, potential long-term operational impacts associated with the release of TACs would be minimal, regulated, and controlled, and would not exceed the SCAQMD significance threshold during operation. Impacts under the Project with the Deck Concept impacts would therefore be less than significant.

Alternative 2, as with the Project with the Deck Concept, would use consumer products and architectural coatings or involve other sources, such as charbroiling associated with

restaurant uses. TAC emissions from these sources are anticipated to be minimal and charbroiling restaurant emissions would be regulated under SCAQMD Rule 1138. In addition, Alternative 2 would provide stationary emergency generators for its buildings, which would be regulated under SCAQMD Rule 1470 for periodic maintenance and testing up to 50 hours per year. Alternative 2 would generate minor amounts of diesel emissions from mobile sources, such as delivery trucks, but would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. Furthermore, trucks would be required to comply with the applicable provisions of the CARB 13 CCR, Section 2025 (Truck and Bus regulation) to minimize and reduce PM and NO_x emissions from existing diesel trucks. However, with the reduced retail component, there would be fewer delivery trucks to the Project Site under Alternative 2 than the Project with the Deck Concept. Toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the uses expected on the Project Site, as with the Project with the Deck Concept, potential long-term operational impacts associated with the release of TACs under Alternative 2 would be minimal, regulated, and controlled, and would not be expected to exceed the SCAQMD significance threshold. Operation of Alternative 2, as with the Project with the Deck Concept, would not expose sensitive receptors to substantial TAC concentrations, and operational impacts would be less than significant. However, because of potentially fewer delivery trucks during operation under Alternative 2, impacts would be less than under the Project with the Deck Concept.

(b) *Cultural Resources*

(i) *Historical Resources*

(a) *Project*

As discussed in Section IV.B, *Cultural Resources*, of this Draft EIR, there are no historical resources present on the Project Site. Regarding historical resources adjacent to the Project Site, the Project has the potential to result in direct impacts to the historic 7th Street Bridge due to the removal of character defining features along the north side of the Bridge adjacent to the project Site, including the removal of approximately 222 linear feet of character-defining railing. In addition, construction vibration could also impact the structural integrity of the 7th Street Bridge under the Project, which is a potentially significant impact. Mitigation Measures, including CUL-MM-1 through CUL-MM-4 and NOISE-MM-6 through NOISE-MM-8, are required to reduce impacts to this historical resource. With implementation of these mitigation measures, impacts to the 7th Street Bridge would be reduced to levels that are less than significant.

Under Alternative 2, more linear feet of the 7th Street Bridge's character-defining railing would need to be removed for the development of the Deck (an additional approximately 69 linear feet). As with the Project, construction vibration under Alternative 2 could also impact the structural integrity of the 7th Street Bridge. Similar to the Project, the impacts to the 7th Street Bridge under Alternative 2 would be potentially significant and would

require implementation of Mitigation Measures CUL-MM-1 through CUL-MM-4 and NOISE-MM-6 through NOISE-MM-8 to reduce impacts to less-than-significant levels. However, because Alternative 2 would remove 69 more linear feet of character defining railing, impacts would be greater compared to the Project.

(b) Project with the Deck Concept

To accommodate Deck and roadway construction, the Project with the Deck Concept would require the removal of 291 linear feet of existing character-defining railing at the historic 7th Street Bridge, resulting in a potentially significant historical resources impact. Although the Deck would be smaller under Alternative 2, a similar amount/length of character-defining railing along the 7th Street Bridge would be required, since only approximately 69 linear feet of the Bridge would be affected under either scenario due to the rise of the Bridge where the Deck separates from the Bridge. Thus, potentially significant direct impacts would be similar under Alternative 2 and the Project with the Deck Concept. Construction vibration could also impact the structural integrity of the 7th Street Bridge under both Alternative 2 and the Project with the Deck Concept. Implementation of Mitigation Measures CUL-MM-1 through CUL-MM-4 and NOISE-MM-6 through NOISE-MM-8 would reduce impacts under Alternative 2 and the Project with the Deck Concept to levels that would be less than significant. Based on the above, direct and indirect impacts would be similar under Alternative 2 and the Project with the Deck Concept.

(ii) *Archaeological Resources*

(a) Project

As discussed in Section IV.B, *Cultural Resources*, of this Draft EIR, there are no known archaeological resources identified within the Project Site. Nonetheless, due to the Project Site's proximity to the Los Angeles River (which is a known landmark for prehistoric habitation), soil matrices, past historic-period uses, and only moderate past disturbances, grading and excavation for the Project's subterranean garage may encounter unknown archaeological resources. Therefore, Project excavation activities have the potential to disturb, damage, or degrade archaeological resources that could be encountered during construction, thus resulting in a substantial adverse change in the significance of an archaeological resource qualifying as a historical resource or unique archaeological resources pursuant to CEQA Guidelines Section 15064.5. The Project would be required to implement Mitigation Measures CUL-MM-5 through CUL-MM-7. With implementation of these measures, impacts related to archaeological resources would be reduced to less-than-significant levels.

Alternative 2 would require a similar depth of excavation for the subterranean parking levels as the Project. A relatively limited amount of excavation would be required to install the piers that would support the Deck under Alternative 2. Therefore, potential exists for Alternative 2's excavation activity to disturb, damage, or degrade archaeological resources. Such disturbance could result in a substantial adverse change in the

significance of an archaeological resource qualifying as a historical resource or unique archaeological resource pursuant to CEQA Guidelines Section 15064.5. Alternative 2, as with the Project, would be required to implement Mitigation Measures CUL-MM-5 through CUL-MM-7. With implementation of these measures, impacts to archaeological resources would be less than significant. Given the relatively limited excavation required to install the piers that would support the Deck under Alternative 2 and the same general sensitivity for encountering unknown archaeological resources where excavation extends into native soil/sediment, impacts associated with archaeological resources would be less than significant with mitigation under both the Project and Alternative 2. However, impacts would be incrementally greater under Alternative 2 due to the increased construction footprint associated with the Deck construction.

(b) Project with the Deck Concept

Grading and excavation for the Project with the Deck Concept, including excavation for subterranean parking may encounter unknown archaeological resources. As such, excavation activities have the potential to disturb, damage, or degrade archaeological resources that could be encountered during construction and, thus, impact archaeological resources. With implementation of Mitigation Measures CUL-MM-5 through CUL-MM-7, impacts to archaeological resources under the Project with the Deck Concept would be reduced to less-than-significant levels.

Alternative 2 would require a similar depth and volume of excavation for the subterranean parking levels as the Project with the Deck Concept. This excavation constitutes the vast majority of the Project with the Deck Concept and Alternative 2's excavation activity. A relatively limited amount of excavation would be required to install the piers that would support the Deck, although slightly greater under the Project with the Deck Concept than under Alternative 2. The potential exists for Alternative 2's excavation activities to disturb, damage, or degrade archaeological resources, which could result in a substantial adverse change in the significance of an archaeological resource qualifying as a historical resource or unique archaeological resource. Alternative 2 would be required to implement Mitigation Measures CUL-MM-5 through CUL-MM-7 to reduce impacts. With implementation of mitigation measures related to archaeological resources, impacts under both Alternative 2 and the Project with the Deck Concept would be less than significant. Given the relatively limited excavation required to install the piers that would support the Deck under the Project with the Deck Concept and Alternative 2 and the same general sensitivity for encountering unknown archaeological resources where excavation extends into native soil/sediment, impacts associated with archaeological resources would be less than significant with mitigation under both the Project with the Deck Concept and Alternative 2, However, impacts would be incrementally less under Alternative 2 due to the decreased construction footprint associated with the Deck construction.

(iii) *Human Remains*

(a) Project

The Project would excavate to six subterranean levels. As discussed in Section IV.B, *Cultural Resources*, of this Draft EIR, no human remains were identified during the pedestrian survey of the Project Site, and no known human remains have been recorded within the Project Site or a 0.5-mile radius. In addition, with implementation of procedures codified in PRC Section 5097.98 and State Health and Safety Code Section 7050.5, impacts under the Project would be less than significant.

Alternative 2 would excavate to the same depths as under the Project for six subterranean levels. A relatively limited amount of excavation would be required to install the piers that would support the Deck under Alternative 2. Pursuant to PRC Section 5097.98 and State Health and Safety Code Section 7050.5, any discovery of unrecorded human remains would require the immediate halting of construction or ground-disturbing activities and notification of the County Coroner. If the remains are determined to be Native American in origin, a “Most Likely Descendent” would be contacted to assist in determining appropriate treatment for the remains. In the event of the discovery of unrecorded human remains during construction, compliance with applicable regulatory requirements would ensure potential impacts are less than significant. Thus, Alternative 2, as with the Project, would have a less-than-significant impact with respect to human remains. Given the relatively limited excavation required to install the piers that would support the Deck under Alternative 2 and the same general sensitivity for encountering unknown human remains, impacts associated with human remains would be less than significant under both the Project and Alternative 2. However, impacts would be incrementally greater under Alternative 2 because of the larger construction footprint associated with the Deck construction.

(b) Project with the Deck Concept

The Project with the Deck Concept would excavate to six subterranean levels. A relatively limited amount of excavation would be required to install the piers that would support the Deck. Although no human remains have been recorded within the Project Site or within a 0.5-mile radius of the Project Site, all excavation activity has the potential to encounter unrecorded human remains. In the event that any human remains are recovered, the Project with the Deck Concept would implement procedures codified in PRC Section 5097.98 and State Health and Safety Code Section 7050.5. Implementation of these procedures would ensure appropriate handling of any recovered human remains and that any impacts to human remains would be less than significant.

Alternative 2 would excavate to six subterranean levels and construct a 75,000-square-foot Deck, compared to the Project with the Deck Concept, which would construct a 132,000-square-foot deck. Any discovery of unrecorded human remains would require the immediate halting of construction or ground-disturbing activities and implementation of procedures described under the Project, above. In the event of the discovery of unrecorded human remains during construction, compliance with procedures codified in

PRC Section 5097.98 and State Health and Safety Code Section 7050.5, would ensure potential impacts are less than significant. Thus, impacts with respect to human remains under the Alternative 2 and Project with the Deck Concept would be less than significant. Given the relatively limited excavation required to install the piers that would support the Deck under the Project with the Deck Concept and Alternative 2, impacts associated with human remains would be less than significant under the Project with the Deck Concept and Alternative 2. However, impacts would be incrementally less under Alternative 2 because of the reduced construction footprint associated with the Deck construction.

(c) *Energy*

(i) *Efficient Energy Consumption*

(a) *Project*

As discussed in Section IV.C, *Energy*, of this Draft EIR, construction of the Project would utilize fuel-efficient equipment consistent with State and federal regulations, such as fuel efficiency regulations in accordance with the CARB Pavley Phase II standards, the anti-idling regulation in accordance with CCR Title 13, Section 2485 and fuel requirements in accordance with CCR Title 17, Section 93115, and would comply with State measures to reduce the inefficient, wasteful, and unnecessary consumption of energy, such as petroleum-based transportation fuels. Construction would utilize energy only for necessary on-site activities and to transport construction materials and demolition debris to and from the Project Site, and impacts would be less than significant. During operation, the Project-related net increase in annual electricity consumption of approximately 26,472,098 kWh for the Project would be within LADWP's projected electricity supplies. The Project-related net increase in annual natural gas consumption of approximately 49,500,000 kBtu would fall within SoCalGas' projected consumption for the area and would be consistent with SoCalGas' anticipated regional demand from population or economic growth. The Project is estimated to consume approximately 2.37 million gallons of gasoline and 0.192 million gallons of diesel per year. The Project's mixed use design and its increase in density within an HQTAs; proximity to transit, including multiple bus routes; proximity to other retail, restaurant, entertainment, commercial, and job destinations and walkable environment; implementation of a TDM program; and provision of EV charging stations and EV-ready parking spaces, the Project would reduce VMT more than a standard project within the Air Basin. The Project incorporates Project Design Feature GHG-PDF-1 (Green Building Features), which includes building features to achieve the LEED Silver Certification level or equivalent green building standards. The Project would incorporate Project Design Feature WS-PDF-1 (Water Conservation Features) to minimize water demand and associated energy needed for water conveyance. The Project would provide for the installation of the conduit and panel capacity to accommodate future EV charging stations. Additionally, the Project's mixed-use design and its increase in density on an infill site within an HQTAs and in proximity to transit would achieve a reduction in VMT. Therefore, operation of the Project would not result in wasteful, inefficient, and unnecessary consumption of energy, and impacts would be less than significant.

Alternative 2 would utilize fuel-efficient equipment consistent with State and federal regulations. Construction would utilize energy only for necessary on-site activities and to transport construction materials and demolition debris to and from the Project Site, and impacts would be less than significant. During operation, based on energy modeling conducted for Alternative 2, provided in Appendix P of this Draft EIR, Alternative 2 would generate a net increase in annual electricity consumption of approximately 23,016,881 kWh, which would be within LADWP's projected electricity supplies and would be less than the Project. Alternative 2 would generate a net increase in annual natural gas consumption of approximately 35,000,000 kBtu, which would fall within SoCalGas' projected consumption for the area, would be consistent with SoCalGas' anticipated regional demand from population or economic growth, and would be less than the Project. Alternative 2 is estimated to consume approximately 1.55 million gallons of gasoline and 0.101 million gallons of diesel per year which would be less than the Project's annual fuel demand. Because of proximity to transit and services, and with the installation of 10 percent EV stations and 30 percent EV-ready stations, Alternative 2 as with the Project, would minimize operational transportation fuel demand. Alternative 2 would incorporate Project Design Features as GHG-PDF-1 and WS-PDF-1 to minimize water demand and energy use. Alternative 2 would similarly install conduit and panel capacity to accommodate future EV charging stations. Alternative 2 would be located within an HQTAs and would achieve a reduction in VMT. Therefore, Alternative 2, as with the Project, would not cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation and, as such, impacts related to efficient energy consumption would be less than significant. As Alternative 2 would require less electricity, natural gas, and transportation energy demand than the Project, impacts under Alternative 2 would be less than the Project. Operational energy calculations for Alternative 2 are provided in Appendix P of this Draft EIR.

(b) Project with the Deck Concept

The Project with the Deck Concept would require electricity and natural gas for operation of facilities, electricity for outdoor lighting associated the temporary programming on the Deck, and fuel for transportation. With the addition of the Deck during the last phase of construction, the Project with the Deck Concept would continue to use energy related to construction activities longer than under the Project. During operation, the Project with the Deck Concept's net increase in annual electricity consumption would be approximately 26,518,298 kWh. Demand for electricity would be within LADWP's projected electricity supplies. Project with the Deck Concept-related net increase in annual natural gas consumption would be approximately 49,500,000 kBtu. This demand would fall within SoCalGas' projected consumption for the area and would be consistent with SoCalGas' anticipated regional demand from population or economic growth. The Project with the Deck Concept is estimated to consume approximately 2.4 million gallons of gasoline and 0.196 million gallons of diesel per year. The Project with the Deck's increase in density within an HQTAs; proximity to transit, including multiple bus routes; proximity to other retail, restaurant, entertainment, commercial, and job destinations and walkable environment; implementation of a TDM program; and provision of EV charging

stations and EV-ready parking spaces, the Project would reduce VMT more than a standard project within the Air Basin. The Project with the Deck Concept would incorporate Project Design Feature GHG-PDF-1 (Green Building Features), which includes building features to achieve the LEED Silver Certification level or equivalent green building standards. The Project with the Deck Concept would also incorporate Project Design Feature WS-PDF-1 (Water Conservation Features) to minimize water demand and associated energy needed for water conveyance. The Project with the Deck Concept would provide for the installation of the conduit and panel capacity to accommodate future EV charging stations. Additionally, the Project with the Deck Concept's mixed-use design and its increase in density on an infill site within an HQTAs and in proximity to transit would achieve a reduction in VMT. Therefore, operation of the Project with the Deck Concept would not result in wasteful, inefficient, and unnecessary consumption of energy, and impacts would be less than significant.

Based on energy modeling conducted for Alternative 2, provided in Appendix P of this Draft EIR, Alternative 2 would generate a net increase in annual electricity consumption of approximately 23,016,881 kWh, a net increase in annual natural gas consumption of approximately 35,000,000 kBtu, and a demand for 1.55 million gallons of gasoline and 0.101 million gallons of diesel per year, which would be less than the Project with the Deck Concept and would be within the projected supplies of the energy providers. Because of the smaller Deck and incrementally reduced truck and visitor traffic, Alternative 2 would incrementally decrease the Project with the Deck Concept's transportation energy demand. With the installation of 10 percent EV stations and 30 percent EV-ready stations, Alternative 2 as with the Project, would minimize operational transportation fuel demand. In addition, as with the Project with the Deck Concept, Alternative 2 would implement energy saving design features, such as EV charging stations. Neither the Project with the Deck Concept nor Alternative 2 would result in the wasteful or inefficient use of energy. Energy efficiency impacts under both would be less than significant. Because Alternative 2 would result in less energy demand, impacts would be less than under the Project with the Deck Concept. Operational energy calculations for Alternative 2 are provided in Appendix P of this Draft EIR.

(ii) *Conflict with Plans for Renewable Energy or Energy Efficiency*

(a) Project

As discussed in Section IV.C, *Energy*, of this Draft EIR, the Project's design would comply with existing energy standards and incorporate project design features to reduce energy consumption. The Project would support and promote the use of renewable energy and energy efficiency and would result in less-than-significant impacts. The Project would be consistent with and not conflict with regional planning strategies that address energy conservation. Therefore, impacts would be less than significant.

Alternative 2, as with the Project, would comply with existing energy standards, would include a project design and building operation that would incorporate energy-

conservation measures beyond those otherwise required, and would not conflict with adopted energy conservation plans. Alternative 2, as with the Project, would incorporate similar Project Design Features, including GHG-PDF-1 (Green Building Features) and WS-PDF-1 (Water Conservation Features), and accommodate future EV charging stations to increase energy efficiency. By exceeding the regulatory standards, similar to the Project, Alternative 2 would have a less-than-significant impact regarding the provisions of plans for renewable energy and energy efficiency. As Alternative 2 would be in compliance with plans for renewable energy and energy efficiency, impacts under Alternative 2 would be similar to the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would comply with existing energy standards and incorporate design features to reduce energy consumption. The Project with the Deck Concept would support and promote the use of renewable energy and energy efficiency and impacts as discussed above. As such, the Project with the Deck Concept would be consistent and not conflict with regional planning strategies that address energy conservation. Impacts relating to renewable energy and energy efficiency plans would be less than significant.

As with the Project with the Deck Concept, Alternative 2 would also comply with existing energy standards, would include a project design and building operation that would incorporate energy-conservation measures, including GHG-PDF-1 (Green Building Features) and WS-PDF-1 (Water Conservation Features), beyond those otherwise required and, as such, would not conflict with adopted energy conservation plans. Alternative 2, as with the Project with the Deck Concept, would incorporate similar Project Design Features and accommodate future EV charging stations to increase energy efficiency. By exceeding the regulatory standards, similar to the Project with the Deck Concept, Alternative 2 would have a less-than-significant impact regarding the provisions of plans for renewable energy and energy efficiency. As Alternative 2 would be in compliance with plans for renewable energy and energy efficiency, impacts under Alternative 2 would be less than significant and similar to the Project with the Deck Concept.

(d) *Geology and Soils*

(i) *Seismic Hazards*

(a) Project

As discussed in Section IV.D, *Geology and Soils*, of this Draft EIR, the Project Site is not located within an Alquist-Priolo Special Studies Zone (earthquake fault zone) or in proximity to any identified active faults. The Project would implement the Los Angeles Building Code's seismic safety regulations, as well as CBC regulations related to specific seismic zones. Because of the Project Site's distance from active faults and the Los Angeles Department of Building and Safety's enforcement of state and local seismic safety regulations in building design, the Project would not directly or indirectly cause

potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault; strong seismic ground shaking; seismic-related ground failure; and landslides. Therefore, Project impacts would be less than significant.

Alternative 2 would be developed within the same general area as the Project relative to distance from active earthquake faults, and would have the same exposure to seismic activity. Alternative 2 would implement the Los Angeles Building Code's seismic safety regulations, implement similar building construction techniques, and result in similar exposure of occupied units and uses as the Project. Impacts under both Alternative 2 and the Project, with respect to rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, and landslides would be less than significant. Impacts under Alternative 2 would be similar to those of the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would occupy the same building site as the Project and include a 132,000-square-foot Deck that extends over the adjacent Rail Yard Property. The Deck would be used for everyday pedestrian activity and would be intermittently used for outdoor events. The Project Site is not located within an Alquist-Priolo Special Studies Zone (earthquake fault zone) or in proximity to any identified active faults. The Project with the Deck Concept would implement the Los Angeles Building Code's seismic safety regulations, as well as CBC regulations related to specific seismic zones. Because of the Project Site's distance from active faults and the Los Angeles Department of Building and Safety's enforcement of state and local seismic safety regulations in building design, impacts with respect to earthquake fault rupture, ground shaking, or fault-induced landslides under the Project with the Deck Concept would be less than significant.

Alternative 2, which would include a 75,000-square-foot Deck over the Railyards, would be developed within the same region as the Project with the Deck Concept relative to distance from active earthquake faults, and would have the same exposure to seismic activity. Alternative 2 would implement the Los Angeles Building Code's seismic safety regulations, implement similar building construction techniques, and result in similar exposure of occupied units and uses as the Project with the Deck Concept. Impacts under both Alternative 2 and the Project with the Deck Concept, with respect to rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, and landslides would be less than significant. Impacts under Alternative 2 would be similar to those under the Project with the Deck Concept.

(ii) *Soil Erosion or Loss of Topsoil*

(a) Project

As discussed in Section IV.D, *Geology and Soils*, of this Draft EIR, Project construction would increase the exposure of excavated soils to potential erosion. The Project would comply with applicable code and regulatory requirements including BMPs as required

under the SWPPP that control erosion of soils. With such compliance, impacts associated with substantial erosion or loss of topsoil during construction would be less than significant.

Excavation for Alternative 2 would be to the same maximum depths as under the Project. Also, the disturbed footprint area under the Project and Alternative 2 would be generally similar, as only a limited ground area would be disturbed by construction of the deck under Alternative 2. Similar to the Project, construction of Alternative 2 would comply with applicable code and regulatory requirements such that impacts associated with substantial erosion or loss of topsoil during construction would be less than significant and similar to the Project.

(b) Project with the Deck Concept

Construction of the Project with the Deck Concept would result in exposure of excavated soils to potential erosion. The Project with the Deck Concept would comply with Los Angeles Building Code regulations related to grading and reduction of exposure and loss of soils. The foundations for the vertical columns supporting the Deck would be drilled concrete piers, resulting in limited ground disturbance and exposure of soils during construction of the Deck. Regulations include BMPs associated with the SWPPP required for all grading and excavation operations on the Project Site. The SWPPP incorporates measures to control erosion of all exposed soils. With compliance with applicable regulations, construction impacts associated with substantial erosion or loss of topsoil under the Project with the Deck Concept would be less than significant.

The depth of excavation under Alternative 2 would be equivalent to the Project with the Deck Concept, although the number of vertical columns would be reduced by approximately half. The construction of piers would result in limited ground disturbance and limited exposures of soils. Construction of Alternative 2 would comply with applicable code and regulatory requirements, including the implementation of erosion prevention BMPs under the required SWPPP. With the required SWPPP, impacts associated with substantial erosion or loss of topsoil under Alternative 2 and the Project with the Deck Concept during construction would be less than significant and similar to the Project with the Deck Concept.

(iii) *Unstable Geologic Units*

(a) Project

As discussed in Section IV.D, *Geology and Soils*, of this Draft EIR, the Project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, Project impacts would be less than significant.

Alternative 2, as with the Project, would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of Alternative 2, and potentially result

in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, impacts under Alternative 2 would be similar to those of the Project and would be less than significant.

(b) Project with the Deck Concept

As discussed in Section IV.D, *Geology and Soils*, of this Draft EIR, the Project with the Deck Concept would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project with the Deck Concept, or potentially result in soil or earth failures, such as on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, impacts related to unstable geologic units under the Project with the Deck Concept would be less than significant.

Alternative 2, as with the Project with the Deck Concept, would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of Alternative 2. Alternative 2 would not cause on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, impacts related to unstable geologic units under Alternative 2 or the Project with the Deck Concept would be less than significant. Impacts under Alternative 2 would be similar to those under the Project with the Deck Concept.

(iv) *Expansive Soils*

(a) Project

As discussed in Section IV.D, *Geology and Soils*, of this Draft EIR, the Project would not be located on expansive soil creating substantial risks to life or property caused in whole or in part by its exacerbating the expansive soil conditions, and impacts would be less than significant.

Similar to the Project, Alternative 2 would not be located on expansive soil creating substantial risks to life or property caused in whole or in part by its exacerbating the expansive soil conditions, and impacts would be less than significant. Impacts under Alternative 2 would be similar to those of the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would not be located on expansive soil creating substantial risks to life or property caused in whole or in part by its exacerbating the expansive soil conditions, and impacts would be less than significant.

Similar to the Project with the Deck Concept, Alternative 2 would not be located on expansive soil creating substantial risks to life or property caused in whole or in part by its exacerbating the expansive soil conditions, and impacts would be less than significant. Impacts under Alternative 2 would be similar to those under the Project with the Deck Concept.

(v) *Paleontological Resources*

(a) Project

As discussed in Section IV.D, *Geology and Soils*, of this Draft EIR, Project-related grading and excavation for the subterranean parking structure, which constitutes the vast majority of Project construction, may encounter native soils and sediment. These soils and sediment have a high potential for containing previously unknown buried paleontological resources and, as such, excavation could directly or indirectly destroy a unique paleontological resource. Mitigation would be required and with implementation of Mitigation Measures GEO-MM-1 through GEO-MM-4, Project impacts would be reduced to less than significant.

Alternative 2 would require a similar depth of excavation for the subterranean parking levels within native soils and sediment as under the Project. In addition, Alternative 2 excavation would include piers for the 75,000 square-foot Deck. Therefore, potential exists for Alternative 2's excavation to disturb, damage, or degrade paleontological resources that could be encountered during construction and, thus, could result in a substantial adverse change in the significance of a paleontological resource. Mitigation would be required and, with implementation of Mitigation Measures GEO-MM-1 through GEO-MM-4 under the Project with the Deck Concept, impacts to paleontological resources resulting in a substantial adverse change in the significance of a paleontological resource would be less than significant. Similar to the Project, Alternative 2 would implement Mitigation Measures GEO-MM-1 through GEO-MM-4 to reduce impacts to paleontological resources to less-than-significant levels. Although minor differences in excavation activities would occur between the Project and Alternative 2, impacts related to the potential exposure of paleontological resources would be similar. less than significant under both. However, because Alternative 3 would have a larger excavation footprint, paleontological impacts would be greater than under the Project. Under Alternative 2, because of the greater construction footprint required for the Deck, impacts related to the potential exposure of paleontological resources would be incrementally greater than under the Project.

(b) Project with the Deck Concept

Grading and excavation for the Project with the Deck Concept, including placement of vertical columns between the existing railroad tracks for the Deck, may encounter unknown paleontological resources. As such, the Project with the Deck Concept has the potential to disturb, damage, or degrade paleontological resources that could be encountered during construction and, thus, result in a substantial adverse change in the significance of a paleontological resource. With implementation of Mitigation Measures GEO-MM-1 through GEO-MM-4 under the Project with the Deck Concept, impacts to paleontological resources resulting in a substantial adverse change in the significance of a paleontological resource would be less than significant.

Alternative 2 would require a similar depth of excavation for the subterranean parking levels as under the Project with the Deck Concept. As with the Project with Deck Concept, the potential exists for Alternative 2's construction to directly or indirectly destroy a unique paleontological resource. As with the Project with the Deck Concept, Alternative 2 would implement Mitigation Measures GEO-MM-1 through GEO-MM-4. With implementation of these measures, impacts to paleontological resources would be less than significant under both Alternative 2 and the Project with the Deck Concept. However, because of the smaller construction footprint required for Alternative 2's Deck compared to the Project with the Deck Concept, paleontological impacts would be incrementally less under Alternative 2 than under the Project with the Deck Concept.

(e) *Greenhouse Gas Emissions*

(i) *GHG Emissions/Conflict with Applicable Plans, Policies, Regulations, or Recommendations*

(a) Project

As discussed in Section IV.E, *Greenhouse Gas Emissions*, of this Draft EIR, the Project would be generally consistent with regulations and policies and comply with or exceed the regulations and reduction actions/strategies outlined in the Climate Change Scoping Plan, 2020–2045 RTP/SCS, the City of L.A.'s Green New Deal (Sustainable City pLAN 2019), and the Los Angeles Green Building Code. Impacts related to GHG emissions would be less than significant.

Alternative 2, as with the Project, would be consistent with applicable strategies outlined in Climate Change Scoping Plan, 2020–2045 RTP/SCS, the L.A.'s Green New Deal (Sustainable City pLAN 2019), and the Los Angeles Green Building Code. Both the Project and Alternative 2 are located within an HQTAs-designated location, which would also encourage utilization of alternative modes of transportation in support of the applicable GHG emission reduction plans and policies included within the Climate Change Scoping Plan, 2020–2045 RTP/SCS, the City of L.A.'s Green New Deal (Sustainable City pLAN 2019), and Los Angeles Green Building Code. As such, similar to the Project, Alternative 2 would not conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHGs. Thus, impacts related to GHGs would be less than significant and similar to the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would be consistent with applicable regulations and policies and comply with or exceed the regulations and reduction actions/strategies outlined in the Climate Change Scoping Plan, 2020–2045 RTP/SCS, the L.A.'s Green New Deal (Sustainable City pLAN 2019), and the Los Angeles Green Building Code. The Project with the Deck Concept would not conflict with Climate Change Scoping Plan Greenhouse Gas Reduction Strategies related to VMT. Impacts related to GHG policies under the Project with the Deck Concept would be less than significant.

Alternative 2 would be consistent with applicable strategies outlined in Climate Change Scoping Plan, 2020–2045 RTP/SCS, the City of L.A.’s Green New Deal (Sustainable City pLAn 2019), and the Los Angeles Green Building Code. Both the Project with the Deck Concept and Alternative 2 are located within an HQTAs-designated location, which would also encourage utilization of alternative modes of transportation in support of the applicable GHG emission reduction plans and policies included within the Climate Change Scoping Plan, the 2020–2045 RTP/SCS, the City of L.A.’s Green New Deal (Sustainable City pLAn 2019), and Los Angeles Green Building Code. As such, similar to the Project with the Deck Concept, Alternative 2 would not conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHGs. Thus, impacts related to GHGs would be less than significant and similar to the Project with the Deck Concept.

(f) *Hazards and Hazardous Materials*

(i) *Hazards to the Public or Environment through the Routine Transport, Use, or Disposal of Hazardous Materials*

(a) Project

As discussed in Section IV.F, *Hazards and Hazardous Materials*, of this Draft EIR, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant. Construction and occupancy of the Project would include demolition of existing structures, which may contain asbestos and other hazardous materials; construction equipment and materials, which may contain oils, paints, caustics, and other hazardous materials; and the limited use of potentially hazardous materials typically used in residences, offices, and restaurants. Such materials would be used, stored, and disposed of in consumer quantities and in accordance with applicable laws and regulations and manufacturers’ instructions, and impacts would be less than significant.

Construction of Alternative 2, as with the Project, would include demolition of existing warehouse buildings and surface parking lots. Construction equipment and materials, such as fuels, oils and lubricants, solvents and cleaners, adhesives, paints and thinners, degreasers, cement and concrete, and asphalt mixtures, which are all commonly used in construction, would be used, stored, and disposed of in consumer quantities and in accordance with applicable laws and regulations and manufacturers’ instructions. As with the Project, operation of Alternative 2 would involve the limited use of potentially hazardous materials typical of those used in residences, offices, and restaurants, including cleaning agents, paints, pesticides, and other materials used for landscaping. In addition, hazardous materials on the Project Site would continue to be acquired, handled, used, stored, and disposed of in accordance with all manufacturers’ specifications and all applicable federal, State, and local requirements. Alternative 2 would comply with all applicable regulations concerning the transport, use, and disposal of hazardous waste, as with the Project, and impacts would be less than significant. Due to of the similarity in the developed floor area and the land uses that are proposed under

Alternative 2 and the Project, impacts with respect to the routine transport, use and disposal of hazardous materials under Alternative 2 would be similar to the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Construction and occupancy of the Project with the Deck concept, would include demolition of existing structures, which may contain asbestos and other hazardous materials; construction equipment and materials, which may contain oils, paints, caustics, and other hazardous materials; and the limited use of potentially hazardous materials typically used in residences, offices, and restaurants. Such materials would be used, stored, and disposed of in consumer quantities and in accordance with applicable laws and regulations and manufacturers' instructions. Impacts related to hazards and hazardous materials under the Project with the Deck Concept would be less than significant.

Construction and occupancy of Alternative 2, as with the Project with the Deck Concept, would also include demolition of existing structures, use of construction equipment and materials, and the limited use of potentially hazardous household materials used in residences, offices, and restaurants. Alternative 2 would comply with all applicable regulations concerning the transport, use, and disposal of hazardous waste. Impacts under both the Project with the Deck Concept and Alternative 2 would be less than significant and similar.

(ii) *Hazard to the Public or Environment Involving the Accidental Release of Hazardous Materials into the Environment*

(a) Project

As discussed in Section IV.F, *Hazards and Hazardous Materials*, of this Draft EIR, soil excavation at the Project Site during construction could expose construction workers and the environment to elevated concentrations of hazardous materials present in the soil. As such, impacts would be potentially significant. The Project would require the implementation of Mitigation Measures HAZ-MM-1 and HAZ-MM-2, which would ensure the proper management of contaminated soils and to reduce the risk of impacts to construction workers, the public, and the environment, and impacts would be reduced to a less-than-significant level.

In addition to the excavation of six levels of subterranean parking as under the Project, Alternative 2 would also extend construction into the Railway Properties and increase potential exposure of workers to hazards materials within contaminated soils, such as herbicides for weed control, hydrocarbons, metals, creosote, and naphthalene associated with railroad operations, as well as potential soil gases. Such excavation for Alternative 2 would be potentially significant and require the implementation of Mitigation Measures

HAZ-MM-1 and HAZ-MM-2. These mitigation measures would ensure the proper management of contaminated soils and to reduce the risk of impacts to construction workers, the public, and the environment and, as such reduce impacts associated with the accidental release of hazardous materials under both Alternative 2 and the Project to levels that would be less than significant. However, because of the potential for greater exposure to hazardous materials under Alternative 2, impacts with respect to the release of hazardous materials would be greater under Alternative 2 than the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would extend into the Railway Properties. During construction, the potential release of hazardous materials in the soils including herbicides for weed control, hydrocarbons, metals, creosote, and naphthalene associated with the adjacent railroad operations could occur, resulting a potentially significant impact. The Project with the Deck Concept would implement Mitigation Measure HAZ-MM-3 to address the potential release of hazardous materials or soil gas during performed earthwork at the Railway Properties. Mitigation Measure HAZ-MM-3 requires soil sampling at the Railway Properties prior to construction of the Deck. The Project with the Deck Concept would also implement Mitigation Measures HAZ-MM-1 and HAZ-MM-2 in the event of elevated contaminant levels that exceed applicable regulatory standards. With the implementation of mitigation measures, impacts related to release of hazardous materials into the environment under the Project with the Deck Concept would be less than significant.

Alternative 2 would extend partially over the Railway Properties and, as with the Project with the Deck Concept, would implement Mitigation Measure HAZ-MM-3, as well as Mitigation Measures HAZ-MM-1 and HAZ-MM-2 in the event of exposed hazardous materials or soil gas that exceed applicable regulatory standards. Implementation of these measures would reduce impacts to a level of less than significant under both the Project with the Deck Concept and Alternative 2. Further, because Alternative 2 would reduce the construction footprint into the Railway Properties due to the reduced size of the Deck, impacts related to hazardous materials under Alternative 2 would be less than under the Project with Deck Concept.

(iii) *Hazards Resulting from Hazardous or Acutely Hazardous Materials, Substances, or Waste within One-Quarter Mile of a School*

(a) Project

As discussed in Section IV.F, *Hazards and Hazardous Materials*, of this Draft EIR, there are no existing or proposed schools within one-quarter mile of the Project Site. Therefore, impacts would be less than significant.

Alternative 2, as with the Project, is not located within one-quarter mile of a school. Therefore, similar to the Project, impacts under Alternative 2 would be less than significant.

(b) Project with the Deck Concept

There are no existing or proposed schools within one-quarter mile of the Project Site. Therefore, impacts would be less than significant. Alternative 2, as with the Project with Deck Concept, is not located within one-quarter mile of a school. Therefore, impacts under Alternative 2 and the Project with the Deck Concept would be less than significant and similar.

(iv) *Hazardous Materials Sites*

(a) Project

As discussed in Section IV.F, *Hazards and Hazardous Materials*, of the Draft EIR, although the Project Site is located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, the listing is a permit for air emissions for a former textile manufacturing facility. The facility had no records of violations and is no longer operating at the Project Site, and impacts would be less than significant.

Alternative 2 would have a larger footprint for development when compared to the Project. While the Project Site is located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, the facility that is listed has no records of violations and is no longer operating at the Project Site. Footings for the Deck under Alternative 2 would extend over the railroad track, which are also not listed hazardous materials Sites.²⁸ As such, impacts related to hazardous materials sites under Alternative 2 would be less than significant and similar to the Project.

(b) Project with the Deck Concept

The Project Site is located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The listing is a permit for air emissions for a former textile manufacturing facility. Because the facility had no record of violations and is no longer operating at the Project Site, the Project Site is not considered to be a hazardous materials site. Although the Project with Deck Concept extends the proposed development over the railroad tracks where footings to support the Deck would be located, the railroad tracks are not listed hazardous materials sites.²⁹ As such, impacts related to hazardous materials sites for the Project with the Deck Concept would be less than significant.

While the Project Site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, the listed facility has no record of violations and is no longer operating at the Project Site. Alternative 2, which would have a reduced Deck compared to the Project with the Deck Concept, would comprise a smaller development

²⁸ Rincon Consultants, Inc., *Phase I ESA*, September 6, 2016, page 10, Table 2, EDR Listing of Select Sites within One-Eighth Mile of the Subject Site, Appendix G-1, of this EIR.

²⁹ Rincon Consultants, Inc., *Phase I ESA*, September 6, 2016, page 10, Table 2, EDR Listing of Select Sites within One-Eighth Mile of the Subject Site, Appendix G-1, of this EIR.

site, with footings for the Deck extending partially over the Railyard Properties. The railroad tracks and rail yard, however, are not listed hazardous materials sites. As such, impacts related to hazardous materials sites under Alternative 2 and the Project with the Deck Concept would be less than significant and similar.

(v) *Emergency Response Plan/Emergency Evacuation Plan*

(a) Project

As discussed in Section IV.F, *Hazards and Hazardous Materials*, of the Draft EIR, no City-designated Selected Disaster Routes border the Project Site, and the Project would not physically alter the City's designated disaster routes. Project construction would implement Project Design Feature TRAF-PDF-1 to ensure that adequate access for emergency vehicles would be maintained. Project operation would ensure that site accessibility and design would be reviewed and approved by the LAFD to ensure that emergency response and access would be maintained. Impacts would be less than significant.

Alternative 2, as with the Project, would involve new construction and increased traffic. Alternative 2, as with the Project, would not physically alter the City's designated disaster routes. Alternative 2 would implement Project Design Feature TRAF-PDF-1 to ensure that adequate access for emergency vehicles would be maintained. As with the Project, compliance with existing regulations would ensure that adequate emergency response and access would be maintained for Alternative 2. Impacts under Alternative 2 with respect to conflicts with or interfering with emergency response or evacuation plans would be less than significant and would be similar to the Project.

(b) Project with the Deck Concept

No City-designated Selected Disaster Routes border the Project Site, and the Project with the Deck Concept would not physically alter the City's designated disaster routes. The Project with the Deck Concept would implement Project Design Feature TRAF-PDF-1 to ensure that adequate access for emergency vehicles. Project plans would be reviewed and approved by the LAFD to ensure that emergency response and access would be maintained. Impacts with respect to emergency response or evacuation plans under the Project with the Deck Concept would be less than significant.

Alternative 2 would not physically alter the City's designated disaster routes. As with the Project with the Deck Concept, Alternative 2 would implement Project Design Feature TRAF-PDF-1 to ensure that adequate access for emergency vehicles would be maintained. As with the Project with the Deck Concept, Alternative 2 would comply with existing regulations to ensure that adequate emergency response and access would be maintained for the Project Site. Impacts under Alternative 2 and the Project with the Deck Concept with respect to emergency response or evacuation plans would be less than significant and similar.

(g) *Hydrology and Water Quality*

(i) *Water Quality*

(a) *Construction*

(i) *Project*

As stated in Section IV.G, *Hydrology and Water Quality*, of the Draft EIR, construction activities, including earth moving, maintenance/operation of construction equipment, potential dewatering, and handling/storage/disposal of materials, could contribute to pollutant loading in stormwater runoff from the construction site. Also, wind could convey exposed and stockpiled soils at the construction site into nearby storm drains during storm events, and on-site water activities for dust suppression purposes could contribute to pollutant loading in runoff from the construction site. As such, contaminated soils could be encountered during construction of the Project, and therefore, impacts would be potentially significant. The Project would implement Mitigation Measure HAZ-MM-2 to address impacts regarding water quality, as well as implement a SWPPP as required by the State of California for all Projects more than one acre in area. Mitigation Measure HAZ-MM-2 would require a Soil and Groundwater Management Plan to ensure the proper management of contaminated soils and to reduce the risk of impacts to construction workers, the public, and the environment. The SWPPP specifies BMPs and erosion control measures to be used during construction to prevent pollution, to contain and treat, as necessary, stormwater or construction watering on the Project Site so runoff does not impact off-site drainage facilities or receiving waters. Further, if grading activities occur during the rainy season (October 1 through April 14), a WVECP would be prepared that would include BMPs to address potential erosion effects. With the implementation HAZ-MM-2 and SWPPP measures, impacts related to the exposure of surface water to contamination under the Project would be less than significant.

Alternative 2, as with the Project, would include construction activities, including earth moving, maintenance/operation of construction equipment, potential dewatering, and handling/storage/disposal of materials, that could contribute to pollutant loading in stormwater runoff from the construction site. Also, wind could convey exposed and stockpiled soils at the construction site into nearby storm drains during storm events, and on-site water activities for dust suppression purposes could contribute to pollutant loading in runoff from the construction site. Alternative 2, as with the Project, could encounter contaminated soils during construction, and impacts would be potentially significant. Alternative 2, as with the Project, would be required to implement Mitigation Measure HAZ-MM-2 to reduce impacts regarding water quality to less-than-significant levels. Because Alternative 2 would extend into the Railway Properties to drill footings and piers for the deck, more potentially contaminated materials would be exposed to stormwater runoff than under the Project. Although impacts would be less than significant with mitigation, impacts with respect to potential violations of water quality standards during construction under Alternative 2 would be greater compared to the Project.

(ii) Project with the Deck Concept

Construction activities under the Project with the Deck Concept, including earth moving, maintenance/operation of construction equipment, potential dewatering, and handling/storage/disposal of materials, that could contribute to pollutant loading in stormwater runoff from the construction site. Also, wind could convey exposed and stockpiled soils at the construction site into nearby storm drains during storm events, and on-site water activities for dust suppression purposes could contribute to pollutant loading in runoff from the construction site. As such, contaminated soils could be encountered during construction of the Project with the Deck Concept and, therefore, impacts would be potentially significant. In addition, because the Project with the Deck Concept extends to the construction of footings across the railroad tracks, potential exposure of contaminated soils would be slightly greater than under the Project. The Project with the Deck Concept would implement Mitigation Measure HAZ-MM-2 to address impacts regarding water quality as well as implement a SWPPP as required by the State of California for all Projects more than one acre in area. The SWPPP specifies BMPs and erosion control measures to be used during construction to prevent pollution, to contain and treat, as necessary, stormwater or construction watering on the Project Site so runoff does not impact off-site drainage facilities or receiving waters. Further, if the Project requires grading activities during the rainy season (October 1 through April 14), a WVECP would be prepared that would include BMPs to address potential erosion effects. With the implementation HAZ-MM-2 and SWPPP measures, impacts related to the exposure of surface water to contamination under the Project with the Deck Concept, would be less than significant.

The depth of excavation for subterranean parking under Alternative 2 would be similar to the Project with the Deck Concept. In addition, Alternative 2 would encroach into the Railway Properties for the development of Deck footings and piers. Construction activities, including earth moving, maintenance/operation of construction equipment, potential dewatering, and handling/storage/disposal of materials that, as with the Project with the Deck Concept, could contribute to pollutant loading in stormwater runoff from the construction site. As such, Alternative 2 would be required to implement the same pollution controls and Mitigation Measure HAZ-MM-2 as the Project with the Deck Concept. With implementation of regulatory measures and Mitigation Measure HAZ-MM-2, water quality impacts during construction under Alternative 2 and the Project with the Deck Concept would be reduced to a level that would be less than significant. Because of the reduced size of the Deck under Alternative 2 compared to the Project with the Deck Concept, the extent of soil disruption in the Railway Properties would be less. Impacts would be less than significant with mitigation under both the Project with the Deck Concept and Alternative 2. Impacts with respect to violation of water quality standards under Alternative 2 would be less compared to the Project with the Deck Concept.

(b) Operation

(i) *Project*

As stated in Section IV.G, *Hydrology and Water Quality*, of the Draft EIR, the existing Project Site was developed prior to the enforcement of storm water quality BMP design, implementation, and maintenance. The Project Site currently does not implement BMPs and has no means for treatment of stormwater runoff. The Project would implement LID BMPs to improve the quality of stormwater runoff discharged from the Project Site compared to existing conditions. With BMPs, water quality impacts would be less than significant.

Alternative 2, as with the Project, would incorporate similar LID BMPs to improve the quality of stormwater runoff discharged from the Project Site. LID requirements would include the collection of surface runoff from Alternative 2's 75,000-foot deck surface, which would increase the water collection area compared to the Project. With the implementation of the LID BMPs, Alternative 2, as with the Project, would result in an improvement in the quality of stormwater runoff from the Project Site compared to existing conditions. As with the Project, impacts related to water quality standards under Alternative 2 would be less than significant and would be similar to the Project.

(ii) *Project with the Deck Concept*

During operation, the Project with the Deck Concept would implement LID BMPs to collect and treat surface runoff and stormwater discharged from the Project Site. Runoff from the 132,000-square-foot Deck surface would also be collected and subject to the City's water quality BMPs. Although the proposed Deck would extend over a portion of the freight and passenger rail lines and rail yards, gradient changes, collection, or other BMPs would not be provided at grade level across the railroad tracks. However, with the treatment of surface runoff and implementation of LID BMPs within the Project Site and Deck surface, the quality of stormwater runoff discharged from the Project Site and, ultimately, to the Los Angeles River would be substantially improved compared to existing conditions. Impacts related to water quality standards under the Project with the Deck Concept would be less than significant.

Alternative 2 would implement similar LID BMPs to control operational surface runoff. With implementation of the LID BMPs, Alternative 2, as with the Project with the Deck Concept, would result in an improvement in the quality of stormwater runoff from the Project Site compared to existing conditions. As with the Project, impacts related to water quality standards under Alternative 2 and the Project with the Deck Concept would be less than significant and similar.

(ii) *Decreases in Groundwater Supplies or Recharge*

(a) Project

As stated in Section IV.G, *Hydrology and Water Quality*, of the Draft EIR, Project construction would not impede sustainable groundwater management of the groundwater basin. The Project would not include new injection or supply wells and does not include the installation or operation of water wells or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well or spreading ground facility. Excavation depths for the subterranean garage under the Project would extend from 61 to 68 feet below grade and reach depths of 75 feet below grade in some areas. This depth could encroach into the groundwater table, which is estimated to be 57 to 61 feet below grade. Thus, construction activities would potentially require the removal and discharge of ground water. However, dewatering during construction would be temporary and would not result in the substantial removal of groundwater that would reduce the local groundwater table. Further, dewatering would not continue post-construction. As such, the Project would not result in a decrease in groundwater supplies or substantially interfere with groundwater recharge. Because groundwater removal would be temporary, impacts related to decreases in groundwater supplies and recharge would be less than significant.

The Project Site is currently 90.1 percent impervious, increasing to 94 percent under the Project. However, implementation of the proposed BMPs would result in an overall reduction of the volume of water leaving the Project Site. The Project's subterranean parking would be below the redeveloped areas of the Project Site, resulting in no material change to the amount of stormwater that would percolate into the groundwater table compared to existing conditions. Therefore, pre- and post-Project infiltration volumes would be effectively equivalent. No groundwater withdrawal is anticipated during Project operation. The Project would not include new injection or supply wells and does not include the installation or operation of water wells or any extraction or recharge system. As such, operation would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project would impede sustainable groundwater management of the basin. Impacts would be less than significant.

Alternative 2, as with the Project, would not involve wells or regular groundwater removal. However, similar to the Project, construction for the Alternative 2's six-level subterranean garage, which would reach depths of 61 to 68 feet below grade and reach depths of 75 feet below grade in some areas, could intercept the groundwater table. The groundwater table is estimated to be 57 to 61 feet below grade. Alternative 2 would have the potential to require removal and discharge of intercepted waters. Such dewatering during construction would not result in the substantial removal of groundwater that would reduce the local groundwater table. Further, dewatering would temporary and would not continue post-construction. Neither Alternative 2 nor the Project would cause substantial depletion of groundwater supplies or substantially interfere with groundwater recharge.

Under Alternative 2, the larger development footprint would increase the Project Site's impervious area in the Railway Properties due to construction of a 75,000 square foot deck. However, after implementation of LID BMPs, any excess runoff from the Railway Properties would be rerouted to Mesquit Street and the municipal storm drain system. As such, any reduction in groundwater recharge due to the overall change in imperviousness would be minimal in the context of the regional groundwater basin. No groundwater withdrawal is anticipated during operation of Alternative 2. Impacts related to groundwater supplies and recharge during either construction or operation under both Alternative 2 and the Project would be less than significant and similar.

(b) Project with the Deck Concept

Construction of the Project with the Deck Concept would not impede sustainable groundwater management of the groundwater basin. The Project with the Deck Concept would not include new injection or supply wells. It would not involve the installation or operation of water wells or any extraction or recharge system in the vicinity of the coast or in an area of known groundwater contamination or seawater intrusion. The Project with the Deck Concept would not be located in the vicinity of a municipal supply well or spreading ground facility. However, excavation depths for the subterranean garage under the Project with the Deck Concept would extend from 61 to 68 feet below grade and reach depths of 75 feet below grade in some areas. This depth could intercept the groundwater table, which is estimated to be 57 to 61 feet below grade. Thus, construction activities would potentially require the removal and discharge of ground water. However, dewatering during construction would be temporary and would not result in the substantial removal of groundwater that would reduce the local groundwater table. Further, dewatering would not continue post-construction. As such, the Project with the Deck Concept would not result in a decrease in groundwater supplies or substantially interfere with groundwater recharge. Because groundwater removal would be temporary, impacts related to decreases in groundwater supplies and recharge would be less than significant.

The Project Site is currently 90.1 percent impervious and with the development of the Railway Properties under the Project with the Deck Concept, impervious area would increase to 96 percent. However, with implementation of LID BMPs, any excess runoff from the Railway Properties would be rerouted to Mesquit Street and the municipal storm drain system. As such, any reduction in groundwater recharge due to the overall change in imperviousness would be minimal in the context of the regional groundwater basin. No groundwater withdrawal is anticipated during operation of the Project with the Deck Concept. As such, operation would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project with the Deck Concept would impede sustainable groundwater management of the basin. Impacts would be less than significant.

Alternative 2, as with the Project with the Deck Concept, would not involve wells or regular groundwater removal. However, similar to the Project with the Deck Concept, construction for the Alternative 2's six-level subterranean garage, which would reach depths of 61 to

68 feet below grade and reach depths of 75 feet below grade in some areas, could intercept the groundwater table. The groundwater table is estimated to be 57 to 61 feet below grade. Alternative 2 would have the potential to require removal and discharge of intercepted waters. Such dewatering during construction would not result in the substantial removal of groundwater that would reduce the local groundwater table. Further, dewatering would temporary and would not continue post-construction. Neither Alternative 2 nor the Project with the Deck Concept would cause substantial depletion of groundwater supplies or substantially interfere with groundwater recharge.

During operation, Alternative 2 would be developed with a 75,000-square-foot Deck over the Railway properties, compared to a 132,000-square-foot deck under the Project with the Deck Concept. Although this would increase impermeability of the Project Site, it would result in less increase than under the Project with the Deck Concept. The excess runoff from the Railway Properties would be rerouted to Mesquit Street and the municipal storm drain system. As such, any reduction in groundwater recharge due to the overall change in imperviousness would be minimal in the context of the regional groundwater basin. Alternative 2, as with the Project with the Deck Concept, would not require groundwater withdrawal during operation. Because neither the Project with the Deck Concept nor the Project would substantially deplete groundwater supplies or substantially interfere with groundwater recharge, impacts regarding groundwater supplies or recharge under both Alternative 2 and the Project with the Deck Concept would be less than significant and similar.

(iii) *Alteration of Drainage Patterns*

(a) Construction

(i) *Project*

The Project would control flow directions and runoff volumes during construction as required under the required SWPPP BMPs. In addition, the Project would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion and to control runoff from the Project Site during the construction period. Project construction would adhere to compliance measurements to avoid flooding, substantially increasing or decreasing the amount of surface water flow from the Project Site into a water body, or a permanent, adverse change to the movement of surface water. No existing streams or river courses would be altered by the Project. Therefore, impacts from Project construction with respect to drainage patterns, siltation, erosion, and surface runoff would be less than significant.

Alternative 2, as with the Project, would include construction activities that could contribute to altering existing surface runoff or drainage patterns resulting in on- or off-site erosion, siltation or flooding; increasing rate or flow in surface runoff; or exceeding the capacity of the area's drainage system. Alternative 2 would require similar excavation and export of materials as under the Project, with the construction footprint increased due

to the Deck construction. As with the Project, construction of Alternative 2 would adhere to compliance measurements to avoid flooding, substantially increasing or decreasing the amount of surface water flow from the Project Site into a water body, or a permanent, adverse change to the movement of surface water. As with the Project, construction BMPs to manage runoff flows and avoid on- or off-site flooding, would be implemented under Alternative 2. Nonetheless, because of the addition of the 75,000-square-foot Deck, the overall duration of construction activities and the potential for impacts to drainage patterns under Alternative 2 would be incrementally greater than the Project. Thus, while impacts with respect to surface runoff, siltation, rates of runoff and capacity of drainage systems would be less than significant under Alternative 2 similar to the Project, impacts would be incrementally greater than under the Project.

(ii) *Project with the Deck Concept*

The Project with the Deck Concept would control flow directions and runoff volumes during construction as required under the required SWPPP BMPs and erosion control measures to manage runoff flows and avoid on- or off-site flooding. In addition, the Project with Deck Concept would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion and to control runoff from the Project Site during the construction period. The Project with the Deck Concept would adhere to compliance measurements to avoid any runoff that would substantially increase or decrease the amount of surface water flow from the Project Site into a water body or a cause a permanent, adverse change to the movement of surface water. No existing streams or river courses would be altered by the Project with the Deck Concept. Therefore, with adherence to existing regulations, impacts related to drainage patterns under the Project with the Deck Concept during construction would be less than significant.

As with the Project with the Deck Concept, Alternative 2 would adhere to regulatory standards to avoid flooding; to avoid any substantial increase or decrease the amount of surface water flow from the Project Site into a water body; or avoid a permanent, adverse change to the movement of surface water. As with the Project with the Deck Concept, construction BMPs to manage runoff flows and avoid on- or off-site flooding, would be implemented under Alternative 2. Nonetheless, because of the smaller 75,000-square-foot Deck compared to the Project with the Deck Concept, the overall duration of construction activities and the potential for impacts to drainage patterns under Alternative 2 would be incrementally less than the Project with the Deck Concept. Thus, while impacts with respect to surface runoff, siltation, rates of runoff and capacity of drainage systems would be less than significant under Alternative 2 similar to the Project with the Deck Concept, impacts would be incrementally less than under the Project with the Deck Concept.

(b) Operation

(i) *Project*

As discussed in Section IV.G, *Hydrology and Water Quality*, of this Draft EIR, Project operation would increase the peak flow rate of stormwater runoff due to the increase in impervious surfaces compared to existing conditions; however, implementation of the proposed LID BMPs would reduce the volume of stormwater runoff discharged from the Project Site and would improve the quality of stormwater runoff leaving the Project Site. Therefore, impacts from Project operation would be less than significant. During operation, the 50-year peak flow rate of stormwater runoff from the 5.46-acre Project Site would increase slightly from approximately 17.21 cfs to 17.25 cfs (a 0.04-cfs increase or 0.2 percent) due to the increase (albeit small) in impervious surfaces compared to existing conditions. However, the overall volume of stormwater runoff from the Project Site discharged to the municipal storm drain system would decrease compared to existing conditions, as a result of the implementation of LID BMPs per City requirements, which would capture, store, and infiltrate the first stormwater on-site, more than off-setting the increase in impervious area and associated runoff. In addition, this would reduce the potential for on-site and off-site flooding.

Drainage patterns for much of the Project Site would generally be unchanged, except that runoff would no longer be discharged via sheet flows off-site to the east, and the first stormwater falling on the Project Site would be directed to BMP facilities on-site. Therefore, impacts from Project operation would be less than significant.

Under Alternative 2, a proposed 75,000-square-foot Deck would be incorporated into the Project. Alternative 2's Deck, which would be an impermeable feature over the currently pervious Railway Properties, would result in an increased 24-hour volumetric flow of 5.8 percent compared to existing conditions.³⁰ In the event a potential for exceedance of the capacity of the municipal stormwater drainage system is determined during the City's required design and plan check process, Alternative 2 would either incorporate an expanded on-site LID system or reconstruct existing off-site storm drain facilities, as required by the City. With these regulatory measures, the rate or amount of surface runoff that could result in flooding of the existing stormwater drainage system would be less than significant. Although impacts related to surface water runoff and flooding under both the Project and Alternative 2 would be less than significant, because runoff would be less under the Project, impacts would be greater under Alternative 2.

(ii) *Project with the Deck Concept*

The Project with the Deck Concept would include a 132,000-square foot Deck (an approximately 3.01-acre surface area) across the Railway Properties. This area is currently considered 99 percent pervious. The Project with the Deck Concept would increase impervious surfaces on the Project Site. Approximately 96 percent of the Project

³⁰ KPFF Consulting Engineers, *670 Mesquit – Hydrology Technical Report Alternatives*, June 29, 2021. Provided in Appendix P of this Draft EIR.

Site under the Project with Deck Concept would be impervious, leaving little opportunity for erosion or siltation. Due to the increase in impervious area resulting from construction of the Deck, the 50-year peak flow rate of stormwater runoff from the 8.47-acre area encompassing the 5.46-acre Project Site (without the Railway Properties) plus the 3.01-acre area (Railway Properties) covered by the Deck would increase from an estimated 26.31 cfs to 26.79 cfs (a 0.48 cfs or 1.8 percent increase). Some of the runoff captured and discharged from the Deck would be stored and infiltrated into on-site soils by BMP facilities intended to treat the first flush of stormwater. However, as the drainage pattern of the Project Site would be substantially altered with development of the Project with the Deck Concept, potentially significant impacts could occur related to on- or off-site flooding, exceeding the capacity of existing stormwater drainage systems, or providing substantial additional sources of polluted runoff. While the Project with the Deck Concept would increase impervious surfaces on the Project Site, approximately 96 percent of the Project Site under the Project with Deck Concept would be impervious, leaving little opportunity for erosion or siltation.

The remaining runoff not captured by the BMP facilities would be discharged from the Deck to the municipal storm drain system in Mesquit Street, Jesse Street, and 7th Street, and ultimately discharge to the Los Angeles River. In accordance with standard City practice, detailed drainage construction plans would be completed during the construction document development phase and, in the event this assessment identifies potential for exceedance of the capacity of the municipal stormwater drainage system, upgrades to the system would be required. Improvements could include an expanded on-site LID system, or reconstruction and upgrades to the existing catch basins in Mesquit Street, the 15-inch storm main in Jesse Street, and the 24-inch storm lateral on 7th Street. Through compliance with Bureau of Engineering (BOE) requirements during the plan check approval process, any potential for the rate or amount of surface runoff to result in flooding would be reduced to a level that would be less than significant.

Under Alternative 2, the proposed Deck would total 75,000 square feet of surface area, which would result in an increased 24-hour volumetric flow of 5.8 percent compared to existing conditions;³¹ therefore, surface runoff under Alternative 2 would be less than under the Project with the Deck Concept, which would result in an 18.6 percent increase in 24-hour volumetric flow as compared to existing conditions. In the event a potential for exceedance of the capacity of the municipal stormwater drainage system is determined during the City's required design and plan check process, the on-site LID system could be expanded or existing facilities could be reconstructed, as required by existing regulatory requirements. With these measures, the rate or amount of surface runoff that could result in flooding of the existing stormwater drainage system would be less than significant under both Alternative 2 and the Project with the Deck Concept. Further, because runoff would be less due to Alternative 2's smaller Deck, impacts would be less than the Project with the Deck Concept.

³¹ KPFF Consulting Engineers, *670 Mesquit – Hydrology Technical Report Alternatives*, June 29, 2021. Provided in Appendix P of this Draft EIR.

(iv) *Conflict with or Obstruct Implementation of Water Quality Control Plans*

(a) Project

As discussed in Section IV.G, *Hydrology and Water Quality*, of this Draft EIR, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan during operation of the Project. However, as contaminated soils could impact the groundwater that underlies the Project Site, construction of the Project may conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and impacts would be potentially significant. Implementation of Mitigation Measure HAZ-MM-2 would reduce impacts to a less-than-significant level.

Alternative 2, as with the Project, would incorporate BMPs and drainage systems that would be consistent with water quality control plans, the policies of which are expressed in City and State water quality regulations for the protection of water resources. Alternative 2, as with the Project, falls within the jurisdiction of water quality plan regulations that assure that development projects are in compliance with clean water policies. These plans and regulations include the LARWQB (Region 4) Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties and the National Pollutant Discharge Elimination System (NPDES) stormwater permitting program. However, construction of Alternative 2 would, similar to the Project, allow contaminated soils to impact the groundwater that underlies the Project Site, and impacts would be potentially significant. Alternative 2 would require implementation of Mitigation Measure HAZ-MM-2 to reduce impacts to a less-than-significant level. As with the Project, impacts related to water quality control plans under Alternative 2 would be less than significant after mitigation and would be similar to the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan during operation. However, as contaminated soils could impact the groundwater, construction of the Project with the Deck Concept, as with the Project, may conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and impacts would be potentially significant. With implementation of Mitigation Measure HAZ-MM-2 under the Project with the Deck Concept, impacts regarding a conflict with a water quality control plan would be less than significant.

Alternative 2 would incorporate BMPs and drainage systems that would be consistent with water quality control plans, the policies of which are expressed in City and State water quality regulations for the protection of water resources. However, construction of Alternative 2, similar to the Project with the Deck Concept, would allow contaminated soils to impact the groundwater that underlies the Project Site, causing a potentially significant impact. As with the Project with the Deck Concept, Alternative 2 would require

implementation of Mitigation Measure HAZ-MM-2 to reduce impacts to a less-than-significant level. Impacts related to water quality control plans under Alternative 2 and the Project with the Deck Concept would be less than significant after mitigation and similar.

(h) *Land Use and Planning*

(i) *Physically Divide an Established Community*

(a) Project

As discussed in Section IV.H, *Land Use and Planning*, of this Draft EIR, Project implementation would open the Project Site to both north-south and east-west access, creating new direct connections between the Arts District neighborhoods north and south of the Project Site and between the neighborhoods west of the Project Site and the Los Angeles River and Boyle Heights to the east. The Project would not physically divide an established community, and impacts would be less than significant.

Alternative 2 proposes up to 1,792,103 square feet of residential, office, retail, restaurant, hotel, studio/event/gallery/potential museum, and gym, with an approximate FAR of 7.5:1, similar to the Project. Similar to the Project, Alternative 2 would open the Project Site to north-south and east-west access between the Arts District neighborhoods north and south of the Project Site and between the neighborhoods west of the Project Site and the Los Angeles River and Boyle Heights to the east. Alternative 2's Deck would further expand this connectivity with the Ribbon of Light Bridge, the proposed PARC Improvements, and the 7th Street Bridge and other amenities. Therefore, implementation of Alternative 2 would, similar to the Project, increase the direct connections through the Project Site and allow for connectivity between the neighborhoods, thus not physically dividing an established community. Similar to the Project, Alternative 2 would have a less than significant impact.

(b) Project with the Deck Concept

The Project with the Deck Concept would open the Project Site to both north-south and east-west access, creating new direct connections between the Arts District neighborhoods north and south of the Project Site and between the neighborhoods west of the Project Site and the Los Angeles River and Boyle Heights to the east. The Project with the Deck Concept would include the same vehicular and bicycle access to the Project Site as under the Project. By expanding pedestrian access to future Metro transit projects and providing a closer potential connection to the Los Angeles River, the Project with the Deck Concept would provide greater access to the Los Angeles River and to transit than under the Project. In the Project area, pedestrians would be able to move from the Mesquit Street Level to the 7th Street Level and Deck via the Entry Plazas. With the inclusion of the Deck, and the proposed 7th Street Bridge connection, the Project with the Deck Concept would increase accessibility of Mesquit Street from the surrounding streets and neighborhoods. Impacts related to physical division of an established community under the Project with the Deck Concept would be less than significant.

As with the Project with the Deck Concept, Alternative 2 would open the Project Site to north-south and east-west access between the Arts District neighborhoods north and south of the Project Site and between the neighborhoods west of the Project Site and the Los Angeles River and Boyle Heights to the east; expand pedestrian access to future Metro transit projects; and improve access from the Mesquit Street Level to the 7th Street Level and Deck via the Entry Plazas. Implementation of Alternative 2 would, similar to the Project with the Deck Concept, increase the direct connections through the Project Site and allow for connectivity between the neighborhoods, and thus would not physically divide an established community. Impacts related to potential division of an established community under both the Project with the Deck Concept and Alternative 2 would be less than significant and similar.

(ii) *Conflict with Applicable Land Use Plan, Policy, or Regulation*

(a) Project

The Project would develop residential, office, retail, restaurant, hotel, studio/gallery/museum, and gym uses at the Project Site. As discussed in Section IV.H, *Land Use and Planning*, of the Draft EIR, based on the analysis of Project consistency with applicable policies of SCAG's 2020–2045 RTP/SCS, the Framework Element, the Community Plan, the RIO District Ordinances, and the LAMC, the Project would be consistent with and would not conflict with relevant land use policies and regulations adopted for the purpose of avoiding or mitigating a significant environmental effect. Approval of the Project's requested entitlements, including the proposed Specific Plan, would bring the Project into consistency with the applicable plans and regulations. Impacts would be less than significant.

Alternative 2 would not conflict with the above-listed plans as Alternative 2 would similarly facilitate land use patterns that link land uses with sustainable transportation options. Alternative 2 would also develop residential units and co-located commercial uses within an HQTAs and TPA, and would therefore be consistent with the above-listed plans and policies that would promote a reduction in VMT and air pollution. In addition, Alternative 2 would provide more residential units as compared to the Project and, as such would meet policies and plans to increase housing and residents in HQTAs. It would also include affordable units consistent with Measure JJJ requirements. Requested entitlements under Alternative 2, including a General Plan Amendment, approval of the Mesquit Specific Plan, a Vesting Zone Change and Height District change, as well as other requested entitlements would be similar to Project. The maximum floor area for both the Project and Alternative 2 (1,792,103 sf) would result in the same FAR of 7.5:1.

Because of the proximity of Alternative 2 and the Project to the Los Angeles River, exterior lighting at the boundary and 15 feet beyond the boundary would exceed the more stringent exterior lighting standards that apply to the RIO District Ordinance. Both the Project and Alternative 2 would conflict with RIO District requirements regarding lighting, the level of lighting within a TPA under PRC Section 21099(d)(1) and ZI File No. 2452 is

not considered an impact on the environment. Furthermore, the areas where Project and Alternative 2 lighting would exceed the RIO standards include streets, rail yards, electrical switching stations, and industrial use properties and do not include natural habitat or residential uses. As such, pursuant to the 2006 L.A. CEQA Thresholds Guide, and as indicated under section IV., Biological Resources, in the Initial Study provided in Appendix A-2, Initial Study, of this Draft EIR, there would be no substantial adverse effects on light sensitive natural habitat or residential receptors. Therefore, because this inconsistency would not result in an adverse environmental impact, neither the Project nor Alternative 2 would conflict with policies, plans, or regulations to avoid or mitigate environmental effects. Because neither the Project nor Alternative 2 would conflict with policies, plans, or regulations to avoid or mitigate environmental effects, land use impacts under Alternative 2 would be less than significant and similar.

(b) Project with the Deck Concept

The Project with the Deck Concept would develop residential, office, retail, restaurant, hotel, studio/gallery/museum, and gym uses at the Project Site. In addition, the Project with the Deck Concept would include a 132,000 square foot Deck in place of the Project's Elevated Pedestrian Walkway. The Project with the Deck Concept would provide a sizeable publicly accessible open space amenity area, in addition to the open space provided under the Project with the Deck Concept, that would further enhance the new pedestrian connections and create additional opportunities for public programming. Similar amenities, with a reduced deck of 75,000 square feet would be provided under Alternative 2.

However, exterior lighting under both the Project with the Deck Concept and Alternative 2 would exceed the more stringent standards that apply to the RIO District at the Project boundary and 15 feet beyond the boundary (in proximity to the Los Angeles River). Although the Project with the Deck Concept would conflict with RIO District requirements regarding lighting, the level of lighting within a TPA under PRC Section 21099(d)(1) and ZI File No. 2452 is not considered an impact on the environment. Furthermore, the areas where Project and Alternative 2 lighting would exceed the RIO standards include streets, rail yards, electrical switching stations, and industrial use properties and do not include natural habitat or residential uses. As such, pursuant to the 2006 L.A. CEQA Thresholds Guide, and as indicated under section IV., Biological Resources, in the Initial Study provided in Appendix A-2, Initial Study, of this Draft EIR, there would be no substantial adverse effects on light sensitive natural habitat or residential receptors. Therefore, because this inconsistency would not result in an adverse environmental impact, neither the Project with the Deck Concept nor Alternative 2 would conflict with policies, plans, or regulations to avoid or mitigate environmental effects. The Project with the Deck Concept would be consistent with the same applicable policies and plans of the 2020–2045 RTP/SCS, Framework Element, Central City North Community Plan, RIO District Ordinances and the LAMC. As with the Project, with approval of the proposed entitlements, including the proposed Specific Plan, impacts under the Project with the Deck Concept related to conflict with applicable plans, policies, and regulations adopted to avoid or mitigate environmental effects would be less than significant.

Alternative 2 would not conflict with applicable plans adopted to avoid or mitigate environmental effects. Alternative 2 would develop 420 residential units within an HQTAs and TPA, including affordable units. Alternative 2 would, therefore, not conflict with plans and policies that support greater housing densities, including affordable housing within an HQTAs and a TPA, and would therefore be consistent with the above-listed plans and policies that would promote a reduction in VMT and air pollution. Under Alternative 2, the proposed Deck would be 75,000 square feet as opposed to the 132,000 square feet under the Project with the Deck Concept. As the Deck under the Alternative 2 would be smaller and would allow less pedestrian access and enhanced activity close to the Los Angeles River, Alternative 2 would not meet the RIO policies to achieve a stronger connection and increased pedestrian accessibility to the Los Angeles River to the same extent as the Project with the Deck Concept. As with the Project with the Deck Concept, because Alternative 2 would support policies and plans to increase housing, residents, and co-located commercial uses within HQTAs and TPAs, impacts with respect to conflict with applicable plans under Alternative 2 would be less than significant. Overall impacts related to conflicts with applicable plans, policies, and regulations adopted to avoid or mitigate environmental effects impacts would be similar to the Project with the Deck Concept.

(i) *Noise*

(i) *Noise Levels in Excess of Standards*

(a) *Construction*

(i) *Project*

As discussed in Section IV.I, *Noise*, of this Draft EIR, on-site Project construction would result in temporary increases in ambient noise that would exceed thresholds of significance at the closest off-site noise-sensitive receptors, and impacts at R1 (the three-story multi-family residential use to the west of the Project Site), R2 (the two-story multi-family residential use to the south of the Project Site), R3 (the AMP Lofts to the west of the Project Site), and R4 (the future 6th Street PARC) would be potentially significant. Implementation of Mitigation Measures NOISE-MM-1 and NOISE-MM-2 would reduce noise levels at all receptors and would reduce impacts at R2 and R3 to less-than-significant levels. However, the Project's on-site construction noise impacts would remain significant and unavoidable at R1 and R4 during daytime and nighttime periods on weekdays and weekends. Off-site construction traffic noise impacts for the Project would exceed the threshold of significance along two roadway segments (i.e., Jesse Street between Mateo Street and Santa Fe Avenue, and Mateo Street between 4th Place and Willow Street) where sensitive residential uses are present. With implementation of Mitigation Measure NOISE-MM-3, off-site construction traffic noise impacts would be reduced to less-than-significant levels.

Similar to the Project, construction of Alternative 2 would result in a temporary increase in ambient noise that would exceed thresholds of significance at R1, R2, R3, and R4, and impacts would be potentially significant. Alternative 2 would implement Mitigation

Measures NOISE-MM-1 and NOISE-MM-2 to reduce noise levels at all receptors and would reduce impacts from on-site construction noise at R2 and R3 to less-than-significant levels. However, as with the Project, on-site construction noise impacts under Alternative 2 would remain significant and unavoidable at R1 and R4. Off-site construction traffic noise impacts under Alternative 2, would, like the Project, be potentially significant. As with the Project, Mitigation Measure NOISE-MM-3 would reduce off-site construction traffic noise impacts to less-than-significant levels. While Alternative 2 would have similar maximum daily noise levels as the Project, the duration of construction activity under Alternative 2 would be slightly longer than the Project. For this reason, impacts related to construction noise would be greater under Alternative 2 than under the Project.

(ii) *Project with the Deck Concept*

Maximum daily construction noise levels under the Project with the Deck Concept would be similar to the Project. The Project with the Deck Concept would also implement Mitigation Measures NOISE-MM-1 and NOISE-MM-2, which would reduce noise levels at all receptors and would reduce impacts at R2 and R3 to less-than-significant levels. On-site construction noise impacts under the Project with the Deck Concept, although temporary, would be significant and unavoidable at R1 and R4 during daytime and nighttime periods on weekdays and weekends. Off-site construction traffic noise impacts for the Project with the Deck Concept would exceed the threshold of significance along two roadway segments (i.e., Jesse Street between Mateo Street and Santa Fe Avenue and Mateo Street between 4th Place and Willow Street) where sensitive residential uses are present. With implementation of Mitigation Measure NOISE-MM-3, off-site construction traffic noise impacts would be reduced to less-than-significant levels. Because of the addition of the Deck, construction noise impacts would occur over a longer period of time under the Project with the Deck Concept. Under the Project with the Deck Concept, even with implementation of mitigation measures, on-site construction noise impacts would remain significant and unavoidable.

Alternative 2 would require the same types of construction activities as the Project with the Deck Concept. Off-site construction traffic noise impacts under Alternative 2, would be potentially significant. Mitigation Measure NOISE-MM-3 would reduce off-site construction traffic noise impacts to less-than-significant levels. Similar to the Project with the Deck Concept, on-site construction activities for Alternative 2 would result in a temporary increase in ambient noise that would exceed thresholds of significance at R1, R2, R3, and R4. Alternative 2 would implement Mitigation Measures NOISE-MM-1 and NOISE-MM-2 to reduce impacts at all receptors and would reduce impacts at R2 and R3 to less-than-significant levels. However, similar to the Project with the Deck Concept, on-site construction noise impacts under Alternative 2 would remain significant and unavoidable at R1 and R4. While Alternative 2 would have similar maximum daily noise levels as the Project with the Deck Concept, the duration of construction activity under Alternative 2 would be slightly shorter than the Project with the Deck Concept. For this reason, impacts related to construction noise would be less under Alternative 2 than under the Project with the Deck Concept.

(b) Operation

(i) *Project*

As discussed in Section IV.I, *Noise*, of this Draft EIR, noise impacts during Project operation from mechanical equipment, parking structure, loading dock and trash collection areas, emergency generators, heliport, and off-site traffic noise would be less than significant and would not require mitigation. Noise impacts from daytime use of individual outdoor open spaces, specifically the River Balcony North, would be significant at R4 and the combined simultaneous use of Project open spaces would be significant at R1, R2, R3, and R4. Nighttime use of individual outdoor open spaces, specifically the 7th Street Terrace, would be significant at R2 and the combined simultaneous nighttime use of Project open spaces would be significant at receptor R2. Operational composite noise would be significant at R1. The Implementation of Mitigation Measure NOISE-MM-4 and NOISE-MM-5, which require noise controls for amplified speakers at outdoor spaces, would reduce impacts related to daytime and nighttime operation of outdoor spaces, individually and combined, to less-than-significant levels.

Alternative 2, as with the Project, would result in heliport noise and would increase off-site traffic and generate on-site composite noise associated with fixed equipment, vehicle activity, heliport operation, and human outdoor activity. However, Alternative 2 includes reduced retail square footage and would result in less off-site traffic than the Project.³² Alternative 2 would include similar outdoor amplified sound systems and speakers as the Project for the outdoor open space areas, but would also include the 75,000 square-foot Deck with outdoor amplified sound systems and speakers. Therefore, impacts from on-site noise related to daytime and nighttime operation of outdoor spaces would be potentially significant under Alternative 2 and the impact would be greater than the Project. With implementation of Mitigation Measures NOISE-MM-4 and NOISE-MM-5, impacts from on-site noise under Alternative 2, like the Project, would be reduced to less than significant. Because of reduced off-site traffic, operational off-site traffic noise under Alternative 2 would be slightly less than the Project. However, overall, operational noise impacts under Alternative 2 would be greater than the Project due to the increased noise from the Deck.

(ii) *Project with the Deck Concept*

Noise impacts during operation of the Project with the Deck Concept resulting from mechanical equipment, parking structure, loading dock and trash collection areas, emergency generators, heliport, and off-site traffic would be less than significant and would not require mitigation. However, noise impacts from daytime use of outdoor open spaces, specifically the River Balcony North, would be significant at R4 and the combined simultaneous use of open spaces, including the Deck, would be significant at R1, R2, R3, and R4. Additionally, nighttime use of the Deck would be significant at R2, combined nighttime operation of all open spaces would be significant at R2, and operational composite noise under the Project with the Deck Concept would be significant at R1 and

³² Fehr & Peers, *Analysis of 670 Mesquit Project Alternatives Technical Memorandum*, October 8, 2021. Provided in Appendix P of this Draft EIR.

R2. With implementation of Mitigation Measures NOISE-MM-4 and NOISE-MM-5, open space noise from daytime or nighttime use of open spaces, individually and combined, would not exceed the threshold of a 5 dBA increase in nighttime ambient noise. Operational noise impacts under the Project with the Deck Concept would be less than significant.

Alternative 2 would result in heliport noise and would increase off-site traffic and generate on-site composite noise associated with fixed equipment, vehicle activity, heliport operation, and human outdoor activity. However, Alternative 2 includes reduced retail floor area and would result in less off-site traffic than the Project with the Deck Concept. In addition, the size of the Deck under Alternative 2 (75,000 square feet) would be reduced in size with a capacity of 5,000 people compared to the Project with the Deck Concept's capacity of 8,800 people. However, due to the inclusion of similar outdoor amplified sound systems and speakers under Alternative 2 and the Project with the Deck Concept for the outdoor open space areas, impacts related to daytime and nighttime operation of outdoor spaces would be reduced to less than significant levels with implementation of Mitigation Measures NOISE-MM-4 and NOISE-MM-5 for both the Project with the Deck Concept and Alternative 2, although less under Alternative 2. Because of reduced off-site traffic and reduced Deck area compared to the Project with the Deck Concept, operational noise impacts under Alternative 2 would be less than the Project with the Deck Concept.

(ii) *Groundborne Vibration*

(a) *Construction*

(i) *Project*

As discussed in Section IV.I, *Noise*, of this Draft EIR, construction activities at the Project Site have the potential to generate low levels of groundborne vibration as the operation of heavy equipment generates vibrations that propagate through the ground and diminish in intensity with distance from the source. The potential vibration impacts for structural damage due to off-site haul trucks would be less than significant for the Project. Estimated vibration velocity levels from construction equipment for the Project would not exceed the respective significance thresholds at V2 (multi-family residential use to the south of the Project Site at 2135 E. 7th Place), V3 (AMP Lofts to the west of the Project Site), V4 (industrial building located at 640 Santa Fe Avenue), or V5 (industrial building located at 1580 Jesse Street). Vibration impacts associated with structural damage from on-site construction activities under the Project would be potentially significant for V1 (multi-family residential use to the west of the Project Site at 2101 E. 7th Street) and V6 (7th Street Bridge). With implementation of Mitigation Measure NOISE-MM-6, potential Project structural vibration impacts on receptors V1 and V6 would be mitigated to less than significant for the majority of construction activities, except for temporary shoring activities and installation of shoring infrastructure. The Project would require shoring activities adjacent to V6 (7th Street Bridge). Mitigation Measure NOISE-MM-7 is proposed to reduce vibration velocities due to shoring; however, in the case that structural damage does occur during Project construction, it would be required to be repaired pursuant to Mitigation Measure NOISE-MM-8. With implementation of Mitigation Measures NOISE-

MM-7 and NOISE-MM-8, Project impacts with regard to structural damage for the 7th Street bridge (V6) would be mitigated to a less-than-significant level for all construction activity except for temporary shoring. Similarly, with implementation of Mitigation Measures NOISE-MM-7 and NOISE-MM-8, such damage to V1 could be repaired by the Project contractor, which would reduce Project impacts to a less-than-significant level. However, because V1 is a privately owned structure, inspections and repair pursuant to Mitigation Measure NOISE-MM-8 would require the consent of the property owner, who may not agree. Thus, Project impacts to V1 would be significant and unavoidable should consent for inspections and repairs not be granted.

With respect to human annoyance, the estimated groundborne vibration levels from on-site, off-road construction equipment under the Project would exceed the significance criteria at V1, and impacts would be potentially significant. With implementation of Mitigation Measures NOISE-MM-6 through NOISE-MM-9, construction vibration impacts related to human annoyance from on-site, off-road equipment would remain significant and unavoidable with respect to exceedance of applicable thresholds. Vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from construction trucks traveling along the local roadway network would be less than significant for the Project.

Construction of Alternative 2 would generate groundborne construction vibration during construction activities when heavy construction equipment is used. Because the construction activities under Alternative 2 would be similar as the activities under the Project, Alternative 2 would have similar impacts associated with structural damage from on-site construction activities for V1 and V6. Alternative 2 would implement the same mitigation measures to reduce impacts. Impacts with regard to structural damage for V6 would be mitigated to a less-than-significant level, except for temporary shoring activities. However, as stated above and as similar to the circumstances under the Project, because V1 is a privately owned structure and would require the consent of the property owner, impacts to V1 would be significant and unavoidable after mitigation should consent for inspections and repairs not be granted. Impacts under Alternative 2 would be greater than the Project because of the longer construction duration of Alternative 2 and would be significant and unavoidable.

Regarding human annoyance, as with the Project, the estimated vibration levels due to maximum construction activity under Alternative 2 would exceed the significance criteria at V1, and impacts would be potentially significant. Similar to the Project, Alternative 2 would implement Mitigation Measures NOISE-MM-6 through NOISE-MM-9, but construction vibration impacts would remain significant and unavoidable. Vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from construction trucks traveling along the local roadway network would be less than significant. While Alternative 2 would result in similar maximum daily vibration levels, the duration of construction activity under Alternative 2 would be greater than the Project. Because of the longer construction duration of Alternative 2, impacts related to construction vibration would be greater under Alternative 2 compared to the Project.

(ii) *Project with the Deck Concept*

The Project with the Deck Concept would use a similar mix of construction equipment as the Project, but would result in a greater duration of construction activity associated with Deck construction. Construction activities include excavation for footings for the Deck. Because the Deck would be located on the east side of the Project Site (adjacent to the Los Angeles River), excavation locations would not be any closer to vibration sensitive uses or structures than analyzed for the Project. The analysis above for the Project assumes the construction activity would be located at a distance as near as five feet from the 7th Street Bridge (receptor V6) to account for shoring activities. This activity would also be required for construction of Project with Deck concept. With implementation of Mitigation Measure NOISE-MM-6, potential Project with the Deck Concept structural vibration impacts on receptors V1 and V6 would be mitigated to less than significant for the majority of construction activities, except for temporary shoring activities and installation of shoring infrastructure. The Project with Deck Concept would require shoring activities adjacent to V6 (7th Street Bridge). Mitigation Measures NOISE-MM-7 and NOISE-MM-8 would reduce vibration impacts at the 7th Street Bridge to less-than-significant levels for all construction activity except for temporary shoring. Similarly, with implementation of Mitigation Measures NOISE-MM-7 and NOISE-MM-8, such damage to V1 could be repaired by the Project contractor, which would reduce impacts to a less-than-significant level. However, because V1 is a privately owned structure, inspections and repair pursuant to Mitigation Measure NOISE-MM-8 would require the consent of the property owner, who may not agree. Thus, impacts to V1 under the Project with the Deck Concept would be significant and unavoidable should consent for inspections and repairs not be granted.

Potential vibration impacts from on-site construction activities with respect to human annoyance would be significant prior to the implementation of mitigation measures at sensitive receptor location V1. As with the Project, with implementation of Mitigation Measures NOISE-MM-6 through NOISE-MM-9, construction vibration impacts related to human annoyance from on-site, off-road equipment would remain significant and unavoidable with respect to exceedance of applicable thresholds. Vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from construction trucks traveling along the local roadway network would be less than significant for the Project with the Deck Concept.

Construction of Alternative 2 would generate groundborne construction vibration during construction activities when heavy construction equipment is used. Because the construction activities under Alternative 2 would be similar to the Project with the Deck Concept, Alternative 2 would have similar impacts associated with structural damage from on-site construction activities for V1 and V6. As with the Project with Deck Concept, Alternative 2 would implement the same mitigation measures to attempt to reduce impacts. Impacts with regard to structural damage for V6 would be mitigated to a less-than-significant level except for temporary shoring activities. However, because V1 is a privately owned structure and would require the consent of the property owner, impacts to V1 would be significant and unavoidable after mitigation should consent for inspections

and repairs not be granted. Impacts under Alternative 2 would be significant and unavoidable, and would be less than the Project with the Deck Concept due to the shorter construction duration.

Regarding human annoyance, the estimated vibration levels due to maximum construction activity under Alternative 2 would exceed the significance criteria at V1, and impacts would be potentially significant. As with the Project with the Deck Concept, Alternative 2 would implement Mitigation Measures NOISE-MM-6 through NOISE-MM-9, but construction vibration impacts would remain significant and unavoidable. Vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from construction trucks traveling along the local roadway network would be less than significant. While Alternative 2 would result in a similar maximum daily vibration levels, the duration of construction activity under Alternative 2 would be less than the Project with the Deck Concept. Because of the shorter construction duration of Alternative 2, impacts related to construction vibration would be less under Alternative 2 compared to the Project with the Deck Concept.

(b) Operation

(i) *Project*

As discussed in Section IV.I, *Noise*, of this Draft EIR, Project operations would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce vibration at low levels that would not cause damage or annoyance impacts to the Project buildings or on-site occupants and would not cause vibration impacts to the off-site environment. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the proposed parking area. Pumps or compressors would generate groundborne vibration levels of 0.5 in/sec PPV at 1 foot, which would not generate off-site vibration. It is anticipated that Project mechanical equipment, including air handling units, condenser units, and exhaust fans, would be located on building rooftops. Therefore, groundborne vibration levels for the Project would be less than significant.

Day-to-day operations under Alternative 2, as with the Project, would include typical commercial-grade stationary mechanical and electrical equipment, which would produce vibration at low levels that would not cause damage or annoyance impacts to on-site or off-site environment. Primary sources of transient vibration would include vehicle circulation within the proposed parking areas, which would be confined to the immediate area and would not be expected to be perceptible off the Project Site. It is anticipated that mechanical equipment under Alternative 2 would be located in similar locations as for the Project. Therefore, as with the Project, groundborne vibration from the operation of such mechanical equipment under Alternative 2 would not impact any of the off-site sensitive receptors. Impacts with respect to operational vibration would be less than significant and similar to the Project.

(ii) *Project with the Deck Concept*

The Project with the Deck Concept operation would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce vibration at low levels that would not cause damage or annoyance impacts to the Project buildings or on-site occupants and would not cause vibration impacts to the off-site environment. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the proposed parking area. Pumps or compressors would generate groundborne vibration levels of 0.5 in/sec PPV at 1 foot, which would not generate off-site vibration. It is anticipated that Project mechanical equipment, including air handling units, condenser units, and exhaust fans, would be located on building rooftops. The Deck would be located on the east side of the Project adjacent to the Los Angeles River. Industrial and commercial uses to the east of the Los Angeles River are located at distances of a minimum of 500 feet and would not be affected by activities occurring on the Deck. Therefore, groundborne vibration levels during operation of the Project with the Deck Concept would be less than significant.

Alternative 2, as with the Project with the Deck Concept, would include typical commercial-grade stationary mechanical and electrical equipment, which would produce vibration at low levels that would not cause damage or annoyance impacts to on-site or off-site environment. Primary sources of transient vibration would include vehicle circulation within the proposed parking areas, which would be confined to the immediate area and would not be expected to be perceptible off the Project Site. It is anticipated that mechanical equipment under Alternative 2 would be located in similar locations as for the Project with the Deck Concept. Therefore, as with the Project with the Deck Concept, groundborne vibration from the operation of such mechanical equipment under Alternative 2 would not impact any of the off-site sensitive receptors. Impacts with respect to operational noise for both the Project with the Deck Concept and Alternative 2 would be less than significant and similar.

(j) *Population and Housing*

(i) *Project*

As discussed in Section IV.J, *Population and Housing*, of this Draft EIR, the Project would involve demolition of the existing warehouse buildings on the Project Site to support approximately 944,055 square feet of office space, 308 multi-family residential dwelling units, 236 hotel rooms (158,647 square feet), and a range of commercial uses, including 136,152 square feet of retail, 89,577 square feet of restaurants, 93,617 square feet of studio/event/gallery space/museum, and 62,148 square feet of gym. The Project's 308 residential units would result in an increase in 743 residents on the Project Site, and the Project's commercial uses would result in a net increase of 4,523 employees. The Project's projected growth would be within SCAG's 2020–2045 RTP/SCS projections for the City, and the Project would not induce unplanned substantial population growth in an area directly through the development of new housing and employment opportunities. Furthermore, Project operation would modify access from streets that surround the

Project Site and would implement infrastructure improvements but would not extend roads into new undeveloped areas. Infrastructure improvements under the Project would not induce substantial unplanned population growth in an area, either directly or indirectly. As such, the Project would not induce substantial unplanned population growth in the area, either directly or indirectly that cannot be reasonably accommodated, and impacts would be less than significant.

Alternative 2 would increase occupancy and use of the existing Project Site. Alternative 2's projected increases in residential population and housing stock are summarized **Table V-3, Estimate of Alternative 2 Population and Housing**.

TABLE V-3
ESTIMATE OF ALTERNATIVE 2 POPULATION AND HOUSING

Total Housing Units	Average Household Size ^a	Total Population
420	2.41	1,013

NOTE(S):
^a Based on 2018 Census American Community Survey 5-Year Estimate data (2014–2018).
 SOURCE: ESA, 2021.

Alternative 2's projected increase in employment is summarized in **Table V-4, Estimate of Alternative 2's Employment**.

Alternative 2 would provide 420 residential units, generating approximately 1,013 new residents. Alternative 2 would generate 4,292 net new employees. By comparison, the Project would generate 743 new residents and 4,523 net new employees. Alternative 2's population increase of 1,013 new residents would represent 0.39 percent of SCAG's 2017–2026 population growth projection of 259,913 and approximately 0.13 percent of SCAG's 2017–2045 population growth projection of 808,620. Alternative 2's 4,292 new employees would represent approximately 4.81 percent of SCAG's 2017–2026 employment growth projection of 89,254 and approximately 1.55 percent of SCAG's 2017–2045 employment growth projection of 277,682.³³ Alternative 2, as with the Project, would not exceed SCAG's growth projections, would help the City meet its housing obligation under SCAG's RHNA allocation, and would provide the type of transit oriented development encouraged in the City's General Plan and SCAG 2020–2045 RTP/SCS policies. Because there are no existing housing units on the Project Site, no existing residences would be displaced. The Project would not induce population or employment beyond SCAG's growth projections. As such, Alternative 2, as with the Project, would result in a less than significant population, housing, and employment impacts. As SCAG population and housing projections would not be exceeded, impacts with respect to substantial unplanned population growth under Alternative 2 would be less than significant and similar to the Project.

³³ Population increase calculations: $1,013 \div 259,913 = 0.39\%$; $1,013 \div 808,620 = 0.13\%$. Employment increase calculations: $4,292 \div 89,254 = 4.81\%$; $4,292 \div 277,682 = 1.55\%$.

TABLE V-4
ESTIMATE OF ALTERNATIVE 2'S EMPLOYMENT

Use	Amount	Employment Generation Factor ^a	Number of Employees ^b
Office	1,000,666 sf	4 emp/ksf	4,002
Retail	11,664 sf	2 emp/ksf	23
Restaurant	59,700 sf	4 emp/ksf	239
Hotel	236 rms	0.5 emp/rm	118
Studio/Gallery	44,069 sf	1 emp/ksf	45
Gym	52,424 sf	1 emp/ksf	53
Elementary School	32,150 (300 students)	0.1 emp/student	30
<i>Proposed Subtotal</i>			4,510
Existing Uses			
Freezer/Cooler	161,854 sf	1 emp/ksf	162
Office	11,157 sf	4 emp/ksf	45
Dry Storage	32,382 sf	0.33 emp/ksf	11
<i>Existing Subtotal</i>			218
Net New Employees			4,292

NOTE(S):

sf = square feet; rm = room; emp = employee

^a The employee generation factors are taken from Table 1, Land Use and Trip Generation Base Assumptions, from the City of Los Angeles Vehicle Miles Traveled (VMT) Calculator Documentation, Version 1.3, provided by the LADOT and Los Angeles Department of City Planning.

^b Totals are rounded.

SOURCE: ESA, 2021.

(ii) Project with the Deck Concept

The Project with the Deck Concept would provide 308 residential units and generate a population of 743 new residents and 4,523 net new employees. The Project with the Deck Concept's projected growth would be within SCAG's 2020–2045 RTP/SCS projections for the City, and the Project with the Deck Concept would not induce unplanned substantial population growth in an area directly through the development of new housing and employment opportunities. As such, impacts related to population and housing under the Project with the Deck Concept would be less than significant.

Alternative 2 would provide 420 residential units and generate 1,013 new residents and 4,292 net new employees. Alternative 2's population and employment increase would not exceed SCAG's growth projections. It would also help the City meet its housing obligation under SCAG's RHNA allocation and implement mixed-use, transit oriented development. As such, Alternative 2 would be consistent with SCAG growth policies and projections.

Impacts with respect to substantial unplanned population growth under both the Project with the Deck Concept and Alternative 2 would be less than significant and similar.

(k) *Public Services*

(i) *Fire Protection*

(a) *Project*

As discussed in Section IV.K.1, *Public Services – Fire Protection*, of this Draft EIR, Project demand for fire protection and response times during construction would be less than significant. The Project would implement Project Design Feature TRAF-PDF-1 (Construction Traffic Management Plan) to minimize disruptions to through traffic flow and maintain emergency vehicle access to the Project Site and neighboring land uses. Additionally, as part of a Construction Worker Parking Plan (TRAF-PDF-2), construction worker parking would either be accommodated on the Project Site or in an alternate location that would not affect the adjacent streets. The Project would be required to upgrade the nearby fire-flow infrastructure to have available flow to serve the Project Site. With the inclusion of these system upgrades, the hydrants would have adequate fire flow available to meet the flow required for the Project. Therefore, construction of the Project would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, and impacts would be less than significant.

During Project operation, the Project would comply with the applicable Building and Fire Codes, LAFD's recommendations for fire prevention and protection, and LAFD's fire/life safety inspection for new construction projects to ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment without creating the need for new or expanded fire facilities, the construction of which would result in physical environmental impacts. Impacts during Project operation would be less than significant.

Alternative 2, as with the Project, would involve construction activities and intensify the use of the Project Site so that it would increase demand on fire protection and emergency medical services, as well as potentially affect emergency access. Alternative 2, as with the Project, would incorporate Project Design Feature TRAF-PDF-1 to provide a Construction Traffic Management Plan to improve vehicular access around the construction site. Project Design Feature TRAF-PDF-2 would identify and enforce parking location requirements for construction workers. The implementation of these Project Design Features would facilitate emergency access. As such, similar to the Project, construction under Alternative 2 would result in less-than-significant impacts with respect to emergency response times and emergency access.

During operation, Alternative 2 would result in a population increase of 1,013 new residents and 4,391 new employees, for a total service area increase of 5,404 in the service population. By comparison, the Project would result in a population increase of 743

residents and 4,523 new employees, for a total service area increase of 5,266 in the service population. Alternative 2, as with the Project, would comply with the applicable Occupational Safety and Health Administration (OSHA), Building Code, Fire Code, other LAMC, and LAFD requirements and recommendations, which would reduce demand on LAFD facilities and equipment without creating the need for new or expanded fire facilities. In addition, the Project Site is located within a highly urbanized area accessed via an established street system. Fire Station 17 is located 1.032 miles from the Project Site and Fire Station 9 is located 1.632 miles from the Project Site, none of the stations that would serve the Project Site meet the LAFD distance standard to the Project Site of 1 mile for an Engine Company or 1.5 miles for a Truck Company. However, the Project would include an automatic sprinkler system that would support compliance with the relevant requirements in Section 57.107.6 of the Fire Code. The LAFD recommended a variety of fire prevention and protection features regarding building identification, emergency access lanes, building setbacks, and private roadway widths. Additionally, plans and specifications would be submitted to LAFD prior to the provision of necessary permits for the Project. The inclusion of these recommendations would reduce impacts to an acceptable level.

Furthermore, Alternative 2, as with the Project, would be required to upgrade the nearby fire-flow infrastructure to have available flow to serve the Project Site. With the inclusion of these system upgrades, the hydrants would have adequate fire flow available to meet the flow required for Alternative 2, similar to the Project. As such, Alternative 2, as with the Project, would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. Impacts under Alternative 2, as with the Project, would be less than significant. Because Alternative 2 would increase Project Site service population (employees plus residents) more compared to the Project, impacts related to fire protection services under Alternative 2 would be greater than the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would generate a new population of 743 residents and 4,603 employees that would increase demand for fire protection services. This demand would be addressed by various measures, including LAFD review of Project Site and building access and an upgrade to the adjacent fire-flow infrastructure, including hydrants and water lines to have available fire flow to serve the Project Site. Other fire safety features would include implementation of Project Design Feature TRAF-PDF-1 (Construction Traffic Management Plan) to minimize disruptions to through traffic flow and maintain emergency vehicle access to the Project Site and neighboring land uses during construction, highly visible building identification, installation of sprinklers throughout all inhabited spaces, and compliance with the Fire Code. The inclusion of these and other system upgrades and features would reduce demand on existing stations and avoid the need to provide new or expanded facilities, the construction of which would result in physical environmental impacts. Therefore, impacts to fire services by the Project with the Deck Concept would be less than significant.

Alternative 2 would generate a population increase of 1,013 new residents and 4,392 new employees for a total population gain of 5,405 new occupants that would increase demand for fire protection services. As with the Project with the Deck Concept, Alternative 2 would be required to upgrade the nearby fire-flow infrastructure to have available flow to serve the Project Site. With the inclusion of these system upgrades, the hydrants would have adequate fire flow available to meet the flow required for Alternative 2, similar to the Project with the Deck Concept. As such, Alternative 2 would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities. Impacts with respect to fire protection services under both the Project with the Deck Concept and Alternative 2 would be less than significant. However, because Alternative 2 would increase the area's service population to a greater degree than the Project with the Deck Concept, impacts related to fire protection services under Alternative 2 would be greater than the Project with the Deck Concept.

(ii) *Police Protection*

(a) *Project*

As discussed in Section IV.K.2, *Public Services – Police Protection*, of this Draft EIR, Project impacts related to police protection services during construction would be less than significant. The Project would implement Project Design Feature POL-PDF-1 to include a number of security measures that limit access to construction areas, including private security, construction fencing, locked entry, and security lighting, and other security features. Implementation of these security features would minimize the Project's potential need for police protection services during the construction phase. Implementation of the Project Design Feature TRAF-PDF-1 (Construction Traffic Management Plan) would ensure that adequate and safe access remains available at the Project Site during construction activities. The Construction Traffic Management Plan would require approval by LADOT to ensure maintenance of emergency access. Project Design Feature TRAF-PDF-2 would implement a Construction Worker Parking Plan to identify and enforce parking location requirements for construction workers. Furthermore, construction-related traffic generated by the Project would not significantly affect LAPD response times within the Project vicinity as LAPD vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic during construction. The various safety features and plans that would be implemented during Project construction would reduce the potential for incidents that would require police responses. Therefore, construction of the Project would not result in substantial adverse physical impacts associated with the provision of or need for new or altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives, and impacts would be less than significant.

As discussed in Section IV.J, *Population and Housing*, of this Draft EIR, the Project would generate a residential population increase of 743, which would increase demand for police services. During Project operation, the Project would implement Project Design

Feature POL-PDF-2, which includes a security program with controlled access, security personnel, staff training and video surveillance. These security features would help reduce the potential for on-site crimes, including loitering, theft, and burglaries, and would reduce demand for LAPD services. Therefore, Project operation would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives, and impacts would be less than significant.

Alternative 2, as with the Project, would result in construction activities that could affect emergency access and increase demand for police protection services. As with the Project, Alternative 2's construction phase could increase potential demand for LAPD services related to theft or vandalism and increased worker activity, as well as construction traffic that could affect emergency response times. To reduce LAPD demand during construction, Alternative 2, as with the Project, would implement a number of security measures under Project Design Feature POL-PDF-1 to limit access to construction areas, including private security, construction fencing, and locked entry. Similar to the Project, construction activities under Alternative 2 may involve temporary lane closures to accommodate trucks entering and exiting the Project Site. Under Project Design Feature TRAF-PDF-1, a Construction Traffic Management Plan would ensure that adequate and safe access remains available at the Project Site during construction activities. The Construction Traffic Management Plan would require approval by LADOT to ensure maintenance of emergency access. Project Design Feature TRAF-PDF-2 would implement a Construction Worker Parking Plan to identify and enforce parking location requirements for construction workers. Furthermore, construction-related traffic generated by Alternative 2, as with the Project, would not significantly affect LAPD response times within the Project vicinity as LAPD vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic during construction. With implementation of the various safety features to reduce the potential for incidents that would require police responses, construction of the Project or Alternative 2 would not result in substantial adverse physical impacts requiring new or altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives, and impacts would be less than significant. Accordingly, impacts during construction under Alternative 2 would be similar to the Project.

During operation, Alternative 2 would generate a population increase of 1,013 new residents and, as with the Project, would incorporate Project Design Feature POL-PDF-2 to provide a 24-hour/seven-day security program to ensure the safety of its employees and site visitors. These measures would reduce demand on police services during operation. Similar to the Project, with the implementation of these features, Alternative 2 would not increase police services demand to the extent that the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, Alternative 2, as with the Project, would result in

less than significant impacts with respect police protection services. However, as Alternative 2 would introduce more residents to the Project Site as compared to the Project, impacts to police protection services under Alternative 2 would be greater than the Project.

(b) Project with the Deck Concept

As discussed in Section IV.K.2, *Public Services – Police Protection*, of this Draft EIR, the Project with the Deck Concept's demand for police protection during construction would be less than significant. The Project with the Deck Concept would implement Project Design Feature POL-PDF-1 to include a number of security measures that limit access to construction areas, including private security, construction fencing, locked entry, and security lighting, and other features discussed under the Project, above. Implementation of these security features would minimize the Project with the Deck Concept's potential need for police protection services during the construction phase. Implementation of the Project Design Feature TRAF-PDF-1 (Construction Traffic Management Plan) would ensure that adequate and safe access remains available at the Project Site during construction activities. The Construction Traffic Management Plan would require approval by LADOT to ensure maintenance of emergency access. Project Design Feature TRAF-PDF-2 would implement a Construction Worker Parking Plan to identify and enforce parking location requirements for construction workers. Furthermore, construction-related traffic generated by the Project with the Deck Concept would not significantly affect LAPD response times within the Project vicinity as LAPD vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic during construction. The various safety features that would be implemented during Project with the Deck Concept construction would reduce the potential for incidents that would require police responses. As such, construction of the Project with the Deck Concept would not result in substantial adverse physical impacts associated with the provision of or need for new or altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives, and impacts would be less than significant.

The Project with the Deck Concept would result in a population increase of 743 new residents who would increase demand for police protection services. During operation, the Project with the Deck Concept would include the same supporting safety features as the Project, including Project Design Feature POL-PDF-2 to require controlled access, security personnel, staff training and video surveillance. These security features would help reduce the potential for on-site crimes, including loitering, theft, and burglaries, and would reduce demand for LAPD services. Therefore, the Project with the Deck Concept would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives, and impacts would be less than significant.

Alternative 2, as with the Project with the Deck Concept, would result in construction activities that could affect emergency access and increase demand for police protection services. As with the Project with the Deck Concept, Alternative 2's construction phase could increase potential demand for LAPD services related to theft or vandalism and increased worker activity, as well as construction traffic that could affect emergency response times. To reduce LAPD demand during construction, Alternative 2, as with the Project with the Deck Concept, would implement a number of security measures under Project Design Feature POL-PDF-1 to limit access to construction areas, including private security, construction fencing, and locked entry. Similar to the Project with the Deck Concept, construction activities under Alternative 2 may involve temporary lane closures to accommodate trucks entering and exiting the Project Site. Under Project Design Feature TRAF-PDF-1, a Construction Traffic Management Plan would ensure that adequate and safe access remains available at the Project Site during construction activities. The Construction Traffic Management Plan would be approved by the LADOT to ensure maintenance of emergency access. Project Design Feature TRAF-PDF-2 would implement a Construction Worker Parking Plan to identify and enforce parking location requirements for construction workers. Furthermore, construction-related traffic generated by Alternative 2, as with the Project with the Deck Concept, would not significantly affect LAPD response times within the Project vicinity as LAPD vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic during construction. With implementation of the various safety features to reduce the potential for incidents that would require police responses, construction of the Project with the Deck Concept or Alternative 2 would not result in substantial adverse physical impacts requiring new or altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives, and impacts would be less than significant. Accordingly, impacts during construction under Alternative 2 would be similar to the Project with the Deck Concept.

Alternative 2 would result in a population increase of 1,013 new residents who would increase demand for police protection services. As with the Project with the Deck Concept, Alternative 2 would incorporate Project Design Feature POL-PDF-2 to provide a 24-hour/seven-day security program to ensure the safety of its employees and site visitors. These measures would reduce demand on police services during operation. Similar to the Project with the Deck Concept, with the implementation of these features, Alternative 2 would not increase police services demand to the extent that the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, Alternative 2, as with the Project with the Deck Concept, would result in less than significant impacts with respect police protection services. However, as Alternative 2 would introduce more residents to the Project Site as compared to the Project with the Deck Concept, impacts to police protection services under Alternative 2 would be greater than the Project with the Deck Concept.

(iii) Schools

(a) Project

As discussed in Section IV.K.3, *Public Services – Schools*, of this Draft EIR, there are no public schools located in the immediate Project vicinity that would be affected by construction activities at the Project Site. Project construction would also not result in a notable increase in the resident population or generate new students needing to attend local schools. Therefore, Project construction would not result in the need for new or physically altered facilities, construction of which could lead to significant impacts. During operation, the Project would generate a net increase of 759 elementary school students, 212 middle school students, and 436 high school students for a total net increase of 1,407 school students. While the Project would increase demand at local schools that serve the Project Site, the LAUSD bond program would fund improvements and upgrades to LAUSD school facilities upon review of enrollment and attendance. In addition, pursuant to Section 65995 of the California Government Code, the Project applicant would be required to pay fees in accordance with SB 50. Payment of such fees is intended for the general purpose of addressing the construction of new school facilities, whether schools serving the Project in question are at capacity or not. Pursuant to Section 65995(h) of the California Government Code, payment of such fees is deemed full mitigation of a project's development impacts. Project operational impacts to schools would be less than significant.

LAUSD has student generation rates for residential, office, and commercial uses within their 2018 Developer Fee Justification Study. Trip generation rates and total estimated students for Alternative 2 are presented in **Table V-5, *Estimated Number of Students Generated by Alternative 2.***

Based on these rates, Alternative 2 would generate approximately 764 elementary school students, 211 middle school students, and 440 high school students, resulting in a total of 1,415 students. The Project would generate approximately 1,407 students. Similar to the Project, the additional students generated by Alternative 2 could potentially exceed the number of seats available at local schools. However, Alternative 2 would incorporate a charter elementary school that would accommodate up to 300 students and, thus, reduce demand on existing public schools compared to the Project. In addition, pursuant to Section 65995 of the California Government Code, the Project Applicant would be required to pay fees in accordance with SB 50. Payment of such fees is intended for the general purpose of addressing the construction of new school facilities, whether schools serving the Project are at capacity or not and, pursuant to Section 65995(h), payment of such fees is deemed to be full mitigation of a project's development impacts. As such, impacts to school facilities and services under Alternative 2 would, as with the Project, would be less than significant. However, because Alternative 2 would provide an on-site charter elementary school, which would potentially relieve demand for public elementary school seats, and because Alternative 2 would generate a similar number of school age children as the Project, impacts on schools would be less under Alternative 2 compared to the Project.

**TABLE V-5
ESTIMATED NUMBER OF STUDENTS GENERATED ALTERNATIVE 2**

Land Use ^{a,b}	Use	Generation Factors	Elemen. School	Middle School	High School	Total ^c
Proposed Uses						
Residential Multi-Family	420 units	Elm: 0.2269/unit MS:0.0611/unit HS: 0.1296/unit	96	26	55	177
Retail	11,664 sf	0.610/1,000 sf	4	2	3	9
Creative Office	1,000,666 sf	1.077/1,000 sf	582	162	334	1,078
Restaurant	59,700 sf	0.610/1,000 sf	19	5	12	36
Hotel	209,560 sf	0.96/1,000 sf	29	8	16	53
Studio Space	44,069 sf	0.610/1,000 sf	15	4	8	27
Gym	52,424 sf	0.610/1,000 sf	17	5	11	33
Elementary School	32,150 sf	0.684/1,000 sf	12	3	7	22
<i>Total Students Generated by Proposed Uses</i>			<i>774</i>	<i>215</i>	<i>446</i>	<i>1,435</i>
Existing Uses						
Office	11,157 sf	0.610/1,000 sf	7	2	4	13
Dry Storage	32,382 sf	0.013/1,000 sf	1	1	1	3
Freezer/Cooler	161,854 sf	0.013/1,000 sf	2	1	1	4
<i>Total Students Generated by Existing Uses</i>			<i>10</i>	<i>4</i>	<i>6</i>	<i>20</i>
Net Increase (Proposed-Existing)			764	211	440	1,415

NOTE(S):

- ^a Student generation rates for residential uses are based on Table 3 of the LAUSD 2018 Developer Fee Justification Study: Elementary
- ^b Student generation for the office, hotel, retail, restaurant, studio space, and gym uses is based on the Neighborhood Shopping Center student generation rates as provided in Table 15 of the LAUSD 2018 Developer Fee Justification Study. Student generation for the school use is based on Research and Development (no school uses are listed) in Table 15. Since the Developer Fee Justification Study does not specify grade levels for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 54 percent elementary school, 15 percent middle school, and 31 percent high school). For the existing dry storage and freezer/cooler uses, the Rental Self Storage factor was used.
- ^c Rounded to the nearest whole number.

SOURCE: ESA, 2021.

(b) Project with the Deck Concept

As with the Project, based on the LAUSD's 2018 Developer Fee Justification Study, the Project with the Deck Concept would generate a net increase of 759 elementary school students, 211 middle school students, and 436 high school students for a total net increase of 1,407 school students. While the Project with the Deck Concept would

increase demand at local schools, the LAUSD bond program would fund improvements and upgrades to LAUSD school facilities upon review of enrollment and attendance. In addition, pursuant to Section 65995 of the California Government Code, the Project applicant would be required to pay fees in accordance with SB 50. Payment of such fees is intended for the general purpose of addressing the construction of new school facilities, whether schools serving the Project in question are at capacity or not. Pursuant to Section 65995(h) of the California Government Code, payment of such fees is deemed full mitigation of a project's development impacts. Therefore, operational impacts to schools from the Project with the Deck Concept would be less than significant.

Based on the LAUSD's 2018 Developer Fee Justification Study, Alternative 2 would generate approximately 764 elementary school students, 211 middle school students, and 440 high school students, resulting in a total of 1,415 students. This increase would be fully mitigated by the payment of fees in accordance with SB 50 and Section 65995(h) of the California Government Code, and, as such, impacts would be less than significant as under the Project with the Deck Concept. Because Alternative 2 would incorporate a charter elementary school with a capacity of up to 300, which would potentially relieve demand for public elementary school seats, and because Alternative 2 would generate a relatively similar number of school age children as the Project with the Deck Concept (1,407 under the Project with the Deck Concept compared to 1,415 under Alternative 2) the impact to school services under Alternative 2 compared to the Project with the Deck Concept would be less.

(iv) *Parks and Recreation*

(a) *Project*

As discussed in Section IV.K.4, *Public Services – Parks and Recreation*, of this Draft EIR, the Project would provide approximately 141,876 square feet of open space. Of the 141,876 square feet of open space, 73,848 square feet would be publicly accessible open space and would include the Northern Landscaped Area, Mesquit Paseo, River Balconies, Elevated Pedestrian Walkway connecting the River Balconies, Public Plaza Flex Deck, Fitness Deck, Sculpture Garden, Work Breakout Deck, and the Residential Pool Deck. The Project would provide open space in excess of the useable open space and landscape requirements of LAMC Section 12.21.G. Furthermore, the Applicant would pay the \$200 tax per new eligible residential unit, per LAMC Section 12.33.G to support the City's acquisition of new park space. The Project would also comply with LAMC section 17.12 (the City's parkland dedication ordinance) in accordance with the Quimby Act. The Project would largely offset demand for recreational facilities through provision of on-site recreational and open space facilities in excess of Code requirements for the benefit of on-site residents, employees, and visitors. As such, the Project would not result in a high use of public parks and recreational facilities such that would result in the substantial deterioration of public recreational facilities, and the Project would also not require the construction of new, or expansion of existing, park facilities, which could have an adverse impact on the environment. Therefore, the Project would have a less than significant impact on parks and recreation services.

Alternative 2 would generate approximately 1,013 new residents that would utilize parks and recreation facilities. In contrast, the Project would generate approximately 743 new residents. When accounting for the 75,000-square-foot Deck, Alternative 2 would provide a total of 213,139 square feet of open space, compared to the Project's 141,876 square feet of open space. Alternative 2, as with the Project, would comply with LAMC Section 12.33.G, which requires the Applicant to pay the \$200 tax per new eligible residential unit to support the City's acquisition of new park space. Furthermore, Alternative 2, as with the Project, would exceed the requirements of LAMC Sections 12.21.G regarding the provision of useable open space and would comply with LAMC section 17.12 (the City's parkland dedication ordinance) in accordance with the Quimby Act. As with the Project, Alternative 2 would largely offset demand for recreational facilities through provision of on-site recreational and open space facilities in excess of Code requirements for the benefit of on-site residents, employees, and visitors. As such, Alternative 2 would not result in a high use of public parks and recreational facilities that would result in the substantial deterioration of public recreational facilities, and Alternative 2 would also not require the construction of new, or expansion of existing, park facilities, which could have an adverse impact on the environment. However, since Alternative 2 would generate more population and therefore greater demand for parkland than under the Project, impacts would be greater than the Project, though less than significant.

(b) Project with the Deck Concept

The Project with the Deck Concept would provide 141,876 square feet (3.26 acres) of open space across the Project Site. Of the 141,876 square feet of open space, 73,848 square feet would be publicly accessible open space and include the Northern Landscaped Area, Mesquit Paseo, North and South River Balconies, 7th Street Terrace, and the Public Plaza Flex Deck. The Project with the Deck Concept would also include a 132,000-square-foot Deck that would result in a total of 273,876 square feet (6.29 acres) of open space. Open spaces provided under the Project with the Deck Concept would also exceed the landscape requirements of the LAMC and would comply with LAMC section 17.12 (the City's parkland dedication ordinance) in accordance with the Quimby Act. As such, operation of the Project with the Deck Concept would not exacerbate the existing shortfalls in parkland relative to City standards to the extent that new or physically altered park or recreational facilities would need to be constructed in order to maintain service. In addition, the Project with the Deck Concept would also pay \$200 per unit for each of its 308 residential units for park fees to further reduce the City's parks and open space shortfall. Impacts with respect to parks and recreation would be less than significant under the Project with the Deck Concept.

Alternative 2 would generate approximately 1,013 new residents who would utilize parks and recreation facilities. In contrast, the Project with the Deck Concept would generate approximately 743 new residents. Alternative 2 would provide 213,139 square feet of open space with the inclusion of the 75,000 square foot Deck. Alternative 2, as with the Project with the Deck Concept, would comply with LAMC requirements to pay the \$200 tax per new eligible residential unit. In addition, Alternative 2, as with the Project with the

Deck, would exceed LAMC regulations regarding the provision of useable open space and would comply with LAMC section 17.12 (the City's parkland dedication ordinance) in accordance with the Quimby Act. As with the Project with the Deck Concept, Alternative 2 would largely offset demand for recreational facilities through provision of on-site recreational and open space facilities in excess of Code requirements for the benefit of on-site residents, employees, and visitors. As such, Alternative 2 would not result in a high use of public parks and recreational facilities that would result in the substantial deterioration of public recreational facilities, and Alternative 2 would also not require the construction of new, or expansion of existing, park facilities, which could have an adverse impact on the environment. However, since Alternative 2 would generate more population and, therefore, greater demand for parkland, as well as provide less open space than under the Project with the Deck Concept, impacts under Alternative 2 compared to the Project with the Deck Concept would be greater, though less than significant.

(v) *Libraries*

(a) Project

As discussed in Section IV.K.5, *Public Services – Libraries*, of this Draft EIR, there are no libraries located in the immediate Project vicinity that would be affected by construction activities at the Project Site. Project construction would also not result in a notable increase in library usage at the libraries serving the Project Site. During Project operation, the Project's 308 residential units would generate an estimated 743 new residents and 4,523 net new employees, and would therefore have the potential to increase demand at the libraries at the two branch libraries (Benjamin Franklin Branch Library and Little Tokyo Branch Library) with existing overcapacity conditions. However, the new level of service population at each library would not increase the population such that construction of a new branch library would be recommended according to the LAPL standards. Therefore, the Project's increase in demand for library services would not reach the recommended level at which the LAPL would consider building a new branch library in the area, the construction of which would have an adverse physical effect on the environment. Impacts would be less than significant.

Alternative 2's residential population, as with the Project, would increase demand for library services. Alternative 2 would generate approximately 1,013 new residents compared to the Project, which would generate approximately 743 new residents. The LAPL has indicated they have no plans for a new branch library in the Project vicinity. The residents generated by Alternative 2 would have the potential to increase demand at the two branch libraries (Benjamin Franklin Branch Library and Little Tokyo Branch Library) with existing overcapacity conditions. However, the new level of service population at each library would not increase the population such that construction of a new branch library would be recommended according to the LAPL standards. Therefore, similar to the Project, Alternative 2 would not create the need for new or physically altered library facilities, the construction of which would result in substantial adverse physical environmental impacts, in order to maintain acceptable service ratios or objectives. Therefore, as with the Project, impacts to libraries under Alternative 2 would be less than

significant. However, because Alternative 2 would generate more population as compared to the Project, impacts would be greater than the Project.

(b) Project with the Deck Concept

Construction of the Project with the Deck Concept would not result in a notable increase in library usage by construction workers at the libraries serving the Project Site. Regarding use of libraries by the additional builders of the Deck, the construction of the deck is expected to use the same labor pools as the Project and would not generate additional demand for library services by construction employees. As such, to accommodate construction population, there would be no need for new library facilities, the construction of which would have an adverse physical effect on the environment. The Project with the Deck Concept would provide 308 residential units and generate a population of 743 new residents and 4,523 net new employees. As such the Project with the Deck Concept would increase service population and demand on library services. However, the increase in demand for library services under the Project with the Deck Concept would not reach the recommended level at which the LAPL would consider building a new branch library in the area, the construction of which would have an adverse physical effect on the environment. Therefore, impacts to libraries from the Project with the Deck Concept would be less than significant.

Alternative 2's residential population would increase demand for library services. Alternative 2 would generate approximately 1,013 new residents compared to the Project with the Deck Concept that would generate approximately 743 new residents. The LAPL has indicated they have no plans for a new branch library in the Project vicinity. However, the service population would not reach the recommended level at which the LAPL would consider building a new branch library in the area. Therefore, Alternative 2 would not create the need for new or physically altered library facilities, the construction of which would result in substantial adverse physical environmental impacts, in order to maintain acceptable service ratios or objectives. Therefore, as with the Project with the Deck Concept, impacts to libraries under Alternative 2 would be less than significant. However, because Alternative 2 would generate more population compared to the Project with the Deck Concept, impacts to library services would be greater, although still less than significant.

(l) *Transportation*

(i) *Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities*

(a) Project

As discussed in Section IV.L, *Transportation*, of this Draft EIR, the Project, which is located within a TPA, would include roadway and sidewalk improvements that facilitate convenient access to transit. Components of the Project include the Mesquit Paseo that would improve bicyclist and pedestrian connectivity between Mesquit Street and 7th

Street. The Project would include 288 short-term bicycle parking spaces and 519 long-term bicycle parking spaces. The Project would also include TDM measures to discourage single-occupancy vehicle trips. With improvements to the pedestrian system, roadways, and provision of bicycle facilities, the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, which have been adopted to protect the environment and reduce VMT. Impacts with respect to programs, plans, and ordinances would be less than significant.

Alternative 2, as with the Project, would support multimodal transportation options and a reduction in VMT, as well as promote transportation-related safety in the Project area. Alternative 2, as with the Project, would not conflict with any programs, plans, ordinances or policies addressing the circulation system, transit, roadways, bicycle and pedestrian facilities, including those of Mobility Plan 2035, the Community Plan, the LADOT MPP, Vision Zero, the LAMC, the Plan for a Healthy Los Angeles, and the Citywide Design Guidelines. Alternative 2, as with the Project, would coordinate land use densities and promote the use of transit as it would be developed within a TPA. Alternative 2, as with the Project, would increase population and employment density in close proximity to a major transit stop. Additionally, Alternative 2, similar to the Project, would be located close to the proposed future Metro Arts District/6th Street Station, which is currently under study. Alternative 2, as with the Project, would also provide for road and pedestrian improvements, including multiple pedestrian and vehicle access points throughout the Project Site. Similar to the Project, Alternative 2 would not conflict with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities and, as such, impacts relative to plans and programs would be less than significant and similar to the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would include the same roadway and sidewalk improvements as the Project that would facilitate convenient access to transit. The Project with the Deck Concept would also develop a pedestrian-oriented, 132,000-square-foot Deck on the 7th Street level that would extend open space to near the Los Angeles River and enhance pedestrian access across the Project Site. The Project with the Deck Concept would also provide the Mesquit Paseo that would improve bicyclist and pedestrian connectivity between Mesquit Street and 7th Street, as with the Project. The Project with the Deck Concept would incorporate 288 short-term bicycle parking spaces and 519 long-term bicycle parking spaces, and include TDM measures provided for in Mitigation Measure TRAF-MM-1 to discourage single-occupancy vehicle trips. With proposed improvements to the pedestrian system, roadways, and provision of bicycle facilities under the Project with the Deck Concept, impacts related to programs, plans, ordinances or policies would be less than significant.

Alternative 2, as with the Project with the Deck Concept would not conflict with any programs, plans, ordinances or policies addressing the circulation system, transit, roadways, bicycle and pedestrian facilities. Alternative 2 would increase population and

employment density in close proximity to a major transit stop. Alternative 2 would also provide for road and pedestrian improvements, including multiple pedestrian and vehicle access points throughout the Project Site. Similar to the Project with the Deck Concept, Alternative 2 would not conflict with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. As such, under both the Project with the Deck Concept and Alternative 2, impacts related to programs, plans, ordinances or policies would be less than significant and similar.

(ii) *Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)*

(a) Project

As discussed in Section IV.L, *Transportation*, of this Draft EIR, the Project is estimated to generate a total of 27,040 daily vehicle trips and a total daily VMT of 195,304. The daily residential VMT per capita is estimated at 4.0, below the threshold of 6.0 for the Central APC. The daily work VMT per employee is estimated at 6.6 for the Project, below the threshold of 7.6 for the Central APC. Since the retail components of the Project are greater than 50,000 square feet, they were evaluated using the City's travel demand forecasting model. -The City's model estimated a total daily VMT of 96,898,000 miles within a 12-mile radius of the Project TAZ with all retail uses included.³⁴ This is a net increase of 32,000 daily miles, or a 0.03 percent increase from the network before the retail was added. This increase in VMT is considered to be a significant impact, due to the significance criteria identifying an impact when any increase in VMT due to regional-serving retail occurs. The Project would implement Mitigation Measure TRAF-MM-1 which would partially offset the increase in VMT projected for the Project's retail uses, but would not reduce the retail VMT impact to a less-than-significant level. Therefore, the Project-generated regional-serving retail VMT impact would be significant and unavoidable. Alternative 2 is estimated to generate a total of 17,855 daily vehicle trips and a total daily VMT of 129,528. Alternative 2 would have a household VMT of 4.4 per capita and a work VMT of 6.2 per employee, which would also be below the thresholds of significance for the City's Central APC household per capita of 6.0 and work VMT of 7.6 per employee.³⁵

Regional-serving retail development can lead to longer trips and potentially increase VMT. In regard to the regional-serving retail component, Alternative 2 would reduce the Project's retail floor area. Schools that are intended to primarily serve the immediate community, such as the charter elementary school in Alternative 2, may be screened out from further VMT analysis. However, the Technical Memorandum for the School included

³⁴ The VMT analysis of retail uses for the Project presents a worst case scenario based on additional outdoor programming that would occur under the Project with the Deck Concept. Although the Project analysis presents a worst case scenario, the retail VMT impact findings for the Project would not be materially different if the added outdoor programming were not included.

³⁵ Fehr & Peers, *Analysis of 670 Mesquit Project Alternatives Technical Memorandum*, October 8, 2021. Provided in Appendix P of this Draft EIR.

this use in the evaluation of daily vehicle trips for the entire anticipated mix of uses.³⁶ The City's model estimated a total daily VMT of 96,924,000 miles within a 12-mile radius from the Project TAZ when run without the retail components of Alternative 2. With all the Alternative 2 retail uses included, the model estimated a total daily VMT of 96,918,000 miles within a 12-mile radius from the Project TAZ. This is a net decrease of 6,000 daily miles from the network before the retail was added. This decrease in VMT is not considered to be a significant impact since an impact is considered to be significant when any increase in VMT due to retail occurs.³⁷ Therefore, Alternative 2 would be consistent with the requirements of CEQA Guidelines Section 15064.3, Subdivision (b) and would avoid the Project's significant and unavoidable regional retail VMT impact. Impacts would be less than significant and less compared to the Project.

Therefore, Alternative 2 would be consistent with the requirements of CEQA Guidelines Section 15064.3, Subdivision (b) and would avoid the Project's significant and unavoidable regional retail VMT impact. Impacts would be less than significant and less compared to the Project with the Deck Concept.

(iii) *Design Hazards*

(a) Project

As discussed in Section IV.L, *Transportation*, of this Draft EIR, the Project and its proposed driveways would not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses and impacts on local safety would be less than significant. However, the Project would add car lengths to the US-101 Southbound freeway near the 7th Street Off-ramp such that it would constitute a potential safety issue. Specifically, the addition of traffic generated by the Project is projected to increase the overflow onto the mainline lanes by six cars in the AM peak hour and 2 cars in the PM peak hour (assuming an average queue storage length of 25 feet per car) for the US-101 Southbound Off-ramp to 7th Street in both Future Base (2026 and 2040) plus Project scenarios. Therefore, the Project would potentially substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses and impacts on freeway safety would be potentially significant. The Project would implement Mitigation Measure TRAF-MM-2 to signalize the intersection of the US-101 Southbound Off-ramp and 7th Street, which would sufficiently reduce the off-ramp queue and would not extend onto the freeway mainline. However, since the intersection is within the jurisdiction of another public agency (Caltrans), and the improvement would involve a decision by Caltrans, the City cannot guarantee that Caltrans will agree with implementation of this mitigation measure. Therefore, it is conservatively concluded that the impacts related to freeway safety would remain significant and unavoidable.

³⁶ Fehr & Peers, *Analysis of 670 Mesquit Project Alternatives Technical Memorandum*, October 8, 2021. Provided in Appendix P of this Draft EIR.

³⁷ Fehr & Peers, *Analysis of 670 Mesquit Project Alternatives Technical Memorandum*, October 8, 2021. Provided in Appendix P of this Draft EIR.

Alternative 2, as with the Project, would provide new sidewalks around the perimeter of the Project Site and through the Entry Plazas, Mesquit Paseo, and Elevated Pedestrian Walkways, all of which would be accessible to the neighborhood. Similar to the Project, Alternative 2 would provide access locations that would be designed to the City standards and would provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety. All roadways and driveways will intersect at right angles. Street trees and other potential impediments to adequate driver and pedestrian visibility would be minimal and would be designed to applicable City standards and requirements. Pedestrian entrances separated from vehicular driveways would provide access from the adjacent streets, parking facilities, and transit stops. The provided driveways would be designed to comply with LADOT standards. Therefore, Alternative 2 would not substantially increase geometric hazards due to a design feature or incompatible uses, and impacts on local safety would be less than significant.

Regarding freeway safety, Alternative 2 would be projected to increase the queue onto the mainline lines by five car lengths compared to the six car lengths projected under the Project.³⁸ Similar to the Project, Alternative 2 would be required to implement Mitigation Measure TRAF-MM-2 to signalize the intersection of the US-101 Southbound Off-ramp and 7th Street, which would sufficiently reduce the off-ramp queue and would not extend onto the freeway mainline. However, since the intersection is within the jurisdiction of another public agency (Caltrans), and the improvement would involve a decision by Caltrans, the City cannot guarantee that Caltrans will agree with implementation of this mitigation measure. Therefore, it is conservatively concluded that the impacts related to freeway safety would remain significant and unavoidable. However, as Alternative 2 would result in fewer car lengths projected onto the mainline lines than the Project, impacts would be less than the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would feature several points of pedestrian access that include new sidewalks and bicycle parking facilities. The Project with the Deck Concept and its driveways would not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. However, traffic generated by the Project with the Deck Concept would increase the overflow onto the freeway mainline lanes by more than two cars for the US-101 Southbound Off-ramp to 7th Street. Therefore, because the Project with the Deck Concept would potentially substantially increase geometric hazards due to a design feature, impacts on freeway safety would be potentially significant. The Project with the Deck Concept would implement Mitigation Measure TRAF-MM-2 to signalize the intersection of the US-101 Southbound Off-ramp and 7th Street. Since the intersection is within the jurisdiction of Caltrans, and the improvement would involve a decision by Caltrans, the City cannot guarantee that Caltrans will agree with implementation of this mitigation measure. As

³⁸ Fehr & Peers, *Analysis of 670 Mesquit Project Alternatives Technical Memorandum*, October 8, 2021. Provided in Appendix P of this Draft EIR.

such, impacts related to design hazards under the Project with the Deck Concept would be significant and unavoidable.

As with the Project with the Deck Concept, Alternative 2's access locations would provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety. Pedestrian entrances separated from vehicular driveways would provide access from the adjacent streets, parking facilities, and transit stops. The provided driveways would be designed to comply with LADOT standards. Therefore, Alternative 2 would not substantially increase geometric hazards due to a design feature or incompatible uses, and impacts on local safety would be less than significant.

Regarding freeway safety, Alternative 2 is projected to increase the queue onto the mainline lines by five car lengths compared to the six or more car lengths under the Project with the Deck Concept. Similar to the Project with Deck Concept, Alternative 2 would be required to implement Mitigation Measure TRAF-MM-2 to signalize the intersection of the US-101 Southbound Off-ramp and 7th Street, which would sufficiently reduce the off-ramp queue and would not extend onto the freeway mainline. However, since the intersection is within the jurisdiction of Caltrans, and the improvement would involve a decision by Caltrans, as described above, the City cannot guarantee that Caltrans will agree with implementation of this mitigation measure. Therefore, it is conservatively concluded that the impacts related to freeway safety would remain significant and unavoidable. However, as Alternative 2 would result in fewer car lengths projected onto the mainline lines than the Project with the Deck, impacts under Alternative 2 would be less.

(iv) *Emergency Access*

(a) *Project*

As discussed in Section IV.L, *Transportation*, of this Draft EIR, Project construction activities would result in less than significant impacts to emergency access. The Project would also implement a Construction Traffic Management Plan (see TRAF-PDF-1). The Project's construction activities would not require a new, or significantly interfere with an existing risk management, emergency response, or evacuation plan. The Project would not result in inadequate emergency access during construction. During operation, a section of Mesquit Street, a designated Collector Street, would be permanently closed for the development of the Mesquit Paseo between 6th Street and 7th Street. Mesquit Street, which is not currently accessible from 7th Street because of 7th Street's elevated approach to the 7th Street Bridge, consists entirely of the two-block segment between 6th Street and 7th Street. Mesquit Street, thus, does not currently provide through access to surrounding neighborhoods. With development, access to Mesquit Street and the Paseo would continue to be accessible from 6th Street and emergency access would be newly available from 7th Street. For Project operation, the site plan for the Project would be reviewed prior to issuance of a building permit to ensure that all Los Angeles Fire Department fire safety requirements (including those related to emergency access) are met as part of the City's standard plan check review process.

The Project Site is located in an established urban area served by the surrounding roadway network. Drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. During operation, under Alternative 2, a section of Mesquit Street, a designated Collector Street, would be permanently closed for the development of the Mesquit Paseo between 6th Street and 7th Street. Mesquit Street, which is not currently accessible from 7th Street because of 7th Street's elevated approach to the 7th Street Bridge, consists entirely of the two-block segment between 6th Street and 7th Street. Mesquit Street, thus, does not currently provide through access to surrounding neighborhoods. With development, access to Mesquit Street and the Paseo would continue to be accessible from 6th Street and emergency access would be newly available from 7th Street. Similar to the Project, Alternative 2 would implement TRAF-PDF-1 to ensure that emergency access and emergency response implementation would be maintained during construction. With review and approval of Project Site access and circulation plans by the LAFD, Alternative 2, as with the Project, would not impair implementation of or physically interfere with adopted emergency response or emergency evacuation plans. Impacts regarding emergency access under Alternative 2 would be less than significant and similar to the Project.

(b) Project with the Deck Concept

Construction activities for the Project with the Deck Concept could potentially affect emergency access to the Project Site and surroundings. However, construction activities for the Project with the Deck Concept would not require full street closures and most activities would be confined to the Project Site. With implementation of Project Design Feature TRAF-PDF-1, Construction Traffic Management Plan, the Project with the Deck Concept's construction activities would not significantly interfere with an existing risk management, emergency response, or evacuation plan. Further, the site plan for the Project with the Deck Concept would be reviewed prior to issuance of a building permit to ensure that all Los Angeles Fire Department fire safety requirements (including those related to emergency access) are met as part of the City's standard plan check review process. The Project with the Deck Concept would not result in inadequate emergency access during construction. During operation, a section of Mesquit Street, a designated Collector Street, would be permanently closed for the development of the Mesquit Paseo between 6th Street and 7th Street. Mesquit Street, which is not currently accessible from 7th Street because of 7th Street's elevated approach to the 7th Street Bridge, consists entirely of the two-block segment between 6th Street and 7th Street. Mesquit Street, thus, does not currently provide through access to surrounding neighborhoods. With development, access to Mesquit Street and the Paseo would continue to be accessible from 6th Street and emergency access would be newly available from 7th Street. As such, the changes on Mesquit Street would not adversely affect emergency vehicle access. No other street closures that would affect emergency access in or around the Project Site are anticipated. Impacts associated with emergency access under the Project with the Deck Concept would be less than significant.

Alternative 2 would implement TRAF-PDF-1 to ensure that emergency access and emergency response implementation would be maintained during construction. Further, the site plan for the Project would be reviewed prior to issuance of a building permit to ensure that all Los Angeles Fire Department fire safety requirements (including those related to emergency access) are met as part of the City's standard plan check review process. During operation, under Alternative 2, a section of Mesquit Street, a designated Collector Street, would be permanently closed for the development of the Mesquit Paseo between 6th Street and 7th Street. Mesquit Street, which is not currently accessible from 7th Street because of 7th Street's elevated approach to the 7th Street Bridge, consists entirely of the two-block segment between 6th Street and 7th Street. Mesquit Street, thus, does not currently provide through access to surrounding neighborhoods. With development, access to Mesquit Street and the Paseo would continue to be accessible from 6th Street and emergency access would be newly available from 7th Street. With review and approval of Project Site access and circulation plans by the LAFD, Alternative 2, as with the Project with the Deck Concept, would not impair implementation of or physically interfere with adopted emergency response or emergency evacuation plans. Impacts regarding emergency access under Alternative 2 and the Project with the Deck Concept would be less than significant and similar.

(m) *Tribal Cultural Resources*

(a) Project

Construction activities for the Project would involve excavation for subterranean parking and other ground-disturbing activities. As discussed in Section IV.M, *Tribal Cultural Resources*, of this Draft EIR, no known tribal cultural resources would be affected by the Project. The Los Angeles River is a known landmark for prehistoric habitation and trading. Due to the Project Site's proximity to the river, there is the potential tribal cultural resources to be encountered during Project construction activities. This is considered to be a potentially significant impact. Thus, mitigation measures are proposed to require monitoring for tribal cultural resources and treatment of such resources, if encountered. With implementation of the required mitigation measures, potentially significant impacts under the Project would be reduced to a less than significant level.

Alternative 2 would require a similar depth of excavation for the subterranean parking levels as the Project. A relatively limited amount of excavation would be required to install the piers that would support the Deck under Alternative 2. However, no known tribal cultural resources would be affected by Alternative 2. Similar to the Project, Alternative 2 would be required to implement mitigation measures in the event unknown buried tribal cultural resources are encountered during construction activities. With mitigation, Alternative 2, as with the Project, would result in less-than-significant impacts to tribal cultural resources. However, because of the greater excavation footprint associated with the Deck construction under Alternative 2, impacts would be incrementally greater than under the Project.

(b) Project with the Deck Concept

Construction activities for the Project with the Deck Concept involve excavation for subterranean parking and other ground-disturbing activities. The Deck would be supported by piers that would encroach into subsurface elements. The Los Angeles River is a known landmark for prehistoric habitation and trading. Due to the Project Site's proximity to the river, there is the potential for unknown buried tribal cultural resources to be encountered during Project with the Deck Concept construction activities. This is considered to be a potentially significant impact. Thus, mitigation measures are proposed to require monitoring for tribal cultural resources and treatment of such resources, if encountered. With implementation of the required mitigation measures, potentially significant impacts under the Project with the Deck Concept would be reduced to a less than significant level.

Alternative 2 would require a similar depth of excavation for the subterranean parking levels as the Project with the Deck Concept. A relatively limited amount of excavation would be required to install the piers that would support the Deck under Alternative 2 or the Project with the Deck Concept, although slightly greater area under the Project with the Deck Concept. As with the Project with the Concept, no known tribal cultural resources would be affected by Alternative 2. Similar to the Project with the Deck Concept, Alternative 2 would be required to implement mitigation measures in the event unknown buried tribal cultural resources are encountered during construction activities. With mitigation, Alternative 2, as with the Project with the Deck Concept, would result in less-than-significant impacts to tribal cultural resources. However, because of the greater excavation footprint associated with the Deck Construction under the Project with the Deck Concept, impacts would be incrementally less under Alternative 2.

(n) *Utilities and Service Systems – Water, Wastewater, and Solid Waste*(i) *Wastewater*

(a) Project

As discussed in Section IV.N.1, *Wastewater*, of this Draft EIR, Project construction would include all necessary on-site and off-site sewer pipe improvements and connections to adequately connect to the City's existing sewer system. The design of the connections would be developed by a registered engineer and approved by the BOE. All necessary improvements would be verified through the permit approval process of obtaining a sewer connection permit from the City. Project construction would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. The Project would pay the required sewer connection fees to help offset the Project's contribution to the City's wastewater collection infrastructure needs. During Project operation, the Project's increase in wastewater generation would represent a negligible increase in the wastewater volumes treated at the HWRP and the Hyperion Sanitary

Sewer System. Therefore, Project operation would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant.

Alternative 2 would generate additional wastewater and increase demand on the HWRP and the Hyperion Sanitary Sewer System. **Table V-6, *Wastewater Generation During Alternative 2 Operation***, shows that Alternative 2 would result in an estimated average gross wastewater generation of approximately 516,033 gallons per day (gpd). Alternative 2 would have an estimated net wastewater generation volume of 509,871 gpd or 0.509 mgd. This estimate does not account for reductions in wastewater generation that would result from required compliance with applicable LAMC requirements or water conservation measures, as presented in Project Design Feature WS-PDF-1.

Comparatively, the Project is estimated to increase on-site wastewater generation by 558,306 gpd or 0.558 mgd. Similar to the Project, the increase in wastewater generation by Alternative 2 would be within the capacity limits of the conveyance and treatment facilities serving the Project Site as determined in the WWSI for the Project. Similar to the Project, impacts on wastewater conveyance and treatment systems under Alternative 2 would be less than significant. Further, because Alternative 2 would generate a lower volume of wastewater, impacts under Alternative 2 would be less than the Project.

(b) Project with the Deck Concept

The minimal wastewater generation during construction of the Project with the Deck Concept would not require the construction of new or expansion of existing facilities, and, given the small amount of wastewater, construction activities are not anticipated to exceed the capacity of existing wastewater conveyance and treatment systems. Operation of the Project with the Deck Concept would generate approximately 558,306 gpd or 0.558 mgd of wastewater. Event programming proposed under the Project with the Deck Concept would be temporary and would not occur every day and throughout the day. Therefore, it is unlikely that any wastewater generated during these events, above 0.558 mgd would be more than the current remaining capacities at the HWRP. The Project with the Deck Concept would pay the required sewer connection fees to help offset the Project with the Deck Concept's contribution to the City's wastewater collection infrastructure needs and would require approval of sewer permits prior to connection to the sewer system. Impacts to wastewater infrastructure and treatment under the Project with the Deck Concept would be, thus, less than significant.

Alternative 2 would have an estimated net wastewater generation of 509,871 gpd or 0.509 mgd. As with the Project with the Deck Concept, this volume is within the capacity limits of the conveyance and treatment facilities serving the Project Site as determined in the WWSI for the Project. Impacts on wastewater conveyance and treatment systems under Alternative 2 would be less than significant. Further, because Alternative 2 would generate a lower volume of wastewater, impacts under Alternative 2 would be less than the Project with the Deck Concept.

**TABLE V-6
WASTEWATER GENERATION DURING ALTERNATIVE 2 OPERATION**

Land Use	Units	Generation Rate (gpd/unit)	Total Wastewater Generation (gpd)
Existing to Be Removed			
Cold Storage	205,393 sf	30/1,000 sf	6,162
Proposed			
Residential: Apt – Bachelor	100 rooms	75/Room	7,500
Residential: Apt- 1 Bedroom	230 rooms	110/Room	25,300
Residential: Apt – 2 Bedrooms	67 rooms	150/Room	10,050
Residential: Apt – 3 Bedrooms	23 rooms	190/Room	4,370
Hotel: Use Guest Rooms Only	236 room	120/room	28,320
Hotel Bar: Cocktail, Fixed Seat ^{a,b}	4,000 sf (267 seats)	15/seat	4,005
Ballroom	3,000 sf	350/1,000 sf	1,050
Meeting Room	1,000 sf	120/1,000 sf	120
Restaurant: full Service Indoor Seat ^a	59,700 (3,980 seats)	30/seat	119,400
Retail	11,664 sf	25/1,000 sf	292
Office Building w/Cooling Towers	1,000,666 sf	170/1,000 sf	170,113
Museum: All Area	44,069 sf	30/1,000 sf	1,323
Health Club/Spa	52,424 sf	650/1,000 sf	34,076
Water Features ^b	2,400 cf		17,952
Reflecting Pools ^b	4,800 cf		35,904
Pools ^b	6,000 cf		44,880
Spas ^b	1,080 cf		8,078
Elementary School ^c	300 students	11/student	3,300
Gross Wastewater Generation			516,033
Less Existing to be Removed			-6,162
Net Increase			509,871

NOTE(S):

sf = square feet; cf = cubic feet; gpd = gallons per day

^a It is assumed that each seat requires 15 square feet.^b With the exception of school uses, the wastewater generation for these uses are provided by the Waste Water Services Information (WWSI) Request from the City's Bureau of Sanitation (LASAN). Because specific data regarding these uses are not provided for Alternative 2, it is assumed that similar uses would be provided under Alternative 2 as under the Project.^c Water demand generation factors for the school use are based on LA Sanitation's Sewage Generation Factors for Residential and Commercial Categories, dated April 6, 2012.

SOURCE: ESA, 2021.

(ii) *Water Supply*

(a) Project

As discussed in Section IV.N.2, *Water Supply*, of this Draft EIR, water demand during Project construction would be substantially less than the existing water consumption at the Project Site. In order to accommodate the Project's operational water use, the Project would be required to upgrade the water mains serving the Project to ensure adequate water flow, pressure, and capacity are available for the Project. Project contractors would coordinate with LADWP to identify the locations and depth of all lines, LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. Therefore, existing water infrastructure would meet the limited and temporary water demand necessary for construction of the Project. The design and installation of new service connections are required to meet applicable City standards. Construction impacts associated with the installation of water distribution lines below surface would primarily involve trenching in order to place the water distribution lines below grade and reconnect existing domestic and fire water services for the affected surrounding properties and would be limited to on-site and minor off-site (street right-of-way and sidewalk) construction activities. Project construction would not require or result in the construction of new water facilities or expansion of existing facilities, construction of new facilities, and construction impacts on water supply would be less than significant.

In regard to Project operation, following installation of the new service connections to accommodate the Project's additional water and fire flow requirements, LADWP determined that the water distribution infrastructure would have sufficient capacity to serve the Project Site. The Project's approved WSA determined that there are adequate water supplies available from existing LADWP entitlements and supplies to meet the Project's projected water demand, in addition to existing and planned future demand on LADWP, annually during normal, single-dry, and multiple-dry water years over the next 20 years, as required by SB 610, as well as through at least 2040 (the planning horizon of the LADWP's 2015 UWMP). Sufficient domestic water supplies are available to service the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Operational impacts on water supply would be less than significant.

Alternative 2 would increase demand on water supplies and infrastructure. As shown in **Table V-7, *Estimated Water Demand for Alternative 2***, Alternative 2 would generate an estimated net water demand of 389,295 gpd or 436.1 afy.

**TABLE V-7
ESTIMATED WATER DEMAND FOR ALTERNATIVE 2**

Proposed Uses	Quantity	Water Use Factor (gpd/unit) ^a	Base Demand (gpd)	Water Efficiency Requirements Ordinance Savings (gpd) ^b	Net Proposed Water Demand	
					(gpd)	(afy)
Residential						
Studio	100 du	75/du	7,500			
1 Bedroom	230 du	110/du	25,300			
2 Bedroom	67 du	150/du	10,050			
3 Bedroom	23 du	190/du	4,370			
Base Demand Adjustment (Residential Units) ^c			5,152			
<i>Residential Units Subtotal</i>	<i>420 du</i>		<i>52,372</i>	<i>10,265</i>	<i>42,107</i>	<i>47.17</i>
Lobby	4,260 sf	0.05/sf	213			
Pool/Spa	1,020 sf		96			
BBQ area	260 sf	0.13/sf	33			
<i>Residential Amenities Subtotal^d</i>			<i>342</i>	<i>342</i>	<i>0</i>	<i>0</i>
Hotel Room	236 room	120/room	28,320			
Base Demand Adjustment (Hotel Room)			2,565			
<i>Hotel Room Subtotal^d</i>			<i>30,885</i>	<i>3,370</i>	<i>27,515</i>	<i>30.82</i>
Lobby	2,853 sf	0.05/sf	143			
Pool/Spa	750 sf		70			
Pool Deck	3,000 sf	0.30/sf	900			
Bar	4,000 sf	0.72/sf	2,880			
Ballroom	3,000 sf	0.35/sf	1,050			
Meeting Room	1,000 sf	0.12/sf	120			
<i>Hotel Amenities Subtotal^d</i>			<i>5,163</i>	<i>643</i>	<i>4,520</i>	<i>5.06</i>
Restaurant: Full Service	59,700 sf (3,980 seat)	30/seat	119,400			
General Retail	11,664 sf	0.03/sf	350			
Office	1,000,666 sf	0.12/sf	120,080			
Office Lobby	12,026 sf	0.05/sf	601			
Water Features	1,200 sf		113			
Gallery Space	44,069 sf	0.03/sf	1,323			
Gym	52,424 sf	0.65/sf	34,075			

TABLE V-7
ESTIMATED WATER DEMAND FOR ALTERNATIVE 2

Proposed Uses	Quantity	Water Use Factor (gpd/unit) ^a	Base Demand (gpd)	Water Efficiency Requirements Ordinance Savings (gpd) ^b	Net Proposed Water Demand	
					(gpd)	(afy)
Base Demand Adjustment (Commercial) ^e			2,021			
Elementary School ^a	300 students	9/student	2,700			
<i>Commercial Subtotal</i>			<i>280,663</i>	<i>31,901</i>	<i>248,762</i>	<i>278.65</i>
Landscaping ^f	101,117 sf		9,445	5,154	4,291	4.81
Covered Parking Structure ^g	854,140 sf	0.02/sf	562	0	562	0.63
Cooling Tower Total	6,000 ton	25.25	151,470	30,294	121,176	135.74
Proposed Total			535,167	81,969	530,902	81,969
Less Existing Uses to Be Removed					-58,526	-65.56
Less Additional Conservation ^h					-1,112	-1.25
Net Additional Water Demand					389,295	436.1

NOTE(S):

- ^a Water Use Factor is based on City's Department of Public Works, Bureau of Sanitation, Sewage Generation Factors for Residential and Commercial Categories, dated April 6, 2012.
- ^b The Water Efficiency Requirements Ordinance Savings used for Alternative 2 are the same as those provided in the approved WSA for the Project.
- ^c The base demand adjustment for the residential units is estimated based on the base demand adjustment provided in the approved WSA for the Project. In the approved WSA for the Project, the base demand adjustment for the residential units is approximately 10.9 percent of the estimated water demand for the residential units. Therefore, the base demand adjustment for Alternative 2's residential units is approximately 10.9 percent of the estimated water demand for the residential units.
- ^d The totals for the Residential Amenities, Hotel Rooms, and Hotel Amenities are the same as those provided in the approved WSA for the Project.
- ^e The base demand adjustment for the commercial uses is estimated based on the base demand adjustment provided in the approved WSA for the Project. In the approved WSA for the Project, the base demand adjustment for the commercial uses is approximately 0.7 percent of the estimated water demand for the commercial uses. Therefore, the base demand adjustment for Alternative 2's commercial uses is approximately 0.7 percent of the estimated water demand for the commercial uses.
- ^f Landscaping water use for Alternative 2 uses the same estimates as provided in the approved WSA for the Project. As Alternative 2 would provide less open space, and therefore less landscaping, than the Project, this is a conservative estimate for Alternative 2.
- ^g Covered Parking Structure uses the same water demand estimates as the approved WSA for the Project as a similar amount of parking would be provided under Alternative 2
- ^h Water conservation due to conservation commitments, as detailed in approved WSA for the Project and as WS-PDF-1, is the same as the Project as for Alternative 2, as Alternative 2 would apply the same conservation commitments as under the Project.

SOURCE: ESA, 2021.

In comparison, the approved WSA for the Project indicated that the Project would have a water demand of 439,943 gpd or 492.83 afy. Similar to the Project, Alternative 2's water demand projections would be within LADWP's 2015 UWMP's projected increases in Citywide water demands, while anticipating multi-dry year water conditions through the planning horizon of 2040. Furthermore, similar to the Project, operation of Alternative 2 would require upgrades to the water mains serving the Project Site to ensure adequate water flow, pressure, and capacity for Alternative 2. With regulatory compliance to the LAMC and coordination with LADWP, operation of Alternative 2, as with the Project, would not result in the relocation or construction of new or expanded water facilities, the construction or relocation of which would cause significant environmental effects. Similar to the Project, operational impacts on water infrastructure under Alternative 2 would be less than significant. Further, because Alternative 2 would generate less water demand than the Project, impacts under Alternative 2 would be less than the Project.

(b) Project with the Deck Concept

During construction of the Project with the Deck Concept, water use would be substantially less than the existing water consumption at the Project Site. Similar to the Project, the Project with the Deck Concept would be required to upgrade the water mains serving the Project with the Deck Concept to ensure adequate water flow, pressure, and capacity are available. Construction of the Project with the Deck Concept would include the same necessary on- and off-site improvements and connections as needed under the Project. With compliance with existing regulations and requirements of the LADWP, impacts on water supply resulting from construction activities would be less than significant. With implementation of regulatory water conservation measures, operation of the Project with the Deck Concept would result in a demand of 439,943 gpd or 492.83 acre feet per year afy.

Operation of the Project with the Deck Concept would not include additional uses that are not already analyzed under the Project. Additional event programming, as compared to the Project, proposed under the Project with the Deck Concept would be temporary and would not occur every day and throughout the day. Therefore, as determined by the WSA, the 2015 UWMP's projections for water demand and supply would include the water demand required for the Project with the Deck Concept. Adequate water supplies from existing LADWP entitlements and supplies would be available to meet the Project with the Deck Concept's projected water demand through at least 2040. Impacts related to water supply and infrastructure under the Project with the Deck Concept would be less than significant.

Alternative 2 would generate an estimated net water demand of 389,295gpd or 436.1 afy. Intermittent programming with the deck would be less than under the Project with the Deck Concept. Similar to the Project with the Deck Concept, Alternative 2's water demand projections would be within LADWP's 2015 UWMP's projected increases in Citywide water demands, while anticipating multi-dry year water conditions through the planning horizon of 2040. Furthermore, similar to the Project with the Deck Concept, Alternative 2 be required to upgrade the water mains serving to ensure adequate water flow, pressure, and capacity are available. Construction of alternative would include the same necessary

on- and off-site improvements and connections as needed under the Project with the Deck Concept. With regulatory compliance to the LAMC and coordination with LADWP, as with the Project with the Deck Concept operation of Alternative 2, would not result in the relocation or construction of new or expanded water facilities, the construction or relocation of which would cause significant environmental effects. Operational impacts on water infrastructure under Alternative 2 would be less than significant. Further, Alternative 2 would result in less water demand than the Project with the Deck Concept and, as such, impacts under Alternative 2 would be less.

(iii) *Solid Waste*

(a) Project

As discussed in Section IV.N.3, *Solid Waste*, of this Draft EIR, the Project would generate approximately 203,953 tons of solid waste (post diversion). All C&D waste collected at the Project Site would be taken to a City-certified waste processing facility for sorting and final distribution and disposal. The C&D waste is anticipated to be disposed of at the County's Azusa Land Reclamation landfill or one of the Inert Debris Engineered Fill Operations located in the County that is permitted to receive C&D waste or exported to an out-of-county facility currently accepting waste from Los Angeles County, all of which have remaining disposal capacity to receive the Project's C&D waste. Therefore, Project construction would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and construction impacts on solid waste would be less than significant.

The Project's estimated annual post-diversion, operational solid waste generation would be 3,369 tons per year or 18,462 pounds per day. These volumes represent a negligible amount of the County's annual waste generation and remaining capacity of the County's landfills. The Project's operational waste generation would not exceed the permitted capacity of disposal facilities serving the Project and would not alter the ability of the County to address landfill needs via existing capacity and other planned strategies and measures for ensuring sufficient landfill capacity exists to meet the needs of the County. Therefore, the County's City-certified waste processing facilities would have sufficient permitted capacity to accommodate the Project's operational waste disposal needs. Project operation would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and impacts would be less than significant.

Alternative 2 would generate solid waste at the Project Site that would need to be landfilled. As Alternative 2 would demolish the same buildings and hardscape and would construct the same 1,792,103 square feet of buildings as under the Project, construction of Alternative 2 would be the same as under the Project. The C&D waste generated by construction of Alternative 2 would be disposed of at the County's Azusa Land Reclamation landfill or one of the Inert Debris Engineered Fill Operations located in the County that is permitted to receive C&D waste or exported to an out-of-county facility currently accepting waste from Los Angeles County, all of which have remaining disposal

capacity to receive the C&D waste. Similar to the Project, Alternative 2 construction would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and construction impacts on solid waste would be less than significant.

Alternative 2's estimated solid waste output during operation is presented in **Table V-8, Estimated Operational Generation for Alternative 2.**

**TABLE V-8
ESTIMATED OPERATIONAL SOLID WASTE GENERATION FOR ALTERNATIVE 2**

Land Use	Quantity ^a	Daily Generation Factor ^b	Solid Waste Generation (tons/year)	Solid Waste Generation (lbs/day)
Proposed New Uses				
Residential	420 units	0.87 tons/unit/year	365	2,000
Office	1,000,666 sf (4,002 emp)	2.02 tons/emp/year	8,084	44,296
Restaurant/Retail/Other Commercial ^c	167,857 sf (360 emp)	1.96 tons/emp/year	706	3,868
Hotel	236 rooms (118 emp)	1.76 tons/emp/year	208	1,140
Elementary School	32,150 sf (300 students: 30 emp)	0.63 tons/emp/year	19	104
<i>Proposed Subtotal^d</i>	<i>(4,510 emp)</i>	—	9,382	51,408
Existing Uses ^e	205,393 sf (218 emp)		(137)	(748)
Net Increase (pre-diversion)	—	—	9,245	50,660
Net Increase (post-diversion)^f	—	—	3,236	17,731

NOTE(S):

lb = pounds; sf = square feet; emp = employees

^a Number of employees per use are detailed in Table V-4, *Estimate of Alternative 2's Employment*, in this Chapter, above.

^b Generation factors are provided by CalRecycle's Disposal and Diversion Rates for Business Groups, <https://www2.calrecycle.ca.gov/wastecharacterization/businessgrouprates>. Accessed November 1, 2021.

^c Commercial uses include the gym, restaurants, retail, and studio/event/gallery/museum uses.

^d Totals may not add up due to rounding.

^e Existing subtotal is taken from Table IV.N.3-1, in Section IV. N.3. In Chapter IV of this Draft EIR. The amount here is based on the post-diversion existing operational generation as using a lower number for the existing uses would result in a higher net increase for the Project.

^f Based on an anticipated diversion rate of 65 percent for operations, which was assumed in the CoWMP 2019 Annual Report. This is conservative as the actual diversion is likely to be higher with increasing compliance with the state's recycling goal of 75 percent.

SOURCE: ESA, 2021.

As shown in Table V-8, Alternative 2 would generate, post-diversion, 3,236 net tons of solid waste per year and 17,731 pounds of solid waste per day.

The Sunshine Canyon Landfill, the primary recipient of Class III solid waste from the City, has a maximum daily capacity of 12,100 tons per day and a disposal rate of 6,919 tons per day, indicating a residual daily capacity of 5,181 tons per day. Alternative 2's net addition of 10.37 tons per day³⁹ would represent 0.20 percent of Sunshine Canyon's residual daily capacity, assuming diversion. By comparison, the Project, with diversion, would generate approximately 3,369 net tons per year (10.79 tons per day) of solid waste, representing approximately 0.21 percent of Sunshine Canyon's residual capacity.

Similar to the Project, Alternative 2's additional solid waste generation would be accommodated by the County's City-certified waste processing facilities. As with the Project, Alternative 2's operation would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Similar to the Project, impacts with respect to solid waste under Alternative 2 would be less than significant. Further, because Alternative 2 would generate less solid waste as compared to the Project, impacts under Alternative 2 would be less than the Project.

(b) Project with the Deck Concept

Demolition of the Project with the Deck Concept would generate approximately 204,166 tons of C & D waste. Operation of the Project with the Deck Concept's commercial and residential uses would generate approximately 3,369 net tons a year (post diversion), which would be substantially less than the remaining capacity of the landfills currently serving the Project Site. While event programming would be proposed under the Project with the Deck Concept, these events would be temporary and would not occur every day and throughout the day. Therefore, it is likely that the solid waste generated during these particular events would not be more than the current remaining capacities at the landfills, and the additional solid waste generated by the Project's temporary events would be less than what is generated by the residential and commercial components of the Project with the Deck Concept. Thus, the conclusions regarding impact significance presented above under the Project would be the same and apply to operation of the Project with the Deck Concept. Impacts related to the capacity of local infrastructure and state and local standards under the Project with the Deck Concept would be less than significant.

Alternative 2 would result in similar C&D waste as the Project with the Deck Concept and would not exceed State or local standards, or exceed the capacity of local infrastructure. During operation, Alternative 2 would generate approximately 3,236 net tons of solid waste per year (post-diversion) requiring landfill disposal. By comparison, the Project with the Deck Concept, with diversion, would generate approximately 3,369 tons of solid waste per year. Similar to the Project with the Deck Concept, Alternative 2's operation would not

³⁹ Alternative 2's daily disposal in tons assumes that landfills operate six days per week. 52 weeks * 6 days = 312 days. Therefore, Alternative 2's daily disposal is calculated as 3,236 net tons per year/ 312 days = 10.37 net tons per day.

generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts with respect to solid waste generation and landfill capacity under Alternative 2 would be less than significant. Further, because Alternative 2 would generate less solid waste than the Project with the Deck Concept, impacts under Alternative 2 would be less compared to the Project with the Deck Concept.

(iv) *Electric Power, Natural Gas, and Telecommunications Infrastructure*

(a) Project

As discussed in Section IV.N.4, *Electric Power, Natural Gas, and Telecommunications Infrastructure*, of this Draft EIR, energy (electric power and natural gas) associated with Project construction would require the Project Applicant to coordinate any potential removals or relocations with LADWP and the SoCalGas. Construction impacts associated with the installation of new telecommunication infrastructure would be of short duration and would cease to occur when installation is complete. Furthermore, no upgrades to off-site telecommunications facilities are anticipated. Therefore, the construction of the Project is not anticipated to adversely affect the electric power, natural gas, and telecommunications infrastructure serving the surrounding uses or utility system capacity and would not require the construction of new energy facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects. Construction impacts would be less than significant.

As determined in Section IV.C, *Energy*, of this Draft EIR, the Project's annual net increase in operational electricity and natural gas usage would not require additional infrastructure beyond proposed utilities installed on-site during construction.

The LADWP's projected load forecasts for electricity and LADWP 2017 Power Strategic Long-Term Resource Plan identifies adequate energy resources to support future generation capacity. The Project would not require additional infrastructure (i.e., a substation) beyond proposed utilities installed on-site during construction. Therefore, during Project operations, it is expected that LADWP's existing infrastructure, planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand.

Regarding natural gas, based on the Project's small fraction of total natural gas consumption for the region, ongoing SoCalGas long-range planning efforts to provide natural gas for this service region, and sufficient existing infrastructure, it is expected that SoCalGas' existing and planned natural gas supplies and infrastructure would be sufficient to meet the Project's demand for natural gas. Furthermore, SoCalGas has stated that it has "facilities in the area" of the Project Site and that "service would be in accordance with SoCalGas' policies and extension rules on file with the California Public Utilities Commission (Commission) at the time contractual arrangements are made."⁴⁰

⁴⁰ SoCalGas, Will Serve – 670 Mesquit St, Los Angeles. Included in Appendix E of this Draft EIR.

Telecommunication providers already deliver their services to a large number of commercial and residential buildings in the vicinity of the Project Site, and it is anticipated that existing telecommunications facilities would be sufficient to support the Project's needs for telecommunication services. As such, no upgrades to off-site telecommunications facilities are anticipated. Therefore, the Project would not create the need for additional off-site telecommunications infrastructure, which could cause significant environmental effects.

Alternative 2 would develop the Project Site and increase density above existing conditions such that new buildings and population would be on the Project Site. The floor area and intensity of development under Alternative 2 (1,792,103 square feet and 7.5:1 FAR) would be the same as under the Project. Similar to the Project, Alternative 2 would implement various Project Design Features, including AQ-PDF-1 (natural gas fire place prohibition); GHG-PDF-1 (Green Building Features); and WS-PDF-1 (Water Conservation Features), that would ensure that additional infrastructure beyond the proposed utilities installed on-site during construction would not be required. As Alternative 2 would be built on the same Project Site as under the Project, existing telecommunications facilities would be sufficient to support Alternative 2's needs for telecommunication services as under the Project. Therefore, Alternative 2 would not require the construction of new energy facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects. Impacts would be less than significant and similar to the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would result in a demand for electricity, natural gas, and telecommunication services. The LADWP's projected load forecasts for electricity and LADWP 2017 Power Strategic Long-Term Resource Plan identifies adequate energy resources to support future generation capacity throughout the City. Therefore, during operation, it is expected that existing and planned electricity (including lighting for outdoor events on the Deck), natural gas, and telecommunications infrastructure would be sufficient to support the Project with the Deck Concept's electricity demand. The Project with the Deck Concept would not require additional infrastructure (i.e., a substation) beyond proposed utilities installed on-site during construction. As natural gas and telecommunication providers already deliver their services to a large number of commercial and residential buildings in the vicinity of the Project Site, it is anticipated that existing natural gas and telecommunications facilities would be sufficient to support the Project with the Deck Concept's needs for natural gas and telecommunication services. Because natural gas, electricity, and telecommunications infrastructure is in place to serve the Project Site, the Project with the Deck Concept would not require or result in the relocation or construction of new or expanded facilities, the construction or relocation of which could cause significant effects upon the environment. Impacts under the Project with the Deck Concept would be less than significant.

Based on the similarity in occupancy (5,305 new residents and employees under Alternative 2 and 5,266 new residents and employees under the Project with the Deck

Concept)⁴¹, Alternative 2 would not largely differ in demand or adversely affect the available supply or distribution infrastructure capabilities. The total occupied floor area of Alternative 2 (1,792,103 square feet) would be the same as under the Project with the Deck Concept. As such, Alternative 2 would not result in a specific need to construct new electric power, natural gas, or telecommunications facilities or in the expansion of existing facilities, the construction of which could cause significant environmental effects. Because electric power, natural gas, and telecommunications facilities are currently available within the area and have adequate capacity to serve either the Project with the Deck Concept or Alternative 2, impacts to these services would be less than significant and similar.

(3) Relationship of the Alternative to Project Objectives

As described above, Alternative 2 would develop 420 residential units; 1,032,816 square feet of office, the same 236 hotel rooms; and 167,856 square feet of commercial uses including retail, restaurant, studio/event/gallery/museum, and gym. Alternative 2 would also provide 213,139 square feet of open space, inclusive of a 75,000 square foot Deck. Alternative 2 would provide the same developed floor area and FAR as the Project. As Alternative 2 would develop largely the same uses as under the Project (except for the Charter School) and in the same Project Site in proximity to the Los Angeles River, Ribbon of Light Bridge, the proposed PARC Improvements, and the 7th Street Bridge, Alternative 2 would substantially meet all of the Project Objectives.

Because Alternative 2 would develop more residential units on the Project Site as compared to the Project, and because Alternative 2 would construct a 75,000 square foot Deck, Alternative 2 would meet the following Project Objectives to a greater extent than the Project:

3. Provide much-needed market-rate and affordable multi-family housing.
7. Provide a variety of publicly accessible at-grade and generous above-grade open spaces for Project occupants that take advantage of the Project's stepped building design, Los Angeles River frontage, nearby public improvements and opportunities for river access and panoramic views.
8. Create pedestrian and bicycle connections that link the 7th Street Bridge with landscaped open space within the Project Site and the City's proposed PARC Improvements, Ribbon of Light Bridge, and potential future Metro Arts District/6th Street Station, to reduce travel time, unite the Arts District neighborhoods and Boyle Heights communities, while increasing physical and visual access to the Los Angeles River.
10. Maximize the opportunity to construct a multi-use deck over the Railway Properties, along the Los Angeles River, that would connect the 7th Street Bridge with the City's approximately \$7 billion investment in the Ribbon of Light Bridge and proposed \$23 million PARC Improvements that would create 12 acres of open

⁴¹ The Project would generate 743 new residents and 4,523 employees for a total of 5,266 occupants; Alternative 2 would generate 1,013 new residents and 4,292 employees for a total of 5,305 occupants.

space for the Arts District and Boyle Heights, complementing future public programming and enhancing public views of the Los Angeles River.

Compared to the Project with the Deck Concept, Project Objective No. 3 under Alternative 2 would be met to a greater extent due to the increase in housing units, however, Project Objective Nos. 7, 8 and 10 would be met to a lesser extent since Alternative 2 would include a smaller deck.

The following Project Objectives would be met to a similar extent under Alternative 2 as the Project or the Project with the Deck Concept:

1. Develop a mixed-use infill Project that can accommodate creative office, commercial, and residential uses.
4. Provide needed hotel rooms in an underserved part of Downtown Los Angeles.
6. Provide innovative architectural design in a unique, prominent location along the Los Angeles River, between the Ribbon of Light Bridge and the City's proposed PARC Improvements, and the historic 7th Street Bridge.
9. Create a sign district encompassing the Project Site that: complements the Ribbon of Light Bridge and proposed PARC Improvements, highlights the presence of and connectivity to the Los Angeles River, helps to establish the Ribbon of Light Bridge and 7th Street Bridge as a gateway from the eastern side of the Los Angeles to the Arts District, ensures the economic vitality of the Project tenants, thereby contributing to the City's economic base, and builds off of the artistic character of the neighborhood.

Because Alternative 2 would provide less commercial space and generate fewer job opportunities, Alternative 2 would meet the following Project Objectives to a lesser extent than the Project or the Project with the Deck Concept:

2. Redevelop the site with high-jobs-producing land uses that increase economic activity on the Project Site and in the Project area.
5. Provide a wide range of entertainment, restaurant, and recreational amenities for Downtown residents and visitors from throughout the City.

c) Alternative 3: Reduced Retail and Increased Office and Gym Use Alternative

(1) Description of the Alternative

Alternative 3, the Reduced Retail and Increased Office and Gym Use Alternative, would relocate the hotel use from Building 1 where it is co-located with residential uses under the proposed Project, into Building 2, where it would be co-located with event space and the gym. Under Alternative 3, the offices would be relocated into Buildings 3, 4, and 5 to create a cluster of office buildings. The retail spaces would be reduced and would only be located in Buildings 1 and 3. The building footprints for Alternative 3 would remain the

same as under the Project, and the maximum heights for all of the buildings would be the same as the Project.

Alternative 3 would increase the number of residential units by 112 units from 308 units under the Project to 420 units. Alternative 3 would also increase office floor area by 29,098 square feet from 944,055 square feet under the Project to 973,153 square feet. Alternative 3 would reduce the retail floor area by 122,944 square feet from 136,152 square feet under the Project to 14,208 square feet. Alternative 3 would reduce the restaurant floor area by 23,577 square feet from 89,577 square feet under the Project to 66,000 square feet. The hotel, which would still contain 236 rooms, would increase in size by 70,023 square feet of floor area from 158,647 square feet of floor area under the Project to 228,670 square feet of floor area. The space available for the studio/event/gallery/potential museum would be reduced by 33,517 square feet of floor area from 93,617 square feet of floor area under the Project to 60,100 square feet of floor area. The gym would increase in size by 5,954 square feet of floor area from 62,148 square feet of floor area under the Project to 68,102 square feet of floor area. While the total commercial square footage would be reduced by 73,963 square feet from 1,484,196 square feet under the Project to 1,410,233 square feet, the total developed floor area on the Project Site would remain at 1,792,103 square feet. Therefore, the FAR would continue to be 7.5:1 as under the Project.

Alternative 3 would provide a minimum of 2,000 traditional vehicle parking spaces, with parking for up to 3,500 vehicles using a combination of automated parking systems, valet parking, or other efficiency parking methods. Parking, which would be provided in a six-level below-grade structure and an above-grade structure spanning the Project Site, would be the same as under the Project. The same depth and amount of excavation and site preparation would be required as for the Project. As with the Project, a rooftop heliport would be located on Building 5 for emergency and occasional private use.

Under Alternative 3, the residential pick-up and drop-off would remain on Mesquit Street west of Building 1. The hotel pick-up and drop-off location would be moved from Mesquit Street in front of Building 1 to the front of Building 2. Hotel and event lobby access would be available from the west entrance of Building 2 off of Mesquit Street. Office lobby access would be available from the Mesquit Paseo by Building 3. Office pick-up and drop-off would still be available off of 7th Street on the northern side of Building 5.

Alternative 3 would provide a total of approximately 214,414 square feet of open space for use by Project residents, hotel guests, employees, and visitors. Proposed open space features include at-grade landscaped areas, pedestrian passageways and walkways, balconies offering views of the Los Angeles River, and above-grade landscaped terraces and pool amenity decks. Under Alternative 3, the Northern Landscaped Area, Elevated Pedestrian Walkway, North and South River Balconies, Mesquit Paseo, and Office Terraces would all remain as proposed under the Project. The residential pool deck would be moved from the northern portion of Building 2 to the southern portion of Building 1. The Hotel Garden and hotel bar and pool deck would be moved from the southern portion of Building 1 to the entire rooftop of Building 2. The fitness deck would be moved from the

southern portion of Building 3 to the northern portion of Building 3. The Work Breakout Deck would move from the southern portion of Building 2 to the southern portion of Building 3. The sculpture garden would be removed under Alternative 3. The rooftop of Building 4 would be comprised of an office plaza flex deck, which would only be usable by the office employees. Alternative 3 would include a 75,000 square foot Deck that would extend over a portion of the Railway Properties east of the Project Site. The same types of programming and events would occur on the Project Site as under the Project. For events located on the Deck, Alternative 3 would have the same type and frequency of events, but would have a reduced capacity of 5,000 people compared to the capacity of 8,800 people under the Project with the Deck Concept due to the smaller Deck under Alternative 3.

The components of Alternative 3 are compared to those of the Project in **Table V-9, Comparison of Alternative 3 to the Project.**

**TABLE V-9
COMPARISON OF ALTERNATIVE 3 TO THE PROJECT**

Component	Project	Alternative 3	Difference between Project and Alternative 3
Residential Dwelling Units	308 du	420 du	+112 du
Office	944,055 sf	973,153 sf	+29,098 sf
Retail	136,152 sf	14,208 sf	-122,944 sf
Restaurant	89,577 sf	66,000 sf	-23,577 sf
Hotel (236 rooms)	158,647 sf	228,670 sf	+70,023 sf
Studio/Event/Gallery/Potential Museum	93,617 sf	60,100 sf	-33,517 sf
Gym	62,148 sf	68,102 sf	+5,954 sf
Total Developed Floor Area	1,792,103 sf	1,792,103 sf	Same
FAR	7.5:1	7.5:1	Same
Provided Open Space	141,876 sf	214,414 sf	+72,538 sf
Open Space with the Deck	273,876 sf	214,414 sf	-59,462 sf
Deck & Capacity @ 1 person per 15 sf	132,000 sf/ 8,800 ppl	75,000 sf/ 5,000 ppl	- 57,000 sf/ -3,800 ppl
Vehicle Parking	2,000–3,500	2,000–3,500	Same

SOURCE: ESA, 2021.

(2) Environmental Impacts

(a) *Air Quality*

(i) *Conflict with Air Quality Management Plan*

(a) Project

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, Project construction would not increase the frequency or severity of an existing violation or cause or contribute to new violations for nonattainment pollutants. Project construction would also comply with the CARB requirements to minimize short-term emissions from on-road and off-road diesel equipment, SCAQMD Rule 403 requirements to control fugitive dust, SCAQMD Rule 1113 for controlling VOC emissions from architectural coatings, and the ATCM, such that the Project would meet or exceed AQMP requirements to reduce emissions from construction equipment and activities. Project operations would not conflict with the 2016 AQMP in regard to transportation control strategies from the SCAG 2016–2040 RTP/SCS that are intended to reduce VMT and regional mobile source emissions. Project operation would also be consistent with, and would not conflict with, applicable air quality policies of the General Plan’s Air Quality Element. Project operations would also not result in an increase in localized emissions in excess of the SCAQMD-recommended localized significance thresholds at sensitive receptors in proximity to the Project Site and impacts would be less than significant.

Similar to the Project, Alternative 3 would include new development on the Project Site that would generate new criteria pollutant emissions. Similar to the Project, Alternative 3 would be consistent with the goals of SCAG’s 2016–2040 RTP/SCS and growth projections in the 2016 AQMP, since the growth would occur in a HQTAs and a TPA. Similar to the Project, Alternative 3 would be consistent with the AQMP in its incorporation of appropriate control strategies for emissions reduction during construction and operation. In addition, similar to the Project, Alternative 3 would also be consistent with applicable goals, objectives, and policies of the Air Quality Element of the General Plan that support and encourage pedestrian activity in the City and Community Plan area and uses that contribute to a land use pattern addressing housing needs while reducing VMT and air pollutant emissions within a TPA. For all of these reasons, impacts under Alternative 3 with respect to consistency with air quality management plans would be less than significant and similar to the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would be consistent with the goals of the AQMP regarding transportation control strategies for emissions reduction during construction and operation; it would be consistent with the City’s Air Quality Element that supports pedestrian activity and growth within a TPA; it would implement CARB requirements to minimize short-term emissions from on-road and off-road diesel equipment, as well as implement all applicable SCAQMD Rules. Operation of the Project with the Deck Concept

would also not result in an increase in localized emissions that would exceed the SCAQMD-recommended localized significance threshold concentrations at sensitive receptors in proximity to the Project Site. Because the Project with the Deck Concept would not conflict with air quality management plans, impacts would be less than significant.

For reasons discussed, above, Alternative 3 would generate new criteria pollutant emissions. Similar to the Project with the Deck Concept, Alternative 3 would be consistent with the goals of SCAG's 2016–2040 RTP/SCS and growth projections in the 2016 AQMP, since the growth would occur in a HQTAs and a TPA. As with the Project with the Deck Concept, Alternative 3 would be consistent with the AQMP in its incorporation of appropriate control strategies for emissions reduction during construction and operation. In addition, similar to the Project with the Deck Concept, Alternative 3 would also be consistent with applicable goals, objectives, and policies of the Air Quality Element of the General Plan that support and encourage pedestrian activity in the City and Community Plan area and uses that contribute to a land use pattern addressing housing needs while reducing VMT and air pollutant emissions within a TPA. For all of these reasons, impacts under Alternative 3 with respect to consistency with air quality management plans would be less than significant and similar to the Project with the Deck Concept.

(ii) *Cumulative Increase in Criteria Pollutants/Violation of Air Quality Standards*

(a) Construction

(i) *Project*

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, air emissions from Project construction on a maximum construction day would exceed the SCAQMD's regional significance thresholds for NO_x, and even with implementation of feasible mitigation measures, impacts would remain significant and unavoidable.

Alternative 3's construction phases have the potential to generate emissions that would exceed SCAQMD air quality standards through the use of heavy-duty construction equipment, construction traffic, fugitive dust emissions, paving operation, and the application of architectural coatings and other building materials. The maximum emissions under Alternative 3 would be similar to the Project because emission levels are based on a single day in which maximum construction activity would occur. Similar to the Project, even with incorporation of Mitigation Measure AQ-MM-1, construction emissions under Alternative 3 would exceed SCAQMD numerical significance thresholds for regional emissions of NO_x, and impacts would be significant and unavoidable. Alternative 3's total floor area and expected duration of construction would be similar to the Project. However, with the additional construction of the Deck under Alternative 3, the potential maximum daily emission levels of criteria pollutants would be similar to the

Project but occur for a greater duration than under the Project. As such, impacts relative to air quality threshold standards under Alternative 3 would be greater than the Project.

(i) *Project with the Deck Concept*

The Project with the Deck Concept would exceed SCAQMD's regional numerical significance thresholds for NO_x on a maximum construction activity day, even with implementation of Mitigation Measure AQ-MM-1. Even with implementation of all feasible mitigation measures, the Project with the Deck Concept would result in maximum daily emissions (on a maximum construction day) and significant and unavoidable impacts with respect to cumulative increase in criteria pollutants and air quality standards.

Similar to the Project with the Deck Concept, Alternative 3 would generate new criteria pollutant emissions during construction. As with the Project with the Deck Concept, Alternative 3's construction phases have the potential to generate emissions that would exceed SCAQMD air quality standards. With the reduced Deck size compared to the Project with the Deck Concept, the maximum daily emissions under Alternative 3 would be similar to the Project with the Deck Concept but would occur for fewer days than under the Project with the Deck Concept. Similar to the Project with the Deck Concept, even with incorporation of Mitigation Measure AQ-MM-1, maximum daily construction emissions under Alternative 3 would exceed SCAQMD numerical significance thresholds for NO_x, and impacts would be significant and unavoidable. Nonetheless, due to the shorter duration of construction under Alternative 3, impacts under Alternative 3 would be less than the Project with the Deck Concept.

(b) Operation

(i) *Project*

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, the Project's operation would not cause an exceedance of SCAQMD regional numerical significance thresholds for NO_x, CO, SO_x, PM₁₀, and PM_{2.5}, and impacts would be less than significant. However, VOCs emissions would be 84 pounds per day for the Project, which would exceed the daily impact regional threshold of 55 pounds per day, and Project impacts would be potentially significant. Even with implementation of feasible mitigation measures (Mitigation Measures AQ-MM-2 through AQ-MM-3 and TRAF-MM-1), which would reduce Project VOC emissions to 77 pounds per day, associated Project impacts would be reduced to 77 pounds per day and would remain significant and unavoidable.

During operation, Alternative 3 would generate emissions associated with vehicle trips, heating, lighting, other electric and natural gas power requirements, emergency generators, and architectural coatings. Similar to the Project, based on emissions modeling conducted for Alternative 3, provided in Appendix P of this Draft EIR, Alternative 3 would not exceed the SCAQMD numerical significance thresholds for NO_x, CO, SO_x, PM₁₀, and PM_{2.5}, and Alternative 3's emissions for those pollutants would be less than under the Project. Thus, as with the Project, impacts under Alternative 3 would be less than significant for these criteria pollutants. Alternative 3 would result in VOC

emissions of 70 pounds per day, which would exceed the daily impact threshold of 55 pounds per day. Therefore, impacts under Alternative 3 would be potentially significant. With implementation of Mitigation Measures AQ-MM-2 through AQ-MM-3 and TRAF-MM-1, Alternative 3's VOC emissions would be reduced to 65 pounds per day. Therefore, while VOC impacts under Alternative 3 would remain significant and unavoidable after implementation of feasible mitigation measures, the impacts would be less than the Project. Operational emissions calculations for Alternative 3 are provided in Appendix P of this Draft EIR.

(i) *Project with the Deck Concept*

The Project with the Deck Concept would emit criteria pollutants from mobile, stationary, and area sources. The Project with the Deck Concept would comprise the same residential and commercial uses as the Project, and include a 132,000-square-foot Deck. In addition to source and mobile emissions from the residential and commercial uses, the Deck would emit source emissions related to coatings and landscaping, as well as generate mobile emissions related to intermittent programmed activities. Unmitigated VOC emissions would be 88 pounds per day, thus, exceeding the daily impact threshold of 55 pounds per day. Even with implementation of feasible mitigation measures (Mitigation Measures AQ-MM-2 through AQ-MM-3 and TRAF-MM-1), which would reduce the Project with the Deck Concept's VOC emissions to 81 pounds per day, VOC levels would still exceed the impact threshold. Impacts under the Project with the Deck Concept would therefore remain significant and unavoidable.

During operation, Alternative 3 would generate emissions for the reasons described under the Project, above. Similar to the Project with the Deck Concept, based on emissions modeling conducted for Alternative 3, provided in Appendix P of this Draft EIR, Alternative 3 would not exceed the SCAQMD numerical significance thresholds for NO_x, CO, SO_x, PM₁₀, and PM_{2.5}, and Alternative 3's emissions for those pollutants would be less than significant and less than under the Project with the Deck Concept. However, Alternative 3 would result in VOC emissions of 70 pounds per day, which would exceed the daily impact threshold of 55 pounds per day. With implementation of Mitigation Measures AQ-MM-2 through AQ-MM-3 and TRAF-MM-1, Alternative 3's VOC emissions would be slightly reduced but would remain at 65 pounds per day due to the increased mobile source emissions. However, mitigated VOCs would be less than under the Project with the Deck Concept (81 pounds per day compared to 65 pounds per day). Therefore, while VOC impacts under Alternative 3 would remain significant and unavoidable after implementation of feasible mitigation measures, VOC impacts under Alternative 3 would be less than the Project with the Deck Concept. Operational emissions calculations for Alternative 3 are provided in Appendix P of this Draft EIR.

(iii) *Exposure of Sensitive Receptors to Pollutant Concentrations*

(a) Localized Emissions

(i) *Construction*

Project

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, given that NO_x, PM₁₀ and PM_{2.5} emissions would exceed the SCAQMD's localized thresholds, Project impacts would be potentially significant and would require implementation of Mitigation Measure AQ-MM-1 for impacts to be reduced to less-than-significant levels. However, with the construction of the Deck under Alternative 3, Alternative 3 would generate maximum daily emissions similar to the Project but would occur for more days (resulting in a greater duration of activity).

As with the Project, maximum localized emissions under Alternative 3 associated with grading and architectural coatings during construction would be potentially significant and would require implementation of Mitigation Measure AQ-MM-1 to reduce impacts to less-than-significant levels. Although impacts related to localized construction emissions would be greater under Alternative 3 due to the increased construction duration, impacts related to exposure of sensitive receptors to localized construction emissions would be reduced to levels that are less than significant with mitigation under both Alternative 3 and the Project.

Project with the Deck Concept

Maximum daily construction activities under the Project with the Deck Concept would exceed the SCAQMD's localized emission thresholds for NO_x, PM₁₀ and PM_{2.5}, a potentially significant impact to sensitive receptors. This impact would be addressed through implementation of Mitigation Measure AQ-MM-1, which would reduce localized emission levels to levels that are less than significant.

As with the Project with the Deck Concept, Alternative 3 would expose sensitive receptors to localized emissions during construction. With the reduction of the size of the Deck under Alternative 3, maximum daily localized construction would be similar to the Project with the Deck Concept but would occur for fewer days. As with the Project with the Deck Concept, maximum localized emissions under Alternative 3 during construction would be potentially significant and would require implementation of Mitigation Measure AQ-MM-1 to reduce impacts to less-than-significant levels. With respect to localized construction emissions, impacts to sensitive receptors would be less than significant under Alternative 3 with mitigation and, because of fewer maximum construction emission days, would be less than the Project with the Deck Concept.

(ii) *Operation*

Project

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, Project operation would not exceed the localized thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. Therefore, Project impacts related to localized operational emissions would be less than significant. Alternative 3 would have a similar scale of construction and overall building massing as the Project. Based on emissions modeling conducted for Alternative 3, provided in Appendix P of this Draft EIR, Alternative 3 would have a higher level of CO concentrations than the Project, but lower levels of other criteria pollutants. Alternative 3 would still have CO concentrations below the localized significance threshold. As further detailed in the *Energy* analysis below for Alternative 3, Alternative 3 would have reduced localized emissions and reduced natural gas combustion compared to the Project. Therefore, localized operational emission impacts under Alternative 3 would be less than significant and less than the Project.

Project with the Deck Concept

The Project with the Deck Concept would emit criteria pollutants from mobile, stationary, and area sources. In addition to source and mobile emissions from residential and commercial uses, the Project with the Deck Concept would emit source emissions from the Deck, including architectural coating, consumer products and landscaping, and mobile emissions related to visitors to programmatic activities on the Deck. The operation of the Project with the Deck Concept would not exceed localized thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. Impacts under the Project with the Deck Concept with respect to localized emissions would be less than significant.

Alternative 3 would have a similar scale of construction and overall building massing as the Project with the Deck Concept. Based on emissions modeling conducted for Alternative 3, provided in Appendix P of this Draft EIR. Alternative 3 would have a higher level of CO concentrations than the Project with the Deck Concept, but lower levels of other criteria pollutants. compared to the Project with the Deck Concept. Alternative 3 would still have CO concentrations below the localized significance threshold. Therefore, localized operational emission impacts under Alternative 3 would be less than significant and less than the Project with the Deck Concept.

(b) *Carbon Monoxide Hotspots*

(i) *Project*

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, the Project's 27,040 daily vehicle trips and residential and commercial uses would not generate CO hotspots that would exceed emission thresholds. Impacts with respect to CO hotspots would be less than significant.

Vehicle trips would be approximately 12 to 16 percent lower under Alternative 3 than the Project.⁴² Therefore, as Alternative 3 would generate fewer vehicle trips than the Project, CO hotspot impacts would be less than the Project and would be less than significant.

(ii) *Project with the Deck Concept*

Operation of the Project with the Deck Concept would emit CO pollutants from mobile, stationary, and area sources. Mobile source emissions under the Project with the Deck Concept would comprise 27,493 trips per day. The Project with the Deck Concept's daily vehicle trips and residential and commercial uses would not generate CO hotspots that would exceed emission thresholds. Impacts with respect to CO hotspots would be less than significant.

Vehicle trips would be approximately 18 to 23 percent lower under Alternative 3 than the Project with the Deck Concept.⁴³ Therefore, as Alternative 3 would generate fewer vehicle trips than the Project with the Deck Concept, CO hotspot impacts would be less than significant and less than the Project with the Deck Concept.

(c) Toxic Air Contaminants

(i) *Construction*

Project

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, maximum daily construction activity for the Project would generate DPM emissions resulting in TAC emissions adjacent to sensitive residential receptors. TAC levels under the Project would not exceed SCAQMD thresholds and, as such, sensitive receptors would not be exposed to substantial TAC concentrations. Impacts related to TAC emissions and health risk impacts would be less than significant under the Project.

Under Alternative 3, as with the Project, TACs associated with DPM emissions from heavy construction equipment would occur adjacent to sensitive residential receptors. TAC levels under Alternative 3 would not exceed SCAQMD thresholds and sensitive receptors would not be exposed to substantial TAC concentrations. Impacts with respect to TACs would be less than significant under both the Project and Alternative 3. However, because of the increased duration of construction activity required for development of the Deck under Alternative 3, impacts with respect to TACs would be greater than under the Project.

Project with the Deck Concept

Under the Project with the Deck Concept, maximum daily construction activity would generate DPM emissions resulting in TAC emissions adjacent to sensitive residential

⁴² Fehr & Peers, *Analysis of 670 Mesquit Project Alternatives Technical Memorandum*, October 8, 2021. Provided in Appendix P of this Draft EIR.

⁴³ Fehr & Peers, *Analysis of 670 Mesquit Project Alternatives Technical Memorandum*, October 8, 2021. Provided in Appendix P of this Draft EIR.

receptors. TAC levels under the Project would not exceed SCAQMD thresholds and, as such, sensitive receptors would not be exposed to substantial TAC concentrations. Impacts related to TAC emissions and health risk impacts would be less than significant under the Project with the Deck Concept.

Under Alternative 3, as with the Project with the Deck Concept, TACs associated with DPM emissions from heavy construction equipment would occur adjacent to sensitive residential receptors. TAC levels under Alternative 3 would not exceed SCAQMD thresholds and sensitive receptors would not be exposed to substantial TAC concentrations. Impacts with respect to TACs would be less than significant under both the Project with the Deck Concept and Alternative 3. However, because of the decreased duration of daily construction activity required for development of the reduced Deck under Alternative 3, impacts with respect to TACs would be less than under the Project with the Deck Concept.

(d) Operation

(i) Project

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, based on the uses expected on the Project Site, potential long-term operational impacts associated with the release of TACs would be minimal, regulated, and controlled, and would not be expected to exceed the SCAQMD significance threshold during operation, and Project impacts would be less than significant.

Alternative 3, as with the Project, would use consumer products and architectural coatings or involve other sources, such as charbroiling associated with restaurant uses. TAC emissions from these sources are anticipated to be minimal and charbroiling restaurant emissions would be regulated under SCAQMD Rule 1138. In addition, as with the Project, Alternative 3 would provide stationary emergency generators for its buildings. The emergency generators would result in emissions during maintenance and testing operations, similar to the Project. Emergency generators are permitted by the SCAQMD and regulated under SCAQMD Rule 1470. Maintenance and testing would occur periodically, up to 50 hours per year per Rule 1470. Alternative 3 would generate only minor amounts of diesel emissions from mobile sources, such as delivery trucks, but would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. Furthermore, trucks would be required to comply with the applicable provisions of the CARB 13 CCR, Section 2025 (Truck and Bus regulation) to minimize and reduce PM and NO_x emissions from existing diesel trucks. However, with the reduced retail component, there would be fewer delivery trucks to the Project Site under Alternative 3 than the Project. Toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the uses expected on the Project Site, as with the Project, potential long-term operational impacts associated with the release of TACs under Alternative 3 would be minimal, regulated, and controlled, and would not exceed the SCAQMD significance thresholds. Operation of Alternative 3, as with the Project,

would therefore not expose sensitive receptors to substantial TAC concentrations, and operational impacts would be less than significant. However, because of fewer delivery trucks during operation under Alternative 3, impacts would be less than under the Project.

(ii) *Project with the Deck Concept*

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, based on the uses expected on the Project Site, potential long-term operational impacts associated with the release of TACs would be minimal, regulated, and controlled, and would not exceed the SCAQMD significance threshold during operation. Therefore, impacts under the Project with the Deck Concept would be less than significant.

Alternative 3, as with the Project with the Deck Concept, would use consumer products and architectural coatings or involve other sources, such as charbroiling associated with restaurant uses. TAC emissions from these sources are anticipated to be minimal and charbroiling restaurant emissions would be regulated under SCAQMD Rule 1138. In addition, Alternative 3 would provide stationary emergency generators for its buildings, which would be regulated under SCAQMD Rule 1470 for periodic maintenance and testing up to 50 hours per year. Alternative 3 would generate only minor amounts of diesel emissions from mobile sources, such as delivery trucks, but would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. Furthermore, trucks would be required to comply with the applicable provisions of the CARB 13 CCR, Section 2025 (Truck and Bus regulation) to minimize and reduce PM and NO_x emissions from existing diesel trucks. However, with the reduced retail component, there would be fewer delivery trucks to the Project Site under Alternative 3 than the Project with the Deck Concept. Toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the uses expected on the Project Site, as with the Project with the Deck Concept, potential long-term operational impacts associated with the release of TACs under Alternative 3 would be minimal, regulated, and controlled, and would not exceed the SCAQMD significance thresholds. Operation of Alternative 3, as with the Project with the Deck Concept, would not expose sensitive receptors to substantial TAC concentrations, and operational impacts would be less than significant. However, because of fewer delivery trucks during operation under Alternative 3, impacts would be less compared to the Project with the Deck Concept.

(b) *Cultural Resources*

(i) *Historical Resources*

(a) *Project*

As discussed in Section IV.B, *Cultural Resources*, of this Draft EIR, there are no historical resources present on the Project Site. Regarding historical resources adjacent to the Project Site, the Project has the potential to result in direct impacts to the historic 7th Street Bridge due to the removal of character defining features along the north side of the Bridge adjacent to the project Site, including the removal of approximately 222 linear feet

of character-defining railing. In addition, construction vibration could also impact the structural integrity of the 7th Street Bridge under the Project, which is a potentially significant impact. Mitigation Measures, including CUL-MM-1 through CUL-MM-4 and NOISE-MM-6 through NOISE-MM-8, are required to reduce impacts to this historical resource. With implementation of these mitigation measures, impacts to the 7th Street Bridge would be reduced to levels that are less than significant.

Under Alternative 3, more linear feet of the 7th Street Bridge's character-defining railing would need to be removed for the development of the Deck (an additional approximately 69 linear feet). As with the Project, construction vibration under Alternative 3 could also impact the structural integrity of the 7th Street Bridge. Similar to the Project, the impacts to the 7th Street Bridge under Alternative 3 would be potentially significant and would require implementation of Mitigation Measures CUL-MM-1 through CUL-MM-4 and NOISE-MM-6 through NOISE-MM-8 to reduce impacts to less-than-significant levels. However, because Alternative 3 would remove 69 more linear feet of character defining railing, impacts would be greater compared to the Project.

(b) Project with the Deck Concept

To accommodate Deck and roadway construction, the Project with the Deck Concept would require the removal of 291 linear feet of existing character-defining railing at the historic 7th Street Bridge, resulting in a potentially significant historical resources impact. Although the Deck would be smaller under Alternative 3, a similar amount/length of character-defining railing along the 7th Street Bridge would be required, since only approximately 69 linear feet of the Bridge would be affected under either scenario due the rise of the Bridge where the Deck separates from the Bridge. Thus, potentially significant direct impacts would be similar under Alternative 3 and the Project with the Deck Concept. Construction vibration could also impact the structural integrity of the 7th Street Bridge under both Alternative 3 and the Project with the Deck Concept. Implementation of Mitigation Measures CUL-MM-1 through CUL-MM-4 and NOISE-MM-6 through NOISE-MM-8 would reduce impacts under Alternative 3 and the Project with the Deck Concept to levels that would be less than significant. Based on the above, direct and indirect impacts would be similar under Alternative 3 and the Project with the Deck Concept.

(ii) *Archaeological Resources*

(a) Project

As discussed in Section IV.B, *Cultural Resources*, of this Draft EIR, there are no known archaeological resources identified within the Project Site. Nonetheless, due to the Project Site's proximity to the Los Angeles River (which is a known landmark for prehistoric habitation), soil matrices, past historic-period uses, and only moderate past disturbances, grading and excavation for the Project's subterranean garage may encounter unknown archaeological resources. Therefore, Project construction has the potential to disturb, damage, or degrade archaeological resources that could be

encountered during construction, thus resulting in a substantial adverse change in the significance of an archaeological resource qualifying as a historical resource or unique archaeological resources pursuant to CEQA Guidelines Section 15064.5. The Project would be required to implement Mitigation Measures CUL-MM-5 through CUL-MM-7. With implementation of these measures, impacts related to archaeological resources would be reduced to less-than-significant levels.

Alternative 3 would require a similar depth of excavation for the subterranean parking levels as the Project. A relatively limited amount of excavation would be required to install the piers that would support the Deck under Alternative 3. Therefore, potential exists for Alternative 3's excavation activity to disturb, damage, or degrade archaeological resources. Such disturbance could result in a substantial adverse change in the significance of an archaeological resource qualifying as a historical resource or unique archaeological resource pursuant to CEQA Guidelines Section 15064.5. Alternative 3, as with the Project, would be required to implement Mitigation Measures CUL-MM-5 through CUL-MM-7. With implementation of these measures, impacts to archaeological resources would be less than significant. Given the relatively limited excavation required to install the piers that would support the Deck under Alternative 3 and the same general sensitivity for encountering unknown archaeological resources where excavation extends into native soil/sediment, impacts associated with archaeological resources would be less than significant with mitigation under both the Project and Alternative 3. However, impacts would be incrementally greater under Alternative 3 due to the increased construction footprint associated with the Deck construction.

(b) Project with the Deck Concept

Grading and excavation for the Project with the Deck Concept, including excavation for subterranean parking may encounter unknown archaeological resources. As such, excavation activities have the potential to disturb, damage, or degrade archaeological resources that could be encountered during construction and, thus, impact archaeological resources. With implementation of Mitigation Measures CUL-MM-5 through CUL-MM-7, impacts to archaeological resources under the Project with the Deck Concept would be reduced to less-than-significant levels.

Alternative 3 would require a similar depth and volume of excavation for the subterranean parking levels as the Project with the Deck Concept. This excavation constitutes the vast majority of the Project with the Deck Concept and Alternative 3's excavation activity. A relatively limited amount of excavation would be required to install the piers that would support the Deck, although excavation would be slightly greater under the Project with the Deck Concept than under Alternative 3. The potential exists for Alternative 3's excavation activities to disturb, damage, or degrade archaeological resources, which could result in a substantial adverse change in the significance of an archaeological resource qualifying as a historical resource or unique archaeological resource. Alternative 3 would be required to implement Mitigation Measures CUL-MM-5 through CUL-MM-7 to reduce impacts. With implementation of mitigation measures related to archaeological resources, impacts under both Alternative 3 and the Project with the Deck

Concept would be less than significant. Given the relatively limited excavation required to install the piers that would support the Deck under the Project with the Deck Concept and Alternative 3 and the same general sensitivity for encountering unknown archaeological resources where excavation extends into native soil/sediment, impacts associated with archaeological resources would be less than significant with mitigation under both the Project with the Deck Concept and Alternative 3. However, impacts would be incrementally less under Alternative 3 due to the decreased construction footprint associated with the Deck construction.

(iii) *Human Remains*

(a) Project

The Project would excavate to six subterranean levels. As discussed in Section IV.B, *Cultural Resources*, of this Draft EIR, no human remains were identified during the pedestrian survey of the Project Site, and no known human remains have been recorded within the Project Site or a 0.5-mile radius. In addition, with implementation of procedures codified in PRC Section 5097.98 and State Health and Safety Code Section 7050.5, impacts under the Project would be less than significant.

Alternative 3 would excavate to the same depths as under the Project for six subterranean levels. Alternative 3 would construct a 75,000-square-foot Deck, compared to a 132,000 square-foot Deck under the Project. A relatively limited amount of excavation would be required to install the piers that would support the Deck under Alternative 3. Pursuant to PRC Section 5097.98 and State Health and Safety Code Section 7050.5, any discovery of unrecorded human remains would require the immediate halting of construction or ground-disturbing activities and notification of the County Coroner. If the remains are determined to be Native American in origin, a “Most Likely Descendent” would be contacted to assist in determining appropriate treatment for the remains. In the event of the discovery of unrecorded human remains during construction, compliance with applicable regulatory requirements would ensure potential impacts are less than significant. Thus, Alternative 3, as with the Project, would have a less-than-significant impact with respect to human remains. Given the relatively limited excavation required to install the piers that would support the Deck under Alternative 3 and the general sensitivity for encountering unknown human remains, impacts associated with human remains would be less than significant under both the Project and Alternative 3. However, impacts would be incrementally greater under Alternative 3 because of the larger construction footprint associated with the Deck construction.

(b) Project with the Deck Concept

The Project with the Deck Concept would excavate to six subterranean levels. A relatively limited amount of excavation would be required to install the piers that would support the Deck. Although no human remains have been recorded within the Project Site or within a 0.5-mile radius of the Project Site, all excavation activity has the potential to encounter unrecorded human remains. In the event that any human remains are recovered, the

Project with the Deck Concept would implement procedures codified in PRC Section 5097.98 and State Health and Safety Code Section 7050.5. Implementation of these procedures would ensure appropriate handling of any recovered human remains and that any impacts to human remains would be less than significant.

Alternative 3 would excavate to six subterranean levels as with the Project with the Deck Concept, and construct a 75,000-square-foot Deck, compared to a 132,000-square-foot-deck under the Project with the Deck Concept. Any discovery of unrecorded human remains would require the immediate halting of construction or ground-disturbing activities and implementation of procedures described under the Project, above. In the event of the discovery of unrecorded human remains during construction, compliance with applicable regulatory requirements would ensure potential impacts are less than significant. Thus, impacts with respect to human remains under either the Project with the Deck Concept or Alternative 3 would be less than significant. Given the relatively limited excavation required to install the piers that would support the Deck under the Project with the Deck Concept and Alternative 3, impacts associated with human remains would be less than significant under both the Project with the Deck Concept and Alternative 3. However, impacts would be incrementally less under Alternative 3 because of the smaller construction footprint associated with the Deck construction.

(c) *Energy*

(i) *Efficient Energy Consumption*

(a) *Project*

As discussed in Section IV.C, *Energy*, of this Draft EIR, construction of the Project would utilize fuel-efficient equipment consistent with State and federal regulations, such as fuel efficiency regulations in accordance with the CARB Pavley Phase II standards, the anti-idling regulation in accordance with CCR Title 13, Section 2485 and fuel requirements in accordance with CCR Title 17, Section 93115, and would comply with State measures to reduce the inefficient, wasteful, and unnecessary consumption of energy, such as petroleum-based transportation fuels. Construction would utilize energy only for necessary on-site activities and to transport construction materials and demolition debris to and from the Project Site, and impacts would be less than significant. During operation, the Project-related net increase in annual electricity consumption of approximately 26,472,098 kWh for the Project would be within LADWP's projected electricity supplies. The Project-related net increase in annual natural gas consumption of approximately 49,500,000 kBtu would fall within SoCalGas' projected consumption for the area and would be consistent with SoCalGas' anticipated regional demand from population or economic growth. The Project is estimated to consume approximately 2.37 million gallons of gasoline and 0.192 million gallons of diesel per year. The Project's mixed use design and its increase in density within an HQTAs; proximity to transit, including multiple bus routes; proximity to other retail, restaurant, entertainment, commercial, and job destinations and walkable environment; implementation of a TDM program; and provision of EV charging stations and EV-ready parking spaces, the Project would reduce VMT

more than a standard project within the Air Basin. The Project incorporates Project Design Feature GHG-PDF-1 (Green Building Features), which includes building features to achieve the LEED Silver Certification level or equivalent green building standards. The Project would incorporate Project Design Feature WS-PDF-1 (Water Conservation Features) to minimize water demand and associated energy needed for water conveyance. The Project would provide for the installation of the conduit and panel capacity to accommodate future EV charging stations. Additionally, the Project's mixed-use design and its increase in density on an infill site within an HQTAs and in proximity to transit would achieve a reduction in VMT. Therefore, operation of the Project would not result in wasteful, inefficient, and unnecessary consumption of energy, and impacts would be less than significant.

Alternative 3, as with the Project, would utilize fuel-efficient equipment consistent with State and federal regulations. Construction would utilize energy only for necessary on-site activities and to transport construction materials and demolition debris to and from the Project Site, and impacts would be less than significant. During operation, based on energy modeling conducted for Alternative 3, provided in Appendix P of this Draft EIR, Alternative 3 would generate a net increase in annual electricity consumption of approximately 23,298,696 kWh, which would be within LADWP's projected electricity supplies and would be less than the Project. Alternative 3 would generate a net increase in annual natural gas consumption of approximately 36,400,000 kBtu, would fall within SoCalGas' projected consumption for the area, would be consistent with SoCalGas' anticipated regional demand from population or economic growth, and would be less than the Project. Alternative 3 is estimated to consume approximately 1.65 million gallons of gasoline and 0.112 million gallons of diesel per year. Because of proximity to transit and services, and with the installation of 10 percent EV stations and 30 percent EV-ready stations, Alternative 3 as with the Project, would minimize operational transportation fuel demand. Alternative 3 would incorporate Project Design Features as GHG-PDF-1 and WS-PDF-1 to minimize water demand and energy use. Alternative 3 would similarly install conduit and panel capacity to accommodate future EV charging stations. Alternative 3 would be located within an HQTAs and would achieve a reduction in VMT. Therefore, Alternative 3, as with the Project, would not cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation and, as such, impacts related to efficient energy consumption would be less than significant. As Alternative 3 would require less electricity, natural gas, and transportation energy demand than the Project, impacts under Alternative 3 would be less than the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would require electricity and natural gas for operation of facilities, electricity for outdoor lighting associated the temporary programming on the Deck, and fuel for transportation. With the addition of the Deck during the last phase of construction, the Project with the Deck Concept would continue to use energy related to construction activities longer than under the Project. During operation, the Project with the Deck Concept's net increase in annual electricity consumption would be

approximately 26,518,298 kWh. Demand for electricity would be within LADWP's projected electricity supplies. Project with the Deck Concept -related net increase in annual natural gas consumption would be approximately 49,500,000 kBtu. This demand would fall within SoCalGas' projected consumption for the area and would be consistent with SoCalGas' anticipated regional demand from population or economic growth. The Project with the Deck Concepts mixed use design and its increase in density located on an infill site within an HQTAs and in proximity to transit, including multiple bus routes, its proximity to other retail, restaurant, entertainment, commercial, and job destinations, and its walkable environment would achieve a reduction in VMT more than that of a standard project within the Air Basin. The Project with the Deck Concept is estimated to consume approximately 2.4 million gallons of gasoline and 0.196 million gallons of diesel per year. The Project with the Deck Concept would incorporate Project Design Feature GHG-PDF-1 (Green Building Features), which includes building features to achieve the LEED Silver Certification level or equivalent green building standards. The Project with the Deck Concept would also incorporate Project Design Feature WS-PDF-1 (Water Conservation Features) to minimize water demand and associated energy needed for water conveyance. The Project with the Deck Concept would provide for the installation of the conduit and panel capacity to accommodate future EV charging stations. Additionally, the Project with the Deck Concept's mixed-use design and its increase in density on an infill site within an HQTAs and in proximity to transit would achieve a reduction in VMT. Therefore, operation of the Project with the Deck Concept would not result in wasteful, inefficient, and unnecessary consumption of energy, and impacts would be less than significant.

Based on energy modeling conducted for Alternative 3, provided in Appendix P of this Draft EIR, Alternative 3 would generate a net increase in annual electricity consumption of approximately 23,298,696 kWh, which would be within LADWP's projected electricity supplies and would be less than the Project with the Deck Concept. Alternative 3 would generate a net increase in annual natural gas consumption of approximately 36,400,000 kBtu, which would also be less than the Project with the Deck Concept and would be within the projected supplies of the energy providers. Because of the smaller Deck and incrementally reduced truck and visitor traffic, Alternative 3 would incrementally decrease the Project with the Deck Concept's transportation energy demand. Alternative 3 is estimated to consume approximately 1.65 million gallons of gasoline and 0.112 million gallons of diesel per year. With the installation of 10 percent EV stations and 30 percent EV-ready stations, Alternative 3 as with the Project, would minimize operational transportation fuel demand. In addition, as with the Project with the Deck Concept, Alternative 3 would implement energy saving design features, such as EV charging stations. Neither the Project with the Deck Concept nor Alternative 3 would result in the wasteful or inefficient use of energy. Energy efficiency impacts under both would be less than significant. However, because Alternative 3 would result in less energy demand, impacts would be less than under the Project with the Deck Concept.

(ii) *Conflict with Plans for Renewable Energy or Energy Efficiency*

(a) Project

As discussed in Section IV.C, *Energy*, of this Draft EIR, the Project's design would comply with existing energy standards and incorporate project design features to reduce energy consumption. The Project would support and promote the use of renewable energy and energy efficiency and would result in less-than-significant impacts. The Project would be consistent with and not conflict with regional planning strategies that address energy conservation. Therefore, impacts would be less than significant.

Alternative 3, as with the Project, would comply with existing energy standards, would include a project design and building operation that would incorporate energy-conservation measures beyond those otherwise required, and would not conflict with adopted energy conservation plans. Alternative 3, as with the Project, would incorporate similar Project Design Features, including GHG-PDF-1 (Green Building Features) and WS-PDF-1 (Water Conservation Features), and accommodate future EV charging stations to increase energy efficiency. By exceeding the regulatory standards, similar to the Project, Alternative 3 would have a less-than-significant impact regarding the provisions of plans for renewable energy and energy efficiency. As Alternative 3 would be in compliance with plans for renewable energy and energy efficiency, impacts under Alternative 3 would be similar to the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would comply with existing energy standards and incorporate design features to reduce energy consumption. The Project with the Deck Concept would support and promote the use of renewable energy and energy efficiency and impacts as discussed above. As such, the Project with the Deck Concept would be consistent and not conflict with regional planning strategies that address energy conservation. Impacts relating to renewable energy and energy efficiency plans would be less than significant.

As with the Project with the Deck Concept, Alternative 3 would also comply with existing energy standards, would include a project design and building operation that would incorporate energy-conservation measures, including GHG-PDF-1 (Green Building Features) and WS-PDF-1 (Water Conservation Features) beyond those otherwise required and, as such, would not conflict with adopted energy conservation plans. Alternative 3, would incorporate similar Project Design Features and accommodate future EV charging stations as under the Project with the Design Concept to increase energy efficiency. By exceeding the regulatory standards, Alternative 3 would have a less-than-significant impact regarding the provisions of plans for renewable energy and energy efficiency. As Alternative 3 would be in compliance with plans for renewable energy and energy efficiency, impacts under Alternative 3 would be less than significant and similar to the Project with the Deck Concept.

(d) *Geology and Soils*

(i) *Seismic Hazards*

(a) Project

As discussed in Section IV.D, *Geology and Soils*, of this Draft EIR, the Project Site is not located within an Alquist-Priolo Special Studies Zone (earthquake fault zone) or in proximity to any identified active faults. The Project would implement the Los Angeles Building Code's seismic safety regulations, as well as CBC regulations related to specific seismic zones. Because of the Project Site's distance from active faults and the Los Angeles Department of Building and Safety's enforcement of state and local seismic safety regulations in building design, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault; strong seismic ground shaking; seismic-related ground failure; and landslides. Therefore, Project impacts would be less than significant.

Alternative 3 would be developed within the same general area as the Project relative to distance from active earthquake faults, and would have the same exposure to seismic activity. Alternative 3 would implement the Los Angeles Building Code's seismic safety regulations, implement similar building construction techniques, and result in similar exposure of occupied units and uses as the Project. Impacts under both Alternative 3 and the Project, with respect to rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, and landslides would be less than significant. Impacts under Alternative 3 would be similar to those of the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would occupy the same building site as the Project, in addition to developing a 132,000-square-foot Deck that extends over the adjacent Rail Yard Property. The Deck would be used for everyday pedestrian activity and would be intermittently used for outdoor events. The Project Site is not located within an Alquist-Priolo Special Studies Zone (earthquake fault zone) or in proximity to any identified active faults. The Project with the Deck Concept would implement the Los Angeles Building Code's seismic safety regulations, as well as CBC regulations related to specific seismic zones. Because of the Project Site's distance from active faults and the Los Angeles Department of Building and Safety's enforcement of state and local seismic safety regulations in building design, impacts with respect to earthquake fault rupture, ground shaking, or fault-induced landslides under the Project with the Deck Concept would be less than significant.

Alternative 3, which would include a 75,000-square-foot Deck over the Railyards, would be developed within the same region as the Project with the Deck Concept relative to distance from active earthquake faults, and would have the same exposure to seismic activity. Alternative 3 would implement the Los Angeles Building Code's seismic safety regulations, implement similar building construction techniques, and result in similar exposure of occupied units and uses as the Project with the Deck Concept. Impacts under

both Alternative 3 and the Project with the Deck Concept, with respect to rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, and landslides would be less than significant. Impacts under Alternative 3 would be similar to those under the Project with the Deck Concept.

(ii) *Soil Erosion or Loss of Topsoil*

(a) Project

As discussed in Section IV.D, *Geology and Soils*, of this Draft EIR, Project construction would increase the exposure of excavated soils to potential erosion. The Project would comply with applicable code and regulatory requirements including BMPs as required under the SWPPP that control erosion of soils. With such compliance, impacts associated with substantial erosion or loss of topsoil during construction would be less than significant.

Excavation for Alternative 3 would be to the same maximum depths as under the Project. Also, the disturbed footprint area under the Project and Alternative 3 would be generally similar, as only a limited ground area would be disturbed by construction of the deck under Alternative 3. Similar to the Project, construction of Alternative 3 would comply with applicable code and regulatory requirements such that impacts associated with substantial erosion or loss of topsoil during construction would be less than significant and similar to the Project.

(b) Project with the Deck Concept

Construction of the Project with the Deck Concept would result in exposure of excavated soils to potential erosion. The Project with the Deck Concept would comply with Los Angeles Building Code regulations related to grading and reduction of exposure and loss of soils. The foundations for the vertical columns supporting the Deck would be drilled concrete piers, resulting in limited ground disturbance and exposure of soils during construction of the Deck. Regulations include BMPs associated with the SWPPP required for all grading and excavation operations on the Project Site. The SWPPP incorporates measures to control erosion of all exposed soils. With compliance with applicable regulations, construction impacts associated with substantial erosion or loss of topsoil under the Project with the Deck Concept would be less than significant.

The depth of excavation under Alternative 3 would be equivalent to the Project with the Deck Concept although the number of vertical columns would be reduced by approximately half. The construction of the piers would result in limited ground disturbance. Construction of Alternative 3 would comply with applicable code and regulatory requirements, including the implementation of erosion prevention BMPs under the required SWPPP. As such, impacts associated with substantial erosion or loss of topsoil under Alternative 3 and the Project with the Deck Concept during construction would be less than significant and similar to the Project with the Deck Concept.

(iii) *Unstable Geologic Units*

(a) Project

As discussed in Section IV.D, *Geology and Soils*, of this Draft EIR, the Project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, Project impacts would be less than significant.

Alternative 3, as with the Project, would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of Alternative 3, or that would potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, impacts under Alternative 3 would be similar to those of the Project and would be less than significant.

(b) Project with the Deck Concept

As discussed in Section IV.D, *Geology and Soils*, of this Draft EIR, the Project with the Deck Concept would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project with the Deck Concept, or potentially result in soil or earth failures, such as on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, impacts related to unstable geologic units under the Project with the Deck Concept would be less than significant.

Alternative 3, as with the Project with the Deck Concept, would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of Alternative 3. Alternative 3 would not cause on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, impacts related to unstable geologic units under Alternative 3 or the Project with the Deck Concept would be less than significant. Impacts under Alternative 3 would be similar to those under the Project with the Deck Concept.

(iv) *Expansive Soils*

(a) Project

As discussed in Section IV.D, *Geology and Soils*, of this Draft EIR, the Project would not be located on expansive soil creating substantial risks to life or property caused in whole or in part by its exacerbating the expansive soil conditions, and impacts would be less than significant.

Similar to the Project, Alternative 3 would not be located on expansive soil creating substantial risks to life or property caused in whole or in part by its exacerbating the expansive soil conditions, and impacts would be less than significant. Impacts under Alternative 3 would be similar to those of the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would not be located on expansive soil creating substantial risks to life or property caused in whole or in part by its exacerbating the expansive soil conditions, and impacts would be less than significant.

Similar to the Project with the Deck Concept, Alternative 3 would not be located on expansive soil creating substantial risks to life or property caused in whole or in part by its exacerbating the expansive soil conditions, and impacts would be less than significant. Impacts under Alternative 3 would be similar to those under the Project with the Deck Concept.

(v) *Paleontological Resources*

(a) Project

As discussed in Section IV.D, *Geology and Soils*, of this Draft EIR, Project-related excavation for the subterranean parking structure, which constitutes the vast majority of Project construction, may encounter native soils and sediment, these soils and sediment have a high potential for containing previously unknown buried paleontological resources and, as such, excavation could directly or indirectly destroy a unique paleontological resource. Mitigation would be required and, with implementation of Mitigation Measures GEO-MM-1 through GEO-MM-4, Project impacts would be reduced to levels that are less than significant.

Alternative 3 would require a similar depth of excavation for the subterranean parking levels within native soils and sediment as under the Project and would require the excavation for the piers for the 75,000-square-foot Deck. Therefore, potential exists for Alternative 3's excavation to disturb, damage, or degrade paleontological resources that could be encountered during construction and, thus, could result in a substantial adverse change in the significance of a paleontological resource. Mitigation would be required and, with implementation of Mitigation Measures GEO-MM-1 through GEO-MM-4 under the Project with the Deck Concept, impacts to paleontological resources resulting in a substantial adverse change in the significance of a paleontological resource would be less than significant. Similar to the Project, Alternative 3 would implement Mitigation Measures GEO-MM-1 through GEO-MM-4 to reduce impacts to paleontological resources to less-than-significant levels. Although minor differences in excavation activities would occur between the Project and Alternative 3, impacts related to the potential exposure of paleontological resources would be less than significant under both. However, because Alternative 3 would have a larger excavation footprint associated with the Deck construction, paleontological impacts would be incrementally greater than under the Project.

(b) Project with the Deck Concept

Grading and excavation for the Project with the Deck Concept, including installation of vertical columns between the existing railroad tracks for the Deck, may encounter unknown paleontological resources. As such, the Project with the Deck Concept has the

potential to disturb, damage, or degrade paleontological resources that could be encountered during construction and, thus, result in a substantial adverse change in the significance of a paleontological resource. With implementation of Mitigation Measures GEO-MM-1 through GEO-MM-4 under the Project with the Deck Concept, impacts to paleontological resources resulting in a substantial adverse change in the significance of a paleontological resource would be less than significant.

Alternative 3 would require a similar depth of excavation for the subterranean parking levels as under the Project with the Deck Concept. In addition, Alternative 3 excavation would additionally include piers for the 75,000 square-foot Deck. As with the Project with Deck Concept, the potential exists for Alternative 3's construction to directly or indirectly destroy a unique paleontological resource. As with the Project with the Deck Concept, Alternative 3 would implement Mitigation Measures GEO-MM-1 through GEO-MM-4. With implementation of these measures, impacts to paleontological resources would be less than significant under both Alternative 3 and the Project with the Deck Concept. Although minor difference in excavation quantities would occur between the Project with the Deck Concept and Alternative 3, the impact related to the potential exposure of paleontological resources would be less than significant under both. However, because Alternative 3 would have a smaller excavation footprint associated with the Deck construction, paleontological impacts would be incrementally less than under the Project with the Deck Concept.

(e) *Greenhouse Gas Emissions*

(i) *GHG Emissions/Conflict with Applicable Plans, Policies, Regulations, or Recommendations*

(a) Project

As discussed in Section IV.E, *Greenhouse Gas Emissions*, of this Draft EIR, the Project would be generally consistent with regulations and policies and comply with or exceed the regulations and reduction actions/strategies outlined in the Climate Change Scoping Plan, 2020–2045 RTP/SCS, the City of L.A.'s Green New Deal (Sustainable City pLAn 2019), and the Los Angeles Green Building Code. Impacts related to GHG emissions would be less than significant.

Alternative 3, as with the Project, would be consistent with applicable strategies outlined in Climate Change Scoping Plan, 2020–2045 RTP/SCS, the L.A.'s Green New Deal (Sustainable City pLAn 2019), and the Los Angeles Green Building Code. Both the Project with the Deck Concept and Alternative 3 are located within an HQTAs-designated location, which would also encourage utilization of alternative modes of transportation in support of the applicable GHG emission reduction plans and policies included within the Climate Change Scoping Plan, 2020–2045 RTP/SCS, the City of L.A.'s Green New Deal (Sustainable City pLAn 2019), and Los Angeles Green Building Code. As such, similar to the Project, Alternative 3 would not conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHGs. Thus, impacts related to GHGs would be less than significant and similar to the Project.

(b) Project with the Deck Concept

As discussed in Section IV.E, *Greenhouse Gas Emissions*, of this Draft EIR, the Project with the Deck Concept would be generally consistent with regulations and policies and comply with or exceed the regulations and reduction actions/strategies outlined in the Climate Change Scoping Plan, 2020–2045 RTP/SCS, the L.A.’s Green New Deal (Sustainable City pLAn 2019), and the Los Angeles Green Building Code. Impacts related to GHG emissions would be less than significant.

Alternative 3, as with the Project with the Deck Concept, would be consistent with applicable strategies outlined in Climate Change Scoping Plan, 2020–2045 RTP/SCS, the City of L.A.’s Green New Deal (Sustainable City pLAn 2019), and the Los Angeles Green Building Code. As such, similar to the Project, Alternative 3 would not conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHGs. Both the Project with the Deck Concept and Alternative 3 are located within an HQTAdesignated location, which would also encourage utilization of alternative modes of transportation in support of the applicable GHG emission reduction plans and policies included within the Climate Change Scoping Plan, 2020–2045 RTP/SCS, the City of L.A.’s Green New Deal (Sustainable City pLAn 2019), and Los Angeles Green Building Code. Thus, impacts related to GHGs under Alternative 3 would be less than significant and similar to the Project with the Deck Concept.

(f) *Hazards and Hazardous Materials*(i) *Hazards to the Public or Environment through the Routine Transport, Use, or Disposal of Hazardous Materials*

(a) Project

As discussed in Section IV.F, *Hazards and Hazardous Materials*, of this Draft EIR, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Construction and occupancy of the Project would include demolition of existing structures, which may contain asbestos and other hazardous materials; construction equipment and materials, which may contain oils, paints, caustics, and other hazardous materials; and the limited use of potentially hazardous materials typically used in residences, offices, and restaurants. Such materials would be used, stored, and disposed of in consumer quantities and in accordance with applicable laws and regulations and manufacturers’ instructions, and impacts would be less than significant.

Construction of Alternative 3, as with the Project, would include demolition of existing warehouse buildings and surface parking lots. Construction equipment and materials, such as fuels, oils and lubricants, solvents and cleaners, adhesives, paints and thinners, degreasers, cement and concrete, and asphalt mixtures, which are all commonly used in

construction, would be used, stored, and disposed of in consumer quantities and in accordance with applicable laws and regulations and manufacturers' instructions.

As with the Project, operation of Alternative 3 would involve the limited use of potentially hazardous materials typical of those used in residences, offices, and restaurants, including cleaning agents, paints, pesticides, and other materials used for landscaping. In addition, hazardous materials on the Project Site would continue to be acquired, handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, State, and local requirements. Alternative 3 would comply with all applicable regulations concerning the transport, use, and disposal of hazardous waste, as with the Project, and impacts would be less than significant. Due to the similarity in the developed floor area and the land uses that are proposed under Alternative 3 and the Project, impacts with respect to the routine transport, use and disposal of hazardous materials under Alternative 3 would be similar to the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Construction and occupancy of the Project with the Deck concept, would include demolition of existing structures, which may contain asbestos and other hazardous materials; construction equipment and materials, which may contain oils, paints, caustics, and other hazardous materials; and the limited use of potentially hazardous materials typically used in residences, offices, and restaurants. Such materials would be used, stored, and disposed of in consumer quantities and in accordance with applicable laws and regulations and manufacturers' instructions. Impacts related to hazards and hazardous materials under the Project with the Deck Concept would be less than significant.

Construction and occupancy of Alternative 3, as with the Project with the Deck Concept, would also include demolition of existing structures, use of construction equipment and materials, and the limited use of potentially hazardous household materials used in residences, offices, and restaurants. Alternative 3 and the Project with the Deck Concept would both comply with all applicable regulations concerning the transport, use, and disposal of hazardous waste. Impacts under both the Project with the Deck Concept and Alternative 3 would be less than significant and similar.

(ii) *Hazard to the Public or Environment Involving the Accidental Release of Hazardous Materials into the Environment*

(a) Project

As discussed in Section IV.F, *Hazards and Hazardous Materials*, of this Draft EIR, soil excavation at the Project Site could expose construction workers and the environment to elevated concentrations of hazardous materials present in the soil. As such, impacts

would be potentially significant. The Project would require the implementation of Mitigation Measures HAZ-MM-1 and HAZ-MM-2, which would ensure the proper management of contaminated soils and to reduce the risk of impacts to construction workers, the public, and the environment, and impacts would be reduced to a less-than-significant level.

In addition to the excavation of six levels of subterranean parking as under the Project, Alternative 3 would also extend construction into the Railway Properties and increase potential exposure of workers to hazardous materials within contaminated soils, such as herbicides for weed control, hydrocarbons, metals, creosote, and naphthalene associated with railroad operations, as well as potential soil gases. Such excavation for Alternative 3 would be potentially significant and require the implementation of Mitigation Measures HAZ-MM-1 and HAZ-MM-2. These mitigation measures would ensure the proper management of contaminated soils and to reduce the risk of impacts to construction workers, the public, and the environment and, as such reduce impacts associated with the accidental release of hazardous materials under both Alternative 3 and the Project to levels that would be less than significant. However, because of the potential for greater exposure to hazardous materials under Alternative 3, impacts with respect to the release of hazardous materials would be greater under Alternative 3 than the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would extend into the Railway Properties. During Construction, the potential release of hazardous materials in the soils including herbicides for weed control, hydrocarbons, metals, creosote, and naphthalene associated with the adjacent railroad operations could occur, resulting a potentially significant impact. The Project with the Deck Concept would implement Mitigation Measure HAZ-MM-3 to address additional unknown contamination or soil gases during performed earthwork at the Railway Properties. Mitigation Measure HAZ-MM-3 requires soil sampling at the Railway Properties prior to construction of the Deck. The Project with the Deck Concept would also implement Mitigation Measures HAZ-MM-1 and HAZ-MM-2 in the event of elevated contaminant levels that exceed applicable regulatory standards. With the implementation of mitigation measures, impacts related to release of hazardous materials into the environment under the Project with the Deck Concept would be less than significant.

Alternative 3 would extend partially over the Railway Properties and, as with the Project with the Deck Concept, would implement Mitigation Measure HAZ-MM-3, as well as Mitigation Measures HAZ-MM-1 and HAZ-MM-2 in the event of exposed hazardous materials or soil gas that exceed applicable regulatory standards. Implementation of these measures would reduce impacts to a level of less than significant under both the Project with the Deck Concept and Alternative 3. Further, because Alternative 3 would reduce the construction footprint into the Railway Properties due to the reduced size of the Deck, impacts related to hazardous materials under Alternative 3 would be less than under the Project with Deck Concept.

(iii) *Hazard Resulting from Hazardous or Acutely Hazardous Materials, Substances, or Waste within One-Quarter Mile of a School*

(a) Project

As discussed in Section IV.F, *Hazards and Hazardous Materials*, of this Draft EIR, there are no existing or proposed schools within one-quarter mile of the Project Site. Therefore, impacts would be less than significant.

Alternative 3, as with the Project, is not located within one-quarter mile of a school. Therefore, similar to the Project, impacts under Alternative 3 would be less than significant.

(b) Project with the Deck Concept

There are no existing or proposed schools within one-quarter mile of the Project Site. Therefore, impacts would be less than significant. Alternative 3, as with the Project, is not located within one-quarter mile of a school. Therefore, impacts under Alternative 3 and the Project with the Deck Concept would be less than significant and similar.

(iv) *Hazardous Materials Sites*

(a) Project

As discussed in Section IV.F, *Hazards and Hazardous Materials*, of the Draft EIR, although the Project Site is located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, the listing is a permit for air emissions for a former textile manufacturing facility. The facility had no records of violations and is no longer operating at the Project Site, and impacts would be less than significant.

Alternative 3 would have a larger footprint for development when compared to the Project. While the Project Site is located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, the facility that is listed has no records of violations and is no longer operating at the Project Site. Footings for the Deck under Alternative 3 would extend over the railroad track, which are also not listed hazardous materials Sites.⁴⁴ As such, impacts related to hazardous materials sites under Alternative 3 would be less than significant and similar to the Project with the Deck Concept.

(b) Project with the Deck Concept

The Project Site is located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The listing is a permit for air emissions for a former textile manufacturing facility. Because the facility had no record of violations and is no longer operating at the Project Site, the Project Site is not considered

⁴⁴ Rincon Consultants, Inc., *Phase I ESA*, September 6, 2016, page 10, Table 2, EDR Listing of Select Sites within One-Eighth Mile of the Subject Site, Appendix G-1, of this EIR.

to be a hazardous materials site. Although the Project with Deck Concept extends the proposed development over the railroad tracks where footings to support the Deck would be located, the railroad tracks are not listed hazardous materials sites.⁴⁵ As such, impacts related to hazardous materials sites for the Project with the Deck Concept would be less than significant.

While the Project Site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, the listed facility has no record of violations and is no longer operating at the Project Site. Alternative 3, which would have a reduced Deck compared to the Project with the Deck Concept, would comprise a smaller development site, with footings for the Deck extending partially over the railroad tracks. The railroad tracks and rail yard, however, are not listed hazardous materials sites. As such, impacts related to hazardous materials sites under Alternative 3 and the Project, would be less than significant and similar.

(v) *Emergency Response Plan/Emergency Evacuation Plan*

(a) Project

As discussed in Section IV.F, *Hazards and Hazardous Materials*, of the Draft EIR, no City-designated Selected Disaster Routes border the Project Site, and the Project would not physically alter the City's designated disaster routes. Project construction would implement Project Design Feature TRAF-PDF-1 to ensure that adequate access for emergency vehicles would be maintained. Project operation would ensure that site accessibility and design would be reviewed and approved by the LAFD to ensure that emergency response and access would be maintained. Impacts would be less than significant.

Alternative 3, as with the Project, would involve new construction and increased traffic. Alternative 3, as with the Project, would not physically alter the City's designated disaster routes. As with the Project, Alternative 3 would implement Project Design Feature TRAF-PDF-1 to ensure that adequate access for emergency vehicles would be maintained. As with the Project, compliance with existing regulations would ensure that adequate emergency response and access would be maintained for Alternative 3. Impacts under Alternative 3 with respect to conflicts with or interfering with emergency response or evacuation plans would be less than significant and would be similar to the Project.

(b) Project with the Deck Concept

No City-designated Selected Disaster Routes border the Project Site, and the Project with the Deck Concept would not physically alter the City's designated disaster routes. The Project with the Deck Concept would implement Project Design Feature TRAF-PDF-1 to ensure that adequate access for emergency vehicles. Project plans would be reviewed and approved by the LAFD to ensure that emergency response and access would be

⁴⁵ Rincon Consultants, Inc., *Phase I ESA*, September 6, 2016, page 10, Table 2, EDR Listing of Select Sites within One-Eighth Mile of the Subject Site, Appendix G-1, of this EIR.

maintained. Impacts with respect to emergency response plans under the Project with the Deck Concept would be less than significant.

Alternative 3 would not physically alter the City's designated disaster routes. As with the Project with the Deck Concept, Alternative 3 would implement Project Design Feature TRAF-PDF-1 to ensure that adequate access for emergency vehicles would be maintained. As with the Project with the Deck Concept, Alternative 3 would comply with existing regulations to ensure that an adequate emergency response and access would be maintained for the Project Site. Impacts under Alternative 3 and the Project with the Deck Concept with respect to emergency response or evacuation plans would be less than significant and similar.

(g) *Hydrology and Water Quality*

(i) *Water Quality*

(a) *Construction*

(i) *Project*

As stated in Section IV.G, *Hydrology and Water Quality*, of the Draft EIR, construction activities, including earth moving, maintenance/operation of construction equipment, potential dewatering, and handling/storage/disposal of materials, could contribute to pollutant loading in stormwater runoff from the construction site. Also, wind could convey exposed and stockpiled soils at the construction site into nearby storm drains during storm events, and on-site water activities for dust suppression purposes could contribute to pollutant loading in runoff from the construction site. As such, contaminated soils could be encountered during Project construction, and therefore, impacts would be potentially significant. The Project would implement Mitigation Measure HAZ-MM-2 to address impacts regarding water quality, as well as implement a SWPPP as required by the State of California for all Projects more than one acre in area. Mitigation Measure HAZ-MM-2 would require a Soil and Groundwater Management Plan to ensure the proper management of contaminated soils and to reduce the risk of impacts to construction workers, the public, and the environment. The SWPPP specifies BMPs and erosion control measures to be used during construction to prevent pollution, to contain and treat, as necessary, stormwater or construction watering on the Project Site so runoff does not impact off-site drainage facilities or receiving waters. Further, if grading activities occur during the rainy season (October 1 through April 14), a WVECP would be prepared that would include BMPs to address potential erosion effects. With the implementation HAZ-MM-2 and SWPPP measures, impacts related to the exposure of surface water to contamination under the Project would be less than significant.

Alternative 3, as with the Project, would include construction activities, including earth moving, maintenance/operation of construction equipment, potential dewatering, and handling/storage/disposal of materials, that could contribute to pollutant loading in stormwater runoff from the construction site. Also, wind could convey exposed and

stockpiled soils at the construction site into nearby storm drains during storm events, and on-site water activities for dust suppression purposes could contribute to pollutant loading in runoff from the construction site. Alternative 3, as with the Project, could encounter contaminated soils during construction, and impacts would be potentially significant. Alternative 3, as with the Project, would be required to implement Mitigation Measure HAZ-MM-2 to reduce impacts regarding water quality to less-than-significant levels. Because Alternative 3 would extend into the Railway Properties to drill footings and piers for the Deck, more potentially contaminated materials would be exposed to stormwater runoff than under the Project. Although impacts would be less than significant with mitigation under both the Project and Alternative 3, impacts with respect to violations of water quality standards during construction under Alternative 3 would be greater compared to the Project.

(ii) *Project with the Deck Concept*

Construction activities under the Project with the Deck Concept, including earth moving, maintenance/ operation of construction equipment, potential dewatering, and handling/ storage/disposal of materials, that could contribute to pollutant loading in stormwater runoff from the construction site. Also, wind could convey exposed and stockpiled soils at the construction site into nearby storm drains during storm events, and on-site water activities for dust suppression purposes could contribute to pollutant loading in runoff from the construction site. As such, contaminated soils could be encountered during construction of the Project with the Deck Concept and, therefore, impacts would be potentially significant. In addition, because the Project with the Deck Concept extends to the construction of footings across the railroad tracks, potential exposure of contaminated soils would be slightly greater than under the Project. The Project with the Deck Concept would implement Mitigation Measure HAZ-MM-2 to address impacts regarding water quality as well as implement a SWPPP as required by the State of California for all Projects more than one acre in area. The SWPPP specifies BMPs and erosion control measures to be used during construction to prevent pollution, to contain and treat, as necessary, stormwater or construction watering on the Project Site so runoff does not impact off-site drainage facilities or receiving waters. Further, if the Project requires grading activities during the rainy season (October 1 through April 14), a WVECP would be prepared that would include BMPs to address potential erosion effects. With the implementation HAZ-MM-2 and SWPPP measures, impacts related to the exposure of surface water to contamination under the Project with the Deck Concept would be less than significant.

The depth of excavation for subterranean parking under Alternative 3 would be similar to the Project with the Deck Concept. In addition, Alternative 3 would encroach into the Railway Properties for the development of Deck footings and piers. Construction activities, including earth moving, maintenance/operation of construction equipment, potential dewatering, and handling/storage/disposal of materials that, as with the Project with the Deck Concept, could contribute to pollutant loading in stormwater runoff from the construction site. As such, Alternative 3 would be required to implement the same

pollution controls and Mitigation Measure HAZ-MM-2 as the Project with the Deck Concept. With implementation of regulatory measures and Mitigation Measure HAZ-MM-2, impacts with respect to violations of water quality standards during construction under Alternative 3 and the Project with the Deck Concept would be less than significant. Because of the reduced size of the Deck under Alternative 3 compared to the Project with the Deck Concept, the extent of soil disruption in the Railway Properties would be less. Impacts would be less than significant with mitigation under both the Project with the Deck Concept and Alternative 3. Impacts with respect to violation of water quality standards under Alternative 3 would be less compared to the Project with the Deck Concept.

(b) Operation

(i) *Project*

As stated in Section IV.G, *Hydrology and Water Quality*, of the Draft EIR, the existing Project Site was developed prior to the enforcement of storm water quality BMP design, implementation, and maintenance. The Project Site currently does not implement BMPs and has no means for treatment of stormwater runoff. The Project would implement LID BMPs to improve the quality of stormwater runoff discharged from the Project Site compared to existing conditions. With BMPs, water quality impacts would be less than significant.

Alternative 3, as with the Project, would incorporate similar LID BMPs to improve the quality of stormwater runoff discharged from the Project Site. LID requirements would include the collection of surface runoff from Alternative 3's 75,000-foot deck surface, which would increase the water collection area compared to the Project. With the implementation of the LID BMPs, Alternative 3, as with the Project, would result in an improvement in the quality of stormwater runoff from the Project Site compared to existing conditions. As with the Project, impacts related to water quality standards under Alternative 3 would be less than significant and would be similar to the Project.

(ii) *Project with the Deck Concept*

During operation, the Project with the Deck Concept would implement LID BMPs to collect and treat surface runoff and stormwater discharged from the Project Site. Runoff from the 132,000-square-foot Deck surface would also be collected and subject to the City's water quality BMPs. Although the proposed Deck would extend over a portion of the freight and passenger rail lines and rail yards, gradient changes, collection, or other BMPs would not be provided at grade level across the railroad tracks. However, with the treatment of surface runoff and implementation of LID BMPs within the Project Site and Deck surface, the quality of stormwater runoff discharged from the Project Site and, ultimately, to the Los Angeles River would be substantially improved compared to existing conditions. Impacts related to water quality standards under the Project with the Deck Concept would be less than significant.

Alternative 3 and the Project with the Deck Concept would implement similar LID BMPs to control operational surface runoff. With implementation of the LID BMPs, Alternative 3 would

result in an improvement in the quality of stormwater runoff from the Project Site compared to existing conditions. Impacts related to water quality standards under Alternative 3 and the Project with the Deck Concept would be less than significant and similar.

(ii) *Decreases in Groundwater Supplies or Recharge*

(a) Project

As stated in Section IV.G, *Hydrology and Water Quality*, of the Draft EIR, Project construction would not impede sustainable groundwater management of the groundwater basin. The Project would not include new injection or supply wells and does not include the installation or operation of water wells or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well or spreading ground facility. Excavation depths for the subterranean garage under the Project would extend from 61 to 68 feet below grade and reach depths of 75 feet below grade in some areas. This depth could intercept the groundwater table, which is estimated to be 57 to 61 feet below grade. Thus, construction activities would potentially require the removal and discharge of ground water. However, dewatering during construction would be temporary and would not result in the substantial removal of groundwater that would reduce the local groundwater table. Further, dewatering would not continue post-construction. As such, the Project would not result in a decrease in groundwater supplies or substantially interfere with groundwater recharge. Because groundwater removal would be temporary, impacts related to decreases in groundwater supplies and recharge would be less than significant.

The Project Site is currently 90.1 percent impervious, increasing to 94 percent under the Project. However, implementation of the proposed BMPs would result in an overall reduction of the volume of water leaving the Project Site. The Project's subterranean parking would be below the redeveloped areas of the Project Site, resulting in no material change to the amount of stormwater that would percolate into the groundwater table compared to existing conditions. Therefore, pre- and post-Project infiltration volumes would be effectively equivalent. No groundwater withdrawal is anticipated during Project operation. The Project would not include new injection or supply wells and does not include the installation or operation of water wells or any extraction or recharge system. As such, operation would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project would impede sustainable groundwater management of the basin. Impacts would be less than significant.

Alternative 3, as with the Project, would not involve wells or regular groundwater removal. However, similar to the Project, construction for the Alternative 3's six-level subterranean garage, which would reach depths of 61 to 68 feet below grade and reach depths of 75 feet below grade in some areas, could intercept the groundwater table. The groundwater table is estimated to be 57 to 61 feet below grade. Alternative 3 would have the potential to require removal and discharge of intercepted waters. Such dewatering during construction would not result in the substantial removal of groundwater that would reduce the local groundwater table. Further, dewatering would temporary and would not continue

post-construction. Neither Alternative 3 nor the Project would cause substantial depletion of groundwater supplies or substantially interfere with groundwater recharge.

Under Alternative 3, the larger development footprint would increase the Project Site's impervious area in the Railway Properties. However, after implementation of LID BMPs, any excess runoff from the Railway Properties would be rerouted to Mesquit Street and the municipal storm drain system. As such, any reduction in groundwater recharge due to the overall change in imperviousness would be minimal in the context of the regional groundwater basin. No groundwater withdrawal is anticipated during operation of Alternative 3. Impacts related to groundwater supplies and recharge during either construction or operation.

Under Alternative 3, the larger development footprint would increase the Project Site's impervious area in the Railway Properties due to the construction of a 75,000 square foot deck. However, after implementation of LID BMPs, any excess runoff from the Railway Properties would be rerouted to Mesquit Street and the municipal storm drain system. As such, any reduction in groundwater recharge due to the overall change in imperviousness would be minimal in the context of the regional groundwater basin. No groundwater withdrawal is anticipated during operation of Alternative 3. Impacts related to groundwater supplies and recharge during either construction or operation under both Alternative 3 and the Project would be less than significant and similar.

(b) Project with the Deck Concept

Construction of the Project with the Deck Concept would not impede sustainable groundwater management of the groundwater basin. The Project with the Deck Concept would not include new injection or supply wells. It would not involve the installation or operation of water wells or any extraction or recharge system in the vicinity of the coast or in an area of known groundwater contamination or seawater intrusion. The Project with the Deck Concept would not be located in the vicinity of a municipal supply well or spreading ground facility. Excavation depths for the subterranean garage under the Project with the Deck Concept would extend from 61 to 68 feet below grade and reach depths of 75 feet below grade in some areas. This depth could intercept the groundwater table, which is estimated to be 57 to 61 feet below grade. Thus, construction activities would potentially require the removal and discharge of ground water. However, dewatering during construction would be temporary and would not result in the substantial removal of groundwater that would reduce the local groundwater table. Further, dewatering would not continue post-construction. As such, the Project with the Deck Concept would not result in a decrease in groundwater supplies or substantially interfere with groundwater recharge. Because groundwater removal would be temporary, impacts related to decreases in groundwater supplies and recharge would be less than significant.

The Project Site is currently 90.1 percent impervious and with the development of the Railway Properties under the Project with the Deck Concept, impervious area would increase to 96 percent. However, with implementation of LID BMPs, any excess runoff from the Railway Properties would be rerouted to Mesquit Street and the municipal storm

drain system. As such, any reduction in groundwater recharge due to the overall change in imperviousness would be minimal in the context of the regional groundwater basin. No groundwater withdrawal is anticipated during operation of the Project with the Deck Concept. As such, operation would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project with the Deck Concept would impede sustainable groundwater management of the basin. Impacts would be less than significant.

Alternative 3, as with the Project with the Deck Concept, would not involve wells or regular groundwater removal. However, similar to the Project with the Deck Concept, construction for the Alternative 3's six-level subterranean garage, which would reach depths of 61 to 68 feet below grade and reach depths of 75 feet below grade in some areas, could intercept the groundwater table. The groundwater table is estimated to be 57 to 61 feet below grade. Alternative 3 would have the potential to require removal and discharge of intercepted waters. Such dewatering during construction would not result in the substantial removal of groundwater that would reduce the local groundwater table. Further, dewatering would temporary and would not continue post-construction. Neither Alternative 3 nor the Project with the Deck Concept would cause substantial depletion of groundwater supplies or substantially interfere with groundwater recharge.

During operation, Alternative 3 would be developed with a 75,000-square-foot Deck over the Railway properties, compared to a 132,000-square-foot deck under the Project with the Deck Concept. Although this would increase impermeability of the Project Site, it would result in less increase than under the Project with the Deck Concept. The excess runoff from the Railway Properties would be rerouted to Mesquit Street and the municipal storm drain system. As such, any reduction in groundwater recharge due to the overall change in imperviousness would be minimal in the context of the regional groundwater basin. Alternative 3, as with the Project with the Deck Concept, would not require groundwater withdrawal during operation. Because neither the Project with the Deck Concept nor the Project would substantially deplete groundwater supplies or substantially interfere with groundwater recharge, impacts regarding groundwater supplies or recharge under both Alternative 3 and the Project with the Deck Concept would be less than significant and similar.

(iii) Alteration of Drainage Patterns

(a) Construction

(i) Project

The Project would control flow directions and runoff volumes during construction as required under the required SWPPP BMPs. In addition, the Project would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion and to control runoff from the Project Site during the construction period. Project construction would adhere to compliance measurements to avoid flooding, substantially increasing or

decreasing the amount of surface water flow from the Project Site into a water body, or a permanent, adverse change to the movement of surface water. No existing streams or river courses would be altered by the Project. Therefore, impacts from Project construction with respect to drainage patterns, siltation, erosion, and surface runoff would be less than significant.

Alternative 3, as with the Project, would include construction activities that could contribute to altering existing surface runoff or drainage patterns resulting in on- or off-site erosion, siltation or flooding; increasing rate or flow in surface runoff; or exceeding the capacity of the area's drainage system. Alternative 3 would require similar excavation and export of materials as under the Project, with the construction footprint increased due to the Deck construction. As with the Project. Construction of Alternative 3 would adhere to compliance measurements to avoid flooding; substantially increasing or decreasing the amount of surface water flow from the Project Site into a water body; or a permanent, adverse change to the movement of surface water. As with the Project, construction BMPs to manage runoff flows and avoid on- or off-site flooding, would be implemented under Alternative 3. Nonetheless, because of the addition of the 75,000-square-foot Deck, the overall duration of construction activities and the potential for impacts to drainage patterns under Alternative 3 would be incrementally greater than the Project. Thus, while impacts with respect to surface runoff, siltation, rates of runoff and capacity of drainage systems would be less than significant under Alternative 3 similar to the Project, impacts would be incrementally greater than under the Project.

(ii) *Project with the Deck Concept*

The Project with the Deck Concept would control flow directions and runoff volumes during construction as required under the required SWPPP BMPs and Code-required erosion control measures to manage runoff flows and avoid on- or off-site flooding. In addition, the Project with Deck Concept would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion and to control runoff from the Project Site during the construction period. The Project with the Deck Concept would adhere to compliance measurements to avoid any runoff that would substantially increase or decrease the amount of surface water flow from the Project Site into a water body or a cause a permanent, adverse change to the movement of surface water. No existing streams or river courses would be altered by the Project with the Deck Concept. Therefore, with adherence to existing regulations, impacts related to drainage patterns under the Project with the Deck Concept during construction would be less than significant.

As with the Project with the Deck Concept, Alternative 3 would adhere to regulatory standards to avoid flooding; any substantial increase or decrease the amount of surface water flow from the Project Site into a water body; or a permanent, adverse change to the movement of surface water. As with the Project with the Deck Concept, construction BMPs to manage runoff flows and avoid on- or off-site flooding, would be implemented under Alternative 3. Nonetheless, because of the smaller 75,000-square-foot Deck compared to the Project with the Deck Concept, the overall duration of construction activities and the

potential for drainage impacts to drainage patterns under Alternative 3 would be incrementally less than the Project with the Deck Concept. Thus, while impacts with respect to surface runoff, siltation, rates of runoff and capacity of drainage systems would be less than significant under Alternative 3 similar to the Project with the Deck Concept, impacts would be incrementally less than under the Project with the Deck Concept.

(b) Operation

(i) Project

As discussed in Section IV.G, *Hydrology and Water Quality*, of this Draft EIR, Project operation would increase the peak flow rate of stormwater runoff due to the increase in impervious surfaces compared to existing conditions. During operation, the 50-year peak flow rate of stormwater runoff from the 5.46-acre Project Site would increase slightly from approximately 17.21 cfs to 17.25 cfs (a 0.04-cfs increase or 0.2 percent) due to the increase (albeit small) in impervious surfaces compared to existing conditions. However, the overall volume of stormwater runoff from the Project Site discharged to the municipal storm drain system would decrease compared to existing conditions, as a result of the implementation of LID BMPs per City requirements, which would capture, store, and infiltrate the first rainfall on-site, more than off-setting the increase in impervious area and associated runoff. In addition, this would reduce the potential for on-site and off-site flooding.

Drainage patterns for much of the Project Site would generally be unchanged, except that runoff would no longer be discharged via sheet flows off-site to the east, and the first stormwater falling on the Project Site would be directed to BMP facilities on-site. Therefore, impacts from Project operation would be less than significant.

Under Alternative 3, a proposed 75,000-square-foot Deck would be incorporated into the Project. Alternative 3's Deck, which would be an impermeable feature over the currently pervious Railway Properties, would result in an increased 24-hour volumetric flow of 5.8 percent compared to existing conditions.⁴⁶ In the event a potential for exceedance of the capacity of the municipal stormwater drainage system is determined during the City's required design and plan check process, Alternative 3 would either incorporate an expanded on-site LID system or reconstruct existing off-site storm drain facilities, as required by the City. With these regulatory measures, the rate or amount of surface runoff that could result in flooding of the existing stormwater drainage system would be less than significant. Although impacts related to surface water runoff and flooding under both the Project and Alternative 3 would be less than significant, because runoff would be less under the Project, impacts would be greater under Alternative 3.

⁴⁶ KPFF Consulting Engineers, *670 Mesquit – Hydrology Technical Report Alternatives*, June 29, 2021. Provided in Appendix P of this Draft EIR

(ii) Project with the Deck Concept

The Project with the Deck Concept would include a 132,000-square foot Deck (an approximately 3.01-acre surface area) across the Railway Properties. This area is currently considered 99 percent pervious. The Project with the Deck Concept would increase impervious surfaces on the Project Site. Approximately 96 percent of the Project Site under the Project with Deck Concept would be impervious, leaving little opportunity for erosion or siltation. Due to the increase in impervious area resulting from construction of the Deck, the 50-year peak flow rate of stormwater runoff from the 8.47-acre area encompassing the 5.46-acre Project Site (without the Railway Properties) plus the 3.01-acre area (Railway Properties) covered by the Deck would increase from an estimated 26.31 cfs to 26.79 cfs (a 0.48 cfs or 1.8 percent increase). Some of the runoff captured and discharged from the Deck, as with Project, would be, stored and infiltrated into on-site soils by BMP facilities intended to treat the first flush of stormwater. However, as the drainage pattern of the Project Site would be substantially altered with development of the Project with the Deck Concept, potentially significant impacts could occur related to on- or off-site flooding, exceeding the capacity of existing stormwater drainage systems, or providing substantial additional sources of polluted runoff. While the Project with the Deck Concept would increase impervious surfaces on the Project Site, approximately 96 percent of the Project Site under the Project with Deck Concept would be impervious, leaving little opportunity for erosion or siltation.

The remaining runoff not captured by the BMP facilities would be discharged from the Deck to the municipal storm drain system in Mesquit Street, Jesse Street, and 7th Street, and ultimately discharge to the Los Angeles River. In accordance with standard City practice, detailed drainage construction plans would be completed during the construction document development phase and, in the event this assessment identifies potential for exceedance of the capacity of the municipal stormwater drainage system, upgrades to the system would be required. Improvements could include an expanded on-site LID system, or reconstruction and upgrades to the existing catch basins in Mesquit Street, the 15-inch storm main in Jesse Street, and the 24-inch storm lateral on 7th Street. Through compliance with Bureau of Engineering (BOE) requirements during the plan check approval process, any potential for the rate or amount of surface runoff to result in flooding, would be reduced to a level that would be less than significant.

Under Alternative 3, the proposed Deck would total 75,000 square feet of surface area, which would result in less impervious surface than under the Project with the Deck Concept. In the event a potential for exceedance of the capacity of the municipal stormwater drainage system is determined during the City's required design and plan check process, the on-site LID system could be expanded or existing facilities could be reconstructed, by existing regulatory requirements. With these measures, the rate or amount of surface runoff that could result in flooding of the existing stormwater drainage system would be less than significant under both Alternative 3 and the Project with the Deck Concept. Further, because runoff would be less due to Alternative 3's smaller Deck, impacts would be less than the Project with the Deck Concept.

Under Alternative 3, the proposed Deck would total 75,000 square feet of surface area, which would result in an increased 24-hour volumetric flow of 5.8 percent compared to existing conditions;⁴⁷ therefore, surface runoff under Alternative 3 would be less than under the Project with the Deck Concept, which would result in an 18.6 percent increase in 24-hour volumetric flow as compared to existing conditions. In the event a potential for exceedance of the capacity of the municipal stormwater drainage system is determined during the City's required design and plan check process, the on-site LID system could be expanded or existing facilities could be reconstructed, as required by existing regulatory requirements. With these measures, the rate or amount of surface runoff that could result in flooding of the existing stormwater drainage system would be less than significant under both Alternative 3 and the Project with the Deck Concept. Further, because runoff would be less due to Alternative 3's smaller Deck, impacts would be less than under the Project with the Deck Concept.

(iv) *Conflict with or Obstruct Implementation of Water Quality Control Plans*

(a) Project

As discussed in Section IV.G, *Hydrology and Water Quality*, of this Draft EIR, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan during operation of the Project. However, as contaminated soils could impact the groundwater that underlies the Project Site, construction of the Project may conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and impacts would be potentially significant. Implementation of Mitigation Measure HAZ-MM-2 would reduce impacts to a less-than-significant level.

Alternative 3, as with the Project, would incorporate BMPs and drainage systems that would be consistent with water quality control plans, the policies of which are expressed in City and State water quality regulations for the protection of water resources. Alternative 3, as with the Project, falls within the jurisdiction of water quality plan regulations that assure that development projects are in compliance with clean water policies. These plans and regulations include the LARWQB (Region 4) Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties and the National Pollutant Discharge Elimination System (NPDES) stormwater permitting program. However, construction of Alternative 3 would, similar to the Project, allow contaminated soils to impact the groundwater that underlies the Project Site, and impacts would be potentially significant prior to mitigation. Alternative 3 would require implementation of Mitigation Measure HAZ-MM-2 to reduce impacts to a less-than-significant level. As with the Project, impacts related to water quality control plans under Alternative 3 would be less than significant after mitigation and would be similar to the Project.

⁴⁷ KPFF Consulting Engineers, *670 Mesquit – Hydrology Technical Report Alternatives*, June 29, 2021. Provided in Appendix P of this Draft EIR

(b) Project with the Deck Concept

The Project with the Deck Concept would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan during operation. However, as contaminated soils could impact the groundwater, construction of the Project with the Deck Concept, as with the Project, may conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and impacts would be potentially significant. With implementation of Mitigation Measure HAZ-MM-2 under the Project with the Deck Concept, impacts regarding a conflict with a water quality control plan would be less than significant.

Alternative 3 would also incorporate BMPs and drainage systems that would be consistent with water quality control plans, the policies of which are expressed in City and State water quality regulations for the protection of water resources. However, construction of Alternative 3, similar to the Project with the Deck Concept, would allow contaminated soils to impact the groundwater that underlies the Project Site, causing a potentially significant impact prior to mitigation. As with the Project with the Deck Concept, Alternative 3 would require implementation of Mitigation Measure HAZ-MM-2 to reduce impacts to a less-than-significant level. Although impacts related to water quality control plans under Alternative 3 and the Project with the Deck Concept would be less than significant after mitigation and similar.

(h) *Land Use and Planning*(i) *Physically Divide an Established Community*

(a) Project

As discussed in Section IV.H, *Land Use and Planning*, of this Draft EIR, Project implementation would open the Project Site to both north-south and east-west access, creating new direct connections between the Arts District neighborhoods north and south of the Project Site and between the neighborhoods west of the Project Site and the Los Angeles River and Boyle Heights to the east. The Project would not physically divide an established community, and impacts would be less than significant.

Alternative 3 proposes up to 1,792,103 square feet of residential, office, retail, restaurant, hotel, studio/event/gallery/potential museum, and gym, with an approximate FAR of 7.5:1, similar to the Project. Similar to the Project, Alternative 3 would open the Project Site north-south and east-west access between the Arts District neighborhoods north and south of the Project Site and between the neighborhoods west of the Project Site and the Los Angeles River and Boyle Heights to the east. Alternative 3's Deck would further expand this connectivity with the Ribbon of Light Bridge, the proposed PARC Improvements, and the 7th Street Bridge and other amenities. Therefore, implementation of Alternative 3 would, similar to the Project, increase the direct connections through the Project Site and allow for connectivity between the neighborhoods, thus not physically dividing an established community. Similar to the Project, Alternative 3 would have a less than significant impact.

(b) Project with the Deck Concept

The Project with the Deck Concept would open the Project Site to both north-south and east-west access, creating new direct connections between the Arts District neighborhoods north and south of the Project Site and between the neighborhoods west of the Project Site and the Los Angeles River and Boyle Heights to the east. The Project with the Deck Concept would include the same vehicular and bicycle access to the Project Site as under the Project. By expanding pedestrian access to future Metro transit projects and providing a closer potential connection to the Los Angeles River, the Project with the Deck Concept would provide greater access to the Los Angeles River and to transit than under the Project. In the Project area, pedestrians would be able to move from the Mesquit Street Level to the 7th Street Level and Deck via the Entry Plazas. With the inclusion of the Deck, and the proposed 7th Street Bridge connection, the Project with the Deck Concept would increase accessibility of Mesquit Street from the surrounding streets and neighborhoods. Impacts related to physical division of an established community under the Project with the Deck Concept would be less than significant.

As with the Project with the Deck Concept, Alternative 3 would open the Project Site to north-south and east-west access between the Arts District neighborhoods north and south of the Project Site and between the neighborhoods west of the Project Site and the Los Angeles River and Boyle Heights to the east; expand pedestrian access to future Metro transit projects; and improve access from the Mesquit Street Level to the 7th Street Level and Deck via the Entry Plazas. Implementation of Alternative 3 would, similar to the Project with the Deck Concept, increase the direct connections through the Project Site and allow for connectivity between the neighborhoods, and thus would not physically divide an established community. Impacts related to potential division of an established community under both the Project with the Deck Concept and Alternative 3 would be less than significant and similar.

(ii) *Conflict with Applicable Land Use Plan, Policy, or Regulation*

(a) Project

The Project would develop residential, office, retail, restaurant, hotel, studio/gallery/museum, and gym uses at the Project Site. As discussed in Section IV.H, *Land Use and Planning*, of the Draft EIR, based on the analysis of Project consistency with applicable policies of SCAG's 2020–2045 RTP/SCS, the Framework Element, the Community Plan, the RIO District Ordinances and the LAMC, the Project would be consistent with and would not conflict with relevant land use policies and regulations adopted for the purpose of avoiding or mitigating a significant environmental effect. Approval of the Project's requested entitlements, including the proposed Specific Plan, would bring the Project into consistency with the applicable plans and regulations. Impacts would be less than significant.

Alternative 3 would not conflict with the above-listed plans as Alternative 3 would similarly facilitate land use patterns that link land uses with sustainable transportation options. Alternative 3 would also develop residential units and co-located commercial uses within an HQTAs and TPA, and would therefore be consistent with the above-listed plans and policies that would promote a reduction in VMT and air pollution. Under Alternative 3, the proposed Deck would only be 75,000 square feet as opposed to the 132,000 square foot Deck in the Project with the Deck Concept. As Alternative 3 would provide more residential units as compared to the Project with the Deck Concept, Alternative 3 would meet the policies and plans to increase housing and residents in HQTAs and would include affordable units consistent with Measure JJJ requirements. Requested entitlements under Alternative 3, including a General Plan Amendment, approval of the Mesquit Specific Plan, a Vesting Zone Change and Height District change, as well as other requested entitlements would be similar to Project. As shown in Table V-9, Comparison of Alternative 3 to the Project, both Alternative 3 and the Project anticipate the same floor area and an FAR of 7.5:1.

Because of the proximity of Alternative 3 and the Project to the Los Angeles River, lighting would exceed the more stringent exterior lighting standards that apply to the RIO District at the Project boundary and 15 feet beyond the boundary. Although both Alternative 3 and the Project would conflict with RIO District requirements regarding lighting, the level of lighting within a TPA under PRC Section 21099(d)(1) and ZI File No. 2452 is not considered an impact on the environment. Furthermore, the areas where Project and Alternative 3 lighting would exceed the RIO standards include streets, rail yards, electrical switching stations, and industrial use properties and do not include natural habitat or residential uses. As such, pursuant to the 2006 L.A. CEQA Thresholds Guide, and as indicated under section IV., Biological Resources, in the Initial Study provided in Appendix A-2, Initial Study, of this Draft EIR, there would be no substantial adverse effects on light sensitive natural habitat or residential receptors. Because this inconsistency would not result in an adverse environmental impact, neither the Project nor Alternative 3 would conflict with policies, plans, or regulations to avoid or mitigate environmental effects, that would result in adverse environmental impacts. Therefore, land use impacts related to plan consistency under Alternative 3 and the Project would be less than significant and similar.

(b) Project with the Deck Concept

The Project with the Deck Concept would develop residential, office, retail, restaurant, hotel, studio/gallery/museum, and gym uses at the Project Site. In addition, the Project with the Deck Concept would include a 132,000 square foot Deck in place of the Project's Elevated Pedestrian Walkway. The Project with the Deck Concept would provide a sizeable publicly accessible open space amenity area, in addition to the open space provided under the Project with the Deck Concept, that would further enhance the new pedestrian connections and create additional opportunities for public programming. However, lighting for the Deck under the Project with the Deck Concept and Alternative 3 would exceed the more stringent standards that apply to the RIO District at the Project

boundary and 15 feet beyond the boundary in proximity to the River. Although both the Project with the Deck Concept and Alternative 3 would conflict with RIO District requirements regarding lighting in proximity to the Los Angeles River, the level of lighting within a TPA under PRC Section 21099(d)(1) and ZI File No. 2452 is not considered an impact on the environment. Furthermore, the areas where Project and Alternative 3 lighting would exceed the RIO standards include streets, rail yards, electrical switching stations, and industrial use properties and do not include natural habitat or residential uses. As such, pursuant to the 2006 L.A. CEQA Thresholds Guide, and as indicated under section IV., Biological Resources, in the Initial Study provided in Appendix A-2, Initial Study, of this Draft EIR, there would be no substantial adverse effects on light sensitive natural habitat or residential receptors. Therefore, although the Project with the Deck Concept would exceed the RIO District Ordinances lighting requirements because this inconsistency would not result in an adverse environmental impact, neither the Project with the Deck Concept nor Alternative 3 would conflict with policies, plans, or regulations to avoid or mitigate environmental effects, that would result in adverse environmental impacts. Land use impacts related to the RIO District Ordinance under Alternative 3 and the Project with the Deck Concept would be less than significant and similar. The Project with the Deck Concept would be consistent with the same applicable policies and plans of the 2020–2045 RTP/SCS, Framework Element, Central City North Community Plan, RIO District Ordinance, and the LAMC. As with the Project, with approval of the proposed entitlements, including the proposed Specific Plan, impacts under the Project with the Deck Concept related to conflict with applicable plans, policies, and regulations adopted to avoid or mitigate environmental effects would be less than significant.

Alternative 3 would not conflict with applicable plans adopted to avoid or mitigate environmental effects. Alternative 3 would develop 420 residential units within an HQTAs and TPA, including affordable units Alternative 3 would, therefore, not conflict with plans and policies that support greater housing densities within a TPA and an HQTAs, and would therefore be consistent with the above-listed plans and policies that would promote a reduction in VMT and air pollution. Under Alternative 3, the proposed Deck would be 75,000 square feet as opposed to the 132,000 square feet under the Project with the Deck Concept. As the Deck under the Alternative 3 would be smaller and would allow less pedestrian access and enhanced activity close to the Los Angeles River, Alternative 3 would not meet the RIO policies to achieve a stronger connection and increased pedestrian accessibility to the Los Angeles River to the same extent as the Project with the Deck Concept. As with the Project with the Deck Concept, because Alternative 3 would support policies and plans to increase housing, residents and co-located commercial uses within HQTAs and TPAs, impacts with respect to conflict with applicable plans under Alternative 3 would be less than significant. Overall, impacts related to conflicts with applicable plans, policies, and regulations adopted to avoid or mitigate environmental effects would be similar to the Project with the Deck Concept.

(i) *Noise*(i) *Noise Levels in Excess of Standards*(a) *Construction*(i) *Project*

As discussed in Section IV.I, *Noise*, of this Draft EIR, on-site Project construction would result in temporary increases in ambient noise that would exceed thresholds of significance at the closest off-site noise-sensitive receptors, and impacts at R1 (the three-story multi-family residential use to the west of the Project Site), R2 (the two-story multi-family residential use to the south of the Project Site), R3 (the AMP Lofts to the west of the Project Site), and R4 (the future 6th Street PARC) would be potentially significant. Implementation of Mitigation Measures NOISE-MM-1 and NOISE-MM-2 would reduce noise levels at all receptors and would reduce impacts at R2 and R3 to less-than-significant levels. However, the Project's on-site construction noise impacts would remain significant and unavoidable at R1 and R4 during daytime and nighttime periods on weekdays and weekends. Off-site construction traffic noise impacts for the Project would exceed the threshold of significance along two roadway segments (i.e., Jesse Street between Mateo Street and Santa Fe Avenue and Mateo Street between 4th Place and Willow Street) where sensitive residential uses are present. With implementation of Mitigation Measure NOISE-MM-3, off-site construction traffic noise impacts would be reduced to less-than-significant levels.

Alternative 3 would require the same construction activities as the Project. Similar to the Project, construction of Alternative 3 would therefore result in a temporary increase in ambient noise that would exceed thresholds of significance at R1, R2, R3, and R4, and impacts would be potentially significant. Alternative 3 would implement Mitigation Measures NOISE-MM-1 and NOISE-MM-2 to reduce noise levels at all receptors and would reduce impacts from on-site construction noise at R2 and R3 to less-than-significant levels. However, as with the Project, on-site construction noise impacts under Alternative 3 would remain significant and unavoidable at R1 and R4. Off-site construction traffic noise impacts under Alternative 3, would, like the Project, be potentially significant prior to mitigation. As with the Project, Mitigation Measure NOISE-MM-3 would reduce off-site construction traffic noise impacts to less-than-significant levels. Although Alternative 3 would have a similar maximum daily noise level, the duration of construction activity, due to the additional construction of the Deck, under Alternative 3 would be greater than under Project. As such, impacts related to construction noise would be greater under Alternative 3 than the Project.

(i) *Project with the Deck Concept*

Maximum construction noise levels under the Project with the Deck Concept would be similar to the Project. The Project with the Deck Concept would also implement Mitigation Measures NOISE-MM-1 and NOISE-MM-2, which would reduce noise levels at all receptors and would reduce impacts at R2 and R3 to less-than-significant levels. On-site

construction noise impacts under the Project with the Deck Concept, although temporary, would be significant and unavoidable at R1 and R4 during daytime and nighttime periods on weekdays and weekends. Off-site construction traffic noise impacts for the Project with the Deck Concept would exceed the threshold of significance along two roadway segments (i.e., Jesse Street between Mateo Street and Santa Fe Avenue and Mateo Street between 4th Place and Willow Street) where sensitive residential uses are present. With implementation of Mitigation Measure NOISE-MM-3, off-site construction traffic noise impacts would be reduced to less-than-significant levels. Because of the addition of the Deck, construction noise impacts would occur over a longer period of time under the Project with the Deck Concept. Under the Project with the Deck Concept, even with implementation of mitigation measures, on-site construction noise impacts would remain significant and unavoidable.

Alternative 3 would require similar maximum daily construction activities as the Project with the Deck Concept. Off-site construction traffic noise impacts under Alternative 3, would be potentially significant. Mitigation Measure NOISE-MM-3 would reduce off-site construction traffic noise impacts to less-than-significant levels. Similar to the Project with the Deck Concept, on-site construction activities for Alternative 3 would result in a temporary increase in ambient noise that would exceed thresholds of significance at R1, R2, R3, and R4. As with the Project with the Deck Concept, Alternative 3 would implement Mitigation Measures NOISE-MM-1 and NOISE-MM-2 to reduce impacts at all receptors and would reduce impacts at R2 and R3 to less-than-significant levels. However, on-site construction noise impacts under Alternative 3 would remain significant and unavoidable at R1 and R4. Because of the smaller Deck under Alternative 3 compared to the Project with the Deck Concept, the duration of construction activities would be reduced. Therefore, on-site construction noise impacts under both Alternative 3 compared to the Project with the Deck Concept would be significant and unavoidable and less.

(b) Operation

(i) *Project*

As discussed in Section IV.I, *Noise*, of this Draft EIR, noise impacts during Project operation from mechanical equipment, parking structure, loading dock and trash collection areas, emergency generators, heliport, and off-site traffic noise would be less than significant and would not require mitigation. Noise impacts from daytime use of individual outdoor open spaces, specifically the River Balcony North, would be significant at R4 and the combined simultaneous use of Project open spaces would be significant at R1, R2, R3, and R4. Nighttime use of individual outdoor open spaces, specifically the 7th Street Terrace, would be significant at R2 and the combined simultaneous nighttime use of Project open spaces would be significant at receptor R2. Operational composite noise would be significant at R1. The Implementation of Mitigation Measure NOISE-MM-4 and NOISE-MM-5, which require noise controls for amplified speakers at outdoor spaces, would reduce impacts related to daytime and nighttime operation of outdoor spaces, individually and combined, to less-than-significant levels.

Alternative 3, as with the Project, would generate heliport noise and would increase off-site traffic and generate on-site composite noise associated with fixed equipment, vehicle activity, heliport operation, and human outdoor activity. However, Alternative 3 includes reduced retail square footage, increased office square footage, and would result in less off-site traffic than the Project.⁴⁸ Alternative 3 would include similar outdoor amplified sound systems and speakers as the Project for the outdoor open space areas, but would also include the 75,000 square-foot Deck with outdoor amplified sound systems and speakers. Therefore, impacts from on-site noise related to daytime and nighttime operation of outdoor spaces would be potentially significant under Alternative 3 and the impact would be greater than the Project. With implementation of Mitigation Measures NOISE-MM-4 and NOISE-MM-5, impacts under Alternative 3, like the Project, would be reduced to less than significant. Because of reduced off-site traffic, operational off-site traffic noise under Alternative 3 would be slightly less than the Project. However, overall, operational noise impacts under Alternative 3 would be greater than the Project due to the increased noise from the Deck.

(i) *Project with the Deck Concept*

Noise impacts during operation of the Project with the Deck Concept resulting from mechanical equipment, parking structure, loading dock and trash collection areas, emergency generators, heliport, and off-site traffic would be less than significant and would not require mitigation. However, noise impacts from daytime use of outdoor open spaces, specifically the River Balcony North, would be significant at R4 and the combined simultaneous use of open spaces, including the Deck, would be significant at R1, R2, R3, and R4. Additionally, nighttime use of the Deck would be significant at R2, combined nighttime operation of all open spaces would be significant at R2, and operational composite noise under the Project with the Deck Concept would be significant at R1 and R2. With implementation of Mitigation Measures NOISE-MM-4 and NOISE-MM-5, open space noise from daytime or nighttime use of open spaces, individually and combined, would not exceed the threshold of a 5 dBA increase in nighttime ambient noise. Operational noise impacts under the Project with the Deck Concept would be less than significant with mitigation.

Alternative 3 would result in heliport noise and would increase off-site traffic and generate on-site composite noise associated with fixed equipment, vehicle activity, heliport operation, and human outdoor activity. However, Alternative 3 includes reduced retail floor area and would result in less off-site traffic than the Project with Deck Concept. In addition, the size of the Deck under Alternative 3 (75,000 square feet) would be reduced in size with a capacity of 5,000 people compared to the Project with the Deck Concept's capacity of 8,800 people. However, due to the inclusion of similar outdoor amplified sound systems and speakers under Alternative 3 as the Project with Deck Concept for the outdoor open space areas, impacts related to daytime and nighttime operation of outdoor spaces would be potentially significant under Alternative 3. With implementation of Mitigation Measures

⁴⁸ Fehr & Peers, *Analysis of 670 Mesquit Project Alternatives Technical Memorandum*, October 8, 2021. Provided in Appendix P of this Draft EIR.

NOISE-MM-4 and NOISE-MM-5 impacts under Alternative 3, like the Project with Deck Concept, would be reduced to less than significant. Because of reduced off-site traffic and reduced Deck area compared to the Project with the Deck Concept, operational noise impacts under Alternative 3 would be less than the Project with Deck Concept.

(ii) *Groundborne Vibration*

(a) *Construction*

(i) *Project*

As discussed in Section IV.I, *Noise*, of this Draft EIR, construction activities at the Project Site have the potential to generate low levels of groundborne vibration as the operation of heavy equipment generates vibrations that propagate through the ground and diminish in intensity with distance from the source. The potential vibration impacts for structural damage due to off-site haul trucks would be less than significant for the Project. Estimated vibration velocity levels from construction equipment for the Project would not exceed the respective significance thresholds at V2 (multi-family residential use to the south of the Project Site at 2135 E. 7th Place), V3 (AMP Lofts to the west of the Project Site), V4 (industrial building located at 640 Santa Fe Avenue), or V5 (industrial building located at 1580 Jesse Street). Vibration impacts associated with structural damage from on-site construction activities under the Project would be potentially significant for V1 (multi-family residential use to the west of the Project Site at 2101 E. 7th Street) and V6 (7th Street Bridge). With implementation of Mitigation Measure NOISE-MM-6, potential Project structural vibration impacts on receptors V1 and V6 would be mitigated to less than significant for the majority of construction activities, except for temporary shoring activities and installation of shoring infrastructure. The Project would require shoring activities adjacent to V6 (7th Street Bridge). Mitigation Measure NOISE-MM-7 is proposed to reduce vibration velocities due to shoring; however, in the case that structural damage does occur during Project construction, it would be required to be repaired pursuant to Mitigation Measure NOISE-MM-8. With implementation of Mitigation Measures NOISE-MM-7 and NOISE-MM-8, Project impacts with regard to structural damage for the 7th Street bridge (V6) would be mitigated to a less-than-significant level for all construction activity except for temporary shoring. Similarly, with implementation of Mitigation Measures NOISE-MM-7 and NOISE-MM-8, such damage to V1 could be repaired by the Project contractor, which would reduce Project impacts to a less-than-significant level. Further, because V1 is a privately owned structure, inspections and repair pursuant to Mitigation Measure NOISE-MM-7 would require the consent of the property owner, who may not agree. Thus, Project impacts to V1 would be significant and unavoidable should consent for inspections and repairs not be granted.

With respect to human annoyance, the estimated groundborne vibration levels from on-site, off-road construction equipment under the Project would exceed the significance criteria at V1, and impacts would be potentially significant. With implementation of Mitigation Measures NOISE-MM-6 through NOISE-MM-9, construction vibration impacts related to human annoyance from on-site, off-road equipment would remain significant

and unavoidable with respect to exceedance of applicable thresholds. Vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from construction trucks traveling along the local roadway network would be less than significant for the Project.

Construction of Alternative 3 would generate groundborne construction vibration during construction activities when heavy construction equipment is used. Because the construction activities under Alternative 3 would be similar as the activities under the Project, Alternative 3 would have similar impacts associated with structural damage from on-site construction activities for V1 and V6. Alternative 3 would implement the same mitigation measures to reduce impacts. Impacts with regard to structural damage for V6 would be mitigated to a less-than-significant level except during temporary shoring activities. However, as stated above and as similar to the circumstances under the Project, because V1 is a privately owned structure and would require the consent of the property owner, impacts to V1 would be significant and unavoidable after mitigation should consent for inspections and repairs not be granted. Impacts under Alternative 3 would be similar to the Project and would be significant and unavoidable.

Regarding human annoyance, as with the Project, the estimated vibration levels due to maximum construction activity under Alternative 3 would exceed the significance criteria at V1, and impacts would be potentially significant. Similar to the Project, Alternative 3 would implement Mitigation Measures NOISE-MM-6 through NOISE-MM-9, but construction vibration impacts would remain significant and unavoidable. Vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from construction trucks traveling along the local roadway network would be less than significant. As Alternative 3 would result in a longer duration of construction activity and increased amount of construction associated with the 75,000 square foot deck, impacts related to construction vibration would be greater than under the Project.

(i) *Project with the Deck Concept*

The Project with the Deck Concept would use a similar mix of construction equipment as the Project, and would result in a similar duration of construction activity associated with Deck construction. Construction activities include excavation for footings for the Deck. Because the Deck would be located on the east side of the Project Site (adjacent to the Los Angeles River), excavation locations would not be any closer to vibration sensitive uses or structures than analyzed for the Project. The analysis above for the Project assumes the construction activity would be located at a distance as near as five feet from the 7th Street Bridge (receptor V6) to account for shoring activities. This activity would also be required for construction of Project with Deck concept. With implementation of Mitigation Measure NOISE-MM-6, potential Project with the Deck Concept structural vibration impacts on receptors V1 and V6 would be mitigated to less than significant for the majority of construction activities, except for temporary shoring activities and installation of shoring infrastructure. The Project with Deck Concept would require shoring activities adjacent to V6 (7th Street Bridge). Mitigation Measures NOISE-MM-7 and NOISE-MM-8 would reduce vibration impacts at the 7th Street Bridge to less-than-

significant levels for all construction activity except for temporary shoring. Similarly, with implementation of Mitigation Measures NOISE-MM-7 and NOISE-MM-8, such damage to V1 could be repaired by the Project contractor, which would reduce impacts to a less-than-significant level. Further, because V1 is a privately owned structure, inspections and repair pursuant to Mitigation Measure NOISE-MM-8 would require the consent of the property owner, who may not agree. Thus, impacts to V1 under the Project with the Deck Concept would be significant and unavoidable should consent for inspections and repairs not be granted.

Potential vibration impacts from on-site construction activities with respect to human annoyance would be significant prior to the implementation of mitigation measures at sensitive receptor location V1. As with the Project, with implementation of Mitigation Measures NOISE-MM-6 through NOISE-MM-9, construction vibration impacts related to human annoyance from on-site, off-road equipment would remain significant and unavoidable with respect to exceedance of applicable thresholds. Vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from construction trucks traveling along the local roadway network would be less than significant for the Project with the Deck Concept.

Construction of Alternative 3 would generate groundborne construction vibration during construction activities when heavy construction equipment is used. Because the construction activities under Alternative 3 would be similar as the activities under the Project with Deck Concept, Alternative 3 would have similar impacts associated with structural damage from on-site construction activities for V1 and V6. As with the Project with Deck Concept, Alternative 3 would implement the same mitigation measures to attempt to reduce impacts. Impacts with regard to structural damage for V6 would be mitigated to a less-than-significant level except for temporary shoring activities. However, because V1 is a privately owned structure and would require the consent of the property owner, impacts to V1 would be significant and unavoidable after mitigation should consent for inspections and repairs not be granted. Impacts under Alternative 3 would be significant and unavoidable, and would be similar to the Project with the Deck Concept.

Regarding human annoyance, the estimated vibration levels due to maximum construction activity under Alternative 3 would exceed the significance criteria at V1, and impacts would be potentially significant. As with the Project with the Deck Concept, Alternative 3 would implement Mitigation Measures NOISE-MM-6 through NOISE-MM-9, but construction vibration impacts would remain significant and unavoidable. Vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from construction trucks traveling along the local roadway network would be less than significant. Alternative 3 would result in a similar maximum daily vibration level as the Project with the Deck Concept. However, because of the reduced duration of construction under Alternative 3 compared to the Project with the Deck Concept, the vibration impacts would be less than the Project with the Deck Concept. Groundborne vibration and human annoyance impacts under both the Project

with the Deck Concept and Alternative 3 would be significant and unavoidable, although less under Alternative 3.

(b) Operation

(i) *Project*

As discussed in Section IV.I, *Noise*, of this Draft EIR, Project operations would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce vibration at low levels that would not cause damage or annoyance impacts to the Project buildings or on-site occupants and would not cause vibration impacts to the off-site environment. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the proposed parking area. Pumps or compressors would generate groundborne vibration levels of 0.5 in/sec PPV at 1 foot, which would not generate off-site vibration. It is anticipated that Project mechanical equipment, including air handling units, condenser units, and exhaust fans, would be located on building rooftops. Therefore, groundborne vibration levels for the Project would be less than significant.

Day-to-day operations under Alternative 3, as with the Project, would include typical commercial-grade stationary mechanical and electrical equipment, which would produce vibration at low levels that would not cause damage or annoyance impacts to on-site or off-site environment. Primary sources of transient vibration would include vehicle circulation within the proposed parking areas, which would be confined to the immediate area and would not be expected to be perceptible off the Project Site. It is anticipated that mechanical equipment under Alternative 3 would be located in similar locations as for the Project. Therefore, as with the Project, groundborne vibration from the operation of such mechanical equipment under Alternative 3 would not impact any of the off-site sensitive receptors. Impacts with respect to operational vibration would be less than significant and similar to the Project.

(ii) *Project with the Deck Concept*

The Project with the Deck Concept operation would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce vibration at low levels that would not cause damage or annoyance impacts to the Project buildings or on-site occupants and would not cause vibration impacts to the off-site environment. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the proposed parking area. Pumps or compressors would generate groundborne vibration levels of 0.5 in/sec PPV at 1 foot, which would not generate off-site vibration. It is anticipated that Project mechanical equipment, including air handling units, condenser units, and exhaust fans, would be located on building rooftops. The Deck would be located on the east side of the Project adjacent to the Los Angeles River. Industrial and commercial uses to the east of the Los Angeles River are located at distances of a minimum of 500 feet and would not be affected by activities occurring on the Deck. Therefore,

groundborne vibration levels during operation of the Project with the Deck Concept would be less than significant.

Alternative 3, as with the Project with the Deck Concept, would include typical commercial-grade stationary mechanical and electrical equipment, which would produce vibration at low levels that would not cause damage or annoyance impacts to on-site or off-site environment. Primary sources of transient vibration would include vehicle circulation within the proposed parking areas, which would be confined to the immediate area and would not be expected to be perceptible off the Project Site. It is anticipated that mechanical equipment under Alternative 3 would be located in similar locations as for the Project with the Deck Concept. Therefore, groundborne vibration from the operation of such mechanical equipment under Alternative 3 would not impact any of the off-site sensitive receptors. Impacts with respect to operational vibration for both the Project with the Deck Concept and Alternative 3 would be less than significant and similar.

(j) *Population and Housing*

(i) *Project*

As discussed in Section IV.J, *Population and Housing*, of this Draft EIR, the Project would involve demolition of the existing warehouse buildings on the Project Site to support approximately 944,055 square feet of office space, 308 multi-family residential dwelling units, 236 hotel rooms (158,647 square feet), and a range of commercial uses, including 136,152 square feet of retail, 89,577 square feet of restaurants, 93,617 square feet of studio/event/gallery space/museum, and 62,148 square feet of gym. The Project's 308 residential units would result in an increase in 743 residents on the Project Site, and the Project's commercial uses would result in a net increase of 4,523 employees. The Project's projected growth would be within SCAG's 2020–2045 RTP/SCS projections for the City, and the Project would not induce unplanned substantial population growth in an area directly through the development of new housing and employment opportunities. Furthermore, Project operation would modify access from streets that surround the Project Site and would implement infrastructure improvements but would not extend roads into new undeveloped areas. Infrastructure improvements under the Project would not induce substantial unplanned population growth in an area, either directly or indirectly. As such, the Project would not induce substantial unplanned population growth in the area, either directly or indirectly that cannot be reasonably accommodated, and impacts would be less than significant.

Alternative 3 would increase occupancy and use of the Project Site. Alternative 3's projected increases in residential population and housing stock are summarized **Table V-10, *Estimate of Alternative 3 Population and Housing***.

Alternative 3's projected increase in employment is summarized in **Table V-11, *Estimate of Alternative 3's Employment***.

**TABLE V-10
ESTIMATE OF ALTERNATIVE 3 POPULATION AND HOUSING**

Total Housing Units	Average Household Size^a	Total Population
420	2.41	1,013

NOTE(S):

^a Based on 2018 Census American Community Survey 5-Year Estimate data (2014–2018).

SOURCE: ESA, 2021.

**TABLE V-11
ESTIMATE OF ALTERNATIVE 3'S EMPLOYMENT**

Use	Amount	Employment Generation Factor^a	Number of Employees^b
Office	973,153 sf	4 emp/ksf	3,893
Retail	14,208 sf	2 emp/ksf	28
Restaurant	66,000 sf	4 emp/ksf	264
Hotel	236 rm	0.5 emp/rm	118
Studio/Gallery	60,100 sf	1 emp/ksf	61
Gym	68,102 sf	1 emp/ksf	69
<i>Proposed Subtotal</i>			4,433
Existing Uses			
Freezer/Cooler	161,854 sf	1 emp/ksf	162
Office	11,157 sf	4 emp/ksf	45
Dry Storage	32,382 sf	0.33 emp/ksf	11
<i>Existing Subtotal</i>			218
Net New Employees			4,215

NOTE(S):

sf = square feet; rm = room; emp = employee

^a The employee generation factors are taken from Table 1, Land Use and Trip Generation Base Assumptions, from the City of Los Angeles Vehicle Miles Traveled (VMT) Calculator Documentation, Version 1.3, provided by LADOT and Los Angeles Department of City Planning.

^b Totals are rounded.

SOURCE: ESA, 2021.

Alternative 3 would provide 420 residential units, generating approximately 1,013 new residents. Alternative 3 would generate 4,215 net new employees. By comparison, the Project would generate 743 new residents and 4,523 net new employees. Alternative 3's population increase of 1,013 new residents would represent 0.39 percent of SCAG's

2017–2026 population growth projection of 259,913 and approximately 0.13 percent of SCAG’s 2017–2045 population growth projection of 808,620. Alternative 3’s 4,215 new employees would represent approximately 4.74 percent of SCAG’s 2017–2026 employment growth projection of 89,254 and approximately 1.52 percent of SCAG’s 2017–2045 employment growth projection of 277,682. Alternative 3, as with the Project, would not exceed SCAG’s growth projections, would help the City meet its housing obligation under SCAG’s RHNA allocation, and would provide the type of transit oriented development encouraged in the City’s General Plan and SCAG 2020–2045 RTP/SCS policies. Because there are no existing housing units on the Project Site, no existing residences would be displaced. The Project, as with Alternative 3, would not induce population or employment beyond SCAG’s growth projections. As such, Alternative 3, as with the Project, would result in less than significant population and housing impacts. As SCAG population and housing projections would not be exceeded, impacts with respect to substantial unplanned population growth under Alternative 3 would be less than significant and similar to the Project.

(ii) *Project with the Deck Concept*

The Project with the Deck Concept would provide 308 residential units and generate a population of 743 new residents and 4,523 net new employees. The Project with the Deck Concept’s projected growth would be within SCAG’s 2020–2045 RTP/SCS projections for the City, and the Project with the Deck Concept would not induce unplanned substantial population growth in an area directly through the development of new housing and employment opportunities. As such, impacts related to population and housing under the Project with the Deck Concept would be less than significant.

By comparison, Alternative 3 would provide 420 residential units and generate 1,013 new residents and 4,215 net new employees. As with the Project with the Deck Concept, Alternative 3’s population increase of 1,013 would not exceed SCAG’s growth projections. It would also help the City meet its housing obligation under SCAG’s RHNA allocation and implement transit oriented development. As such, Alternative 3, as with the Project, would be consistent with SCAG growth policies and projections. Impacts with respect to substantial unplanned population growth under both the Project with the Deck Concept and Alternative 3 would be less than significant and similar.

(k) *Public Services*

(i) *Fire Protection*

(a) *Project*

As discussed in Section IV.K.1, *Public Services – Fire Protection*, of this Draft EIR, Project demand for fire protection and response times during construction would be less than significant. The Project would implement Project Design Feature TRAF-PDF-1 (Construction Traffic Management Plan) to minimize disruptions to through traffic flow and maintain emergency vehicle access to the Project Site and neighboring land uses.

Additionally, as part of a Construction Worker Parking Plan (TRAF-PDF-2), construction worker parking would either be accommodated on the Project Site or in an alternate location that would not affect the adjacent streets. The Project would be required to upgrade the nearby fire-flow infrastructure to have available flow to serve the Project Site. With the inclusion of these system upgrades, the hydrants would have adequate fire flow available to meet the flow required for the Project. Therefore, construction of the Project would not result in substantial adverse physical impacts associated with the provision of or need for new or altered police protection facilities, the construction of which could cause significant environmental impacts, and impacts would be less than significant.

During Project operation, the Project would comply with the applicable Building and Fire Codes, LAFD's recommendations for fire prevention and protection, and LAFD's fire/life safety inspection for new construction projects to ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment without creating the need for new or expanded fire facilities, the construction of which would result in physical environmental impacts. Impacts during Project operation would be less than significant.

Alternative 3, as with the Project, would involve construction activities and intensify the use of the Project Site so that it would increase demand on fire protection and emergency medical services, as well as potentially affect emergency access. Alternative 3, as with the Project, would incorporate Project Design Feature TRAF-PDF-1 to provide a Construction Traffic Management Plan to improve vehicular access around the construction site. Project Design Feature TRAF-PDF-2 would identify and enforce parking location requirements for construction workers. The implementation of these Project Design Features would facilitate emergency access. As such, similar to the Project, construction under Alternative 3 would result in less-than-significant impacts with respect to emergency response times and emergency access.

During operation, Alternative 3 would result in a population increase of 1,013 new residents and 4,215 new employees, for a total service area increase of 5,228 in the service population. By comparison, the Project would result in a population increase of 743 residents and 4,523 new employees, for a total service area increase of 5,266 in the service population. Alternative 3, as with the Project, would comply with the applicable OSHA, Building Code, Fire Code, other LAMC, and LAFD requirements and recommendations, which would reduce demand on LAFD facilities and equipment without creating the need for new or expanded fire facilities. In addition, the Project Site is located within a highly urbanized area accessed via an established street system. Fire Station 17 is located 1.032 miles from the Project Site and Fire Station 9 is located 1.632 miles from the Project Site, none of the stations that would serve the Project Site meet the LAFD distance standard to the Project Site of 1 mile for an Engine Company or 1.5 miles for a Truck Company. However, Alternative 3 would include an automatic sprinkler system that would support compliance with the relevant requirements in Section 57.107.6 of the Fire Code. The LAFD recommended a variety of fire prevention and protection features regarding building identification, emergency access lanes, building setbacks, and private

roadway widths. Additionally, plans and specifications would be submitted to LAFD prior to the provision of necessary permits for Alternative 3. The inclusion of these recommendations would reduce impacts to an acceptable level.

Furthermore, Alternative 3, as with the Project, would be required to upgrade the nearby fire-flow infrastructure to have available flow to serve the Project Site. With the inclusion of these system upgrades, the hydrants would have adequate fire flow available to meet the flow required for Alternative 3, similar to the Project. As such, Alternative 3, as with the Project, would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. Impacts under Alternative 3, as with the Project, would be less than significant. Because Alternative 3 would have a smaller increase in service population (employees plus residents) compared to the Project, impacts related to fire protection services under Alternative 3 would be less than the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would generate a new population of 743 residents and 4,603 employees that would increase demand for fire protection services. This demand would be addressed by various measures, including LAFD review of Project Site and building access and an upgrade to the adjacent fire-flow infrastructure, including hydrants and water lines to have available fire flow to serve the Project Site. Other fire safety features would include implementation of Project Design Feature TRAF-PDF-1 (Construction Traffic Management Plan) to minimize disruptions to through traffic flow and maintain emergency vehicle access to the Project Site and neighboring land uses during construction, highly visible building identification, installation of sprinklers throughout all inhabited spaces, and compliance with the Fire Code. The inclusion of these and other system upgrades and features would reduce demand on existing stations and avoid the need to provide new or expanded facilities, the construction of which would result in physical environmental impacts. Therefore, impacts to fire services by the Project with the Deck Concept would be less than significant.

Alternative 3 would generate a population increase of 1,013 new residents and 4,215 new employees for a total population gain of 5,228 new occupants that would increase demand for fire protection services. As with the Project with the Deck Concept, Alternative 3 would be required to upgrade the nearby fire-flow infrastructure to have available flow to serve the Project Site. With the inclusion of these system upgrades, the hydrants would have adequate fire flow available to meet the flow required for Alternative 3, similar to the Project with the Deck Concept. As such, Alternative 3, as with the Project with the Deck Concept, would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities. Impacts with respect to fire protection services under both the Project with the Deck Concept and Alternative 3 would be less than significant. Further, because the Project with the Deck Concept would increase the area's service population to a greater extent

than Alternative 3, impacts related to fire protection services under Alternative 3 would be less than the Project with the Deck Concept.

(ii) *Police Protection*

(a) Project

As discussed in Section IV.K.2, *Public Services – Police Protection*, of this Draft EIR, Project demand for police protection during construction would be less than significant. The Project would implement Project Design Feature POL-PDF-1 to include security measures to limit access to construction areas, which would minimize the Project's potential need for police protection services during the construction phase. The Project would implement Project Design Feature TRAF-PDF-1 (Construction Traffic Management Plan), which would require approval by LADOT to ensure maintenance of emergency access during construction. The Construction Traffic Management Plan would ensure maintenance of emergency access. Project Design Feature TRAF-PDF-2 would implement a Construction Worker Parking Plan to identify and enforce parking location requirements for construction workers. Furthermore, construction-related traffic generated by the Project would not significantly affect LAPD response times within the Project vicinity as LAPD vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic during construction. The various safety features that would be implemented during Project construction would reduce the potential for incidents that would require police responses. Therefore, construction of the Project would not result in substantial adverse physical impacts associated with the provision of or need for new or altered police protection facilities, the construction of which could cause significant environmental impacts, and impacts would be less than significant.

As discussed in Section IV.J, *Population and Housing*, of this Draft EIR, the Project would generate a residential population increase of 743, which would increase demand for police services. During Project operation, the Project would implement Project Design Feature POL-PDF-2, which includes a security program with controlled access, security personnel, staff training, and video surveillance. These security features would help reduce the potential for on-site crimes, including loitering, theft, and burglaries, and would reduce demand for LAPD services. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives, and impacts would be less than significant.

Alternative 3, as with the Project, would result in construction activities that could affect emergency access and increase demand for police protection services. As with the Project, Alternative 3's construction phase could increase potential demand for LAPD services related to theft or vandalism and increased worker activity, as well as construction traffic that could affect emergency response times. To reduce LAPD demand during construction, Alternative 3, as with the Project, would implement a number of

security measures under Project Design Feature POL-PDF-1 to limit access to construction areas, including private security, construction fencing, and locked entry. Similar to the Project, construction activities under Alternative 3 may involve temporary lane closures to accommodate trucks entering and exiting the Project Site. Under Project Design Feature TRAF-PDF-1, a Construction Traffic Management Plan would ensure that adequate and safe access remains available at the Project Site during construction activities. The Construction Traffic Management Plan would require approval by LADOT to ensure maintenance of emergency access. Project Design Feature TRAF-PDF-2 would implement a Construction Worker Parking Plan to identify and enforce parking location requirements for construction workers. Furthermore, construction-related traffic generated by Alternative 3, as with the Project, would not significantly affect LAPD response times within the Project vicinity as LAPD vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic during construction. With implementation of the various safety features to reduce the potential for incidents that would require police responses, construction of the Project or Alternative 3 would not result in substantial adverse physical impacts requiring new or altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives, and impacts would be less than significant. Accordingly, impacts during construction under Alternative 3 would be similar to the Project.

Alternative 3 would generate a population increase of 1,013 new residents and, as with the Project, would incorporate Project Design Feature POL-PDF-2 to provide a 24-hour/seven-day security program to ensure the safety of its employees and site visitors. These measures would reduce demand on police services during operation. Similar to the Project, with the implementation of these features, Alternative 3 would not increase police services demand to the extent that the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, Alternative 3, as with the Project, would result in less than significant impacts with respect police protection services. However, as Alternative 3 would introduce more residents to the Project Site as compared to the Project, impacts to police protection services under Alternative 3 would be greater than the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would result in construction activities that could affect emergency access and increase demand for police protection services. The Project with the Deck Concept would implement Project Design Feature POL-PDF-1 to include a number of security measures that limit access to construction areas, including private security, construction fencing, locked entry, and security lighting, and other security features. Implementation of these security features would minimize the Project with the Deck Concept's potential need for police protection services during the construction phase. Implementation of the Project Design Feature TRAF-PDF-1 (Construction Traffic Management Plan) would ensure that adequate and safe access remains available at the

Project Site during construction activities. The Construction Traffic Management Plan would require approval by LADOT to ensure maintenance of emergency access. Project Design Feature TRAF-PDF-2 would implement a Construction Worker Parking Plan to identify and enforce parking location requirements for construction workers. Furthermore, construction-related traffic generated by the Project with the Deck Concept would not significantly affect LAPD response times within the Project vicinity as LAPD vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic during construction. The various safety features that would be implemented during Project with the Deck Concept construction would reduce the potential for incidents that would require police responses. As such, construction of the Project with the Deck Concept would not result in substantial adverse physical impacts associated with the provision of or need for new or altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives, and impacts would be less than significant.

According to LAPD population generation factors, the Project with the Deck Concept would generate a population increase of 743 new residents who would increase demand for fire protection services. During operation, the Project with the Deck Concept would include the same supporting safety features as the Project, including Project Design Feature POL-PDF-2 to require controlled access, security personnel, staff training and video surveillance. These security features would help reduce the potential for on-site crimes, including loitering, theft, and burglaries, and would reduce demand for LAPD services. Therefore, the Project with the Deck Concept would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives, and impacts would be less than significant.

Alternative 3, as with the Project with the Deck Concept, would result in construction activities that could affect emergency access and increase demand for police protection services. As with the Project with the Deck Concept, Alternative 3's construction phase could increase potential demand for LAPD services related to theft or vandalism and increased worker activity, as well as construction traffic that could affect emergency response times. To reduce LAPD demand during construction, Alternative 3, as with the Project with the Deck Concept, would implement a number of security measures under Project Design Feature POL-PDF-1 to limit access to construction areas, including private security, construction fencing, and locked entry. Similar to the Project, construction activities under Alternative 3 may involve temporary lane closures to accommodate trucks entering and exiting the Project Site. Under Project Design Feature TRAF-PDF-1, a Construction Traffic Management Plan would ensure that adequate and safe access remains available at the Project Site during construction activities. The Construction Traffic Management Plan would require approval by LADOT to ensure maintenance of emergency access. Project Design Feature TRAF-PDF-2 would implement a Construction Worker Parking Plan to identify and enforce parking location requirements

for construction workers. Furthermore, construction-related traffic generated by Alternative 3, as with the Project with the Deck Concept, would not significantly affect LAPD response times within the Project vicinity as LAPD vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic during construction. With implementation of the various safety features to reduce the potential for incidents that would require police responses, construction of the Project with the Deck Concept or Alternative 3 would not result in substantial adverse physical impacts requiring new or altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives, and impacts would be less than significant. Accordingly, impacts during construction under Alternative 3 would be similar to the Project with the Deck Concept.

Alternative 3 would result in a population increase of 1,013 new residents who would increase demand for police protection services. As with the Project with the Deck Concept, Alternative 3 would incorporate Project Design Feature POL-PDF-2 to provide a 24-hour/seven-day security program to ensure the safety of its employees and site visitors. These measures would reduce demand on police services during operation. Similar to the Project with the Deck Concept, with the implementation of these features, Alternative 3 would not increase police services demand to the extent that the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, Alternative 3, as with the Project with the Deck Concept, would result in less than significant impacts with respect police protection services. However, as Alternative 3 would introduce more residents to the Project Site as compared to the Project with the Deck Concept, impacts to police protection services under Alternative 3 would be greater than the Project with the Deck Concept.

(iii) Schools

(a) Project

As discussed in Section IV.K.3, *Public Services – Schools*, of this Draft EIR, there are no public schools located in the immediate Project vicinity that would be affected by construction activities at the Project Site. Project construction would also not result in a notable increase in the resident population or generate new students needing to attend local schools. Therefore, Project construction would not result in the need for new or physically altered facilities, construction of which could lead to significant impacts. During operation, the Project would generate a net increase of 759 elementary school students, 212 middle school students, and 436 high school students for a total net increase of 1,407 school students. While the Project would increase demand at local schools that serve the Project Site, the LAUSD bond program would fund improvements and upgrades to LAUSD school facilities upon review of enrollment and attendance. In addition, pursuant to Section 65995 of the California Government Code, the Project applicant would be required to pay fees in accordance with SB 50. Payment of such fees is intended for the general purpose of addressing the construction of new school facilities, whether schools serving the Project in question are at capacity or not. Pursuant to Section 65995(h) of the California

Government Code, payment of such fees is deemed full mitigation of a project's development impacts. Project operational impacts to schools would be less than significant.

LAUSD has student generation rates for residential, office, and commercial uses within their 2018 Developer Fee Justification Study. Trip generation rates and total estimated students for Alternative 3 are presented in **Table V-12, Estimated Number of Students Generated by Alternative 3.**

TABLE V-12
ESTIMATED NUMBER OF STUDENTS GENERATED BY ALTERNATIVE 3

Land Use ^{a,b}	Use	Generation Factors	Elemen. School	Middle School	High School	Total ^c
Proposed Uses						
Residential Multi-Family	420 units	Elm: 0.2269/unit MS:0.0611/unit HS: 0.1296/unit	96	26	55	177
Retail	14,208 sf	0.610/1,000 sf	5	2	3	10
Creative Office	973,153 sf	1.077/1,000 sf	566	158	325	1,049
Restaurant	66,000 sf	0.610/1,000 sf	22	7	13	42
Hotel	228,670 sf	0.254/1,000 sf	32	9	19	60
Studio Space	60,100 sf	0.610/1,000 sf	20	6	12	38
Gym	68,102 sf	0.610/1,000 sf	23	7	13	43
<i>Total Students Generated by Proposed Uses</i>			764	215	440	1,419
Existing Uses						
Office	11,157 sf	0.610/1,000 sf	7	2	4	13
Dry Storage	32,382 sf	0.013/1,000 sf	1	1	1	3
Freezer/Cooler	161,854 sf	0.013/1,000 sf	2	1	1	4
<i>Total Students Generated by Existing Uses</i>			10	4	6	20
Net Increase (Proposed-Existing)			754	211	434	1,399

NOTE(S):

- ^a Student generation rates for residential uses are based on Table 3 of the LAUSD 2018 Developer Fee Justification Study: Elementary
- ^b Student generation for the office, hotel, retail, restaurant, studio space, and gym uses is based on the Neighborhood Shopping Center student generation rates as provided in Table 15 of the LAUSD 2018 Developer Fee Justification Study. Since the Developer Fee Justification Study does not specify grade levels for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 54 percent elementary school, 15 percent middle school, and 31 percent high school). For the existing dry storage and freezer/cooler uses, the Rental Self Storage factor was used.
- ^c Rounded to the nearest whole number.

SOURCE: ESA, 2021.

Based on these rates, Alternative 3 would generate approximately 754 elementary school students, 211 middle school students, and 434 high school students, resulting in a total of 1,399 students. The Project would generate approximately 1,407 students. Similar to the Project, the additional students generated by Alternative 3 could potentially exceed the number of seats available at local schools. However, pursuant to Section 65995 of the California Government Code, the Project Applicant would be required to pay fees in accordance with SB 50. Payment of such fees is intended for the general purpose of addressing the construction of new school facilities, whether schools serving the Project are at capacity or not and, pursuant to Section 65995(h), payment of such fees is deemed to be full mitigation of a project's development impacts. As such, impacts to school facilities and services under Alternative 3 would, as with the Project, would be less than significant. Further, because Alternative 3 would generate fewer school-age children than the Project, impacts on schools would be less than the Project.

(b) Project with the Deck Concept

Based on the LAUSD's 2018 Developer Fee Justification Study, the Project with the Deck Concept would generate a net increase of 759 elementary school students, 212 middle school students, and 436 high school students for a total net increase of 1,407 school students. While the Project with the Deck Concept would increase demand at local schools that serve the Project Site, the LAUSD bond program would fund improvements and upgrades to LAUSD school facilities upon review of enrollment and attendance. In addition, pursuant to Section 65995 of the California Government Code, the Project applicant would be required to pay fees in accordance with SB 50. Payment of such fees is intended for the general purpose of addressing the construction of new school facilities, whether schools serving the Project in question are at capacity or not. Pursuant to Section 65995(h) of the California Government Code, payment of such fees is deemed full mitigation of a project's development impacts. Therefore, operational impacts to schools from the Project with the Deck Concept would be less than significant.

Based on the LAUSD's 2018 Developer Fee Justification Study, Alternative 3 would generate approximately 754 elementary school students, 211 middle school students, and 434 high school students, resulting in a total of 1,399 students. This increase would be fully mitigated by the payment of fees in accordance with SB 50 and Section 65995(h) of the California Government Code and, as such, impacts would be less than significant. Because Alternative 3 would result in fewer school age children compared to the Project with the Deck Concept, impacts to school services under Alternative 3 would be less.

(iv) *Parks and Recreation*

(a) Project

As discussed in Section IV.K.4, *Public Services – Parks and Recreation*, of this Draft EIR, the Project would provide approximately 141,876 square feet of open space. Of the 141,876 square feet of open space, 73,848 square feet would be publicly accessible open

space and would include the Northern Landscaped Area, Mesquit Paseo, River Balconies, Elevated Pedestrian Walkway connecting the River Balconies, Public Plaza Flex Deck, Fitness Deck, Sculpture Garden, Work Breakout Deck, and the Residential Pool Deck. The Project would provide open space in excess of the useable open space and landscape requirements of LAMC Section 12.21.G. Furthermore, the Applicant would pay the \$200 tax per new eligible residential unit per LAMC Section 12.33.G to support the City's acquisition of new park space, and would comply with LAMC section 17.12 (the City's parkland dedication ordinance) in accordance with the Quimby Act. The Project would largely offset demand for recreational facilities through provision of on-site recreational and open space facilities in excess of Code requirements for the benefit of on-site residents, employees, and visitors. As such, the Project would not result in a high use of public parks and recreational facilities such that would result in the substantial deterioration of public recreational facilities, and the Project would also not require the construction of new, or expansion of existing park facilities, which could have an adverse impact on the environment. Therefore, the Project would have a less than significant impact on parks and recreation services.

Alternative 3 would generate approximately 1,013 new residents who would utilize parks and recreation facilities. In contrast, the Project with the Deck Concept would generate approximately 743 new residents. Alternative 3 would provide 214,414 square feet with the inclusion of the 75,000 square foot Deck compared to the Project's provision of 141,876 square feet of open space. Alternative 3, as with the Project, would comply with LAMC Section 12.33.G, which requires the Applicant to pay the \$200 tax per new eligible residential unit to support the City's acquisition of new park space. Furthermore, Alternative 3, as with the Project, would exceed the requirements of LAMC Sections 12.21.G regarding the provision of useable open space and comply with LAMC section 17.12 (the City's parkland dedication ordinance) in accordance with the Quimby Act. Thus, similar to the Project, operation of Alternative 3 would not exacerbate the existing shortfalls in parkland relative to City standards. As with the Project, Alternative 3 would largely offset demand for recreational facilities through provision of on-site recreational and open space facilities in excess of Code requirements for the benefit of on-site residents, employees, and visitors. As such, Alternative 3 would not result in a high use of public parks and recreational facilities such that would result in the substantial deterioration of public recreational facilities, and Alternative 3 would not also require the construction of new, or expansion of existing park facilities, which could have an adverse impact on the environment. Similar to the Project, impacts with respect to parks and recreation would be less than significant under Alternative 3. However, since Alternative 3 would generate more population and therefore greater demand for parkland than under the Project, impacts would be greater than the Project, though less than significant.

(b) Project with Deck Concept

The Project with the Deck Concept would provide 141,876 square feet (3.26 acres) of open space across the Project Site. Of the 141,876 square feet of open space, 73,848 square feet would be publicly accessible open space and include the Northern

Landscaped Area, Mesquit Paseo, North and South River Balconies, 7th Street Terrace, and the Public Plaza Flex Deck. The Project with the Deck Concept would also include a 132,000-square-foot Deck that would result in a total of 273,876 square feet (6.29 acres) of open space. Open spaces provided under the Project with the Deck Concept would also exceed the landscape requirements of the LAMC, and would comply with LAMC section 17.12 (the City's parkland dedication ordinance) in accordance with the Quimby Act. As such, operation of the Project with the Deck Concept would not exacerbate the existing shortfalls in parkland relative to City standards to the extent that new or physically altered park or recreational facilities would need to be constructed. In addition, the Project with the Deck Concept would also pay \$200 per unit for each of its 308 residential units for park fees to further reduce the City's parks and open space shortfall. The Project with the Deck Concept would largely offset demand for recreational facilities through provision of on-site recreational and open space facilities in excess of Code requirements for the benefit of on-site residents, employees, and visitors. As such, the Project with the Deck Concept would not result in a high use of public parks and recreational facilities such that would result in the substantial deterioration of public recreational facilities, and the Project with the Deck Concept would also not require the construction of new, or expansion of existing park facilities, which could have an adverse impact on the environment. Impacts with respect to parks and recreation would be less than significant under the Project with the Deck Concept.

Alternative 3 would generate approximately 1,013 new residents who would utilize parks and recreation facilities. In contrast, the Project with the Deck Concept would result in approximately 743 new residents. Alternative 3 would provide 214,414 square feet of open space with the inclusion of the 75,000 square foot Deck compared to the Project with the Deck Concept's provision of 273,876 square feet of open space. Alternative 3, as with the Project, would comply with LAMC Section 12.33.G, which requires the Applicant to pay the \$200 tax per new eligible residential unit to support the City's acquisition of new park space. Furthermore, Alternative 3, as with the Project, would exceed the requirements of LAMC Sections 12.21.G regarding the provision of useable open space and would comply with LAMC section 17.12 (the City's parkland dedication ordinance) in accordance with the Quimby Act. Thus, similar to the Project with the Deck Concept, operation of Alternative 3 would not exacerbate the existing shortfalls in parkland relative to City standards to the extent that new or physically altered park or recreational facilities would need to be constructed in order to maintain service, the construction of which would cause significant adverse physical environmental impacts. As with the Project, impacts with respect to parks and recreation would be less than significant under Alternative 3. However, since Alternative 3 would generate more population and, therefore, greater demand for parkland, as well as provide less open space than under the Project with the Deck Concept, impacts under Alternative 3 compared to the Project with the Deck Concept would be greater, although still less than significant.

(v) *Libraries*

(a) Project

As discussed in Section IV.K.5, *Public Services – Libraries*, of this Draft EIR, there are no libraries located in the immediate Project vicinity that would be affected by construction activities at the Project Site. Project construction would also not result in a notable increase in library usage at the libraries serving the Project Site. During Project operation, the Project's 4,523 net new employees and 308 residential units, which would generate an estimated 743 new residents, and would have the potential to increase demand at the libraries at the two branch libraries (Benjamin Franklin Branch Library and Little Tokyo Branch Library) with existing overcapacity conditions. However, the new level of service population at each library would not increase the population such that construction of a new branch library would be recommended according to the LAPL standards. Therefore, the Project's increase in demand for library services would not reach the recommended level at which the LAPL would consider building a new branch library in the area, the construction of which would have an adverse physical effect on the environment. Impacts would be less than significant.

Alternative 3's residential population, as with the Project, would increase demand for library services. Alternative 3 would generate approximately 1,013 new residents compared to the Project which would generate approximately 743 new residents. The LAPL has indicated they have no plans for a new branch library in the Project vicinity. The residents generated by Alternative 3 would have the potential to increase demand at the two branch libraries (Benjamin Franklin Branch Library and Little Tokyo Branch Library) with existing overcapacity conditions. However, the new level of service population at each library would not increase the population such that construction of a new branch library would be recommended according to the LAPL standards. Therefore, similar to the Project, Alternative 3 would not create the need for new or physically altered library facilities, the construction of which would result in substantial adverse physical environmental impacts, in order to maintain acceptable service ratios or objectives. Therefore, impacts to libraries under Alternative 3 would be less than significant. Further, because Alternative 3 would generate more population as compared to the Project, impacts would be greater than the Project.

(b) Project with the Deck Concept

Construction of the Project with the Deck Concept would not result in a notable increase in library usage by construction workers at the libraries serving the Project Site. Regarding use of libraries by the additional builders of the Deck, the construction of the deck is expected to use the same labor pools as the Project and would not generate additional demand for library services by construction employees. As such, to accommodate construction population, there would be no need for new library facilities, the construction of which would have an adverse physical effect on the environment. The Project with the Deck Concept would involve the same number of residential units and commercial floor area and result in a similar service population as the Project. The Project with the Deck

Concept has the potential to increase demand at the libraries. However, the increase in demand for library services under the Project with the Deck Concept would not reach the recommended level at which the LAPL would consider building a new branch library in the area, the construction of which would have an adverse physical effect on the environment. As such, impacts to libraries from the Project with the Deck Concept would be less than significant.

Alternative 3's residential population, as with the Project with the Deck Concept, would increase demand for library services. Alternative 3 would generate approximately 1,013 new residents compared to the Project with the Deck Concept that would generate approximately 743 new residents. The LAPL has indicated they have no plans for a new branch library in the Project vicinity. However, the service population would not reach the recommended level at which the LAPL would consider building a new branch library in the area. Therefore, similar to the Project, Alternative 3 would not create the need for new or physically altered library facilities, the construction of which would result in substantial adverse physical environmental impacts, in order to maintain acceptable service ratios or objectives. Therefore, as with the Project with the Deck Concept, impacts to libraries under Alternative 3 would be less than significant. Further, because Alternative 3 would generate more population compared to the Project with the Deck Concept, impacts to library services would be greater, although still less than significant.

(I) *Transportation*

(i) *Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities*

(a) *Project*

As discussed in Section IV.L, *Transportation*, of this Draft EIR, the Project, which is located within a TPA, would include roadway and sidewalk improvements that facilitate convenient access to transit. Components of the Project include the Mesquit Paseo that would improve bicyclist and pedestrian connectivity between Mesquit Street and 7th Street. The Project would include 288 short-term bicycle parking spaces and 519 long-term bicycle parking spaces. The Project would also include TDM measures to discourage single-occupancy vehicle trips. With improvements to the pedestrian system, roadways, and provision of bicycle facilities, the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, which have been adopted to protect the environment and reduce VMT. Impacts with respect to programs, plans and ordinances impacts would be less than significant.

Alternative 3, as with the Project, would support multimodal transportation options and a reduction in VMT, as well as promote transportation-related safety in the Project area. Alternative 3, as with the Project, would not conflict with any programs, plans, ordinances or policies addressing the circulation system, transit, roadways, bicycle and pedestrian

facilities, including those of Mobility Plan 2035, the Community Plan, the LADOT MPP, Vision Zero, the LAMC, the Plan for a Healthy Los Angeles, and the Citywide Design Guidelines. Alternative 3, as with the Project, would coordinate land use densities and promote the use of transit as it would be developed within a TPA. Alternative 3, as with the Project, would increase population and employment density in close proximity to a major transit stop. Additionally, Alternative 3, similar to the Project, would be located close to the proposed future Metro Arts District/6th Street Station, which is currently under study. Alternative 3, as with the Project, would also provide for road and pedestrian improvements, including multiple pedestrian and vehicle access points throughout the Project Site. Similar to the Project, Alternative 3 would not conflict with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities and, as such, impacts relative to plans and programs would be less than significant and similar to the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would include the same roadway and sidewalk improvements as the Project that would facilitate convenient access to transit. The Project with the Deck Concept would also develop a pedestrian-oriented, 132,000-square-foot Deck on the 7th Street level that would extend open space to near the Los Angeles River and enhance pedestrian access across the Project Site. The Project with the Deck Concept would also provide the Mesquit Paseo that would improve bicyclist and pedestrian connectivity between Mesquit Street and 7th Street, as with the Project. The Project with the Deck Concept would incorporate 288 short-term bicycle parking spaces and 519 long-term bicycle parking spaces, and include TDM measures provided for in Mitigation Measure TRAF-MM-1 to discourage single-occupancy vehicle trips. With proposed improvements to the pedestrian system, roadways, and provision of bicycle facilities under the Project with the Deck Concept, impacts related to programs, plans, ordinances or policies would be less than significant.

Alternative 3, as with the Project with the Deck Concept, for the reasons described under the Project, above, would not conflict with any programs, plans, ordinances or policies addressing the circulation system, transit, roadways, bicycle and pedestrian facilities. Alternative 3, as with the Project with the Deck Concept, would increase population and employment density in close proximity to a major transit stop. Alternative 3, as with the Project with the Deck Concept, would also provide for road and pedestrian improvements, including multiple pedestrian and vehicle access points throughout the Project Site. Similar to the Project with the Deck Concept, Alternative 3 would not conflict with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. As such, under both the Project with the Deck Concept and Alternative 3, impacts related to programs, plans, ordinances or policies would be less than significant and similar.

(ii) *Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)*

(a) Project

As discussed in Section IV.L, *Transportation*, of this Draft EIR, the Project is estimated to generate a total of 27,040 daily vehicle trips and a total daily VMT of 195,304. The daily residential VMT per capita is estimated at 4.0, below the threshold of 6.0 for the Central APC. The daily work VMT per employee is estimated at 6.6 for the Project, below the threshold of 7.6 for the Central APC. Since the retail components of the Project are greater than 50,000 square feet, they were evaluated using the City's travel demand forecasting model. The City's model estimated a total daily VMT of 96,898,000 miles within a 12-mile radius of the Project TAZ with all retail uses included.⁴⁹ This is a net increase of 32,000 daily miles, or a 0.03 percent increase from the network before the retail was added. This increase in VMT is considered to be a significant impact, due to the significance criteria identifying an impact when any increase in VMT due to regional-serving retail occurs. The Project would implement Mitigation Measure TRAF-MM-1 which would partially offset the increase in VMT projected for the Project's retail uses, but would not reduce the retail VMT impact to a less-than-significant level. Therefore, the Project-generated regional-serving retail VMT impact would be significant and unavoidable.

Alternative 3 is estimated to generate a total of 18,899 daily vehicle trips and a total daily VMT of 136,954. Alternative 3 would have a household VMT of 4.4 per capita and a work VMT of 6.3 per employee, which would also be below the thresholds of significance proposed for the City's Central APC household per capita of 6.0 and work VMT of 7.6 per employee.⁵⁰ In regard to the regional-serving retail component, Alternative 3 would reduce the Project's retail area. The City's model estimated a total daily VMT of 96,945,000 miles within a 12-mile radius from the Project TAZ when run without the retail components of Alternative 3. With all the Alternative 3 retail uses included, the model estimated a total daily VMT of 96,962,000 miles within a 12-mile radius from the Project TAZ. This is a net increase of 17,000 daily miles from the network before the retail was added. As the retail uses would result in an increase in VMT under Alternative 3, regional-serving retail is considered to be a significant impact, and mitigation measures would be required. Similar to the Project, Alternative 3 would be required to implement Mitigation Measure TRAF-MM-1 to offset the increase in VMT projected for Alternative 3's retail uses. However, similar to the Project, implementation of Mitigation Measure TRAF-MM-1 would not reduce the retail VMT impact to a less-than-significant level. Therefore, the Alternative 3-generated regional-serving retail VMT impact would be significant and unavoidable. Because the net increase in VMT would be less under Alternative 3 than the Project (17,000 under Alternative 3 versus 32,000 for the Project), impacts with respect

⁴⁹ The VMT analysis of retail uses for the Project presents a worst case scenario based on additional outdoor programming that would occur under the Project with the Deck Concept. Although the Project analysis presents a worst case scenario, the retail VMT impact findings for the Project would not be materially different if the added outdoor programming were not included.

⁵⁰ Fehr & Peers, *Analysis of 670 Mesquit Project Alternatives Technical Memorandum*, October 8, 2021. Provided in Appendix P of this Draft EIR.

to CEQA Guidelines Section 15064(b) are considered to be less under Alternative 3 than the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept is estimated to generate a total of 27,493 daily vehicle trips and a total daily VMT of 198,540. The daily residential VMT per capita and daily work VMT per employee are estimated at 4.0 and 6.6, respectively. Both would be below the thresholds for the Central APC.

As indicated for the Project, under the Project with the Deck Concept, the model estimated a net increase of 32,000 daily miles, or a 0.03 percent increase in VMT from the network with retail uses included. This increase in VMT is considered to be a significant impact, due to the significance criteria identifying an impact when any increase in VMT due to retail occurs. Elements of Mitigation Measure TRAF-MM-1 related to pedestrian, bicycle, and transit amenities would help to reduce retail trip making and would partially offset the increase in VMT projected for the Project with the Deck Concept's retail uses. However, impacts related to VMT would continue to be significant and unavoidable under the Project with the Deck Concept.

Alternative 3 is estimated to generate a total of 18,899 daily vehicle trips and a total daily VMT of 136,954. Alternative 3 would have a household VMT of 4.4 per capita and a work VMT of 6.3 per employee, which would also be below the thresholds of significance proposed for the City's Central APC household per capita of 6.0 and work VMT of 7.6 per employee.⁵¹

In regard to the regional-serving retail component, Alternative 3 would reduce the Project with the Deck Concept's retail floor area. The City's model estimated a total daily VMT of 96,945,000 miles within a 12-mile radius from the Project TAZ when run without the retail components of Alternative 3. With all the Alternative 3 retail uses included, the model estimated a total daily VMT of 96,962,000 miles within a 12-mile radius from the Project TAZ. This is a net increase of 17,000 daily miles from the network before the retail was added. As the retail uses would result in an increase in VMT under Alternative 3, regional-serving retail is considered to be a significant impact, and mitigation measures would be required. Similar to the Project with the Deck Concept, Alternative 3 would be required to implement Mitigation Measure TRAF-MM-1 to offset the increase in VMT projected for Alternative 3's retail uses. However, similar to the Project with the Deck Concept, implementation of Mitigation Measure TRAF-MM-1 would not reduce the retail VMT impact to a less-than-significant level. Therefore, the Alternative 3-generated regional-serving retail VMT impact would be significant and unavoidable. Because the net increase in VMT would be less under Alternative 3 than the Project with the Deck Concept (17,000 under Alternative 3 versus 32,000 for the Project with the Deck Concept), impacts with respect to CEQA Guidelines Section 15064(b) are considered to be less under Alternative 3 than the Project with the Deck Concept.

⁵¹ Fehr & Peers, *Analysis of 670 Mesquit Project Alternatives Technical Memorandum*, October 8, 2021. Provided in Appendix P of this Draft EIR.

(iii) *Design Hazards*

(a) Project

As discussed in Section IV.L, *Transportation*, of this Draft EIR, the Project and its proposed driveways would not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses and impacts on local safety would be less than significant. However, the Project would add car lengths to the US-101 Southbound freeway near the 7th Street Off-ramp such that it would constitute a potential safety issue. Specifically, the addition of traffic generated by the Project is projected to increase the overflow onto the mainline lanes by six cars in the AM peak hour and 2 cars in the PM peak hour (assuming an average queue storage length of 25 feet per car) for the US-101 Southbound Off-ramp to 7th Street in both Future Base (2026 and 2040) plus Project scenarios. Therefore, the Project would potentially substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses and impacts on freeway safety would be potentially significant. The Project would implement Mitigation Measure TRAF-MM-2 to signalize the intersection of the US-101 Southbound Off-ramp and 7th Street, which would sufficiently reduce the off-ramp queue and would not extend onto the freeway mainline. However, since the intersection is within the jurisdiction of another public agency (Caltrans), and the improvement would involve a decision by Caltrans, the City cannot guarantee that Caltrans will agree with implementation of this mitigation measure. Therefore, it is conservatively concluded that the impacts related to freeway safety would remain significant and unavoidable.

Alternative 3, as with the Project, would provide new sidewalks around the perimeter of the Project Site and through the Entry Plazas, Mesquit Paseo, and Elevated Pedestrian Walkways, all of which would be accessible to the neighborhood. Similar to the Project, Alternative 3 would provide access locations that would be designed to the City standards and would provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety. All roadways and driveways will intersect at right angles. Street trees and other potential impediments to adequate driver and pedestrian visibility would be minimal and would be designed to applicable City standards and requirements. Pedestrian entrances separated from vehicular driveways would provide access from the adjacent streets, parking facilities, and transit stops. The provided driveways would be designed to comply with LADOT standards. Therefore, Alternative 3 would not substantially increase geometric hazards due to a design feature or incompatible uses, and impacts on local safety would be less than significant.

Regarding freeway safety, Alternative 3 would be projected to increase the queue onto the mainline lines by five car lengths compared to the six car lengths projected under the Project.⁵² Similar to the Project, Alternative 3 would be required to implement Mitigation

⁵² Fehr & Peers, *Analysis of 670 Mesquit Project Alternatives Technical Memorandum*, October 8, 2021. Provided in Appendix P of this Draft EIR.

Measure TRAF-MM-2 to signalize the intersection of the US-101 Southbound Off-ramp and 7th Street, which would sufficiently reduce the off-ramp queue and would not extend onto the freeway mainline. However, since the intersection is within the jurisdiction of another public agency (Caltrans), and the improvement would involve a decision by Caltrans, the City cannot guarantee that Caltrans will agree with implementation of this mitigation measure. Therefore, it is conservatively concluded that the impacts related to freeway safety would remain significant and unavoidable. However, as Alternative 3 would result in fewer car lengths projected onto the mainline lines than the Project, impacts would be less than the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would feature similar points of pedestrian access to the Project Site and driveway locations as under the Project. The Project with the Deck Concept would provide new sidewalks and bicycle parking facilities. The Project with the Deck Concept and its driveways would not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. However, traffic generated by the Project with the Deck Concept would increase the overflow onto the freeway mainline lanes by more than two cars for the US-101 Southbound Off-ramp to 7th Street. Therefore, because the Project with the Deck Concept would potentially substantially increase geometric hazards due to a design feature, impacts on freeway safety would be potentially significant. The Project with the Deck Concept would implement Mitigation Measure TRAF-MM-2 to signalize the intersection of the US-101 Southbound Off-ramp and 7th Street. However, since the intersection is within the jurisdiction of Caltrans, and the improvement would involve a decision by Caltrans, the City cannot guarantee that Caltrans will agree with implementation of this mitigation measure. As such, impacts related to design hazards would be significant and unavoidable.

As with the Project with the Deck Concept, Alternative 3's access locations would provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety. Pedestrian entrances separated from vehicular driveways would provide access from the adjacent streets, parking facilities, and transit stops. The provided driveways would be designed to comply with LADOT standards. Therefore, Alternative 3 would not substantially increase geometric hazards due to a design feature or incompatible uses, and impacts on local safety would be less than significant.

Regarding freeway safety, Alternative 3 would be projected to increase the queue onto the mainline lines by five car lengths. Similar to the Project with the Deck Concept, Alternative 3 would be required to implement Mitigation Measure TRAF-MM-2 to signalize the intersection of the US-101 Southbound Off-ramp and 7th Street, which would sufficiently reduce the off-ramp queue and would not extend onto the freeway mainline. However, since the intersection is within the jurisdiction of Caltrans, and the improvement would involve a decision by Caltrans, the City cannot guarantee that Caltrans will agree with implementation of this mitigation measure. Therefore, it is conservatively concluded

that the impacts related to freeway safety would remain significant and unavoidable. However, as Alternative 3 would result in fewer car lengths projected onto the mainline lines than the Project with the Deck Concept, impacts compared to the Project with the Deck Concept would be less.

(iv) *Emergency Access*

(a) *Project*

As discussed in Section IV.L, *Transportation*, of this Draft EIR, Project construction activities would result in less than significant impacts to emergency access. The Project would also implement a Construction Traffic Management Plan (see TRAF-PDF-1). The Project's construction activities would not require a new, or significantly interfere with an existing risk management, emergency response, or evacuation plan. The Project would not result in inadequate emergency access during construction. For Project operation, a section of Mesquit Street, a designated Collector Street, would be permanently closed for the development of the Mesquit Paseo between 6th Street and 7th Street. Mesquit Street, which is not currently accessible from 7th Street because of 7th Street's elevated approach to the 7th Street Bridge, consists entirely of the two-block segment between 6th Street and 7th Street. Mesquit Street, thus, does not currently provide through access to surrounding neighborhoods. With development, access to Mesquit Street and the Paseo would continue to be accessible from 6th Street and emergency access would be newly available from 7th Street. As such, the changes on Mesquit Street would not adversely affect emergency vehicle access.

For Project operation, the site plan for the Project would be reviewed prior to issuance of a building permit to ensure that all Los Angeles Fire Department fire safety requirements (including those related to emergency access) are met as part of the City's standard plan check review process.

The Project Site is located in an established urban area served by the surrounding roadway network. Drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Similar to the Project, during operation under Alternative 3, a section of Mesquit Street, a designated Collector Street, would be permanently closed for the development of the Mesquit Paseo between 6th Street and 7th Street. Mesquit Street, which is not currently accessible from 7th Street because of 7th Street's elevated approach to the 7th Street Bridge, consists entirely of the two-block segment between 6th Street and 7th Street. Mesquit Street, thus, does not currently provide through access to surrounding neighborhoods. With development, access to Mesquit Street and the Paseo would continue to be accessible from 6th Street and emergency access would be newly available from 7th Street. As such, the changes on Mesquit Street would not adversely affect emergency vehicle access. As with the Project, Alternative 3 would implement TRAF-PDF-1 to ensure that emergency access and emergency response implementation would be maintained during construction. With review and approval of Project Site access and circulation plans by the LAFD, Alternative 3, as with the Project, would not impair

implementation of or physically interfere with adopted emergency response or emergency evacuation plans. Impacts regarding emergency access under Alternative 3 would be less than significant and similar to the Project.

(b) Project with the Deck Concept

Construction activities for the Project with the Deck Concept could potentially affect emergency access to the Project Site and surroundings. However, construction activities for the Project with the Deck Concept would not require full street closures and most activities would be confined to the Project Site. With implementation of Project Design Feature TRAF-PDF-1, Construction Traffic Management Plan, the Project with the Deck Concept's construction activities would not significantly interfere with an existing risk management, emergency response, or evacuation plan. Further, the site plan for the Project with the Deck Concept would be reviewed prior to issuance of a building permit to ensure that all Los Angeles Fire Department fire safety requirements (including those related to emergency access) are met as part of the City's standard plan check review process. The Project with the Deck Concept would not result in inadequate emergency access during construction. During operation, a section of Mesquit Street, a designated Collector Street, would be permanently closed for the development of the Mesquit Paseo between 6th Street and 7th Street. Mesquit Street, which is not currently accessible from 7th Street because of 7th Street's elevated approach to the 7th Street Bridge, consists entirely of the two-block segment between 6th Street and 7th Street. Mesquit Street, thus, does not currently provide through access to surrounding neighborhoods. With development, access to Mesquit Street and the Paseo would continue to be accessible from 6th Street and emergency access would be newly available from 7th Street. As such, the changes on Mesquit Street would not adversely affect emergency vehicle access. No other street closures that would affect emergency access in or around the Project Site are anticipated. Impacts associated with emergency access under the Project with the Deck Concept would be less than significant.

Alternative 3 would implement TRAF-PDF-1 to ensure that emergency access and emergency response implementation would be maintained during construction. Further, the site plan for the Project would be reviewed prior to issuance of a building permit to ensure that all Los Angeles Fire Department fire safety requirements (including those related to emergency access) are met as part of the City's standard plan check review process. As with the Project with the Deck Concept, during operation under Alternative 3, a section of Mesquit Street, a designated Collector Street, would be permanently closed for the development of the Mesquit Paseo between 6th Street and 7th Street. Mesquit Street, which is not currently accessible from 7th Street because of 7th Street's elevated approach to the 7th Street Bridge, consists entirely of the two-block segment between 6th Street and 7th Street. Mesquit Street, thus, does not currently provide through access to surrounding neighborhoods. With development, access to Mesquit Street and the Paseo would continue to be accessible from 6th Street and emergency access would be newly available from 7th Street. As such, the changes on Mesquit Street would not adversely affect emergency vehicle access. With review and approval of Project Site access and circulation plans by

the LAFD, Alternative 3, as with the Project with the Deck Concept, would not impair implementation of or physically interfere with adopted emergency response or emergency evacuation plans. Impacts regarding emergency access under Alternative 3 and the Project with the Deck Concept would be less than significant and similar.

(m) *Tribal Cultural Resources*

(i) *Project*

Construction activities for the Project would involve excavation for subterranean parking and other ground-disturbing activities. As discussed in Section IV.M, *Tribal Cultural Resources*, of this Draft EIR, no known tribal cultural resources would be affected by the Project. The Los Angeles River is a known landmark for prehistoric habitation and trading, with native American trade routes leading to and from the river basin. Due to the Project Site's proximity to the river, there is the potential unknown buried tribal cultural resources could be encountered during Project construction activities. This is considered to be a potentially significant impact. Thus, mitigation measures are proposed to require monitoring for tribal cultural resources and treatment of such resources, if encountered. With implementation of the required mitigation measures, potentially significant impacts under the Project would be reduced to a less than significant level.

Alternative 3 would require a similar depth of excavation for the subterranean parking levels as the Project. A relatively limited amount of excavation would be required to install the piers that would support the Deck under Alternative 3. However, no known tribal cultural resources would be affected by Alternative 3. Similar to the Project, Alternative 3, would be required to implement mitigation measures in the event unknown buried tribal cultural resources are encountered during construction activities. With mitigation, Alternative 3, as with the Project, would result in less-than-significant impacts to tribal cultural resources. However, because of the greater excavation footprint associated with the Deck construction under Alternative 3, impacts would be incrementally greater than under the Project.

(ii) *Project with the Deck Concept*

Construction activities for the Project with the Deck Concept involve excavation for subterranean parking and other ground-disturbing activities. The Deck would be supported by piers that would encroach into subsurface elements. The Los Angeles River is a known landmark for prehistoric habitation and trading, with native American trade routes leading to and from the river basin. Due to the Project Site's proximity to the river, there is the potential tribal cultural resources could to be encountered during Project construction activities. This is considered to be a potentially significant impact. Thus, mitigation measures are proposed to require monitoring for tribal cultural resources and treatment of such resources, if encountered. With implementation of the required mitigation measures, potentially significant impacts under the Project with the Deck Concept would be reduced to a less than significant level.

Alternative 3 would require a similar depth of excavation for the subterranean parking levels as the Project with the Deck Concept. A relatively limited amount of excavation would be required to install the piers that would support the Deck under Alternative 3 or the Project with the Deck Concept, although slightly greater under the Project with the Deck Concept. As with the Project with the Concept, no known tribal cultural resources would be affected by Alternative 3. Similar to the Project with the Deck Concept, Alternative 3 would be required to implement mitigation measures in the event unknown buried tribal cultural resources are encountered during construction activities. With mitigation, Alternative 3, as with the Project with the Deck Concept, would result in less-than-significant impacts to tribal cultural resources. However, because of the greater excavation footprint associated with the Deck construction under the Project with the Deck Concept, impacts would be incrementally less under Alternative 3.

(n) *Utilities and Service Systems – Water, Wastewater, and Solid Waste*

(i) *Wastewater*

(a) *Project*

As discussed in Section IV.N.1, *Wastewater*, of this Draft EIR, Project construction would include all necessary on-site and off-site sewer pipe improvements and connections to adequately connect to the City's existing sewer system. The design of the connections would be developed by a registered engineer and approved by the BOE. All necessary improvements would be verified through the permit approval process of obtaining a sewer connection permit from the City. Project construction would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. The Project would pay the required sewer connection fees to help offset the Project's contribution to the City's wastewater collection infrastructure needs. During Project operation, the Project's increase in wastewater generation would represent a negligible increase in the wastewater volumes treated at the HWRP and the Hyperion Sanitary Sewer System. Therefore, Project operation would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant. Alternative 3 would generate additional wastewater and increase demand on the HWRP and the Hyperion Sanitary Sewer System. **Table V-13, *Wastewater Generation during Alternative 3 Operation***, shows that Alternative 3 would result in an estimated average gross wastewater generation of approximately 531,392 gpd. Alternative 3 would have an estimated net wastewater generation volume of 525,230 gpd or 0.525 mgd. This estimate does not account for reductions in wastewater generation that would result from required compliance with applicable LAMC requirements or water conservation measures, as presented in Project Design Feature WS-PDF-1.

**TABLE V-13
WASTEWATER GENERATION DURING ALTERNATIVE 3 OPERATION**

Land Use	Units	Generation Rate (gpd/unit)	Total Wastewater Generation (gpd)
Existing to Be Removed			
Cold Storage	205,393 sf	30/1,000 sf	6,162
Proposed			
Residential: Apt – Bachelor	100 rooms	75/Room	7,500
Residential: Apt- 1 Bedroom	230 rooms	110/Room	25,300
Residential: Apt – 2 Bedrooms	67 rooms	150/Room	10,050
Residential: Apt – 3 Bedrooms	23 rooms	190/Room	4,370
Hotel: Use Guest Rooms Only	236 room	120/room	28,320
Hotel Bar: Cocktail, Fixed Seat ^{a,b}	4,000 sf (267 seats)	15/seat	4,005
Ballroom	3,000 sf	350/1,000 sf	1,050
Meeting Room	1,000 sf	120/1,000 sf	120
Restaurant: full Service Indoor Seat ^a	66,000 sf (4,400 seats)	30/seat	132,000
Retail	14,208 sf	25/1,000 sf	356
Office Building w/ Cooling Towers	973,153 sf	170/1,000 sf	165,437
Museum: All Area	60,100 sf	30/1,000 sf	1,803
Health Club/Spa	68,102 sf	650/1,000 sf	44,267
Water Features ^b	2,400 cf		17,952
Reflecting Pools ^b	4,800 cf		35,904
Pools ^b	6,000 cf		44,880
Spas ^b	1,080 cf		8,078
<i>Gross Wastewater Generation</i>			531,392
Less Existing to Be Removed			-6,162
Net Increase			525,230

NOTE(S):

sf = square feet; cf = cubic feet; gpd = gallons per day

^a It is assumed that each seat requires 15 square feet.^b The wastewater generation for these uses are provided by the WWSI Request from LASAN. Because specific data regarding these uses are not provided for Alternative 3, it is assumed that similar uses would be provided under Alternative 3 as under the Project.

SOURCE: ESA, 2021.

Comparatively, the Project is estimated to increase on-site wastewater generation by 558,306 gpd or 0.558 mgd. Similar to the Project, the increase in wastewater generation by Alternative 3 would be within the capacity limits of the conveyance and treatment facilities serving the Project Site as determined in the WWSI for the Project. Similar to the Project, impacts on wastewater conveyance and treatment systems under Alternative 3 would be less than significant. Further, because Alternative 3 would generate a lower volume of wastewater, impacts under Alternative 3 would be less than the Project.

(b) Project with the Deck Concept

The minimal wastewater generation during construction of the Project with the Deck Concept would not require the construction of new or expansion of existing facilities, and, given the small amount of wastewater, construction activities are not anticipated to exceed the capacity of existing wastewater conveyance and treatment systems. Operation of the Project with the Deck Concept would generate approximately 558,306 gpd or 0.558 mgd of wastewater. Event programming proposed under the Project with the Deck Concept would be temporary and would not occur every day and throughout the day. Therefore, it is unlikely that any wastewater generated during these events, above 0.558 mgd would be more than the current remaining capacities at the HWRP. The Project with the Deck Concept would pay the required sewer connection fees to help offset the Project with the Deck Concept's contribution to the City's wastewater collection infrastructure needs and would require approval of sewer permits prior to connection to the sewer system. Impacts to wastewater infrastructure and treatment under the Project with the Deck Concept would be, thus, less than significant.

Alternative 3 would have an estimated net wastewater generation volume of 525,230 gpd or 0.525 mgd. As with the Project with the Deck Concept, this volume is within the capacity limits of the conveyance and treatment facilities serving the Project Site as determined in the WWSI for the Project. Similar to the Project with the Deck Concept, impacts on wastewater conveyance and treatment systems under Alternative 3 would be less than significant. Further, because Alternative 3 would generate a lower volume of wastewater, impacts under Alternative 3 would be less than the Project with the Deck Concept.

(ii) *Water Supply*

(a) Project

As discussed in Section IV.N.2, Water Supply, of this Draft EIR, water demand during Project construction would be substantially less than the existing water consumption at the Project Site. In order to accommodate the Project's operational water use, the Project would be required to upgrade the water mains serving the Project to ensure adequate water flow, pressure, and capacity are available for the Project. Project contractors would coordinate with LADWP to identify the locations and depth of all lines, LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. Therefore, existing water infrastructure would meet the limited and temporary water demand necessary for construction of the Project. The design and

installation of new service connections are required to meet applicable City standards. Construction impacts associated with the installation of water distribution lines below surface would primarily involve trenching in order to place the water distribution lines below grade and reconnect existing domestic and fire water services for the affected surrounding properties and would be limited to on-site and minor off-site (street right-of-way and sidewalk) construction activities. Project construction would not require or result in the construction of new water facilities or expansion of existing facilities, construction of new facilities, and construction impacts on water supply would be less than significant.

In regard to Project operation, following installation of the new service connections to accommodate the Project's additional water and fire flow requirements, LADWP determined that the water distribution infrastructure would have sufficient capacity to serve the Project Site. The Project's approved WSA determined that there are adequate water supplies available from existing LADWP entitlements and supplies to meet the Project's projected water demand, in addition to existing and planned future demand on LADWP, annually during normal, single-dry, and multiple-dry water years over the next 20 years, as required by SB 610, as well as through at least 2040 (the planning horizon of the LADWP's 2015 UWMP). Sufficient domestic water supplies are available to service the Project and reasonably foreseeable future development during normal, dry and multiple dry-years. Operational impacts on water supply would be less than significant.

Alternative 3 would increase demand on water supplies and infrastructure. As shown in **Table V-14, *Estimated Water Demand for Alternative 3***, Alternative 3 would generate an estimated net water demand of 406,789 gpd or 455.70 afy.

TABLE V-14
ESTIMATED WATER DEMAND FOR ALTERNATIVE 3

Proposed Uses	Quantity	Water Use Factor (gpd/unit) ^a	Base Demand (gpd)	Water Efficiency Requirements Ordinance Savings (gpd) ^b	Net Proposed Water Demand	
					(gpd)	(afy)
Residential						
Studio	100 du	75/du	7,500			
1 Bedroom	230 du	110/du	25,300			
2 Bedroom	67 du	150/du	10,050			
3 Bedroom	23 du	190/du	4,370			
Base Demand Adjustment (Residential Units) ^c			5,152			
<i>Residential Units Subtotal</i>	<i>420 du</i>		<i>52,372</i>	<i>10,265</i>	<i>42,107</i>	<i>47.17</i>

**TABLE V-14
ESTIMATED WATER DEMAND FOR ALTERNATIVE 3**

Proposed Uses	Quantity	Water Use Factor (gpd/unit) ^a	Base Demand (gpd)	Water Efficiency Requirements Ordinance Savings (gpd) ^b	Net Proposed Water Demand	
					(gpd)	(afy)
Lobby	4,260 sf	0.05/sf	213			
Pool/Spa	1,020 sf		96			
BBQ area	260 sf	0.13/sf	33			
<i>Residential Amenities Subtotal^d</i>			342	342	0	0
Hotel Room	236 room	120/room	28,320			
Based Demand Adjustment (Hotel Room)			2,565			
<i>Hotel Room Subtotal^d</i>			30,885	3,370	27,515	30.82
Lobby	2,853 sf	0.05/sf	143			
Pool/Spa	750 sf		70			
Pool Deck	3,000 sf	0.30/sf	900			
Bar	4,000 sf	0.72/sf	2,880			
Ballroom	3,000 sf	0.35/sf	1,050			
Meeting Room	1,000 sf	0.12/sf	120			
<i>Hotel Amenities Subtotal^d</i>			5,163	643	4,520	5.06
Restaurant: Full Service	66,000 sf (4,400 seat)	30/seat	132,000			
General Retail	14,208 sf	0.03/sf	427			
Office	973,153 sf	0.12/sf	116,779			
Office Lobby	12,026 sf	0.05/sf	601			
Water Features	1,200 sf		113			
Gallery Space	60,100 sf	0.03/sf	1,803			
Gym	68,102 sf	0.65/sf	44,266			
Base Demand Adjustment (Commercial) ^e			2,168			
<i>Commercial Subtotal</i>			298,157	31,901	266,256	298.27

**TABLE V-14
ESTIMATED WATER DEMAND FOR ALTERNATIVE 3**

Proposed Uses	Quantity	Water Use Factor (gpd/unit) ^a	Base Demand (gpd)	Water Efficiency Requirements Ordinance Savings (gpd) ^b	Net Proposed Water Demand	
					(gpd)	(afy)
Landscaping ^f	101,117 sf		9,445	5,154	4,291	4.81
Covered Parking Structure ^g	854,140 sf	0.02/sf	562	0	562	0.63
Cooling Tower Total	6,000 ton	25.25	151,470	30,294	121,176	135.74
Proposed Total			548,396	81,969	466,427	522.51
Less Existing Uses to be Removed					-58,526	-65.56
Less Additional Conservation ^h					-1,112	-1.25
Net Additional Water Demand					406,789	455.70

NOTE(S):

- ^a Water Use Factor is based on City's Department of Public Works, Bureau of Sanitation sewer generation rates.
- ^b The Water Efficiency Requirements Ordinance Savings used for Alternative 3 are the same as those provided in the approved WSA for the Project.
- ^c The base demand adjustment for the residential units is estimated based on the base demand adjustment provided in the approved WSA for the Project. In the approved WSA for the Project, the base demand adjustment for the residential units is approximately 10.9 percent of the estimated water demand for the residential units. Therefore, the base demand adjustment for Alternative 3's residential units is approximately 10.9 percent of the estimated water demand for the residential units.
- ^d The totals for the Residential Amenities, Hotel Rooms, and Hotel Amenities are the same as those provided in the approved WSA for the Project.
- ^e The base demand adjustment for the commercial uses is estimated based on the base demand adjustment provided in the approved WSA for the Project. In the approved WSA for the Project, the base demand adjustment for the commercial uses is approximately 0.7 percent of the estimated water demand for the commercial uses. Therefore, the base demand adjustment for Alternative 3's commercial uses is approximately 0.7 percent of the estimated water demand for the commercial uses.
- ^f Landscaping water use for Alternative 3 uses the same estimates as provided in the approved WSA for the Project. As Alternative 3 would provide less open space, and therefore less landscaping, than the Project, this is a conservative estimate for Alternative 3.
- ^g Covered Parking Structure uses the same water demand estimates as the approved WSA for the Project as a similar amount of parking would be provided under Alternative 3.
- ^h Water conservation due to conservation commitments, as detailed in approved WSA for the Project and as WS-PDF-1, is the same as the Project as for Alternative 3, as Alternative 3 would apply the same conservation commitments as under the Project.

SOURCE: ESA, 2021.

In comparison, the approved WSA for the Project indicated that the Project would have a water demand of 439,943 gpd or 492.83 afy. As with the Project, Alternative 3's water demand projections would therefore be within LADWP's 2015 UWMP's projected increases in Citywide water demands, while anticipating multi-dry year water conditions through the planning horizon of 2040. Furthermore, similar to the Project, operation of Alternative 3 would require upgrades to the water mains serving the Project Site to ensure

adequate water flow, pressure, and capacity for Alternative 3. With regulatory compliance to the LAMC and coordination with LADWP, operation of Alternative 3, as with the Project, would not result in the relocation or construction of new or expanded water facilities, the construction or relocation of which would cause significant environmental effects. Similar to the Project, operational impacts on water infrastructure under Alternative 3 would be less than significant. Further, because Alternative 3 would generate less water demand than the Project, impacts under Alternative 3 would be less than the Project.

(b) Project with the Deck Concept

During construction of the Project with the Deck Concept, water use would be substantially less than the existing water consumption at the Project Site. The Project with the Deck Concept would, similar to the Project, be required to upgrade the water mains serving the Project with the Deck Concept to ensure adequate water flow, pressure, and capacity are available. Construction of the Project with the Deck Concept would include the same necessary on- and off-site improvements and connections as needed under the Project. With compliance with existing regulations and requirements of the LADWP, impacts on water supply resulting from construction activities would be less than significant. With implementation of regulatory water conservation measures, operation of the Project with the Deck Concept would result in a demand of 439,943 gpd or 492.83 afy. Operation of the Project with the Deck Concept would not include additional uses that are not already analyzed under the Project. Additional event programming, as compared to the Project, proposed under the Project with the Deck Concept would be temporary and would not occur every day and throughout the day. Therefore, as determined by the WSA, the 2015 UWMP's projections for water demand and supply would include the water demand required for the Project with the Deck Concept. Adequate water supplies from existing LADWP entitlements and supplies would be available to meet the Project with the Deck Concept's projected water demand through at least 2040. Impacts related to water supply and infrastructure under the Project with the Deck Concept would be less than significant.

Alternative 3 would generate an estimated net water demand of 406,789 gpd or 455.70 afy. As with the Project with the Deck Concept, Alternative 3's water demand projections would be within LADWP's 2015 UWMP's projected increases in Citywide water demands, while anticipating multi-dry year water conditions through the planning horizon of 2040. Furthermore, similar to the Project with the Deck Concept, Alternative 3 be required to upgrade the water mains serving to ensure adequate water flow, pressure, and capacity are available. Construction of alternative would include the same necessary on- and off-site improvements and connections as needed under the Project with the Deck Concept. With regulatory compliance to the LAMC and coordination with LADWP, as with the Project with the Deck Concept operation of Alternative 3, would not result in the relocation or construction of new or expanded water facilities, the construction or relocation of which would cause significant environmental effects. Similar to the Project, operational impacts on water infrastructure under Alternative 3 would be less than significant. Further, because Alternative 3 would generate less water demand than the Project with the Deck Concept, water demand impacts under Alternative 3 would be less.

(iii) *Solid Waste*

(a) Project

Demolition of the Project would generate approximately 203,953 tons of C&D waste. As discussed in Section IV.N.3, *Solid Waste*, of this Draft EIR, all C&D waste collected at the Project Site would be taken to a City-certified waste processing facility for sorting and final distribution and disposal. The C&D waste is anticipated to be disposed of at the County's Azusa Land Reclamation landfill or one of the Inert Debris Engineered Fill Operations located in the County that is permitted to receive C&D waste or exported to an out-of-county facility currently accepting waste from Los Angeles County, all of which have remaining disposal capacity to receive the Project's C&D waste. Therefore, Project construction would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and construction impacts on solid waste would be less than significant.

Operation of the Project's commercial and residential uses, post-diversion, would generate approximately 3,369 net tons of solid waste a year and 18,462 net pounds of solid waste per day. The Project's estimated annual operational solid waste generation (post diversion) would represent a negligible amount of the County's annual waste generation and remaining capacity of the County's landfills. The Project's operational waste generation would not exceed the permitted capacity of disposal facilities serving the Project and would not alter the ability of the County to address landfill needs via existing capacity and other planned strategies and measures for ensuring sufficient landfill capacity exists to meet the needs of the County. Therefore, the County's City-certified waste processing facilities would have sufficient permitted capacity to accommodate the Project's operational waste disposal needs. Project operation would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and impacts would be less than significant.

Alternative 3 would increase solid waste generation at the Project Site that would need to be landfilled. As Alternative 3 would demolish the same buildings and hardscape and would construct the same 1,792,103 square feet of buildings as under the Project, construction of Alternative 3 would be the same as under the Project. The C&D waste generated by construction of Alternative 3 would be disposed of at the County's Azusa Land Reclamation landfill or one of the Inert Debris Engineered Fill Operations located in the County that is permitted to receive C&D waste or exported to an out-of-county facility currently accepting waste from Los Angeles County, all of which have remaining disposal capacity to receive the C&D waste. Similar to the Project, Alternative 3 construction would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and construction impacts on solid waste would be less than significant.

Alternative 3's estimated solid waste output during operation is presented in **Table V-15, *Estimated Operational Generation for Alternative 3.***

**TABLE V-15
ESTIMATED OPERATIONAL SOLID WASTE GENERATION FOR ALTERNATIVE 3**

Land Use	Quantity ^a	Daily Generation Factor ^b	Solid Waste Generation (tons/year)	Solid Waste Generation (lbs/day)
Proposed New Uses				
Residential	420 units	0.87 tons/unit/year	365	2,000
Office	973,153 sf (3,893 emp)	2.02 tons/emp/year	7,864	43,090
Restaurant/Retail/Other Commercial ^c	208,410 sf (422 emp)	1.96 tons/emp/year	827	4,532
Hotel	236 rooms (118 emp)	1.76 tons/emp/year	208	1,140
<i>Proposed Subtotal^d</i>	<i>(4,371 emp)</i>	—	<i>9,264</i>	<i>50,762</i>
<i>Existing Uses^e</i>	<i>205,393 sf (218 emp)</i>		<i>(137)</i>	<i>(748)</i>
Net Increase (pre-diversion)	—	—	9,127	50,014
Net Increase (post-diversion)^f	—	—	3,195	17,505

NOTE(S):

lb = pounds; sf = square feet; emp = employees

^a Number of employees per use are detailed in Table V-11, *Estimate of Alternative 3's Employment*, in this Chapter, above.

^b Generation factors are provided by CalRecycle's Disposal and Diversion Rates for Business Groups, <https://www2.calrecycle.ca.gov/wastecharacterization/businessgroup rates>. Accessed November 1, 2021.

^c Commercial uses include the gym, restaurants, retail, and studio/event/gallery/museum uses.

^d Totals may not add up due to rounding.

^e Existing subtotal is taken from Table IV.N.3-1, in Section IV. N.3. In Chapter IV of this Draft EIR. The amount here is based on the post-diversion existing operational generation as using a lower number for the existing uses would result in a higher net increase for the Project.

^f Based on an anticipated diversion rate of 65 percent for operations, which was assumed in the ColWMP 2019 Annual Report. This is conservative as the actual diversion is likely to be higher with increasing compliance with the state's recycling goal of 75 percent.

SOURCE: ESA, 2021.

As shown in Table V-15, Alternative 3 would generate, post-diversion, 3,195 net tons of solid waste per year and 17,505 net pounds of solid waste per day.

The Sunshine Canyon Landfill, the primary recipient of Class III solid waste from the City, has a maximum daily capacity of 12,100 tons per day and a disposal rate of 6,919 tons per day, indicating a residual daily capacity of 5,181 tons per day. Alternative 3's net addition of 10.25 net tons per day⁵³ would represent 0.20 percent of Sunshine Canyon's

⁵³ Alternative 3's daily disposal in tons assumes that landfills operate six days per week. 52 weeks * 6 days = 312 days. Therefore, Alternative 3's daily disposal is calculated by 3,195 net tons per year/ 312 days = 10.25 net tons per day.

residual daily capacity, assuming diversion. By comparison, the Project, with diversion, would generate approximately 3,369 net tons per year (10.79 tons per day) of solid waste, representing approximately 0.21 percent of Sunshine Canyon's residual capacity.

Similar to the Project, Alternative 3's additional solid waste generation would be accommodated by the County's City-certified waste processing facilities. As with the Project, Alternative 3's operation would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Similar to the Project, impacts with respect to solid waste under Alternative 3 would be less than significant. Further, because Alternative 3 would generate less solid waste as compared to the Project, impacts under Alternative 3 would be less than the Project.

(b) Project with the Deck Concept

Demolition of the Project with the Deck Concept would generate approximately 204,166 tons of C & D waste. Operation of the Project with the Deck Concept's commercial and residential uses would generate approximately 3,369 net tons a year (post diversion), which would be substantially less than the remaining capacity of the landfills currently serving the Project Site. While event programming would be proposed under the Project with the Deck Concept, these events would be temporary and would not occur every day and throughout the day. Therefore, it is likely that the solid waste generated during these particular events would not be more than the current remaining capacities at the landfills, and the additional solid waste generated by the Project's temporary events would be less than what is generated by the residential and commercial components of the Project with the Deck Concept. Thus, the conclusions regarding impact significance presented above under the Project would be the same and apply to operation of the Project with the Deck Concept. Impacts related to the capacity of local infrastructure and state and local standards under the Project with the Deck Concept would be less than significant.

Alternative 3 would result in similar C&D waste as the Project with the Deck Concept and, as with the Project with the Deck Concept, would not exceed State or local standards, or exceed the capacity of local infrastructure. During operation, Alternative 3 would generate approximately 3,195 net tons per year requiring landfill disposal. By comparison, the Project with the Deck Concept, with diversion, would generate approximately 3,369 net tons of solid waste per year. Similar to the Project with the Deck Concept, Alternative 3's additional solid waste generation would be accommodated by the County's City-certified waste processing facilities. Alternative 3's operation would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts with respect to solid waste generation and landfill capacity under Alternative 3 would be less than significant. Further, because Alternative 3 would generate less solid waste than the Project with the Deck Concept, impacts under Alternative 3 would be less.

(iv) *Electric Power, Natural Gas, and Telecommunications Infrastructure*

(a) Project

As discussed in Section IV.N.4, *Electric Power, Natural Gas, and Telecommunications Infrastructure*, of this Draft EIR, energy (electric power and natural gas) associated with Project construction would require the Project Applicant to coordinate any potential removals or relocations with LADWP and the SoCalGas. Construction impacts associated with the installation of new telecommunication infrastructure would be of short duration and would cease to occur when installation is complete. Furthermore, no upgrades to off-site telecommunication facilities are anticipated. Therefore, the construction of the Project is not anticipated to adversely affect the electric power, natural gas, and telecommunication infrastructure serving the surrounding uses or utility system capacity and would not require the construction of new energy facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects. Construction impacts would be less than significant.

As determined in Section IV.C, *Energy*, of this Draft EIR, the Project's annual net increase in operational electricity and natural gas usage would not require additional infrastructure beyond proposed utilities installed on-site during construction.

The LADWP's projected load forecasts for electricity and LADWP 2017 Power Strategic Long-Term Resource Plan identifies adequate energy resources to support future generation capacity. The Project would not require additional infrastructure (i.e., a substation) beyond proposed utilities installed on-site during construction. Therefore, during Project operations, it is expected that LADWP's existing infrastructure, planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand.

Regarding natural gas, based on the Project's small fraction of total natural gas consumption for the region, ongoing SoCalGas long-range planning efforts to provide natural gas for this service region, and sufficient existing infrastructure, it is expected that SoCalGas' existing and planned natural gas supplies and infrastructure would be sufficient to meet the Project's demand for natural gas. Furthermore, SoCalGas has stated that it has "facilities in the area" of the Project Site and that "service would be in accordance with SoCalGas' policies and extension rules on file with the California Public Utilities Commission (Commission) at the time contractual arrangements are made."⁵⁴

Telecommunication providers already deliver their services to a large number of commercial and residential buildings in the vicinity of the Project Site, it is anticipated that existing telecommunication facilities would be sufficient to support the Project's needs for telecommunication services. Therefore, the Project would not create the need

⁵⁴ SoCalGas, Will Serve – 670 Mesquit St, Los Angeles. Included in Appendix E of this Draft EIR.

for new off-site telecommunications infrastructure, which could cause significant environmental effects.

Alternative 3 would develop the Project Site and increase density above existing conditions such that new buildings and population would be on the Project Site. The floor area and intensity of development under Alternative 3 (1,792,103 square feet and 7.5:1 FAR) would be the same as under the Project. Similar to the Project, Alternative 3 would implement various Project Design Features, including AQ-PDF-1 (natural gas fire place prohibition); GHG-PDF-1 (Green Building Features); and WS-PDF-1 (Water Conservation Features), such that additional infrastructure beyond the proposed utilities installed on-site during construction would not be required. As Alternative 3 would be built on the same Project Site as under the Project, existing telecommunications facilities would be sufficient to support Alternative 3's needs for telecommunication services as under the Project. Therefore, Alternative 3 would not require the construction of new energy facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects. Impacts would be less than significant and similar to the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would result in a demand for electricity, natural gas, and telecommunication services. The LADWP's projected load forecasts for electricity and LADWP 2017 Power Strategic Long-Term Resource Plan identifies adequate energy resources to support future generation capacity throughout the City. Therefore, during operation, it is expected that existing and planned electricity (including lighting for outdoor events on the Deck), natural gas, and telecommunications infrastructure would be sufficient to support the Project with the Deck Concept's electricity demand. The Project with the Deck Concept would not require additional infrastructure (i.e., a substation) beyond proposed utilities installed on-site during construction. As natural gas and telecommunication providers already deliver their services to a large number of commercial and residential buildings in the vicinity of the Project Site, it is anticipated that existing natural gas and telecommunications facilities would be sufficient to support the Project with the Deck Concept's needs for natural gas and telecommunication services. Because natural gas, electricity, and telecommunications infrastructure is in place to serve the Project Site, the Project with the Deck Concept would not require or result in the relocation or construction of new or expanded facilities, the construction or relocation of which could cause significant effects upon the environment. Impacts under the Project with the Deck Concept would be less than significant.

Based on the similarity in occupancy (5,266 new occupants under the Project with the Deck Concept and 5,405 new occupants under Alternative 3), Alternative 3 would not largely differ in demand or adversely affect the area's available supply or distribution infrastructure capabilities. The total occupied floor area of Alternative 3 (1,792,103 square feet) would be the same as under the Project with the Deck Concept. As such, Alternative 3 as with the Project with the Deck Concept would not result in a specific need to construct new electric power, natural gas, or telecommunications facilities, the

construction of which could cause significant environmental effects. Because electric power, natural gas, and telecommunications facilities are currently available within the area and have adequate capacity to serve either the Project with the Deck Concept or Alternative 3, impacts to these services under the Project with the Deck Concept and Alternative 3 would be less than significant and similar.

(3) Relationship of the Alternative to Project Objectives

As described above, Alternative 3 would develop 420 residential units; 973,153 square feet of office, the same 236 hotel rooms; and 208,410 square feet of commercial uses including retail, restaurant, studio/event/gallery/museum, and gym. Alternative 3 would also provide 214,414 square feet of open space, inclusive of a 75,000 square foot Deck. Alternative 3 would provide the same developed floor area and FAR as the Project. As Alternative 3 would develop the same uses as under the Project and in the same Project Site in proximity to the Los Angeles River, Ribbon of Light Bridge, the proposed PARC Improvements, and the 7th Street Bridge, Alternative 3 would substantially meet all of the Project Objectives.

Because Alternative 3 would develop more residential units on the Project Site as compared to the Project, as well as provide a 75,000 square-foot Deck, Alternative 3 would meet the following Project Objectives to a greater extent than the Project:

3. Provide much-needed market-rate and affordable multi-family housing.
7. Provide a variety of publicly accessible at-grade and generous above-grade open spaces for Project occupants that take advantage of the Project's stepped building design, Los Angeles River frontage, nearby public improvements and opportunities for river access and panoramic views.
8. Create pedestrian and bicycle connections that link the 7th Street Bridge with landscaped open space within the Project Site and the City's proposed PARC Improvements, Ribbon of Light Bridge, and potential future Metro Arts District/6th Street Station, to reduce travel time, unite the Arts District neighborhoods and Boyle Heights communities, while increasing physical and visual access to the Los Angeles River.
10. Maximize the opportunity to construct a multi-use deck over the Railway Properties, along the Los Angeles River, that would connect the 7th Street Bridge with the City's approximately \$7 billion investment in the Ribbon of Light Bridge and proposed \$23 million PARC Improvements that would create 12 acres of open space for the Arts District and Boyle Heights, complementing future public programming and enhancing public views of the Los Angeles River.

Compared to the Project with the Deck Concept, Project Objective No. 3 under Alternative 3 would be met to a greater extent, however, Project Objective Nos. 7, 8 and 10 would be met to a lesser extent since Alternative 3 would include a smaller deck.

The following Project Objectives would be met to a similar extent under Alternative 3 as the Project or the Project with the Deck Concept:

1. Develop a mixed-use infill Project that can accommodate creative office, commercial, and residential uses.
4. Provide needed hotel rooms in an underserved part of Downtown Los Angeles.
6. Provide innovative architectural design in a unique, prominent location along the Los Angeles River, between the Ribbon of Light Bridge and the City's proposed PARC Improvements, and the historic 7th Street Bridge.
9. Create a sign district encompassing the Project Site that: complements the Ribbon of Light Bridge and proposed PARC Improvements, highlights the presence of and connectivity to the Los Angeles River, helps to establish the Ribbon of Light Bridge and 7th Street Bridge as a gateway from the eastern side of the Los Angeles to the Arts District, ensures the economic vitality of the Project tenants, thereby contributing to the City's economic base, and builds off of the artistic character of the neighborhood.

Because Alternative 3 would provide less commercial space and generate approximately 4,215 net new employees, compared to, 4,523 under the Project or the Project with the Deck Concept, Alternative 3 would meet the following Project Objectives to a lesser extent than the Project or the Project with the Deck Concept:

2. Redevelop the site with high-jobs-producing land uses that increase economic activity on the Project Site and in the Project area.
5. Provide a wide range of entertainment, restaurant, and recreational amenities for Downtown residents and visitors from throughout the City.

d) Alternative 4: No Residential/Reduced Intensity Alternative

(1) Description of the Alternative

Alternative 4, the No Residential/Reduced Intensity Alternative would reduce the Project's floor area from 1,792,103 square feet to 1,149,820 square feet, and reduce the Project's FAR from 7.5:1 to 4.8:1. However Alternative 4 would not provide any residential units or hotel use. Alternative 4 would also have reduced floor area/intensity compared to the Project as it would not construct Building 1, which includes both residential and hotel uses under the Project. The footprint from Building 1 would be replaced with a 20,000 square-foot landscaped area that would be used as publicly accessible open space. Alternative 4 would maintain the same office floor area (944,055 square feet) as under the Project. Alternative 4 would also maintain the same studio/event/gallery/potential museum floor area (93,617 square feet) and gym floor area (62,148 square feet) as under the Project. Alternative 4 would substantially reduce retail floor area from 136,152 square feet to 10,000 square feet, and restaurant floor area would decrease from the Project's 89,577

square feet to 40,000 square feet. The rest of the buildings retain the same mix of land uses, a similar site plan, and the same maximum building heights as under the Project. The primary differences between the Project and Alternative 4 include the removal of the residential and hotel uses and a decrease in retail/restaurant floor area. Alternative 4 would provide a minimum of 1,300 traditional vehicle parking spaces, with parking for up to 2,275 vehicles using a combination of automated parking systems, valet parking, or other efficiency parking methods. Parking would be provided in a four-level, subterranean parking structure and within at-grade, and above-grade structured parking spanning the Project Site, resulting in a shallower subterranean garage compared to the six-level subterranean structure proposed under the Project. As with the Project, a rooftop heliport would be located on Building 5 for emergency and occasional private use. Alternative 4 would not provide for the development of a Deck. The Project's deck would be eliminated under Alternative 4 due to the changed nature of uses (i.e., elimination of residential and hotel uses) and overall reduction in the Project's size and density.

The components of Alternative 4 are compared to those of the Project in **Table V-16, Comparison of Alternative 4 to the Project**.

TABLE V-16
COMPARISON OF ALTERNATIVE 4 TO THE PROJECT

Component	Project	Alternative 4	Difference between Project and Alternative 4
Residential Dwelling Units	308 du	0 du	-308 du
Office	944,055 sf	944,055 sf	-0 sf
Retail	136,152 sf	10,000 sf	-126,152 sf
Restaurant	89,577 sf	40,000 sf	-49,577 sf
Hotel (236 rooms)	158,647 sf	0 sf	-158,647 sf
Studio/Event/Gallery/Potential Museum	93,617 sf	93,617 sf	-0 sf
Gym	62,148 sf	62,148 sf	-0 sf
Total Developed Floor Area	1,792,103 sf	1,149,820 sf	-642,283 sf
FAR	7.5:1	4.8:1	Reduced
Provided Open Space	141,876 sf	131,353 sf	-10,523 sf
Open Space with the Deck	273,876 sf	131,353 sf (No Deck)	-142,523 sf
Deck & Capacity @ 1 person per 15 sf	132,000 sf/ 8,800 ppl	0 sf/ 0 ppl	-132,000 sf/ -8,800 ppl
Vehicle Parking Spaces	2,000–3,500	1,300–2,275	-700–1,225
Subterranean Structure	Six below- grade levels	Four below- grade levels	Two below-grade parking levels

SOURCE: ESA, 2021.

(2) Environmental Impacts

(a) *Air Quality*

(i) *Conflict with Air Quality Management Plan*

(a) Project

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, Project construction would not increase the frequency or severity of an existing violation or cause or contribute to new violations for nonattainment pollutants. Project construction would also comply with the CARB requirements to minimize short-term emissions from on-road and off-road diesel equipment, SCAQMD Rule 403 requirements to control fugitive dust, SCAQMD Rule 1113 for controlling VOC emissions from architectural coatings, and the ATCM, such that the Project would meet or exceed AQMP requirements to reduce emissions from construction equipment and activities. Project operations would not conflict with the 2016 AQMP in regard to transportation control strategies from the SCAG 2016–2040 RTP/SCS that are intended to reduce VMT and regional mobile source emissions. Project operation would also be consistent with, and would not conflict with, applicable air quality policies of the General Plan’s Air Quality Element. Project operations would also not result in an increase in localized emissions in excess of the SCAQMD-recommended localized significance thresholds at sensitive receptors in proximity to the Project Site and impacts would be less than significant.

Alternative 4 would include new development on the Project Site that would generate new criteria pollutant emissions. Similar to the Project, Alternative 4 would be consistent with the goals of SCAG’s 2016–2040 RTP/SCS and growth projections in the 2016 AQMP, since the growth would occur in a HQTAs and a TPA. Similar to the Project, Alternative 4 would be consistent with the AQMP in its incorporation of appropriate control strategies for emissions reduction during construction and operation. In addition, similar to the Project, Alternative 4 would also be consistent with applicable goals, objectives, and policies of the Air Quality Element of the General Plan that support and encourage pedestrian activity in the City and Community Plan area and uses that contribute to a land use pattern to reduce VMT and air pollutant emissions by providing employment within a TPA. For all of these reasons, impacts under Alternative 4 with respect to consistency with air quality management plans would be less than significant and similar to the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would be consistent with the goals of the AQMP regarding transportation control strategies for emissions reduction during construction and operation; it would be consistent with the City’s Air Quality Element that supports pedestrian activity and growth within a TPA; it would implement CARB requirements to minimize short-term emissions from on-road and off-road diesel equipment, as well as implement all applicable SCAQMD Rules. Operation of the Project with the Deck Concept would also not result in an increase in localized emissions that would exceed the

SCAQMD-recommended localized significance threshold concentrations at sensitive receptors in proximity to the Project Site. Because the Project with the Deck Concept would not conflict with air quality management plans, impacts would be less than significant.

Similar to the Project with the Deck Concept, Alternative 4 would include new development on the Project Site that would generate new criteria pollutant emissions. Similar to the Project with the Deck Concept, Alternative 4 would be consistent with the goals of SCAG's 2016–2040 RTP/SCS and growth projections in the 2016 AQMP, since the growth would occur in a HQTAs and a TPA. Alternative 4 would be consistent with the AQMP in its incorporation of appropriate control strategies for emissions reduction during construction and operation. In addition, Alternative 4 would also be consistent with applicable goals, objectives, and policies of the Air Quality Element of the General Plan that support and encourage pedestrian activity in the City and Community Plan area and uses that contribute to a land use pattern to reduce VMT and air pollutant emissions by providing employment within a TPA. For all of these reasons, impacts under Alternative 4 with respect to consistency with air quality management plans would be less than significant and similar to the Project with the Deck Concept.

(ii) *Cumulative Increase in Criteria Pollutants/Violation of Air Quality Standards*

(a) Construction

(i) *Project*

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, air emissions from Project construction on a maximum construction activity day would exceed the SCAQMD's regional significance thresholds for NO_x, and even with implementation of feasible mitigation measures, impacts would remain significant and unavoidable.

As with the Project, Alternative 4's construction phases have the potential to generate emissions that would exceed SCAQMD air quality standards through the use of heavy-duty construction equipment, construction traffic, fugitive dust emissions, paving operation, and the application of architectural coatings and other building materials. The maximum emissions under Alternative 4 would be similar to the Project because emission levels are based on a single day in which maximum construction activity would occur. Similar to the Project, even with incorporation of Mitigation Measure AQ-MM-1, construction emissions under Alternative 4 would exceed regional SCAQMD numerical significance thresholds for NO_x, and impacts would be significant and unavoidable. Alternative 4 would have a smaller total developed floor area as compared to the Project. As a result, Alternative 4 would have an expected duration of construction that would be less than the Project and, as such, impacts relative to air quality threshold standards under Alternative 4 would be less than the Project. However, because maximum daily construction emissions would be similar to the Project, impacts would remain significant and unavoidable.

(ii) *Project with the Deck Concept*

The Project with the Deck Concept would exceed SCAQMD's regional numerical significance thresholds for NO_x on a maximum construction activity day, even with implementation of Mitigation Measure AQ-MM-1. Even with implementation of all feasible mitigation measures, the Project with the Deck Concept would result in maximum daily emissions (on a maximum construction day) and significant and unavoidable impacts with respect to cumulative increase in criteria pollutants and air quality standards.

Similar to the Project with the Deck Concept, Alternative 4 would generate new criteria pollutant emissions during construction. As with the Project with the Deck Concept, Alternative 4's construction phases have the potential to generate emissions that would exceed SCAQMD air quality standards. With the absence of the Deck compared to the Project with the Deck Concept, Alternative 4 would have fewer days of maximum daily emissions than the Project with the Deck Concept. Nonetheless, similar to the Project with the Deck Concept, even with incorporation of Mitigation Measure AQ-MM-1, construction emissions under Alternative 4 would exceed regional SCAQMD numerical significance thresholds for NO_x, and impacts would be significant and unavoidable. However, because Alternative 4 would not include the Deck floor area and have a smaller developed floor area, the expected duration of construction would be less than under the Project with the Deck Concept. As such, impacts relative to air quality threshold standards under Alternative 4 would be less compared to the Project with the Deck Concept. However, because maximum daily construction emissions would be similar to the Project with the Deck Concept, impacts would remain significant and unavoidable.

(b) Operation

(i) *Project*

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, the Project's operation would not cause an exceedance of regional SCAQMD numerical significance thresholds for NO_x, CO, SO_x, PM₁₀, and PM_{2.5}, and impacts would be less than significant. However, VOCs emissions would be 84 pounds per day for the Project, which would exceed regional daily impact threshold of 55 pounds per day, and Project impacts would be potentially significant. Even with implementation of feasible mitigation measures (Mitigation Measures AQ-MM-2 through AQ-MM-3 and TRAF-MM-1), which would reduce Project VOC emissions to 77 pounds per day, associated Project impacts would be reduced to 77 pounds per day and would remain significant and unavoidable.

During operation, Alternative 4 would generate emissions associated with vehicle trips, heating, lighting, other electric and natural gas power requirements, emergency generators, and architectural coatings. As with the Project, Alternative 4 would not exceed the SCAQMD numerical significance thresholds for NO_x, CO, SO_x, PM₁₀, and PM_{2.5}, and Alternative 4's emissions for those pollutants would be less than under the Project due to the elimination of residential uses and overall reduction in floor area. Thus, impacts

under Alternative 4 would be less than significant for these criteria pollutants. Prior to mitigation, based on emissions modeling conducted for Alternative 4, provided in Appendix P of this Draft EIR, Alternative 4 would result in net VOC emissions of 43 pounds per day, which would not exceed the daily impact threshold of 55 pounds per day. Therefore, impacts under Alternative 4 would be less than significant. Therefore, Alternative 4 would avoid the Project's significant and unavoidable operational emissions impact. Operational emissions calculations for Alternative 4 are provided in Appendix P of this Draft EIR.

(ii) *Project with the Deck Concept*

The Project with the Deck Concept would emit criteria pollutants from mobile, stationary, and area sources. The Project with the Deck Concept would comprise the same residential and commercial uses as the Project, and include a 132,000-square-foot Deck. In addition to source and mobile emissions from the residential and commercial uses, the Deck would emit source emissions related to coatings and landscaping, as well as generate mobile emissions related to intermittent programmed activities. Unmitigated VOC emissions would be 88 pounds per day, thus, exceeding the daily impact threshold of 55 pounds per day. Even with implementation of feasible mitigation measures (Mitigation Measures AQ-MM-2 through AQ-MM-3 and TRAF-MM-1), which would reduce the Project with the Deck Concept's VOC emissions to 81 pounds per day, VOC levels would still exceed the impact threshold. Impacts under the Project with the Deck Concept would remain significant and unavoidable.

During operation, Alternative 4 would generate emissions for the reasons described under the Project, above. Similar to the Project with the Deck Concept, Alternative 4 would not exceed the SCAQMD numerical significance thresholds for NO_x, CO, SO_x, PM₁₀, and PM_{2.5}, and Alternative 4's emissions for those pollutants would be less than significant and less than under the Project with the Deck Concept due to the elimination of residential uses and the deck, and the overall reduction in floor area. However, prior to mitigation, based on emissions modeling conducted for Alternative 4, provided in Appendix P of this Draft EIR, Alternative 4 would result in net VOC emissions of 43 pounds per day, which would not exceed the daily impact threshold of 55 pounds per day. Therefore, VOC impacts under Alternative 4 would be less than the Project with the Deck Concept and would avoid the project with the deck concept's significant and unavoidable impact. Operational emissions calculations for Alternative 4 are provided in Appendix P of this Draft EIR.

(iii) *Exposure of Sensitive Receptors to Pollutant Concentrations*

(a) Localized Emissions

(i) *Construction*

Project

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, given that NO_x, PM₁₀ and PM_{2.5} emissions would exceed the SCAQMD's localized thresholds, Project impacts would be potentially significant and would require implementation of Mitigation Measure AQ-MM-1 for impacts to be reduced to less-than-significant levels.

As with the Project, Alternative 4 would generate localized emissions during construction. Maximum daily localized construction emissions under Alternative 4 would be similar to the Project. As with the Project, maximum localized emissions under Alternative 4 associated with grading and architectural coatings during construction would be potentially significant and would require implementation of Mitigation Measure AQ-MM-1 to reduce impacts to less-than-significant levels. However, because Alternative 4 would have a smaller total developed floor area, the expected duration of construction would be less compared to the Project. As such, impacts relative to localized emissions under Alternative 4 would be less than the Project because of fewer maximum construction emission days.

Project with the Deck Concept

Maximum daily construction activities under the Project with the Deck Concept would exceed the SCAQMD's localized emission thresholds for NO_x, PM₁₀ and PM_{2.5}, a potentially significant impact to sensitive receptors. This impact would be addressed through implementation of Mitigation Measure AQ-MM-1, which would reduce localized emission levels to levels that are less than significant.

As with the Project with the Deck Concept, Alternative 4 would generate localized emissions during construction. Maximum daily localized construction emissions under Alternative 4 would be similar to the Project with the Deck Concept but would occur for fewer days since Alternative 4 would not include a Deck and would eliminate the residential uses and have reduced overall total floor area. As with the Project, maximum localized emissions under Alternative 4 associated with grading and architectural coatings during construction would be potentially significant and would require implementation of Mitigation Measure AQ-MM-1 to reduce impacts to less-than-significant levels. However, because Alternative 4 would have a smaller developed floor area and not include a Deck, the expected duration of construction would be less compared to the Project with the Deck Concept. As such, impacts relative to localized emissions under Alternative 4 would be less than the Project with the Deck Concept because of fewer maximum construction emission days.

(ii) *Operation*

Project

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, Project operation would not exceed the localized thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. Therefore, Project impacts related to localized operational emissions would be less than significant.

Based on emissions modeling conducted for Alternative 4, provided in Appendix P of this Draft EIR and as detailed in the *Energy* analysis below for Alternative 4, Alternative 4 would have reduced localized emissions and reduced natural gas combustion compared to the Project. Therefore, localized operational emission impacts under Alternative 4 would be less than significant and less than the Project.

Project with the Deck Concept

The Project with the Deck Concept would emit criteria pollutants from mobile, stationary, and area sources. In addition to source and mobile emissions from residential and commercial uses, the Project with the Deck Concept would emit source emissions from the Deck, including architectural coating, consumer products and landscaping, and mobile emissions related to visitors to programmatic activities on the Deck. The operation of the Project with the Deck Concept would not exceed localized thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. Impacts under the Project with the Deck Concept with respect to localized emissions would be less than significant.

Based on emissions modeling conducted for Alternative 4, provided in Appendix P of this Draft EIR, Alternative 4 would have reduced localized operational emissions and reduced natural gas combustion compared to the Project with the Deck Concept. In addition, Alternative 4, which would not provide a Deck; would not generate emissions associated with the Deck and activity, such as vehicle trips, under the Project with the Deck Concept; and Alternative 4 would eliminate the residential uses and reduced overall floor area and commercial uses. Therefore, localized operational emission impacts under Alternative 4 would be less than significant and less than the Project with the Deck Concept.

(b) *Carbon Monoxide Hotspots*

(i) *Project*

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, the Project's 27,040 daily vehicle trips and residential and commercial uses would not generate CO hotspots that would exceed emission thresholds. Impacts with respect to CO hotspots would be less than significant.

Vehicle trips would be approximately 26 to 34 percent lower under Alternative 4 than the Project.⁵⁵ Therefore, as Alternative 4 would generate fewer vehicle trips than the Project, CO hotspot impacts would be less than the Project and would be less than significant.

(ii) *Project with the Deck Concept*

Operation of the Project with the Deck Concept would emit CO pollutants from mobile, stationary, and area sources. Mobile source emissions under the Project with the Deck Concept would comprise 27,493 trips per day. The Project with the Deck Concept's daily vehicle trips and residential and commercial uses would not generate CO hotspots that would exceed emission thresholds. Impacts with respect to CO hotspots would be less than significant.

Vehicle trips would be approximately 31 to 39 percent lower under Alternative 4 than the Project with the Deck Concept.⁵⁶ Therefore, as Alternative 4 would generate fewer vehicle trips than the Project with the Deck Concept, CO hotspot impacts would be less than significant and less than the Project with the Deck Concept.

(c) Toxic Air Contaminants

(i) *Construction*

Project

As discussed in Section IV.A, *Air Quality*, maximum daily construction activity for the Project would generate DPM emissions resulting in TAC emissions adjacent to sensitive residential receptors. TAC levels under the Project would be below SCAQMD thresholds and, as such, sensitive receptors would not be exposed to substantial TAC concentrations. Impacts related to TAC emissions and health risk impacts would be less than significant under the Project.

Under Alternative 4, as with the Project, TAC emissions associated with DPM emissions from heavy construction equipment would occur adjacent to sensitive residential receptors. TAC levels under Alternative 4 would not exceed SCAQMD thresholds and sensitive receptors would not be exposed to substantial TAC concentrations. Impacts with respect to TACs would be less than significant under both the Project and Alternative 4. However, because of the reduced duration of construction activity required for less overall development under Alternative 4, impacts with respect to TACs would be less than under the Project.

Project with the Deck Concept

Under the Project with the Deck Concept, maximum daily construction activity would generate DPM emissions resulting in TAC emissions adjacent to sensitive residential

⁵⁵ Fehr & Peers, *Analysis of 670 Mesquit Project Alternatives Technical Memorandum*, October 8, 2021. Provided in Appendix P of this Draft EIR.

⁵⁶ Fehr & Peers, *Analysis of 670 Mesquit Project Alternatives Technical Memorandum*, October 8, 2021. Provided in Appendix P of this Draft EIR.

receptors. TAC levels under the Project would not exceed SCAQMD thresholds and, as such, sensitive receptors would not be exposed to substantial TAC concentrations. Impacts related to TAC emissions and health risk impacts would be less than significant under the Project with the Deck Concept.

Under Alternative 4, as with the Project with the Deck Concept, TAC emissions associated with DPM emissions from heavy construction equipment would occur during construction adjacent to sensitive residential receptors. TAC levels under Alternative 4 would not exceed SCAQMD thresholds and sensitive receptors would not be exposed to substantial TAC concentrations. Impacts with respect to TACs would be less than significant under both the Project and Alternative 4. However, because of the decreased duration of construction activity required for the reduced overall development under Alternative 4, impacts with respect to TACs would be less than under the Project with the Deck Concept.

(d) Operation

Project

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, based on the uses expected on the Project Site, potential long-term operational impacts associated with the release of TACs would be minimal, regulated, and controlled, and would not be expected to exceed the SCAQMD significance threshold during operation, and Project impacts would be less than significant.

Alternative 4, as with the Project, would use consumer products and architectural coatings or involve other sources, such as charbroiling associated with restaurant uses. TAC emissions from these sources are anticipated to be minimal and charbroiling restaurant emissions would be regulated under SCAQMD Rule 1138. In addition, as with the Project, Alternative 4 would provide stationary emergency generators for its buildings. The emergency generators would result in emissions during maintenance and testing operations, similar to the Project. Emergency generators are permitted by the SCAQMD and regulated under SCAQMD Rule 1470. Maintenance and testing would occur periodically, up to 50 hours per year per Rule 1470. Alternative 4 would generate minor amounts of diesel emissions from mobile sources, such as delivery trucks, but would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. Furthermore, trucks would be required to comply with the applicable provisions of the CARB 13 CCR, Section 2025 (Truck and Bus regulation) to minimize and reduce PM and NO_x emissions from existing diesel trucks. However, with the reduced development intensity with the removal of Building 1, there would be fewer delivery trucks to the Project Site under Alternative 4 than the Project. Toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the uses expected on the Project Site, as with the Project, potential long-term operational impacts associated with the release of TACs under Alternative 4 would be minimal, regulated, and controlled, and would not be expected to exceed the applicable SCAQMD significance thresholds.

Operation of Alternative 4, as with the Project, would not expose sensitive receptors to substantial TAC concentrations, and operational impacts would be less than significant with impacts under Alternative 4 less than the Project.

Project with the Deck Concept

As discussed in Section IV.A, *Air Quality*, of this Draft EIR, based on the uses expected on the Project Site, potential long-term operational impacts associated with the release of TACs would be minimal, regulated, and controlled, and would not be expected to exceed the SCAQMD significance threshold during operation, and the Project with the Deck Concept impacts would be less than significant. Alternative 4, as with the Project with the Deck Concept, would use consumer products and architectural coatings or involve other sources, such as charbroiling associated with restaurant uses. TAC emissions from these sources are anticipated to be minimal and charbroiling restaurant emissions would be regulated under SCAQMD Rule 1138. In addition, Alternative 4 would provide stationary emergency generators for its buildings, which would be regulated under SCAQMD Rule 1470 for periodic maintenance and testing up to 50 hours per year. Alternative 4 would generate minor amounts of diesel emissions from mobile sources, such as delivery trucks, but would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. Furthermore, trucks would be required to comply with the applicable provisions of the CARB 13 CCR, Section 2025 (Truck and Bus regulation) to minimize and reduce PM and NO_x emissions from existing diesel trucks. With the reduced development from the removal of Building 1, there would be fewer delivery trucks to the Project Site under Alternative 4 than the Project with the Deck Concept. Toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the uses expected on the Project Site, as with the Project with the Deck Concept, potential long-term operational impacts associated with the release of TACs under Alternative 4 would be minimal, regulated, and controlled, and would not be expected to exceed the applicable SCAQMD significance thresholds. Operation of Alternative 4, as with the Project with the Deck Concept, would not expose sensitive receptors to substantial TAC concentrations, and operational impacts would be less than significant with impacts under Alternative 4 less than the Project with the Deck Concept.

(b) *Cultural Resources*

(i) *Historical Resources*

(a) Project

As discussed in Section IV.B, *Cultural Resources*, of this Draft EIR, there are no historical resources present on the Project Site. Regarding historical resources adjacent to the Project Site, the Project has the potential to result in direct impacts to the historic 7th Street Bridge due to the removal of character defining features along the north side of the Bridge adjacent to the project Site, including the removal of approximately 222 linear feet of character-defining railing. In addition, construction vibration could also impact the

structural integrity of the 7th Street Bridge under the Project, which is a potentially significant impact. Mitigation Measures, including CUL-MM-1 through CUL-MM-4 and NOISE-MM-6 through NOISE-MM-8, are required to reduce impacts to this historical resource. With implementation of these mitigation measures, impacts to the 7th Street Bridge would be reduced to levels that are less than significant.

As with the Project, no Deck is proposed under Alternative 4. Thus, the extent of direct impacts to the 7th Street Bridge would be similar under Alternative 4 and the Project. As with the Project, construction vibration under Alternative 4 could also impact the structural integrity of the 7th Street Bridge. Similar to the Project, the impacts to the 7th Street Bridge under Alternative 4 would be potentially significant and would require implementation of Mitigation Measures CUL-MM-1 through CUL-MM-4 and NOISE-MM-6 through NOISE-MM-8 to reduce impacts to less-than-significant levels. Based on the above, direct and indirect impacts would be similar under Alternative 4 and the Project.

(b) Project with the Deck Concept

To accommodate Deck and roadway construction, the Project with the Deck Concept would require the removal of 291 linear feet of existing character-defining railing at the historic 7th Street Bridge, resulting in a potentially significant historical resources impact. Construction of Alternative 4 which does not include a Deck, would be expected to remove approximately 222 feet of the 7th Street Bridge's existing character-defining features, including in-kind replacement railing. This is also considered a potentially significant impact. As with the Project with the Deck Concept, construction vibration under Alternative 4 could also impact the structural integrity of the 7th Street Bridge. Similar to the Project with the Deck Concept, the impacts to the 7th Street Bridge under Alternative 4 would be potentially significant and would require implementation of Mitigation Measures CUL-MM-1 through CUL-MM-4 and NOISE-MM-6 through NOISE-MM-8 to reduce impacts to less-than-significant levels. As Alternative 4 would not require any additional removal of character defining features (i.e., railing) for the buildout of a Deck, Alternative 4 would result in a less historical resources impact than under the Project with the Deck Concept.

(ii) *Archaeological Resources*

(a) Project

As discussed in Section IV.B, *Cultural Resources*, of this Draft EIR, there are no known archaeological resources identified within the Project Site. Nonetheless, due to the Project Site's proximity to the Los Angeles River (which is a known landmark for prehistoric habitation), soil matrices, past historic-period uses, and only moderate past disturbances, grading and excavation for the Project's subterranean garage may encounter unknown archaeological resources. Therefore, Project construction has the potential to disturb, damage, or degrade archaeological resources that could be encountered during construction, thus resulting in a substantial adverse change in the significance of an archaeological resource qualifying as a historical resource or unique

archaeological resources pursuant to CEQA Guidelines Section 15064.5. The Project would be required to implement Mitigation Measures CUL-MM-5 through CUL-MM-7 to reduce impacts related to archaeological resources to less-than-significant levels.

Alternative 4, with less subterranean parking would not excavate as deeply as under the Project. Alternative 4 would excavate up to four subterranean levels compared to up to six subterranean levels under the Project in the same excavation footprint. Although Alternative 4 has the potential to encounter archaeological resources, the potential for Alternative 4's construction to disturb, damage, or degrade archaeological resources resulting in a substantial adverse change in the significance of an archaeological resource (pursuant to CEQA Guidelines Section 15064.5) would be reduced compared to the Project. Alternative 4, as with the Project. Alternative 4 would be required to implement Mitigation Measures CUL-MM-5 through CUL-MM-7 in order to reduce impacts to less-than-significant levels. Further, because Alternative 4 would potentially require less excavation for the subterranean garage than under the Project, impacts related to archaeological resources under Alternative 4 would be less than under the Project, and would be less than significant with mitigation.

(b) Project with the Deck Concept

Grading and excavation for the Project with the Deck Concept, including excavation for subterranean parking may encounter unknown archaeological resources. As such, excavation activities have the potential to disturb, damage, or degrade archaeological resources that could be encountered during construction and, thus, impact archaeological resources. With implementation of Mitigation Measures CUL-MM-5 through CUL-MM-7, impacts to archaeological resources under the Project with the Deck Concept would be reduced to less-than-significant levels.

Alternative 4, with less subterranean parking, would not excavate as deeply as under the Project with the Deck Concept (up to six subterranean levels). It would potentially excavate up to four subterranean levels in the same excavation footprint. Although Alternative 4 has the potential to encounter archaeological resources, the potential for Alternative 4's construction to disturb, damage, or degrade archaeological resources resulting in a substantial adverse change in the significance of an archaeological resource (pursuant to CEQA Guidelines Section 15064.5) would be reduced compared to the Project with the Deck Concept. Alternative 4, as with the Project with the Deck Concept, would implement Mitigation Measures CUL-MM-5 through CUL-MM-7 to reduce impacts to less-than-significant levels. However, because Alternative 4 would potentially require less excavation for the subterranean garage than under the Project and would include no Deck construction, impacts related to archaeological resources under Alternative 4 would be less than under the Project with the Deck Concept, and would be less than significant with mitigation.

(iii) *Human Remains*

(a) Project

The Project would excavate to six subterranean levels. As discussed in Section IV.B, *Cultural Resources*, of this Draft EIR, no human remains were identified during the pedestrian survey of the Project Site, and no known human remains have been recorded within the Project Site or a 0.5-mile radius. In addition, with implementation of procedures codified in PRC Section 5097.98 and State Health and Safety Code Section 7050.5, impacts under the Project would be less than significant.

Alternative 4, with less subterranean parking, would not excavate as deeply as under the Project (up to six subterranean levels). Alternative 4 would excavate up to four subterranean levels in the same excavation footprint as the Project and have the potential to encounter unrecorded human remains. Pursuant to PRC Section 5097.98 and State Health and Safety Code Section 7050.5, any discovery of unrecorded human remains would require the immediate halting of construction or ground-disturbing activities and notification of the County Coroner. If the remains are determined to be Native American in origin, a “Most Likely Descendent” would be contacted to assist in determining appropriate treatment for the remains. In the event of the discovery of unrecorded human remains during construction, compliance with applicable regulatory requirements would ensure appropriate and handling of human remains. Thus, Alternative 4, impacts to human remains, under both the Project and Alternative 4 would be less than significant. Further, because of less excavation under Alternative 4, impacts with respect to human remains compared to the Project would be less.

(b) Project with the Deck Concept

The Project with the Deck Concept would excavate to six subterranean levels. A relatively limited amount of excavation would be required to install the piers that would support the Deck. Although no human remains have been recorded within the Project Site or within a 0.5-mile radius of the Project Site, all excavation activity has the potential to encounter unrecorded human remains. In the event that any human remains are recovered, the Project with the Deck Concept would implement procedures codified in PRC Section 5097.98 and State Health and Safety Code Section 7050.5. Implementation of these procedures would ensure appropriate handling of any recovered human remains and that any impacts to human remains would be less than significant.

Alternative 4 would involve no Deck construction and would excavate to approximately four subterranean levels, which would not be as deep as the Project with the Deck Concept. As with the Project with the Deck Concept, any discovery of unrecorded human remains would require the immediate halting of construction or ground-disturbing activities and implementation of procedures described under the Project, above. In the event of the discovery of unrecorded human remains during construction, compliance with applicable regulatory requirements would ensure appropriate and handling of human remains. Thus, impacts to human remains, under both the Project with the Deck Concept

and Alternative 4 would be less than significant. Further, because of less excavation under Alternative 4, impacts with respect to human remains compared to the Project with the Deck Concept would be less.

(c) *Energy*

(i) *Efficient Energy Consumption*

(a) *Project*

As discussed in Section IV.C, *Energy*, of this Draft EIR, construction of the Project would utilize fuel-efficient equipment consistent with State and federal regulations, such as fuel efficiency regulations in accordance with the CARB Pavley Phase II standards, the anti-idling regulation in accordance with CCR Title 13, Section 2485 and fuel requirements in accordance with CCR Title 17, Section 93115, and would comply with State measures to reduce the inefficient, wasteful, and unnecessary consumption of energy, such as petroleum-based transportation fuels. Construction would utilize energy only for necessary on-site activities and to transport construction materials and demolition debris to and from the Project Site, and impacts would be less than significant. During operation, the Project-related net increase in annual electricity consumption of approximately 26,472,098 kWh for the Project would be within LADWP's projected electricity supplies. The Project-related net increase in annual natural gas consumption of approximately 49,500,000 kBtu would fall within SoCalGas' projected consumption for the area and would be consistent with SoCalGas' anticipated regional demand from population or economic growth. The Project is estimated to consume approximately 2.37 million gallons of gasoline and 0.192 million gallons of diesel per year. Because of its location within an HQT, its walkable environment, the provision of EV charging stations and EV-ready stations, and TDM program, the Project would achieve a reduction in VMT more than a standard project within the Air Basin. The Project incorporates Project Design Feature GHG-PDF-1 (Green Building Features), which includes building features to achieve the LEED Silver Certification level or equivalent green building standards. The Project would incorporate Project Design Feature WS-PDF-1 (Water Conservation Features) to minimize water demand and associated energy needed for water conveyance. The Project would provide for the installation of the conduit and panel capacity to accommodate future EV charging stations. With the reduction in VMT and other conservation measures, the operation of the Project would not result in wasteful, inefficient, and unnecessary consumption of energy, and impacts would be less than significant.

Alternative 4 would utilize fuel-efficient equipment consistent with State and federal regulations. Construction would utilize energy only for necessary on-site activities and to transport construction materials and demolition debris to and from the Project Site, and impacts would be less than significant. During operation, based on energy modeling conducted for Alternative 4, provided in Appendix P of this Draft EIR Alternative 4 would generate a net increase in annual electricity consumption of approximately 17,645,726 kWh, which would be within LADWP's projected electricity supplies and would be less

than the Project. Alternative 4 would generate a net increase in annual natural gas consumption of approximately 19,900,000 kBtu, which would fall within SoCalGas' projected consumption for the area, would be consistent with SoCalGas' anticipated regional demand from population or economic growth, and would be less than the Project. Due to its smaller overall development scale than the Project, Alternative 4 would reduce vehicle activity, including delivery trucks, compared to the Project. Alternative 4 is estimated to consume approximately 1.22 million gallons of gasoline and 0.064 million gallons of diesel per year. As such, Alternative 4 would consume less gasoline and diesel fuel than the Project. As with the Project, because of its location within an HQTAs, its walkable environment, the provision of EV charging stations and EV-ready stations, TDM program, Alternative 4 would achieve a reduction in VMT more than a standard project within the Air Basin. Alternative 4 would incorporate Project Design Features as GHG-PDF-1 and WS-PDF-1 to minimize water demand and energy use. Alternative 4 would similarly install conduit and panel capacity to accommodate future EV charging stations. Therefore, Alternative 4, as with the Project, would not cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation and, as such, impacts related to efficient energy consumption would be less than significant. As Alternative 4 would require less electricity, natural gas, and transportation energy than the Project, impacts under Alternative 4 would be less than the Project. Operational energy calculations for Alternative 4 are provided in Appendix P of this Draft EIR.

(b) Project with the Deck Concept

The Project with the Deck Concept would require electricity and natural gas for operation of facilities, electricity for outdoor lighting associated the temporary programming on the Deck, and fuel for transportation. With the addition of the Deck during the last phase of construction, the Project with the Deck Concept would continue to use energy related to construction activities longer than under the Project. During operation, the Project with the Deck Concept's net increase in annual electricity consumption would be approximately 26,518,298 kWh. Demand for electricity would be within LADWP's projected electricity supplies. Project-related net increase in annual natural gas consumption would be approximately 49,500,000 kBtu. This demand would fall within SoCalGas' projected consumption for the area and would be consistent with SoCalGas' anticipated regional demand from population or economic growth. The Project with the Deck Concept is estimated to consume approximately 2.41 million gallons of gasoline and 0.196 million gallons of diesel per year. Because of its location within an HQTAs, its walkable environment, the provision of EV charging stations and EV-ready stations, and TDM program, the Project with Deck Concept would achieve a reduction in VMT more than a standard project within the Air Basin. The Project with the Deck Concept would incorporate Project Design Feature GHG-PDF-1 (Green Building Features), which includes building features to achieve the LEED Silver Certification level or equivalent green building standards. The Project with the Deck Concept would also incorporate Project Design Feature WS-PDF-1 (Water Conservation Features) to minimize water demand and associated energy needed for water conveyance. The Project with the Deck Concept would provide for the installation of the conduit and panel capacity to

accommodate future EV charging stations. With the reduction in VMT and other conservation measures, the operation of the Project with the Deck Concept would not result in wasteful, inefficient, and unnecessary consumption of energy, and impacts would be less than significant.

Based on energy modeling conducted for Alternative 4, provided in Appendix P of this Draft EIR, Alternative 4 would generate a net increase in annual electricity consumption of approximately 17,645,726 kWh, which would be within LADWP's projected electricity supplies and would be less than the Project with the Deck Concept. Alternative 4 would generate a net increase in annual natural gas consumption of approximately 19,900,000 kBtu, which would also be less than the Project with the Deck Concept and would be within the projected supplies of the energy providers. In addition, as with the Project with the Deck Concept, Alternative 4 would implement energy saving design features, such as EV charging stations. Neither the Project with the Deck Concept nor Alternative 4 would result in the wasteful or inefficient use of energy. Because of its smaller development scale, Alternative 4 would reduce vehicle, including delivery truck activity, compared to the Project with the Deck Concept. Alternative 4 is estimated to consume approximately 1.22 million gallons of gasoline and 0.064 million gallons of diesel per year. As such, it would consume less gasoline and diesel fuel than the Project with the Deck Concept. Alternative 4 as with the Project with the Deck Concept would minimize operational transportation fuel demand due to its location within an HQTAs and its walkable environment, the provision of EV charging stations and EV-ready stations. Energy efficiency impacts under both would be less than significant. Because Alternative 4 would result in less energy demand, impacts would be less than under the Project with the Deck Concept. Operational energy calculations for Alternative 4 are provided in Appendix P of this Draft EIR.

(ii) *Conflict with Plans for Renewable Energy or Energy Efficiency*

(a) Project

As discussed in Section IV.C, *Energy*, of this Draft EIR, the Project's design would comply with existing energy standards and incorporate project design features to reduce energy consumption. The Project would support and promote the use of renewable energy and energy efficiency and would result in less-than-significant impacts. The Project would be consistent with and not conflict with regional planning strategies that address energy conservation. Therefore, impacts would be less than significant.

Alternative 4, as with the Project, would comply with existing energy standards, would include a project design and building operation that would incorporate energy-conservation measures beyond those otherwise required, and would not conflict with adopted energy conservation plans. Alternative 4, as with the Project, would incorporate similar Project Design Features, including GHG-PDF-1 (Green Building Features) and WS-PDF-1 (Water Conservation Features) and accommodate future EV charging stations to increase energy efficiency. By exceeding the regulatory standards, similar to

the Project, Alternative 4 would have a less-than-significant impact regarding the provisions of plans for renewable energy and energy efficiency. As Alternative 4 would be in compliance with plans for renewable energy and energy efficiency, impacts under Alternative 4 would be similar to the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would comply with existing energy standards and incorporate design features to reduce energy consumption. The Project with the Deck Concept would support and promote the use of renewable energy and energy efficiency and impacts as discussed above. As such, the Project with the Deck Concept would be consistent and not conflict with regional planning strategies that address energy conservation. Impacts relating to renewable energy and energy efficiency plans would be less than significant.

Alternative 4, as with the Project with the Deck Concept, would also comply with existing energy standards, would include a project design and building operation that would incorporate energy-conservation measures, such as including GHG-PDF-1 (Green Building Features) and WS-PDF-1 (Water Conservation Features) beyond those otherwise required and, as such, would not conflict with adopted energy conservation plans. Alternative 4, as with the Project with the Deck Concept, would incorporate similar Project Design Features and accommodate future EV charging stations to increase energy efficiency. By exceeding the regulatory standards, similar to the Project with the Deck Concept, Alternative 4 would have a less-than-significant impact regarding the provisions of plans for renewable energy and energy efficiency. As Alternative 4 would be in compliance with plans for renewable energy and energy efficiency, impacts under Alternative 4 would be less than significant and similar to the Project with the Deck Concept.

(d) *Geology and Soils*

(i) *Seismic Hazards*

(a) Project

As discussed in Section IV.D, *Geology and Soils*, of this Draft EIR, the Project Site is not located within an Alquist-Priolo Special Studies Zone (earthquake fault zone) or in proximity to any identified active faults. The Project would implement the Los Angeles Building Code's seismic safety regulations, as well as CBC regulations related to specific seismic zones. Because of the Project Site's distance from active faults and the Los Angeles Department of Building and Safety's enforcement of state and local seismic safety regulations in building design, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault; strong seismic ground shaking; seismic-related ground failure; and landslides. Therefore, Project impacts would be less than significant.

Alternative 4 would be developed within the same general area as the Project relative to distance from active earthquake faults, and would have the same exposure to seismic activity. Alternative 4 would implement the Los Angeles Building Code's seismic safety regulations, implement similar building construction techniques, and result in similar exposure to seismic hazards as the Project. Impacts under both Alternative 4 and the Project, with respect to rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, and landslides would be less than significant. Impacts under Alternative 4 would be similar to those of the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would occupy the same building site as the Project, in addition to developing a 132,000 square-foot Deck that extends over the adjacent Rail Yard Property. The Project Site is not located within an Alquist-Priolo Special Studies Zone (earthquake fault zone) or in proximity to any identified active faults. The Project with the Deck Concept would implement the Los Angeles Building Code's seismic safety regulations, as well as CBC regulations related to specific seismic zones. Because of the Project Site's distance from active faults and the Los Angeles Department of Building and Safety's enforcement of state and local seismic safety regulations in building design, impacts with respect to earthquake fault rupture, ground shaking, or fault-induced landslides under the Project with the Deck Concept would be less than significant.

Alternative 4 would be developed within the same region as the Project with the Deck Concept relative to distance from active earthquake faults, and would have the same exposure to seismic activity. Alternative 4 would implement the Los Angeles Building Code's seismic safety regulations, implement similar building construction techniques, and result in similar to seismic hazards as the Project with the Deck Concept. Impacts under both Alternative 4 and the Project with the Deck Concept, with respect to rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, and landslides would be less than significant. Impacts under Alternative 4 would be similar to those under the Project with the Deck Concept.

(ii) *Soil Erosion or Loss of Topsoil*

(a) Project

As discussed in Section IV.D, *Geology and Soils*, of this Draft EIR, Project construction would increase the exposure of excavated soils to potential erosion. The Project would comply with applicable code and regulatory requirements including BMPs as required under the SWPPP that control erosion of soils. With such compliance, such that impacts associated with substantial erosion or loss of topsoil during construction would be less than significant.

Alternative 4, with less subterranean parking, would not excavate as deeply as under the Project (up to six subterranean levels). However, since subterranean parking would be provided throughout the Project Site, but at a shallower level than under the Project, the

disturbed footprint area under the Project and Alternative 4 would be generally similar. Similar to the Project, construction of Alternative 4 would comply with applicable code and regulatory requirements such that impacts associated with substantial erosion or loss of topsoil would be less than significant. Because of the similar disturbed area and excavation requirements under Alternative 4, impacts related to soil erosion would be similar to the Project.

(b) Project with the Deck Concept

Construction of the Project with the Deck Concept would result in exposure of excavated soils to potential erosion. The Project with the Deck Concept would comply with Los Angeles Building Code regulations related to grading and reduction of exposure and loss of soils. The foundations for the vertical columns supporting the Deck would be drilled concrete piers, resulting in limited ground disturbance and exposure of soils during construction of the Deck. Regulations include BMPs associated with the SWPPP required for all grading and excavation operations on the Project Site. The SWPPP incorporates measures to control erosion of all exposed soils. With compliance with applicable regulations, impacts associated with substantial erosion or loss of topsoil during construction of the Project with the Deck Concept would be less than significant.

Alternative 4, with less subterranean parking (up to four subterranean levels), would not excavate as deeply as under the Project with the Deck Concept (up to six subterranean levels). However, because subterranean parking would be located throughout the Project Site, although as a shallower depth under Alternative 4, the disturbed footprint area under the Project and Alternative 4 would be generally similar.

In addition, Alternative 4 would not disturb any of the railyard as under the Project with the Deck Concept. Similar to the Project with the Deck Concept, construction of Alternative 4 would comply with applicable code and regulatory requirements such that impacts associated with substantial erosion or loss of topsoil would be less than significant. Because of the similar disturbed area and excavation requirements under Alternative 4, impacts related to soil erosion would be similar to the Project with the Deck Concept. Operation of Alternative 4 would have no impact related to erosion and loss of topsoil, with operational impacts being similar to the Project with the Deck Concept.

(iii) *Unstable Geologic Units*

(a) Project

As discussed in Section IV.D, *Geology and Soils*, of this Draft EIR, the Project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, or potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, Project impacts would be less than significant.

Alternative 4, because it would be located on the same site as the Project, would also not be located on a geologic unit or soil that is unstable, or that would become unstable as a

result of Alternative 4, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, impacts under Alternative 4 and the Project would be less than significant and similar.

(b) Project with the Deck Concept

As discussed in Section IV.D, *Geology and Soils*, of this Draft EIR, the Project with the Deck Concept would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project with the Deck Concept, or potentially result in soil or earth failures, such as on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, impacts related to unstable geologic units under the Project with the Deck Concept would be less than significant.

Alternative 4, as with the Project with the Deck Concept, would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of Alternative 4. Alternative 4 would not cause on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, impacts related to unstable geologic units under Alternative 4 or the Project with the Deck Concept would be less than significant. Impacts under Alternative 4 would be similar to those under the Project with the Deck Concept.

(iv) *Expansive Soils*

(a) Project

As discussed in Section IV.D, *Geology and Soils*, of this Draft EIR, the Project would not be located on expansive soil creating substantial risks to life or property caused in whole or in part by its exacerbating the expansive soil conditions, and impacts would be less than significant.

Similar to the Project, Alternative 4 would not be located on expansive soil that would create substantial risks to life or property caused in whole or in part by its exacerbating the expansive soil conditions. As such, impacts related to expansive soils under Alternative 4 and the Project would be less than significant and similar.

(b) Project with the Deck Concept

The Project with the Deck Concept would not be located on expansive soils or be subject to foundation and infrastructure failure associated with expansive soils. The Project with the Deck Concept would require excavation depths for six levels of subterranean parking and excavation for Deck columns. Impacts related to expansive soils under the Project with the Deck Concept would be less than significant.

Alternative 4 would not be located on expansive soil creating substantial risks to life or property caused in whole or in part by its exacerbating the expansive soil conditions. Alternative 4 would require excavation depths for four levels of subterranean parking. As such, impacts related to expansive soils under Alternative 4 and the Project with the Deck

Concept would be less than significant. Impacts under Alternative 4 would be similar to those of the Project with the Deck Concept.

(v) *Paleontological Resources*

(a) Project

As discussed in Section IV.D, *Geology and Soils*, of this Draft EIR, Project-related grading and excavation for the subterranean parking structure, which constitutes the vast majority of Project construction, may encounter native soils and sediment. These soils and sediment have a high potential for containing previously unknown buried paleontological resources and, as such, excavation could directly or indirectly destroy a unique paleontological resource. Mitigation would be required and with implementation of Mitigation Measures GEO-MM-1 through GEO-MM-4, Project impacts would be reduced to less than significant.

Alternative 4, with less subterranean parking, would not excavate as deeply as under the Project (up to six subterranean levels). Alternative 4 would potentially excavate up to a lower depth (up to four subterranean levels) within the same excavation footprint over the Project Site. Although all excavation activities have the potential to encounter paleontological resources, the potential for Alternative 4's excavation to disturb, damage, or degrade paleontological resources resulting in a substantial adverse change in the significance of a paleontological resource would be reduced compared to the Project. Further, Alternative 4, as with the Project, would implement Mitigation Measures CUL-MM-5 through CUL-MM-7 to reduce impacts to less-than-significant levels. Because Alternative 4 would require less excavation than under the Project, impacts related to paleontological resources under Alternative 4 would be less.

(b) Project with the Deck Option

Grading and excavation for the Project with the Deck Concept, including excavation for six levels of subterranean parking and installation of vertical columns between the existing railroad tracks for the Deck, may encounter unknown paleontological resources. As such, the Project with the Deck Concept has the potential to disturb, damage, or degrade paleontological resources that could be encountered during construction and, thus, result in a substantial adverse change in the significance of a paleontological resource. With implementation of Mitigation Measures GEO-MM-1 through GEO-MM-4 under the Project with the Deck Concept, impacts to paleontological resources resulting in a substantial adverse change in the significance of a paleontological resource would be less than significant.

Alternative 4, with less subterranean parking, would not excavate as deeply as under the Project with the Deck Concept (up to six subterranean levels). Alternative 4 would potentially excavate up to four subterranean levels in the same excavation footprint. As with the Project with Deck Concept, the potential exists for Alternative 4's construction to directly or indirectly destroy a unique paleontological resource. As with the Project with

the Deck Concept, Alternative 4 would implement Mitigation Measures GEO-MM-1 through GEO-MM-4. With implementation of these measures, impacts to paleontological resources would be less than significant under both Alternative 4 and the Project with the Deck Concept. However, because of the difference in excavation quantities between the Project and Alternative 4, impact related to the potential exposure of paleontological resources would be less under Alternative 4 than under the Project with the Deck Concept.

(e) *Greenhouse Gas Emissions*

(i) *Conflict with Applicable Plans, Policies, Regulations, or Recommendations*

(a) Project

As discussed in Section IV.E, *Greenhouse Gas Emissions*, of this Draft EIR, the Project would be generally consistent with regulations and policies and comply with or exceed the regulations and reduction actions/strategies outlined in the Climate Change Scoping Plan, 2020–2045 RTP/SCS, the L.A.’s Green New Deal (Sustainable City pLAn 2019), and the Los Angeles Green Building Code. Impacts related to GHG emissions would be less than significant.

Alternative 4, as with the Project, would be consistent with applicable strategies outlined in the Climate Change Scoping Plan, 2020–2045 RTP/SCS, the City of L.A.’s Green New Deal (Sustainable City pLAn 2019), and the Los Angeles Green Building Code. Both the Project and Alternative 4 are located within an HQTAs-designated location, which would also encourage utilization of alternative modes of transportation in support of the applicable GHG emission reduction plans and policies included within the Climate Change Scoping Plan, the 2020–2045 RTP/SCS, the City of L.A.’s Green New Deal (Sustainable City pLAn 2019), and Los Angeles Green Building Code. As such, similar to the Project, Alternative 4 would not conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHGs. Thus, impacts related to GHGs would be less than significant and similar to the Project.

(b) Project with the Deck Concept

As discussed in Section IV.E, *Greenhouse Gas Emissions*, of this Draft EIR, the Project with the Deck Concept would be consistent with regulations and policies and comply with or exceed the regulations and reduction actions/strategies outlined in the Climate Change Scoping Plan, 2020–2045 RTP/SCS, the L.A.’s Green New Deal (Sustainable City pLAn 2019), and the Los Angeles Green Building Code. Impacts related to GHG policies under the Project with the Deck Concept would be less than significant.

Alternative 4 would be consistent with applicable strategies outlined in Climate Change Scoping Plan, 2020–2045 RTP/SCS, the L.A.’s Green New Deal (Sustainable City pLAn 2019), and the Los Angeles Green Building Code. As such, similar to the Project with the Deck Concept, Alternative 4 would not conflict with applicable plans, policies, or

regulations adopted for the purpose of reducing GHGs. Both the Project with the Deck Concept and Alternative 4 are located within an HQTAs-designated location, which would also encourage utilization of alternative modes of transportation in support of the applicable GHG emission reduction plans and policies included within the Climate Change Scoping Plan, the 2020–2045 RTP/SCS, the City of L.A.’s Green New Deal (Sustainable City pLAN 2019), and Los Angeles Green Building Code. Thus, impacts related to GHGs would be less than significant and similar to the Project with the Deck Concept.

(f) *Hazards and Hazardous Materials*

(i) *Hazards to the Public or Environment through the Routine Transport, Use, or Disposal of Hazardous Materials*

(a) Project

As discussed in Section IV.F, *Hazards and Hazardous Materials*, of this Draft EIR, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Construction and occupancy of the Project would include demolition of existing structures, which may contain asbestos and other hazardous materials; construction equipment and materials, which may contain oils, paints, caustics, and other hazardous materials; and the limited use of potentially hazardous materials typically used in residences, offices, and restaurants. Such materials would be used, stored, and disposed of in consumer quantities and in accordance with applicable laws and regulations and manufacturers’ instructions, and impacts would be less than significant.

Construction of Alternative 4, as with the Project, would include demolition of existing warehouse buildings and surface parking lots. Construction equipment and materials, such as fuels, oils and lubricants, solvents and cleaners, adhesives, paints and thinners, degreasers, cement and concrete, and asphalt mixtures, which are all commonly used in construction, would be used, stored, and disposed of in consumer quantities and in accordance with applicable laws and regulations and manufacturers’ instructions. However, the overall scale of construction activity would be reduced and as such, Alternative 4 would generate fewer hazardous materials associated with construction activity than the Project. Construction impacts would be less than significant under both the Project and Alternative 4, and less under Alternative 4 than the Project.

As with the Project, operation of Alternative 4 would involve the limited use of potentially hazardous materials typical of those used and restaurants, including cleaning agents, paints, pesticides, and other materials used for landscaping. In addition, hazardous materials on the Project Site would continue to be acquired, handled, used, stored, and disposed of in accordance with all manufacturers’ specifications and all applicable federal, State, and local requirements. Alternative 4 would comply with all applicable regulations concerning the transport, use, and disposal of hazardous waste, as with the Project, and

impacts would be less than significant. Due to Alternative 4's elimination of the Project's residential and hotel components and overall reduction in scale, Alternative 4 would generate less household and operational hazardous materials than under the Project. Overall, the generation of hazardous materials would be less than significant under both the Project and Alternative 4; however, because of the reduction in scale under Alternative 4, impacts would be less than the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Construction and occupancy of the Project with the Deck concept, would include demolition of existing structures, which may contain asbestos and other hazardous materials; construction equipment and materials, which may contain oils, paints, caustics, and other hazardous materials; and the limited use of potentially hazardous materials typically used in residences, offices, and restaurants. Such materials would be used, stored, and disposed of in consumer quantities and in accordance with applicable laws and regulations and manufacturers' instructions. Impacts related to hazards and hazardous materials under the Project with the Deck Concept would be less than significant.

As with the Project with the Deck Concept, construction and operation of Alternative 4 would involve the limited use of potentially hazardous materials typical of those used in offices, retail, and restaurants, including cleaning agents, paints, pesticides, and other materials used for landscaping. In addition, hazardous materials on the Project Site would continue to be acquired, handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, State, and local requirements. Alternative 4 would comply with all applicable regulations concerning the transport, use, and disposal of hazardous waste, as with the Project with the Deck Concept, and impacts would be less than significant. Due to Alternative 4's elimination of the Project with the Deck Concept's residential and hotel components and overall reduction in scale, Alternative 4 would generate less household and operational hazardous materials than under the Project with the Deck Concept. Overall, the generation of hazardous materials would be less than significant under both the Project with the Deck Concept and Alternative 4; however, because of the reduction in scale under Alternative 4, impacts would be less than the Project with the Deck Concept.

(ii) *Hazard to the Public or Environment Involving the Accidental Release of Hazardous Materials into the Environment*

(a) Project

As discussed in Section IV.F, *Hazards and Hazardous Materials*, of this Draft EIR, soil excavation for the six-level subterranean parking structure at the Project Site could expose construction workers and the environment to elevated concentrations of

hazardous materials, present in the soil, including soil gases. As such, during Project construction, impacts would be potentially significant. The Project would require the implementation of Mitigation Measures HAZ-MM-1 and HAZ-MM-2, which would ensure the proper management of contaminated soils and to reduce the risk of impacts to construction workers, the public, and the environment, and impacts would be reduced to a less-than-significant level.

Alternative 4 would excavate for a four-level subterranean parking garage, thus reducing the Project's excavated soil volume. Such excavation for Alternative 4, as with the Project, could expose the public or the environment to soil vapors and other hazardous materials present in the soils. Alternative 4 would require the implementation of Mitigation Measures HAZ-MM-1 and HAZ-MM-2, which would ensure the proper management of contaminated soils and to reduce the risk of impacts to construction workers, the public, and the environment, and impacts would be reduced to a less-than-significant level.

Alternative 4 would require less excavation since it would reduce subterranean parking compared to the Project. Therefore, due to the substantial reduced excavation depth under Alternative 4, impacts would be less under Alternative 4 than under the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would extend into the Railway Properties. Excavation activities associated with the development of the six-level subterranean garage and drilling the piers for the Deck have the potential to expose the public and the environment to hazardous soil vapors and other hazardous materials present in the soils, including herbicides for weed control, hydrocarbons, metals, creosote, and naphthalene associated with former railroad tracks on a portion of the Project Site as well as existing railroad operations in the Railyard Properties. The Project with the Deck Concept would implement Mitigation Measure HAZ-MM-3 to address additional unknown contamination or soil gas levels during performed earthwork at the Railway Properties. Mitigation Measure HAZ-MM-3 requires soil sampling at the Railway Properties prior to construction of the Deck. The Project with the Deck Concept would also implement Mitigation Measures HAZ-MM-1 and HAZ-MM-2 in the event of elevated contaminant levels over the Project Site that exceed applicable regulatory standards. With the implementation of mitigation measures, impacts related to release of hazardous materials into the environment under the Project with the Deck Concept would be less than significant.

Alternative 4 would not develop a Deck that encroaches into the Railway Properties. As such, Mitigation Measure HAZ-MM-3 would not be required. Alternative 4 would implement Mitigation Measures HAZ-MM-1 and HAZ-MM-2 in the event of elevated soil contaminant levels or soil gas levels that exceed applicable regulatory standards within the Project Site (garage construction area). In addition, Alternative 4 would require less excavation than the Project with the Deck Concept since it would reduce subterranean parking, resulting in four levels of underground parking compared to six levels under the Project with the Deck Concept. Impacts under both the Project with the Deck Concept and Alternative 4 would be less than significant with mitigation. However, due to the

reduced excavation depth and activity under Alternative 4, impacts would be less compared to the Project with the Deck Concept.

(iii) *Hazard Resulting from Hazardous or Acutely Hazardous Materials, Substances, or Waste within One-Quarter Mile of a School*

(a) Project

As discussed in Section IV.F, *Hazards and Hazardous Materials*, of this Draft EIR, there are no existing or proposed schools within one-quarter mile of the Project Site. Therefore, impacts would be less than significant.

Alternative 4, as with the Project, is not located within one-quarter mile of a school. Therefore, similar to the Project, impacts under Alternative 4 would be less than significant.

(b) Project with the Deck Concept

There are no existing or proposed schools within one-quarter mile of the Project Site. Therefore, impacts would be less than significant. Alternative 4, as with the Project, is not located within one-quarter mile of a school. Therefore, impacts under Alternative 4 and the Project with the Deck Concept would be less than significant and similar.

(iv) *Hazardous Materials Sites*

(a) Project

As discussed in Section IV.F, *Hazards and Hazardous Materials*, of the Draft EIR, although the Project Site is located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, the listing is a permit for air emissions for a former textile manufacturing facility. The facility had no records of violations and is no longer operating at the Project Site. As such, the development of the Project or Alternative 4 would not occur on a listed, active hazardous materials site. Impacts would be less than significant and similar.

(b) Project with the Deck Concept

The Project Site is located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The listing is a permit for air emissions for a former textile manufacturing facility. Because the facility had no record of violations and is no longer operating at the Project Site, the Project Site is not considered to be a hazardous materials site. Although the Project with Deck Concept extends the Project Site over the railroad tracks where footings to support the Deck would be located, the Railyard Properties are not listed hazardous materials sites.⁵⁷ As such, impacts

⁵⁷ Rincon Consultants, Inc., *Phase I ESA*, September 6, 2016, page 10, Table 2, EDR Listing of Select Sites within One-Eighth Mile of the Subject Site, Appendix G-1, of this EIR.

related to hazardous materials sites under the Project with the Deck Concept would be less than significant.

While the Project Site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, the listed facility has no record of violations and is no longer operating at the Project Site. Alternative 4 would not extend into the Railyard Properties, which are not listed hazardous materials sites. Because, as with the Project with the Deck Concept, no development would occur on an active listed hazardous materials site and as such, impacts would be less than significant and similar.

(v) *Emergency Response Plan/Emergency Evacuation Plan*

(a) Project

As discussed in Section IV.F, *Hazards and Hazardous Materials*, of the Draft EIR, no City-designated Selected Disaster Routes border the Project Site, and the Project would not physically alter the City's designated disaster routes. Project construction would implement Project Design Feature TRAF-PDF-1 to ensure that adequate access for emergency vehicles would be maintained. Project operation would ensure that site accessibility and design would be reviewed and approved by the LAFD to ensure that emergency response and access would be maintained. Impacts would be less than significant.

Alternative 4, as with the Project, would involve new construction and increased traffic. Alternative 4, as with the Project, would not physically alter the City's designated disaster routes. Alternative 4 would implement Project Design Feature TRAF-PDF-1 to ensure that adequate access for emergency vehicles would be maintained. As with the Project, compliance with existing regulations would ensure that adequate emergency response is maintained for Alternative 4. Impacts with respect to conflicts with or interfering with emergency response or evacuation plans under both Alternative 4 and the Project would be less than significant and similar.

(b) Project with the Deck Concept

No City-designated Selected Disaster Routes border the Project Site, and the Project with the Deck Concept would not physically alter the City's designated disaster routes. The Project with the Deck Concept would implement Project Design Feature TRAF-PDF-1 to ensure that adequate access for emergency vehicles. Project plans would be reviewed and approved by the LAFD to ensure that emergency response and access would be maintained. Impacts with respect to emergency response or evacuation plans under the Project with the Deck Concept would be less than significant.

Alternative 4, as with the Project with the Deck Concept, would not physically alter the City's designated disaster routes. As with the Project with the Deck Concept, Alternative 4 would implement Project Design Feature TRAF-PDF-1 to ensure that adequate access for emergency vehicles would be maintained. As with the Project with the Deck Concept,

Alternative 4 would comply with existing regulations to ensure that adequate emergency response and access would be maintained for the Project Site. Impacts with respect to conflicts with or interfering with emergency response or evacuation plans under Alternative 4 and the Project with the Deck Concept would be less than significant and similar.

(g) *Hydrology and Water Quality*

(i) *Water Quality*

(a) *Construction*

(i) *Project*

As stated in Section IV.G, *Hydrology and Water Quality*, of the Draft EIR, construction activities, including earth moving, maintenance/operation of construction equipment, potential dewatering, and handling/storage/disposal of materials, could contribute to pollutant loading in stormwater runoff from the construction site. Also, wind could convey exposed and stockpiled soils at the construction site into nearby storm drains during storm events, and on-site water activities for dust suppression purposes could contribute to pollutant loading in runoff from the construction site. As such, contaminated soils could be encountered during Project construction, and therefore, impacts would be potentially significant. The Project would implement Mitigation Measure HAZ-MM-2 to address impacts regarding water quality, as well as implement a SWPPP as required by the State of California for all Projects more than one acre in area. Mitigation Measure HAZ-MM-2 would require a Soil and Groundwater Management Plan to ensure the proper management of contaminated soils and to reduce the risk of impacts to construction workers, the public, and the environment. The SWPPP specifies BMPs and erosion control measures to be used during construction to prevent pollution, to contain and treat, as necessary, stormwater or construction watering on the Project Site so runoff does not impact off-site drainage facilities or receiving waters. Further, if grading activities occur during the rainy season (October 1 through April 14), a WVECP would be prepared that would include BMPs to address potential erosion effects. With the implementation HAZ-MM-2 and SWPPP measures, impacts related to the exposure of surface water to contamination under the Project would be less than significant.

Alternative 4, as with the Project, would include construction activities including earth moving, maintenance/operation of construction equipment, potential dewatering, and handling/storage/disposal of materials that could contribute to pollutant loading in stormwater runoff from the construction site. Also, wind could convey exposed and stockpiled soils at the construction site into nearby storm drains during storm events, and on-site water activities for dust suppression purposes could contribute to pollutant loading in runoff from the construction site. Alternative 4, as with the Project, could encounter contaminated soils during construction, and impacts would be potentially significant. As with the Project, Alternative 4 would be required to implement Mitigation Measure HAZ-MM-2 to reduce impacts regarding water quality to less-than-significant levels. Further,

because the depth and extent of excavation under Alternative 4 would be reduced compared to the Project, impacts with respect to violations of water quality standards during construction under Alternative 4 would be less compared to the Project.

(ii) *Project with the Deck Concept*

Construction activities under the Project with the Deck Concept would include earth moving, maintenance/ operation of construction equipment, potential dewatering, and handling/storage/disposal of materials. These activities could contribute to pollutant loading in stormwater runoff from the construction site. Also, wind could convey exposed and stockpiled soils at the construction site into nearby storm drains during storm events, and on-site water activities for dust suppression purposes could contribute to pollutant loading in runoff from the construction site. As such, contaminated soils could be encountered during construction of the Project with the Deck Concept and, therefore, impacts would be potentially significant. The Project with the Deck Concept would implement Mitigation Measure HAZ-MM-2 to address impacts regarding water quality as well as implement a SWPPP as required by the State of California for all Projects more than one acre in area. The SWPPP specifies BMPs and erosion control measures to be used during construction to prevent pollution, to contain and treat, as necessary, stormwater or construction watering on the Project Site so runoff does not impact off-site drainage facilities or receiving waters. Further, if the Project requires grading activities during the rainy season (October 1 through April 14), a WVECP would be prepared that would include BMPs to address potential erosion effects. With the implementation HAZ-MM-2 and SWPPP measures, impacts related to the exposure of surface water to contamination under the Project with the Deck Concept, would be less than significant.

Alternative 4's construction activities would include earth moving, maintenance/operation of construction equipment, potential dewatering and handling/storage/disposal of materials that, as with the Project with the Deck Concept, could contribute to pollutant loading in stormwater runoff from the construction site. As such, Alternative 4 would be required to implement the same pollution controls and Mitigation Measure HAZ-MM-2 as the Project with the Deck Concept. Unlike the Project with the Deck Concept, Alternative 4 would not encroach into the Railway Properties and would also reduce the Project with the Deck Concept's subterranean parking structure from six levels to four levels. Alternative 4 would, thus, reduce the Project with the Deck Concept's depth of excavation and exposure of potentially contaminated soils to surface water runoff. With implementation of regulatory measures and Mitigation Measure HAZ-MM-2, impacts with respect to violations of water quality standards during construction under Alternative 4 and the Project with the Deck Concept would be less than significant with mitigation. Because of reduced construction scale, however, impacts with respect to violations of water quality standards during construction would be less under Alternative 4 compared to the Project with the Deck Concept.

(b) Operation

(i) *Project*

As stated in Section IV.G, *Hydrology and Water Quality*, of the Draft EIR, the existing Project Site was developed prior to the enforcement of storm water quality BMP design, implementation, and maintenance. The Project Site currently does not implement BMPs and has no means for treatment of stormwater runoff. The Project would implement LID BMPs to improve the quality of stormwater runoff discharged from the Project Site compared to existing conditions and impacts would be less than significant.

Alternative 4, as with the Project, would incorporate similar LID BMPs to improve the quality of stormwater runoff discharged from the Project Site. With the implementation of the LID BMPs, Alternative 4, as with the Project, would result in an improvement in the quality of stormwater runoff from the Project Site compared to existing conditions and would be less than significant and similar.

(ii) *Project with the Deck Concept*

During operation, the Project with the Deck Concept would implement LID BMPs to collect and treat surface runoff and stormwater discharged from the Project Site. Runoff from the 132,000-square-foot Deck surface would also be collected and subject to the City's water quality BMPs. Although the proposed Deck would extend over a portion of the freight and passenger rail lines and rail yards, gradient changes, collection, or other BMPs would not be provided at grade level across the railroad tracks. However, with the treatment of surface runoff and implementation of LID BMPs within the Project Site and Deck surface, the quality of stormwater runoff discharged from the Project Site and, ultimately, to the Los Angeles River would be substantially improved compared to existing conditions. Impacts related to water quality standards under the Project with the Deck Concept would be less than significant.

Alternative 4, as with the Project with the Deck Concept would implement LID BMPs to control operational surface runoff. With implementation of the LID BMPs, Alternative 4, as with the Project with the Deck Concept, would result in an improvement in the quality of stormwater runoff from the Project Site compared to existing conditions and impacts would be less than significant. Further, because the Project with the Deck Concept would discharge more stormwater than Alternative 4, impacts related to surface runoff would be less under Alternative 4 compared to the Project with the Deck Concept.

(ii) *Decreases in Groundwater Supplies or Recharge*

(a) Project

As stated in Section IV.G, *Hydrology and Water Quality*, of the Draft EIR, Project construction would not impede sustainable groundwater management of the groundwater basin. The Project would not include new injection or supply wells and does not include the installation or operation of water wells or any extraction or recharge system that is in

the vicinity of the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well or spreading ground facility. Excavation depths for the subterranean garage under the Project would extend from 61 to 68 feet below grade and reach depths of 75 feet below grade in some areas. This depth could intercept the groundwater table, which is estimated to be 57 to 61 feet below grade. Thus, construction activities would potentially require the removal and discharge of ground water. However, dewatering during construction would be temporary and would not result in the substantial removal of groundwater that would reduce the local groundwater table. Further, dewatering would not continue post-construction. As such, the Project would not result in a decrease in groundwater supplies or substantially interfere with groundwater recharge. Because groundwater removal would be temporary, impacts related to decreases in groundwater supplies and recharge would be less than significant.

The Project Site is currently 90.1 percent impervious, increasing to 94 percent under the Project. However, implementation of the proposed BMPs would result in an overall reduction of the volume of water leaving the Project Site. The Project's subterranean parking would be below the redeveloped areas of the Project Site, resulting in no material change to the amount of stormwater that would percolate into the groundwater table compared to existing conditions. Therefore, pre- and post-Project infiltration volumes would be effectively equivalent. No groundwater withdrawal is anticipated during Project operation. The Project would not include new injection or supply wells and does not include the installation or operation of water wells or any extraction or recharge system. As such, operation would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project would impede sustainable groundwater management of the basin. Impacts would be less than significant.

Alternative 4, as with the Project, would not involve wells or regular groundwater removal. Alternative 4, as with the Project, would not include wells or involve regular groundwater withdrawal. In addition, Alternative 4's four-level subterranean garage, which would be approximately one-third shallower than the depth of the Project's six-level parking garage, would reach a depth of approximately 40 to 45 feet below grade. This depth is not likely to intercept the groundwater table, which is estimated to be 57 to 61 feet below grade. Further, any required dewatering would only occur temporarily during construction and would not continue post-construction. Because of the similar footprints of the underground parking structures under both Alternative 4 and the Project (even if Building 1 were not constructed) the overall impervious area would be similar. As with the Project, after implementation of LID BMPs, the reduction in groundwater recharge due to the overall change in imperviousness would be minimal in the context of the regional groundwater basin. No groundwater withdrawal is anticipated during operation of Alternative 4. Impacts related to groundwater supplies and recharge during either construction or operation. Overall, neither Alternative 4 nor the Project would cause substantial depletion of groundwater supplies or substantially interfere with groundwater recharge. Impacts with respect to groundwater supplies under both the Project and Alternative 4 would be less than significant. However, Alternative 4 would involve shallower excavation depths compared to the Project and would be less likely to intercept the groundwater table. As

such, impacts on groundwater recharge or depletion under Alternative 4 would be less compared to the Project.

(b) Project with the Deck Concept

Construction of the Project with the Deck Concept would not impede sustainable groundwater management of the groundwater basin. The Project with the Deck Concept would not include new injection or supply wells. It would not involve the installation or operation of water wells or any extraction or recharge system in the vicinity of the coast or in an area of known groundwater contamination or seawater intrusion. The Project with the Deck Concept would not be located in the vicinity of a municipal supply well or spreading ground facility. Excavation depths for the subterranean garage under the Project with the Deck Concept would extend from 61 to 68 feet below grade and reach depths of 75 feet below grade in some areas. This depth could intercept the groundwater table, which is estimated to be 57 to 61 feet below grade. Thus, construction activities would potentially require the removal and discharge of ground water. However, dewatering during construction would be temporary and would not result in the substantial removal of groundwater that would reduce the local groundwater table. Further, dewatering would not continue post-construction. As such, the Project with the Deck Concept would not result in a decrease in groundwater supplies or substantially interfere with groundwater recharge. Because groundwater removal would be temporary, impacts related to decreases in groundwater supplies and recharge would be less than significant.

The Project Site is currently 90.1 percent impervious and with the development of the Railway Properties under the Project with the Deck Concept, impervious area would increase to 96 percent. However, with implementation of LID BMPs, any excess runoff from the Railway Properties would be rerouted to Mesquit Street and the municipal storm drain system. As such, any reduction in groundwater recharge due to the overall change in imperviousness would be minimal in the context of the regional groundwater basin. No groundwater withdrawal is anticipated during operation of the Project with the Deck Concept. As such, operation would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project with the Deck Concept would impede sustainable groundwater management of the basin. Impacts would be less than significant.

Alternative 4, as with the Project with the Deck Concept, would not include wells or involve regular groundwater withdrawal. In addition, Alternative 4's four-level subterranean garage, which would be approximately one-third shallower than the depth of the Project's six-level parking garage, would reach a depth of approximately 40 to 45 feet below grade. This depth is not likely to intercept the groundwater table, which is estimated to be 57 to 61 feet below grade. Any dewatering during construction would not result in the substantial removal of groundwater that would reduce the local groundwater table. Further, any dewatering, if it were required, would only occur temporarily during construction and would not continue post-construction. Overall, neither Alternative 4 nor the Project with the Deck Concept would cause substantial depletion of groundwater supplies or substantially interfere with groundwater recharge. Impacts with respect to

groundwater supplies under both the Project and Alternative 4 would be less than significant. However, Alternative 4 would involve shallower excavation depths compared to the Project with the Deck Concept. In addition, because Alternative 4 would not develop a Deck within the Railway Properties, it would reduce the Project with the Deck's impervious area and provide for greater percolation of stormwater into the groundwater table. As such, impacts on groundwater recharge or depletion under Alternative 4 would be less compared to the Project with the Deck Concept.

(iii) *Alteration of Drainage Patterns*

(a) Construction

(i) *Project*

The Project would control flow directions and runoff volumes during construction as required under the required SWPPP BMPs. In addition, the Project with Deck Concept would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion and to control runoff from the Project Site during the construction period. As discussed in Section IV.G, *Hydrology and Water Quality*, of this Draft EIR, during Project construction, flow directions and runoff volumes would be controlled. Project construction would adhere to compliance measurements to avoid flooding, substantially increasing or decreasing the amount of surface water flow from the Project Site into a water body, or a permanent, adverse change to the movement of surface water. No existing streams or river courses would be altered by the Project. Therefore, impacts from Project construction with respect to drainage patterns, siltation, erosion, and surface runoff would be less than significant.

Alternative 4, as with the Project, would include construction activities that could contribute to altering existing surface runoff or drainage patterns resulting in on- or off-site erosion, siltation or flooding; increasing rate or flow in surface runoff; or exceeding the capacity of the area's drainage system. Alternative 4 would require less excavation and export of materials than under the Project. In addition, Alternative 4 would adhere to compliance measurements to avoid flooding, substantially increasing or decreasing the amount of surface water flow from the Project Site into a water body, or a permanent, adverse change to the movement of surface water. As with the Project, construction BMPs to manage runoff flows and avoid on- or off-site flooding would be implemented under Alternative 4. Impacts under both the Project and Alternative 4 would be less than significant. Further, because the overall scale of construction activities under Alternative 4 would be less than the Project, impacts with respect to surface runoff, siltation, rates of runoff and capacity of drainage systems would be less compared to the Project.

(ii) *Project with the Deck Concept*

The Project with the Deck Concept would control flow directions and runoff volumes during construction as required under the required SWPPP BMPs and erosion control measures to manage runoff flows and avoid on- or off-site flooding. In addition, the Project with Deck Concept would be required to comply with all applicable City grading permit

regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion and to control runoff from the Project Site during the construction period. The Project with the Deck Concept would adhere to compliance measurements to avoid any runoff that would substantially increase or decrease the amount of surface water flow from the Project Site into a water body or a cause a permanent, adverse change to the movement of surface water. No existing streams or river courses would be altered by the Project with the Deck Concept. Therefore, with adherence to existing regulations, impacts related to drainage patterns under the Project with the Deck Concept during construction would be less than significant.

Alternative 4 would adhere to regulatory standards to avoid flooding; any substantial increase or decrease the amount of surface water flow from the Project Site into a water body; or a permanent, adverse change to the movement of surface water. As with the Project with the Deck Concept, construction BMPs to manage runoff flows and avoid on- or off-site flooding, would be implemented under Alternative 4. Impacts under both the Project with the Deck Concept and Alternative 4 would be less than significant. However, because the overall scale of construction activities under Alternative 4 would be less than the Project with the Deck Concept, impacts with respect to surface runoff, siltation, rates of runoff and capacity of drainage systems would be less compared to the Project with the Deck Concept.

(b) Operation

(i) *Project*

As discussed in Section IV.G, *Hydrology and Water Quality*, of this Draft EIR, Project operation would increase the peak flow rate of stormwater runoff due to the increase in impervious surfaces compared to existing conditions. During operation, the 50-year peak flow rate of stormwater runoff from the 5.46-acre Project Site would increase slightly from approximately 17.21 cfs to 17.25 cfs (a 0.04-cfs increase or 0.2 percent) due to the increase (albeit small) in impervious surfaces compared to existing conditions. However, the overall volume of stormwater runoff from the Project Site discharged to the municipal storm drain system would decrease compared to existing conditions, as a result of the implementation of LID BMPs per City requirements, which would capture, store, and infiltrate the first rainfall on-site, more than off-setting the increase in impervious area and associated runoff. In addition, this would reduce the potential for on-site and off-site flooding.

Drainage patterns for much of the Project Site would generally be unchanged, except that runoff would no longer be discharged via sheet flows off-site to the east, and the first stormwater falling on the Project Site would be directed to BMP facilities on-site. Therefore, impacts from Project operation would be less than significant.

As with the Project, Alternative 4 would not provide a Deck in the Railyard Properties. Therefore, stormwater runoff would be the same under Alternative 4 and the Project. In the event a potential for exceedance of the capacity of the municipal stormwater drainage

system is determined during the City's required design and plan check process, the on-site LID system could be expanded or existing facilities could be reconstructed, as required by existing regulatory requirements. With these measures, the rate or amount of surface runoff that could result in flooding of the existing stormwater drainage system would be less than significant and similar under both Alternative 4 and the Project.

(ii) *Project with the Deck Concept*

The Project with the Deck Concept would include a 132,000-square foot Deck (an approximately 3.01-acre surface area) across the Railway Properties. This area is currently considered 99 percent pervious. The Project with the Deck Concept would increase impervious surfaces on the Project Site. Due to the increase in impervious area resulting from construction of the Deck, the 50-year peak flow rate of stormwater runoff from the 8.47-acre area encompassing the 5.46-acre Project Site (without the Railway Properties) plus the 3.01-acre area (Railway Properties) covered by the Deck would increase from an estimated 26.31 cfs to 26.79 cfs (a 0.48 cfs or 1.8 percent increase). Some of the runoff captured and discharged from the Deck, as with Project, would be stored and infiltrated into on-site soils by BMP facilities intended to treat the first flush of stormwater. However, as the drainage pattern of the Project Site would be substantially altered with development of the Project with the Deck Concept, potentially significant impacts could occur related to on- or off-site flooding, exceeding the capacity of existing stormwater drainage systems, or providing substantial additional sources of polluted runoff.

The remaining runoff not captured by the BMP facilities would be discharged from the Deck to the municipal storm drain system in Mesquit Street, Jesse Street, and 7th Street, and ultimately discharge to the Los Angeles River. In accordance with standard City practice, detailed drainage construction plans would be completed during the construction document development phase and, in the event this assessment identifies potential for exceedance of the capacity of the municipal stormwater drainage system, upgrades to the system would be required. Improvements could include an expanded on-site LID system, or reconstruction and upgrades to the existing catch basins in Mesquit Street, the 15-inch storm main in Jesse Street, and the 24-inch storm lateral on 7th Street. Through compliance with Bureau of Engineering (BOE) requirements during the plan check approval process, any potential for the rate or amount of surface runoff to result in flooding, would be reduced to a level that would be less than significant.

Alternative 4 unlike the Project with the Deck Concept, would not include a Deck and, thus, would not increase off-site impermeability that would potentially result in off-site flooding of the existing drainage system. In addition, Alternative 4 would implement LID BMPs to reduce the volume of stormwater runoff discharged from the Project Site and to improve the quality of stormwater runoff. With improvements achieved through the implementation of the LID system, impacts under both the Project with the Deck Concept and Alternative 4 would be less than significant during operation. However, because Alternative 4 would result in less impervious area than under the Project with the Deck Concept, impacts would be less than under the Project with the Deck Concept.

(iv) *Conflict with or Obstruct Implementation of Water Quality Control Plans*

(a) Project

As discussed in Section IV.G, *Hydrology and Water Quality*, of this Draft EIR, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan during operation of the Project. However, as contaminated soils could impact the groundwater that underlies the Project Site, construction of the Project may conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and impacts would be potentially significant. Implementation of Mitigation Measure HAZ-MM-2 would reduce impacts to a less-than-significant level.

Alternative 4, as with the Project, would incorporate BMPs and drainage systems that would be consistent with water quality control plans, the policies of which are expressed in City and State water quality regulations for the protection of water resources. Alternative 4, as with the Project, falls within the jurisdiction of water quality plan regulations that assure that development projects are in compliance with clean water policies. These plans and regulations include the LARWQB (Region 4) Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties and the National Pollutant Discharge Elimination System (NPDES) stormwater permitting program. However, construction of Alternative 4, similar to the Project, would allow contaminated soils to impact the groundwater that underlies the Project Site, and impacts would be potentially significant. Alternative 4 would require implementation of Mitigation Measure HAZ-MM-2 to reduce impacts to a less-than-significant level. As with the Project, impacts related to water quality control plans under Alternative 4 would be less than significant after mitigation. Further, because Alternative 4 would reduce excavation and grading compared to the Project, exposure to contaminated soils would be reduced and impacts would be less compared to the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan during operation. However, as contaminated soils could impact the groundwater, construction of the Project with the Deck Concept, as with the Project, may conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and impacts would be potentially significant. With implementation of Mitigation Measure HAZ-MM-2 under the Project with the Deck Concept, impacts regarding a conflict with a water quality control plan would be less than significant.

Alternative 4, as with the Project with the Deck Concept, would incorporate BMPs and drainage systems that would be consistent with water quality control plans, the policies of which are expressed in City and State water quality regulations for the protection of water resources. However, construction of Alternative 4, similar to the Project with the

Deck Concept, would allow contaminated soils to impact the groundwater that underlies the Project Site, causing a potentially significant impact prior to mitigation. As with the Project with the Deck Concept, Alternative 4 would require implementation of Mitigation Measure HAZ-MM-2 to reduce impacts to a less-than-significant level. Impacts related to water quality control plans under Alternative 4 and the Project with the Deck Concept would be less than significant after mitigation. However, because Alternative 4 would reduce excavation and grading compared to the Project with the Deck Concept, impacts related to water quality control plans would be less under Alternative 4.

(h) *Land Use and Planning*

(i) *Physically Divide an Established Community*

(a) Project

As discussed in Section IV.H, *Land Use and Planning*, of this Draft EIR, Project implementation would open the Project Site to both north-south and east-west access, creating new direct connections between the Arts District neighborhoods north and south of the Project Site and between the neighborhoods west of the Project Site and the Los Angeles River and Boyle Heights to the east. The Project would not physically divide an established community, and impacts would be less than significant.

Alternative 4 proposes up to 1,149,820 square feet of office, retail, restaurant, studio/event/gallery/potential museum, and gym, with an approximate FAR of 4.8:1, compared to 1,792,103 square feet of uses and an FAR of 7.5:1 under the Project. Similar to the Project, Alternative 4 would open the Project Site north-south and east-west access between the Arts District neighborhoods north and south of the Project Site and between the neighborhoods west of the Project Site and the Los Angeles River and Boyle Heights to the east. Therefore, implementation of Alternative 4 would, similar to the Project, increase the direct connections through the Project Site and allow for connectivity between the neighborhoods, thus not physically dividing an established community. Similar to the Project, Alternative 4 would have a less than significant impact.

(b) Project with the Deck Concept

The Project with the Deck Concept would open the Project Site to both north-south and east-west access, creating new direct connections between the Arts District neighborhoods north and south of the Project Site and between the neighborhoods west of the Project Site and the Los Angeles River and Boyle Heights to the east. The Project with the Deck Concept would include the same vehicular and bicycle access to the Project Site as under the Project. By expanding pedestrian access to future Metro transit projects and providing a closer potential connection to the Los Angeles River, the Project with the Deck Concept would provide expanded access to the Los Angeles River and to transit. In the Project area, pedestrians would be able to move from the Mesquit Street Level to the 7th Street Level and Deck via the Entry Plazas. With the inclusion of the Deck, and the proposed 7th Street Bridge connection, the Project with the Deck Concept would increase accessibility of Mesquit Street from the surrounding streets and neighborhoods.

Impacts related to physical division of an established community under the Project with the Deck Concept would be less than significant.

Similar to the Project, Alternative 4 would provide north-south and east-west access between the Arts District neighborhoods north and south of the Project Site and between the neighborhoods west of the Project Site and the Los Angeles River (although it would not provide Deck-side proximity to the River as under the Project with the Deck Concept) and Boyle Heights to the east; expand pedestrian access to future Metro transit projects and improve access from the Mesquit Street Level to the 7th Street Level. Implementation of Alternative 4 would, similar to the Project with the Deck Concept, would increase the direct connections through the Project Site and allow for connectivity between the neighborhoods. Therefore, Alternative 4 would not physically divide an established community. Impacts related to potential division of an established community under both the Project with the Deck Concept and Alternative 4 would be less than significant and similar.

(ii) *Conflict with Applicable Land Use Plan, Policy, or Regulation*

(a) Project

The Project would develop residential, office, retail, restaurant, hotel, studio/gallery/museum, and gym uses at the Project Site. As discussed in Section IV.H, *Land Use and Planning*, of the Draft EIR, based on the analysis of Project consistency with applicable policies of SCAG's 2020–2045 RTP/SCS, the Framework Element, the Community Plan, and the LAMC, the Project would be consistent with and would not conflict with relevant land use policies and regulations adopted for the purpose of avoiding or mitigating a significant environmental effect. Although the Project would conflict with RIO District requirements regarding exterior lighting at the property boundary and 15 feet beyond the boundary, the level of lighting within a TPA under PRC Section 21099(d)(1) and ZI File No. 2452 is not considered an impact on the environment. Approval of the Project's requested entitlements, including the proposed Specific Plan, would bring the Project into consistency with the applicable plans and regulations. Impacts would be less than significant.

As with the Project, Alternative 4 would not conflict with the above-listed plans as Alternative 4 would similarly facilitate land use patterns that link land uses with sustainable transportation options. Alternative 4 would also develop an employment center project on an infill site within a transit priority area. However, Alternative 4 would not develop residential units within an HQTAs and TPA and would result in an FAR of 4.8:1 (compared to 7.5:1 under the Project). In addition, under Alternative 4, as with the Project, no Deck would be provided to facilitate pedestrian access or enhance activity close to the Los Angeles River. In addition, Alternative 4 would not provide residential units to meet the policies and plans to increase housing and residents in HQTAs or provide affordable units consistent with Measure JJJ requirements. However, Alternative 4 would provide an employment center within the TPA, also consistent with the City's General Plan and the

2020–2045 RTP/SCS. Neither the Project nor Alternative 4 would conflict with land use policies adopted to mitigate or avoid environmental impacts. As such, impacts with respect to land use plans, policies, or regulations adopted to avoid or mitigate environmental impacts under both the Project and Alternative 4 would be less than significant and similar.

(b) Project with the Deck Concept

The Project with the Deck Concept would develop residential, office, retail, restaurant, hotel, studio/gallery/museum, and gym uses at the Project Site. In addition, the Project with the Deck Concept would include a 132,000 square foot Deck in place of the Project's Elevated Pedestrian Walkway. The Project with the Deck Concept would provide a sizeable publicly accessible open space amenity area, in addition to the open space provided under the Project with the Deck Concept, that would further enhance the new pedestrian connections and create additional opportunities for public programming. However, lighting for the Deck would exceed the more stringent standards that apply to the RIO District at the Project boundary and 15 feet beyond the boundary. Although the Project with the Deck Concept would conflict with RIO District requirements regarding lighting, the level of lighting within a TPA under PRC Section 21099(d)(1) and ZI File No. 2452 is not considered an impact on the environment. Furthermore, the areas where Project with the Deck Concept's lighting would exceed the RIO standards include streets, rail yards, electrical switching stations, and industrial use properties and do not include natural habitat or residential uses. As such, pursuant to the 2006 L.A. CEQA Thresholds Guide, and as indicated under section IV., Biological Resources, in the Initial Study provided in Appendix A-2, Initial Study, of this Draft EIR, there would be no substantial adverse effects on light sensitive natural habitat or residential receptors the lighting levels would not be considered a significant impact on the environment. Because this inconsistency would not result in an adverse environmental impact, the Project with the Deck Concept would not conflict with policies, plans, or regulations to avoid or mitigate environmental effects.

The Project with the Deck Concept would be consistent with the same applicable policies and plans of the 2020–2045 RTP/SCS, Framework Element, Central City North Community Plan, RIO District Ordinances and the LAMC. As with the Project, with approval of the proposed entitlements, including the proposed Specific Plan, impacts under the Project with the Deck Concept related to conflict with applicable plans, policies, and regulations adopted to avoid or mitigate environmental effects would be less than significant.

Alternative 4, as with the Project with the Deck Concept, would be generally consistent and would not conflict with the applicable plans, adopted to avoid or mitigate environmental effects. Alternative 4 would develop an employment center project on an infill site within a transit priority area and an HQTAs, and would therefore be consistent with the above-listed plans and policies that would promote a reduction in VMT and air pollution. However, it would not develop residential units within an HQTAs and TPA and would result in an FAR of 4.8:1 (compared to 7.5:1 under the Project). Under Alternative 4,

no Deck would be provided to facilitate pedestrian access or enhance activity close to the Los Angeles River. In addition, Alternative 4 would not include residential units to meet policies and plans to increase housing and residents in HQTAs or provide affordable units consistent with Measure JJJ requirements. However, Alternative 4 would provide an employment center within the TPA, also consistent with the City's General Plan and the 2020–2045 RTP/SCS. Neither the Project with the Deck Concept nor Alternative 4 would conflict with land use policies adopted to mitigate or avoid environmental impacts. As such, impacts with respect to land use plans, policies, or regulations adopted to avoid or mitigate environmental impacts under both the Project and Alternative 4 would be less than significant and similar.

(i) *Noise*

(i) *Noise Levels in Excess of Standards*

(a) *Construction*

(i) *Project*

As discussed in Section IV.I, *Noise*, of this Draft EIR, on-site Project construction would result in temporary increases in ambient noise that would exceed thresholds of significance at the closest off-site noise-sensitive receptors, and impacts at R1 (the three-story multi-family residential use to the west of the Project Site), R2 (the two-story multi-family residential use to the south of the Project Site), R3 (the AMP Lofts to the west of the Project Site), and R4 (the future 6th Street PARC) would be potentially significant. Implementation of Mitigation Measures NOISE-MM-1 and NOISE-MM-2 would reduce Project noise levels at all receptors and would reduce impacts at R2 and R3 to less-than-significant levels. However, the Project's on-site construction noise impacts would remain significant and unavoidable at R1 and R4 during daytime and nighttime periods on weekdays and weekends. Off-site construction traffic noise impacts for the Project would exceed the threshold of significance along two roadway segments (i.e., Jesse Street between Mateo Street and Santa Fe Avenue and Mateo Street between 4th Place and Willow Street) where sensitive residential uses are present. With implementation of Mitigation Measure NOISE-MM-3, off-site construction traffic noise impacts would be reduced to less-than-significant levels.

Alternative 4 would require the same construction activities as the Project. Similar to the Project, construction of Alternative 4 would result in a temporary increase in ambient noise that would exceed thresholds of significance at R1, R2, R3, and R4, and impacts would therefore be potentially significant. Alternative 4 would implement Mitigation Measures NOISE-MM-1 and NOISE-MM-2 to reduce noise levels at all receptors and would reduce impacts from on-site construction noise at R2 and R3 to less-than-significant levels. However, as with the Project, on-site construction noise impacts under Alternative 4 would remain significant and unavoidable at R1 and R4. Off-site construction traffic noise impacts under Alternative 4, would, like the Project, be potentially significant prior to mitigation. As with the Project, Mitigation Measure NOISE-MM-3 would reduce

off-site construction traffic noise impacts to less-than-significant levels. However, as with the Project, construction noise levels associated with on-site noise sources under Alternative 4 would remain significant and unavoidable. As Alternative 4 would reduce total developed floor area by 642,283 square feet, the duration of construction activity would be reduced. Although maximum noise levels would be the same as under the Project, because of the reduction in duration of construction activity, impacts related to construction noise would be less than under the Project.

(ii) *Project with the Deck Concept*

Maximum construction noise levels under the Project with the Deck Concept would be similar to the Project. The Project with the Deck Concept would also implement Mitigation Measures NOISE-MM-1 and NOISE-MM-2, which would reduce on-site construction noise impacts at all receptors and would reduce noise levels at R2 and R3 to less-than-significant levels. On-site construction noise impacts under the Project with the Deck Concept, although temporary, would be significant and unavoidable at R1 and R4 during daytime and nighttime periods on weekdays and weekends. As noted for the Project, off-site construction traffic noise impacts for the Project with the Deck Concept would exceed the threshold of significance along two roadway segments (i.e., Jesse Street between Mateo Street and Santa Fe Avenue and Mateo Street between 4th Place and Willow Street) where sensitive residential uses are present. With implementation of Mitigation Measure NOISE-MM-3, off-site construction traffic noise impacts would be reduced to less-than-significant levels. Because of the addition of the Deck, construction noise impacts would occur over a longer period of time under the Project with the Deck Concept. Under the Project with the Deck Concept, even with implementation of mitigation measures, on-site construction noise impacts would remain significant and unavoidable.

Alternative 4 would require the same types of construction activities as the Project with Deck Concept. Off-site construction traffic noise impacts under Alternative 4, would be potentially significant. Mitigation Measure NOISE-MM-3 would reduce off-site construction traffic noise impacts to less-than-significant levels. Similar to the Project with the Deck Concept, on-site construction activity for Alternative 4 would result in a temporary increase in ambient noise that would exceed thresholds of significance at R1, R2, R3, and R4. Alternative 4 would implement Mitigation Measures NOISE-MM-1 and NOISE-MM-2 to reduce impacts at all receptors and would reduce impacts at R2 and R3 to less-than-significant levels. However, on-site construction noise impacts under Alternative 4 would remain significant and unavoidable at R1 and R4. Therefore, on-site construction noise impacts under both Alternative 4 and the Project with the Deck Concept would be significant and unavoidable and similar. As Alternative 4 would reduce total developed floor area by 642,283 square feet, the duration of construction activity would be reduced. Although maximum daily noise levels for Alternative 4 would be the same as under the Project with the Deck Concept, because of greater construction duration for the Project with the Deck Concept, impacts related to construction noise would be less for Alternative 4 than under the Project with Deck Concept.

(b) Operation

(i) *Project*

As discussed in Section IV.I, *Noise*, of this Draft EIR, noise impacts during Project operation from mechanical equipment, parking structure, loading dock and trash collection areas, emergency generators, heliport, and off-site traffic noise would be less than significant and would not require mitigation. Noise impacts from daytime use of individual outdoor open spaces, specifically the River Balcony North, would be significant at R4 and the combined simultaneous use of Project open spaces would be significant at R1, R2, R3, and R4. Nighttime use of individual outdoor open spaces, specifically the 7th Street Terrace, would be significant at R2 and the combined simultaneous nighttime use of Project open spaces would be significant at receptor R2. Operational composite noise would be significant at R1. The Implementation of Mitigation Measure NOISE-MM-4 and NOISE-MM-5, which require noise controls for amplified speakers at outdoor spaces, would reduce impacts related to daytime and nighttime operation of outdoor spaces, individually and combined, to less-than-significant levels.

Alternative 4, as with the Project, would result in heliport noise and would increase off-site traffic and generate on-site composite noise associated with fixed equipment, vehicle activity, heliport operation, and human outdoor activity. However, Alternative 4 includes reduced retail square footage, would eliminate hotel uses, and would result in less off-site traffic than the Project.⁵⁸ Due to the inclusion of similar outdoor amplified sound systems and speakers under Alternative 4 as the Project for the outdoor open space areas, impacts related to daytime and nighttime operation of outdoor spaces would be potentially significant under Alternative 4. With implementation of Mitigation Measures NOISE-MM-4 and NOISE-MM-5, impacts under Alternative 4, like the Project, would be reduced to less than significant. Because of reduced off-site traffic and due to one fewer building and fewer total outdoor spaces compared to the Project, operational noise impacts under Alternative 4 would be less than the Project.

(ii) *Project with the Deck Concept*

Noise impacts during operation of the Project with the Deck Concept resulting from mechanical equipment, parking structure, loading dock and trash collection areas, emergency generators, heliport, and off-site traffic would be less than significant and would not require mitigation. However, noise impacts from daytime use of outdoor open spaces, specifically the River Balcony North, would be significant at R4 and the combined simultaneous use of open spaces, including the Deck, would be significant at R1, R2, R3, and R4. Additionally, nighttime use of the Deck would be significant at R2, combined nighttime operation of all open spaces would be significant at R2, and operational composite noise under the Project with the Deck Concept would be significant at R1 and R2. With implementation of Mitigation Measures NOISE-MM-4 and NOISE-MM-5, open space noise from daytime or nighttime use of open spaces, individually and combined,

⁵⁸ Fehr & Peers, *670 Mesquit Transportation Assessment*, April 2021, contained in Appendix M-1 of this Draft EIR.

would not exceed the threshold of a 5 dBA increase in nighttime ambient noise. Operational noise impacts under the Project with the Deck Concept would be less than significant with mitigation.

Alternative 4 would result in heliport noise and would increase off-site traffic and generate on-site composite noise associated with fixed equipment, vehicle activity, heliport operation, and human outdoor activity. However, Alternative 4 includes reduced retail square footage, would eliminate hotel uses, would eliminate the Deck option, and would result in less off-site traffic than the Project with the Deck Concept. Due to the inclusion of similar outdoor amplified sound systems and speakers under Alternative 4 as the Project with the Deck Concept for the outdoor open space areas (with the exception of the Deck, which is eliminated under Alternative 4, and the one fewer building with fewer total outdoor spaces compared to the Project with the Deck Concept), impacts related to daytime and nighttime operation of outdoor spaces would be potentially significant under Alternative 4. With implementation of Mitigation Measures NOISE-MM-4 and NOISE-MM-5, impacts under Alternative 4, like the Project with Deck Option, would be reduced to less than significant. Because of reduced off-site traffic and due to one fewer building with fewer total outdoor spaces compared to the Project with the Deck Concept, operational impacts under Alternative 4 would be less than the Project with the Deck Concept.

(ii) *Groundborne Vibration*

(a) *Construction*

(i) *Project*

As discussed in Section IV.I, *Noise*, of this Draft EIR, construction activities at the Project Site, including demolition, excavation for six levels of subterranean parking, and building construction, have the potential to generate low levels of groundborne vibration as the operation of heavy equipment generates vibrations that propagate through the ground and diminish in intensity with distance from the source. The potential vibration impacts for structural damage due to off-site haul trucks would be less than significant for the Project. Estimated vibration velocity levels from construction equipment for the Project would not exceed the respective significance thresholds at V2 (multi-family residential use to the south of the Project Site at 2135 E. 7th Place), V3 (AMP Lofts to the west of the Project Site), V4 (industrial building located at 640 Santa Fe Avenue), or V5 (industrial building located at 1580 Jesse Street). Vibration impacts associated with structural damage from on-site construction activities under the Project would be potentially significant for V1 (multi-family residential use to the west of the Project Site at 2101 E. 7th Street) and V6 (7th Street Bridge). With implementation of Mitigation Measure NOISE-MM-6, potential Project structural vibration impacts on receptors V1 and V6 would be mitigated to less than significant for the majority of construction activities, except for temporary shoring activities and installation of shoring infrastructure. The Project would require shoring activities adjacent to V6 (7th Street Bridge). Mitigation Measure NOISE-MM-7 is proposed to reduce vibration velocities due to shoring; however, in the case that structural damage does occur during Project construction, it would be required to be repaired pursuant to

Mitigation Measure NOISE-MM-8. With implementation of Mitigation Measures NOISE-MM-7 and NOISE-MM-8, Project impacts with regard to structural damage for the 7th Street bridge (V6) would be mitigated to a less-than-significant level for all construction activity except for temporary shoring. Similarly, with implementation of Mitigation Measures NOISE-MM-7 and NOISE-MM-8, such damage to V1 could be repaired by the Project contractor, which would reduce Project impacts to a less-than-significant level. However, because V1 is a privately owned structure, inspections and repair pursuant to Mitigation Measure NOISE-MM-8 would require the consent of the property owner, who may not agree. Thus, Project impacts to V1 would be significant and unavoidable and similar should consent for inspections and repairs not be granted.

With respect to human annoyance, the estimated groundborne vibration levels from on-site off-road construction equipment under the Project would exceed the significance criteria at V1, and impacts would be potentially significant. With implementation of Mitigation Measures NOISE-MM-6 through NOISE-MM-9, construction vibration impacts related to human annoyance from on-site, off-road equipment would remain significant and unavoidable with respect to exceedance of applicable thresholds. Vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from construction trucks traveling along the local roadway network would be less than significant for the Project.

Construction of Alternative 4 would generate groundborne construction vibration during construction activities when heavy construction equipment is used. Because the construction activities under Alternative 4 would be similar as the activities under the Project, Alternative 4 would have similar impacts associated with structural damage from on-site construction activities for V1 and V6. Alternative 4 would implement the same mitigation measures to reduce impacts. Impacts with regard to structural damage for V6 would be mitigated to a less-than-significant level except for temporary shoring activities. However, as stated above and similar to the circumstances under the Project, because V1 is a privately owned structure and would require the consent of the property owner, impacts to V1 would be significant and unavoidable after mitigation should consent for inspections and repairs not be granted. Maximum vibration levels under Alternative 4 would be similar to the Project and would be significant and unavoidable. However, because of shorter duration of construction activity under Alternative 4, vibration impacts would be less than under the Project.

Regarding human annoyance, as with the Project, the estimated vibration levels due to maximum construction activity under Alternative 4 would exceed the significance criteria at V1, and impacts would be potentially significant. Similar to the Project, Alternative 4 would implement Mitigation Measures NOISE-MM-6 through NOISE-MM-9, but construction vibration impacts would remain significant and unavoidable. Vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from construction trucks traveling along the local roadway network would be less than significant. However, because of the reduced duration of

construction truck activity under Alternative 4, impacts related to construction vibration would be less than under the Project.

(ii) *Project with the Deck Concept*

The Project with the Deck Concept would use a similar mix of construction equipment as the Project, but would result in a greater intensity of construction activity associated with Deck construction. Construction activities include excavation for six levels of subterranean garages and footings for the Deck. Because the Deck would be located on the east side of the Project Site (adjacent to the Los Angeles River), excavation locations would not be any closer to vibration sensitive uses or structures than analyzed for the Project. The analysis above for the Project assumes the construction activity would be located at a distance as near as five feet from the 7th Street Bridge (receptor V6) to account for shoring activities. This activity would also be required for construction of Project with Deck concept. With implementation of Mitigation Measure NOISE-MM-6, potential Project with the Deck Concept structural vibration impacts on receptors V1 and V6 would be mitigated to less than significant for the majority of construction activities, except for temporary shoring activities and installation of shoring infrastructure. The Project with Deck Concept would require shoring activities adjacent to V6 (7th Street Bridge). Mitigation Measures NOISE-MM-7 and NOISE-MM-8 would reduce vibration impacts at the 7th Street Bridge to less-than-significant levels for all construction activity except for temporary shoring. Similarly, with implementation of Mitigation Measures NOISE-MM-7 and NOISE-MM-8, such damage to V1 could be repaired by the Project contractor, which would reduce impacts to a less-than-significant level. However, because V1 is a privately owned structure, inspections and repair pursuant to Mitigation Measure NOISE-MM-8 would require the consent of the property owner, who may not agree. Thus, impacts to V1 under the Project with the Deck Concept would be significant and unavoidable should consent for inspections and repairs not be granted.

Potential vibration impacts from on-site construction activities with respect to human annoyance would be significant prior to the implementation of mitigation measures at sensitive receptor location V1. As with the Project, with implementation of Mitigation Measures NOISE-MM-6 through NOISE-MM-9, construction vibration impacts related to human annoyance from on-site, off-road equipment would remain significant and unavoidable with respect to exceedance of applicable thresholds. Vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from construction trucks traveling along the local roadway network would be less than significant for the Project with the Deck Concept.

Construction of Alternative 4, as with the Project with Deck Concept, would generate groundborne construction vibration during construction activities when heavy construction equipment is used. Because the construction activities under Alternative 4 would be similar as the activities under the Project with Deck Concept, Alternative 4 would have similar impacts associated with structural damage from on-site construction activities for V1 and V6. As with the Project with Deck Concept, Alternative 4 would implement the same mitigation measures to attempt to reduce impacts. Impacts with regard to structural

damage for V6 would be mitigated to a less-than-significant level except for temporary shoring activities. However, as stated above and as similar to the circumstances under the Project with Deck Concept, because V1 is a privately owned structure and would require the consent of the property owner, impacts to V1 would be significant and unavoidable after mitigation should consent for inspections and repairs not be granted. Impacts under Alternative 4 and the Project with Deck Concept and would be significant and unavoidable. Although the Project with the Deck Concept and Alternative 4 would result in the same maximum vibration levels, because the Project with the Deck Concept would result in a greater duration of construction activity, vibration impacts would be less under Alternative 4.

Regarding human annoyance, as with the Project with the Deck Concept, the estimated vibration levels due to maximum construction activity under Alternative 4 would exceed the significance criteria at V1, and impacts would be potentially significant. Similar to the Project, Alternative 4 would implement Mitigation Measures NOISE-MM-6 through NOISE-MM-9, but construction vibration impacts would remain significant and unavoidable. Vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from construction trucks traveling along the local roadway network would be less than significant. Groundborne vibration and human annoyance impacts under both the Project with the Deck Concept and Alternative 4 would be reach similar maximum levels that would be significant and unavoidable. However, because of reduced construction duration under Alternative 4, human annoyance impacts would be less than under the Project with the Deck Concept.

(b) Operation

(i) *Project*

As discussed in Section IV.I, *Noise*, of this Draft EIR, Project operations would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce vibration at low levels that would not cause damage or annoyance impacts to the Project buildings or on-site occupants and would not cause vibration impacts to the off-site environment. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the proposed parking area. Pumps or compressors would generate groundborne vibration levels of 0.5 in/sec PPV at 1 foot, which would not generate off-site vibration. It is anticipated that Project mechanical equipment, including air handling units, condenser units, and exhaust fans, would be located on building rooftops. Therefore, groundborne vibration levels for the Project would be less than significant.

Day-to-day operations under Alternative 4, as with the Project, would include typical commercial-grade stationary mechanical and electrical equipment, which would produce vibration at low levels that would not cause damage or annoyance impacts to on-site or off-site environment. Primary sources of transient vibration would include vehicle circulation within the proposed parking areas, which would be confined to the immediate area and would not be expected to be perceptible off the Project Site. It is anticipated that

mechanical equipment under Alternative 4 would be located in similar locations as for the Project. Therefore, as with the Project, groundborne vibration from the operation of such mechanical equipment under Alternative 4 would not impact any of the off-site sensitive receptors. Impacts with respect to operational vibration would be less than significant and similar to the Project.

(ii) *Project with the Deck Concept*

The Project with the Deck Concept operations would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce vibration at low levels that would not cause damage or annoyance impacts to the Project buildings or on-site occupants and would not cause vibration impacts to the off-site environment. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the proposed parking area. Pumps or compressors would generate groundborne vibration levels of 0.5 in/sec PPV at 1 foot, which would not generate off-site vibration. It is anticipated that Project mechanical equipment, including air handling units, condenser units, and exhaust fans, would be located on building rooftops. The Deck would be located on the east side of the Project adjacent to the Los Angeles River. Industrial and commercial uses to the east of the Los Angeles River are located at distances of a minimum of 500 feet and would not be affected by activities occurring on the Deck. Therefore, groundborne vibration levels during operation of the Project with the Deck Concept would be less than significant.

Alternative 4, as with the Project with the Deck Concept, would include typical commercial-grade stationary mechanical and electrical equipment, which would produce vibration at low levels that would not cause damage or annoyance impacts to on-site or off-site environment. Primary sources of transient vibration would include vehicle circulation within the proposed parking areas, which would be confined to the immediate area and would not be expected to be perceptible off the Project Site. It is anticipated that mechanical equipment under Alternative 4 would be located in similar locations as for the Project with the Deck Concept. Therefore, as with the Project with the Deck Concept, groundborne vibration from the operation of such mechanical equipment under Alternative 4 would not impact any of the off-site sensitive receptors. Impacts with respect to operational vibration for both the Project with the Deck Concept and Alternative 4 would be less than significant and similar.

(j) *Population and Housing*

(i) *Project*

As discussed in Section IV.J, *Population and Housing*, of this Draft EIR, the Project would involve demolition of the existing warehouse buildings on the Project Site to support approximately 944,055 square feet of office space, 308 multi-family residential dwelling units, 236 hotel rooms (158,647 square feet), and a range of commercial uses, including 136,152 square feet of retail, 89,577 square feet of restaurants, 93,617 square feet of studio/event/gallery space/museum, and 62,148 square feet of gym. The Project's 308

residential units would result in an increase in 743 residents on the Project Site, and the Project's commercial uses would result in a net increase of 4,523 employees. The Project's projected growth would be within SCAG's 2020–2045 RTP/SCS projections for the City, and the Project would not induce unplanned substantial population growth in an area directly through the development of new housing and employment opportunities. Furthermore, Project operation would modify access from streets that surround the Project Site and would implement infrastructure improvements but would not extend roads into new undeveloped areas. Infrastructure improvements under the Project would not induce substantial unplanned population growth in an area, either directly or indirectly. As such, the Project would not induce substantial unplanned population growth in the area, either directly or indirectly that cannot be reasonably accommodated, and impacts would be less than significant.

Although Alternatives 4 would not include any housing or generate an increase in population, Alternative 4 would increase occupancy and use of the Project Site. Alternative 4's projected increase in employment is summarized in **Table V-17, Estimate of Alternative 4's Employment**.

TABLE V-17
ESTIMATE OF ALTERNATIVE 4'S EMPLOYMENT

Use	Amount	Employment Generation Factor ^a	Number of Employees ^b
Office	944,055 sf	4 emp/ksf	3,776
Retail	10,000 sf	2 emp/ksf	20
Restaurant	40,000 sf	4 emp/ksf	160
Studio/Gallery	93,617 sf	1 emp/ksf	94
Gym	62,148 sf	1 emp/ksf	62
<i>Proposed Subtotal</i>			4,112
Existing Uses			
Freezer/Cooler	161,854 sf	1 emp/ksf	162
Office	11,157 sf	4 emp/ksf	45
Dry Storage	32,382 sf	0.33 emp/ksf	11
<i>Existing Subtotal</i>			218
Net New Employees			3,894

NOTE(S):

sf = square feet; rm = room; emp = employee

^a The employee generation factors are taken from Table 1, Land Use and Trip Generation Base Assumptions, from the City of Los Angeles Vehicle Miles Traveled (VMT) Calculator Documentation, Version 1.3, provided LADOT and Los Angeles Department of City Planning.

^b Totals are rounded.

SOURCE: ESA, 2021.

Alternative 4 would generate 3,894 net new employees. By comparison, the Project would generate 743 new residents and 4,523 net new employees. Alternative 4's 3,894 net new employees would represent approximately 4.4 percent of SCAG's 2017–2026 employment growth projection of 89,254 and approximately 1.4 percent of SCAG's 2017–2045 employment growth projection of 277,682. Alternative 4, as with the Project, would not exceed SCAG's growth projections for employment. Alternative 4 would not provide housing toward SCAG's RHNA allocation to the same extent as the Project. Because there are no existing housing units on the Project Site, no residences would be displaced. Alternative 4, as with the Project, would not result in unplanned growth in exceedance of SCAG's population and housing growth projections, and impacts with respect to population and housing under Alternative 4 and the Project would be less than significant and similar.

(ii) *Project with the Deck Concept*

The Project with the Deck Concept would provide 308 residential units and generate a population of 743 new residents and 4,523 net new employees. The Project with the Deck Concept's projected growth would be within SCAG's 2020–2045 RTP/SCS projections for the City, and the Project with the Deck Concept would not induce unplanned substantial population growth in an area directly through the development of new housing and employment opportunities. As such, impacts related to population and housing under the Project with the Deck Concept would be less than significant.

Alternative 4 would generate 3,894 net new employees. Alternative 4 would not increase housing, as under the Project with the Deck Concept. As with the Project with the Deck Concept, Alternative 4 would not induce unplanned population growth or exceed SCAG's forecasts for employment. Because there are no existing housing units on the Project Site, no existing residences would be displaced under either Alternative 4 or the Project with the Deck Concept. Because neither Alternative 4 nor the Project with the Deck Concept would exceed SCAG's population and employment growth projections, impacts under Alternative 4 and the Project with the Deck Concept would be less than significant and similar.

(k) *Public Services*

(i) *Fire Protection*

(a) *Project*

As discussed in Section IV.K.1, *Public Services – Fire Protection*, of this Draft EIR, Project demand for fire protection and response times during construction would be less than significant. The Project would implement Project Design Feature TRAF-PDF-1 (Construction Traffic Management Plan) to minimize disruptions to through traffic flow and maintain emergency vehicle access to the Project Site and neighboring land uses. Additionally, as part of a Construction Worker Parking Plan (TRAF-PDF-2), construction worker parking would either be accommodated on the Project Site or in an alternate

location that would not affect the adjacent streets. The Project would be required to upgrade the nearby fire-flow infrastructure to have available flow to serve the Project Site. With the inclusion of these system upgrades, the hydrants would have adequate fire flow available to meet the flow required for the Project. Therefore, construction of the Project would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, and impacts would be less than significant.

During Project operation, the Project would comply with the applicable Building and Fire Codes, LAFD's recommendations for fire prevention and protection, and LAFD's fire/life safety inspection for new construction projects to ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment without creating the need for new or expanded fire facilities, the construction of which would result in physical environmental impacts. Impacts during Project operation would be less than significant.

Alternative 4, as with the Project, would involve construction activities and intensify the use of the Project Site so that it would increase demand on fire protection and emergency medical services, as well as potentially reduce emergency access. Alternative 4, as with the Project, would incorporate Project Design Feature TRAF-PDF-1 to provide a Construction Traffic Management Plan to improve vehicular access around the construction site. Project Design Feature TRAF-PDF-2 would identify and enforce parking location requirements for construction workers. The implementation of these Project Design Features would facilitate emergency access. As such, similar to the Project, construction under Alternative 4 would result in less-than-significant impacts with respect to emergency response times and emergency access.

During operation, Alternative 4 would result in a 3,894 net new employees in the service population. By comparison, the Project would result in a population increase of 743 residents and 4,523 new employees, for a total service area increase of 5,266 in the service population. Alternative 4, as with the Project, would comply with the applicable OSHA, Building Code, Fire Code, other LAMC, and LAFD requirements and recommendations, which would reduce demand on LAFD facilities and equipment without creating the need for new or expanded fire facilities. In addition, the Project Site is located within a highly urbanized area accessed via an established street system. Fire Station 17 is located 1.032 miles from the Project Site and Fire Station 9 is located 1.632 miles from the Project Site, none of the stations that would serve the Project Site meet the LAFD distance standard to the Project Site of 1 mile for an Engine Company or 1.5 miles for a Truck Company. However, Alternative 4, as with the Project, would include an automatic sprinkler system that would support compliance with the relevant requirements in Section 57.107.6 of the Fire Code. The LAFD recommended a variety of fire prevention and protection features regarding building identification, emergency access lanes, building setbacks, and private roadway widths. Additionally, plans and specifications would be submitted to LAFD prior to the provision of necessary permits for the Alternative 4. The inclusion of these recommendations would reduce impacts to an acceptable level.

Furthermore, Alternative 4, as with the Project, would be required to upgrade the nearby fire-flow infrastructure to have available flow to serve the Project Site. With the inclusion of these system upgrades, the hydrants would have adequate fire flow available to meet the flow required for Alternative 4, similar to the Project. As such, Alternative 4, as with the Project, would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. Impacts under Alternative 4, as with the Project, would be less than significant. Because the Project would generate a greater increase in service population compared to the Alternative 4, impacts related to fire protection services under Alternative 4 would be less than the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would generate a new population of 743 residents and 4,523 employees that would increase demand for fire protection services. This demand would be addressed by various measures, including LAFD review of Project Site and building access and an upgrade to the adjacent fire-flow infrastructure, including hydrants and water lines to have available fire flow to serve the Project Site. Other fire safety features would include implementation of Project Design Feature TRAF-PDF-1 (Construction Traffic Management Plan) to minimize disruptions to through traffic flow and maintain emergency vehicle access to the Project Site and neighboring land uses during construction, highly visible building identification, installation of sprinklers throughout all inhabited spaces, and compliance with the Fire Code. The inclusion of these and other system upgrades and features would reduce demand on existing stations and avoid the need to provide new or expanded facilities, the construction of which would result in physical environmental impacts. Therefore, impacts to fire services by the Project with the Deck Concept would be less than significant.

Alternative 4 would generate 3,894 net new employees and no on-site residential population. However, because it would increase occupancy of the Project Site, it would increase demand for fire protection services. As with the Project with the Deck Concept, Alternative 4 would be required to upgrade the nearby fire-flow infrastructure to have available flow to serve the Project Site. With the inclusion of these system upgrades, the hydrants would have adequate fire flow available to meet the flow required for Alternative 4, similar to the Project with the Deck Concept. As such, Alternative 4, as with the Project with the Deck Concept, would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities. Impacts with respect to fire protection services under both the Project with the Deck Concept and Alternative 4 would be less than significant. Further, because the Project with the Deck Concept would generate a greater increase in the area's service population compared to Alternative 4, impacts related to fire protection services under Alternative 4 would be less than under the Project with the Deck Concept.

(ii) *Police Protection*

(a) Project

As discussed in Section IV.K.2, *Public Services – Police Protection*, of this Draft EIR, Project demand for police protection during construction would be less than significant. The Project would implement Project Design Feature POL-PDF-1 to include security measures to limit access to construction areas, which would minimize the Project's potential need for police protection services during the construction phase. The Project would implement Project Design Feature TRAF-PDF-1 (Construction Traffic Management Plan), which would require approval by LADOT to ensure maintenance of emergency access. Project Design Feature TRAF-PDF-2 would implement a Construction Worker Parking Plan to identify and enforce parking location requirements for construction workers. Furthermore, construction-related traffic generated by the Project would not significantly affect LAPD response times within the Project vicinity as LAPD vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic during construction. The various safety features that would be implemented during Project construction would reduce the potential for incidents that would require police responses. Therefore, construction of the Project would not result in substantial adverse physical impacts associated with the provision of or need for new or altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives, and impacts would be less than significant.

As discussed in Section IV.J, *Population and Housing*, of this Draft EIR, the Project would generate a residential population increase of 743, which would increase demand for police services. During Project operation, the Project would implement Project Design Feature POL-PDF-2, which includes a security program with controlled access, security personnel, staff training, and video surveillance. These security features would help reduce the potential for on-site crimes, including loitering, theft, and burglaries, and would reduce demand for LAPD services. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives, and impacts would be less than significant.

Alternative 4, as with the Project, would result in construction activities that could affect emergency access and increase demand for police protection services. As with the Project, 4's construction phase could increase potential demand for LAPD services related to theft or vandalism and increased worker activity, as well as construction traffic that could affect emergency response times. To reduce LAPD demand during construction, Alternative 4, as with the Project, would implement a number of security measures under Project Design Feature POL-PDF-1 to limit access to construction areas, including private security, construction fencing, and locked entry. Similar to the Project, construction activities under Alternative 4 may involve temporary lane closures to

accommodate trucks entering and exiting the Project Site. Under Project Design Feature TRAF-PDF-1, a Construction Traffic Management Plan would ensure that adequate and safe access remains available at the Project Site during construction activities. The Construction Traffic Management Plan would require approval by LADOT to ensure maintenance of emergency access. Project Design Feature TRAF-PDF-2 would implement a Construction Worker Parking Plan to identify and enforce parking location requirements for construction workers. Furthermore, construction-related traffic generated by Alternative 4, as with the Project, would not significantly affect LAPD response times within the Project vicinity as LAPD vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic during construction. With implementation of the various safety features to reduce the potential for incidents that would require police responses, construction of the Project or Alternative 4 would not result in substantial adverse physical impacts requiring new or altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives, and impacts would be less than significant. Accordingly, impacts during construction under Alternative 4 would be similar to the Project.

During operation, Alternative 4, which would not incorporate any residential development, would not generate an increase in the LAPD's residential service population. Alternative 4, as with the Project, would incorporate Project Design Feature POL-PDF-2 to provide a 24-hour/seven-day security program to ensure the safety of its employees and site visitors. These measures would reduce demand on police services during operation. Based on LAPD service standards, Alternative 4 would not increase police services demand or require the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, Alternative 4, as with the Project, would not result in potential physical impacts associated with construction of police facilities, and impacts with respect to police protection would be less than significant. However, as Alternative 4 would not introduce new residents to the Project Site, compared to the Project, impacts to police protection services under Alternative 4 would be less than the Project.

(b) Project with the Deck Concept

As discussed in Section IV.K.2, *Public Services – Police Protection*, of this Draft EIR, the Project with the Deck Concept's demand for police protection during construction would be less than significant. The Project with the Deck Concept would implement Project Design Feature POL-PDF-1 to include a number of security measures that limit access to construction areas, including private security, construction fencing, locked entry, and security lighting, and other security features. Implementation of these security features would minimize the Project with the Deck Concept's potential need for police protection services during the construction phase. Implementation of the Project Design Feature TRAF-PDF-1 (Construction Traffic Management Plan) would ensure that adequate and safe access remains available at the Project Site during construction activities. The

Construction Traffic Management Plan would require approval by LADOT to ensure maintenance of emergency access. Project Design Feature TRAF-PDF-2 would implement a Construction Worker Parking Plan to identify and enforce parking location requirements for construction workers. Furthermore, construction-related traffic generated by the Project with the Deck Concept would not significantly affect LAPD response times within the Project vicinity as LAPD vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic during construction. The various safety features that would be implemented during Project with the Deck Concept construction would reduce the potential for incidents that would require police responses. As such, construction of the Project with the Deck Concept would not result in substantial adverse physical impacts associated with the provision of or need for new or altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives, and impacts would be less than significant.

The Project with the Deck Concept would result in a population increase of 743 new residents who would increase demand for police protection services. During operation, the Project with the Deck Concept would include the same supporting safety features as under the Project, including Project Design Feature POL-PDF-2 to require controlled access, security personnel, staff training and video surveillance. These security features would help reduce the potential for on-site crimes, including loitering, theft, and burglaries, and would reduce demand for LAPD services. Therefore, the Project with the Deck Concept would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives, and impacts would be less than significant.

Alternative 4, as with the Project with the Deck Concept, would result in construction activities that could affect emergency access and increase demand for police protection services. As with the Project with the Deck Concept, Alternative 4's construction phase could increase potential demand for LAPD services related to theft or vandalism and increased worker activity, as well as construction traffic that could affect emergency response times. To reduce LAPD demand during construction, Alternative 4, as with the Project with the Deck Concept, would implement a number of security measures under Project Design Feature POL-PDF-1 to limit access to construction areas, including private security, construction fencing, and locked entry. Similar to the Project, construction activities under Alternative 4 may involve temporary lane closures to accommodate trucks entering and exiting the Project Site. Under Project Design Feature TRAF-PDF-1, a Construction Traffic Management Plan would ensure that adequate and safe access remains available at the Project Site during construction activities. The Construction Traffic Management Plan would require approval by LADOT to ensure maintenance of emergency access. Project Design Feature TRAF-PDF-2 would implement a Construction Worker Parking Plan to identify and enforce parking location requirements

for construction workers. Furthermore, construction-related traffic generated by Alternative 4, as with the Project with the Deck Concept, would not significantly affect LAPD response times within the Project vicinity as LAPD vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic during construction. With implementation of the various safety features to reduce the potential for incidents that would require police responses, construction of the Project with the Deck Concept or Alternative 4 would not result in substantial adverse physical impacts requiring new or altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives, and impacts would be less than significant. Accordingly, impacts during construction under Alternative 4 would be similar to the Project with the Deck Concept.

Because Alternative 4 would not result in any new residential population, it would not increase the LAPD residential service population. As with the Project with the Deck Concept, Alternative 4 would incorporate Project Design Feature POL-PDF-2 to provide a 24-hour/seven-day security program to ensure the safety of its employees and site visitors. These measures would reduce demand on police services during operation. Similar to the Project with the Deck Concept, with the implementation of these features, Alternative 4 would not increase police services demand to the extent that the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, Alternative 4, as with the Project with the Deck Concept, would result in less than significant impacts with respect police protection services. However, as Alternative 4 would not introduce residents to the Project Site as compared to the Project with the Deck Concept, impacts to police protection services under Alternative 4 would be less than the Project with the Deck Concept.

(iii) Schools

(a) Project

As discussed in Section IV.K.3, *Public Services – Schools*, of this Draft EIR, there are no public schools located in the immediate Project vicinity that would be affected by construction activities at the Project Site. Project construction would also not result in a notable increase in the resident population or generate new students needing to attend local schools. During operation, the Project would generate a net increase of 759 elementary school students, 212 middle school students, and 436 high school students for a total net increase of 1,407 school students. While the Project would increase demand at local schools that serve the Project Site, the LAUSD bond program would fund improvements and upgrades to LAUSD school facilities upon review of enrollment and attendance. In addition, pursuant to Section 65995 of the California Government Code, the Project applicant would be required to pay fees in accordance with SB 50. Payment of such fees is intended for the general purpose of addressing the construction of new school facilities, whether schools serving the Project in question are at capacity or not. Pursuant to Section 65995(h) of the California Government Code, payment of such fees

is deemed full mitigation of a project's development impacts. Project operational impacts to schools would be less than significant.

LAUSD has student generation rates for residential, office, and commercial uses within their 2018 Developer Fee Justification Study. LAUSD has student generation rates for residential, office, and commercial uses within their 2018 Developer Fee Justification Study. Trip generation rates and total estimated students are presented in **Table V-18, Estimated Number of Students Generated by Alternative 4.**

TABLE V-18
ESTIMATED NUMBER OF STUDENTS GENERATED – ALTERNATIVE 4

Land Use ^{a,b}	Use	Generation Factors	Elemen. School	Middle School	High School	Total ^c
Proposed Uses						
Retail	10,000 sf	0.610/1,000 sf	3	1	2	6
Creative Office	944,055 sf	1.077/1,000 sf	549	153	315	1,017
Restaurant	40,000 sf	0.610/1,000 sf	13	4	7	24
Studio Space	93,617 sf	0.610/1,000 sf	31	9	17	57
Gym	62,148 sf	0.610/1,000 sf	21	6	11	38
<i>Total Students Generated by Proposed Uses</i>			<i>617</i>	<i>173</i>	<i>352</i>	<i>1,142</i>
Existing Uses						
Office	11,157 sf	0.610/1,000 sf	7	2	4	13
Dry Storage	32,382 sf	0.013/1,000 sf	1	1	1	3
Freezer/Cooler	161,854 sf	0.013/1,000 sf	2	1	1	4
<i>Total Students Generated by Existing Uses</i>			<i>10</i>	<i>4</i>	<i>6</i>	<i>20</i>
Net Increase (Proposed-Existing)			607	169	346	1,122

NOTE(S):

- ^a Student generation rates for residential uses are based on Table 3 of the LAUSD 2018 Developer Fee Justification Study: Elementary
- ^b Student generation for the office, hotel, retail, restaurant, studio space, and gym uses is based on the Neighborhood Shopping Center student generation rates as provided in Table 15 of the LAUSD 2018 Developer Fee Justification Study. Since the Developer Fee Justification Study does not specify grade levels for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 54 percent elementary school, 15 percent middle school, and 31 percent high school). For the existing dry storage and freezer/cooler uses, the Rental Self Storage factor was used.
- ^c Rounded to the nearest whole number.

SOURCE: ESA, 2021.

Based on these rates, Alternative 4's 165,765 square feet of retail, studio and gym floor area and 944,055 square feet of office floor area would generate approximately 607 elementary school students, 169 middle school students, and 346 high school students,

resulting in a total of 1,122 students. The Project would generate approximately 1,407 students. Similar to the Project, the additional students generated by Alternative 4 could potentially exceed the number of seats available at local schools. However, pursuant to Section 65995 of the California Government Code, the Project Applicant would be required to pay fees in accordance with SB 50. Payment of such fees is intended for the general purpose of addressing the construction of new school facilities, whether schools serving the Project are at capacity or not and, pursuant to Section 65995(h), payment of such fees is deemed to be full mitigation of a project's development impacts. As such, impacts to school facilities and services under Alternative 4 would, as with the Project, would be less than significant. Further, because Alternative 4 would generate fewer school-age children than the Project, impacts on schools would be less than the Project.

(b) Project with the Deck Concept

Based on the LAUSD's 2018 Developer Fee Justification Study, the Project with the Deck Concept would generate a net increase of 759 elementary school students, 212 middle school students, and 436 high school students for a total net increase of 1,407 school students. While the Project with the Deck Concept would increase demand at local schools, the LAUSD bond program would fund improvements and upgrades to LAUSD school facilities upon review of enrollment and attendance. In addition, pursuant to Section 65995 of the California Government Code, the Project applicant would be required to pay fees in accordance with SB 50. Payment of such fees is intended for the general purpose of addressing the construction of new school facilities, whether schools serving the Project in question are at capacity or not. Pursuant to Section 65995(h) of the California Government Code, payment of such fees is deemed full mitigation of a project's development impacts. Therefore, operational impacts to schools from the Project with the Deck Concept would be less than significant.

Based on the LAUSD's 2018 Developer Fee Justification Study, Alternative 4 would generate approximately 607 elementary school students, 169 middle school students, and 346 high school students, resulting in a total of 1,122 students. This increase would be fully mitigated by the payment of fees in accordance with SB 50 and Section 65995(h) of the California Government Code and, as such, impacts would be less than significant. Because Alternative 4 would result fewer students, the impact to school services under Alternative 4 compared to the Project with the Deck Concept would be less.

(iv) *Parks and Recreation*

(a) Project

As discussed in Section IV.K.4, *Public Services – Parks and Recreation*, of this Draft EIR, the Project would provide approximately 141,876 square feet of open space. Of the 141,876 square feet of open space, 73,848 square feet would be publicly accessible open space and would include the Northern Landscaped Area, Mesquit Paseo, River Balconies, Elevated Pedestrian Walkway connecting the River Balconies, Public Plaza Flex Deck, Fitness Deck, Sculpture Garden, Work Breakout Deck, and the Residential

Pool Deck. The Project with the Deck Concept would both provide open space in excess of the useable open space and landscape requirements of LAMC Section 12.21.G. Furthermore, the Applicant would pay the \$200 tax per new eligible residential unit, per LAMC Section 12.33.G to support the City's acquisition of new park space, and would comply with LAMC section 17.12 (the City's parkland dedication ordinance) in accordance with the Quimby Act. The Project would largely offset demand for recreational facilities through provision of on-site recreational and open space facilities in excess of Code requirements for the benefit of on-site residents, employees, and visitors. As such, the Project would not result in a high use of public parks and recreational facilities such that would result in the substantial deterioration of public recreational facilities, and the Project also would not require the construction of new, or expansion of existing, park facilities, which could have an adverse impact on the environment. Therefore, the Project would have a less than significant impact on parks and recreation services.

Alternative 4 would provide 131,353 square feet of open space, compared to the Project's provision of 141,876 square feet of open space. Alternative 4 would not generate any new residents compared to Project's approximately 743 new residents. Neither the Project with nor Alternative 4 would include a Deck and both would exceed LAMC parks and open space requirements. Because Alternative 4 would not include a residential component and would provide on-site open space in excess of Code requirements for the benefit of visitors and on-site employees, it would not result in a high use of public parks and recreational facilities such that would result in the substantial deterioration of recreational facilities, and Alternative 4 would also not require the development of new, or expansion of existing, the development of which would have an adverse impact on the environment. Similar to the Project, impacts with respect to parks and recreation would be less than significant under Alternative 4. However, since the Project would generate a residential population increase, demand for parks and recreational facilities would be higher. Therefore, parks and recreational services impacts would be greater under the Project compared to Alternative 4.

(b) Project with Deck Concept

The Project with the Deck Concept would provide 141,876 square feet (3.26 acres) of open space across the Project Site. Of the 141,876 square feet of open space, 73,848 square feet would be publicly accessible open space and include the Northern Landscaped Area, Mesquit Paseo, North and South River Balconies, 7th Street Terrace, and the Public Plaza Flex Deck. The Project with the Deck Concept would also include a 132,000-square-foot Deck that would result in a total of 273,876 square feet (6.29 acres) of open space. Open spaces provided under the Project with the Deck Concept would also exceed the landscape requirements of the LAMC. The Project with the Deck Concept would comply with LAMC Sections 12.33 and LAMC section 17.12 (the City's parkland dedication ordinance) in accordance with the Quimby Act.

The Project with the Deck Concept would largely offset demand for recreational facilities through provision of on-site recreational and open space facilities in excess of Code requirements for the benefit of on-site residents, employees, and visitors. In addition, the

Project with the Deck Concept would also pay \$200 per unit for each of its 308 residential units for park fees to further reduce the City's parks and open space shortfall. Impacts with respect to parks and recreation would be less than significant under the Project with the Deck Concept.

The Project with the Deck Concept would result in approximately 743 new residents, provide 141,876 square feet of open space, in addition to developing a 132,000-square-foot deck, compared to Alternative 4, which would not generate any new residents and provide 131,353 square feet of open space without the inclusion of a Deck. As with the Project with the Deck Concept, Alternative 4 would provide on-site open space in excess of Code requirements. With the provision of on-site open space and no introduction of new residents, Alternative 4 would not result in a high use of public parks and recreational facilities such that would result in the substantial deterioration of recreational facilities, and Alternative 4 would not require the development of new, or expansion of existing, the development of which would have an adverse impact on the environment. Impacts with respect to parks and recreation would be less than significant under both the Project with the Deck Concept and Alternative 4. However, since the Project with the Deck Concept would generate an increase in residential population, demand for parks and recreational facilities would be higher. As such, impacts would be greater under the Project with the Deck Concept compared to Alternative 4.

(v) *Libraries*

(a) Project

As discussed in Section IV.K.5, *Public Services – Libraries*, of this Draft EIR, there are no libraries located in the immediate Project vicinity that would be affected by construction activities at the Project Site. Project construction would also not result in a notable increase in library usage at the libraries serving the Project Site. During Project operation, the Project's 4,523 net new employees and 308 residential units would generate an estimated 743 new residents, and would therefore have the potential to increase demand at the libraries at the two branch libraries (Benjamin Franklin Branch Library and Little Tokyo Branch Library) with existing overcapacity conditions. However, the new level of service population at each library would not increase the population such that construction of a new branch library would be recommended according to the LAPL standards. Therefore, the Project's increase in demand for library services would not reach the recommended level at which the LAPL would consider building a new branch library in the area, the construction of which would have an adverse physical effect on the environment. Impacts would be less than significant.

Alternative 4 would not result in an increase in residential demand for library services. Therefore, similar to the Project, Alternative 4 would not create the need for new or physically altered library facilities, the construction of which would result in substantial adverse physical environmental impacts. As with the Project, impacts to libraries under Alternative 4 would be less than significant. Further, because Alternative 4 would not

result in any residential population increase, compared to the Project, impacts to library services would be less.

(b) Project with the Deck Concept

Construction of the Project with the Deck Concept would not result in a notable increase in library usage by construction workers at the libraries serving the Project Site. Regarding use of libraries by the additional builders of the Deck, the construction of the deck is expected to use the same labor pools as the Project and would not generate additional demand for library services by construction employees. As such, to accommodate construction population, there would be no need for new library facilities, the construction of which would have an adverse physical effect on the environment. The Project with the Deck Concept would involve the same number of residential units and commercial floor area and result in a similar service population as the Project. The Project with the Deck Concept has the potential to increase demand at the libraries. However, the increase in demand for library services under the Project with the Deck Concept would not reach the recommended level at which the LAPL would consider building a new branch library in the area. As such, under the Project with the Deck Concept, there would not be a need for new or expanded library facilities, the construction of which would result in adverse impacts on the environment, and impacts would be less than significant.

Alternative 4 would not result in an increase in residential demand for library services. Therefore, similar to the Project with the Deck Concept, Alternative 4 would not create the need for new or physically altered library facilities, the construction of which would result in substantial adverse physical environmental impacts. As with the Project with the Deck Concept, impacts to libraries under Alternative 4 would be less than significant. Further, because Alternative 4 would not result in any residential population increase, compared to the Project with the Deck Concept, impacts to library services would be less.

(l) *Transportation*

(i) *Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities*

(a) Project

As discussed in Section IV.L, *Transportation*, of this Draft EIR, the Project, which is located within a TPA, would include roadway and sidewalk improvements that facilitate convenient access to transit. Components of the Project include the Mesquit Paseo that would improve bicyclist and pedestrian connectivity between Mesquit Street and 7th Street. The Project would incorporate 288 short-term bicycle parking spaces and 519 long-term bicycle parking spaces. The Project would also include TDM measures to discourage single-occupancy vehicle trips. With proposed improvements to the pedestrian system, roadways, and provision of bicycle facilities, the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system,

including transit, roadway, bicycle and pedestrian facilities, which have been adopted to protect the environment and reduce VMT. Impacts with respect to programs, plans, and ordinances would be less than significant.

Alternative 4, as with the Project, would support multimodal transportation options and a reduction in VMT, as well as promote transportation-related safety in the Project area. Alternative 4, as with the Project, would not conflict with any programs, plans, ordinances or policies addressing the circulation system, transit, roadways, bicycle and pedestrian facilities, including those of Mobility Plan 2035, the Community Plan, the LADOT MPP, Vision Zero, the LAMC, the Plan for a Healthy Los Angeles, and the Citywide Design Guidelines. Alternative 4, as with the Project, would coordinate land use densities and promote the use of transit as it would be developed within a TPA. Alternative 4 would increase employment density in close proximity to a major transit stop. Additionally, Alternative 4, similar to the Project, would be located close to the proposed future Metro Arts District/6th Street Station, which is currently under study. Alternative 4, as with the Project, would also provide for road and pedestrian improvements, including multiple pedestrian and vehicle access points throughout the Project Site. Similar to the Project, Alternative 4 would not conflict with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities and, as such, impacts relative to plans and programs would be less than significant and similar to the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would include the same roadway and sidewalk improvements as the Project that would facilitate convenient access to transit. The Project with the Deck Concept would also develop a pedestrian-oriented, 132,000-square-foot Deck on the 7th Street level that would extend open space to near the Los Angeles River and enhance pedestrian access across the Project Site. The Project with the Deck Concept would also provide the Mesquit Paseo that would improve bicyclist and pedestrian connectivity between Mesquit Street and 7th Street, as with the Project. The Project with the Deck Concept would incorporate 288 short-term bicycle parking spaces and 519 long-term bicycle parking spaces, and include TDM measures provided for in Mitigation Measure TRAF-MM-1 to discourage single-occupancy vehicle trips. With proposed improvements to the pedestrian system, roadways, and provision of bicycle facilities under the Project with the Deck Concept, impacts related to programs, plans, ordinances or policies would be less than significant.

Alternative 4, as with the Project with the Deck Concept, for the reasons described under the Project, above, would not conflict with any programs, plans, ordinances or policies addressing the circulation system, transit, roadways, bicycle and pedestrian facilities. Alternative 4, as with the Project with the Deck Concept, would increase employment density in close proximity to a major transit stop. Alternative 4, as with the Project, would also provide for road and pedestrian improvements, including multiple pedestrian and vehicle access points throughout the Project Site. Similar to the Project with the Deck Concept, Alternative 4 would not conflict with programs, plans, ordinances or policies

addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. As such, under both the Project with the Deck Concept and Alternative 4, impacts related to programs, plans, ordinances or policies would be less than significant and similar.

(ii) *Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)*

(a) Project

As discussed in Section IV.L, *Transportation*, of this Draft EIR, the Project is estimated to generate a total of 27,040 daily vehicle trips and a total daily VMT of 195,304. The daily residential VMT per capita is estimated at 4.0, below the threshold of 6.0 for the Central APC. The daily work VMT per employee is estimated at 6.6 for the Project, below the threshold of 7.6 for the Central APC. Since the retail components of the Project are greater than 50,000 square feet, they were evaluated using the City's travel demand forecasting model. The City's model estimated a total daily VMT of 96,898,000 miles within a 12-mile radius of the Project TAZ with all retail uses included.⁵⁹ This is a net increase of 32,000 daily miles, or a 0.03 percent increase from the network before the retail was added. This increase in VMT is considered to be a significant impact, due to the significance criteria identifying an impact when any increase in VMT due to regional-serving retail occurs. The Project would implement Mitigation Measure TRAF-MM-1 which would partially offset the increase in VMT projected for the Project's retail uses, but would not reduce the retail VMT impact to a less-than-significant level. Therefore, the Project-generated regional-serving retail VMT impact would be significant and unavoidable.

Alternative 4 is estimated to generate a total of 13,754 daily vehicle trips and a total daily VMT of 101,518. The daily per capita residential VMT for Alternative 4 is not applicable since there are no residential uses proposed for Alternative 4. The daily work VMT per employee is estimated at 6.4 and, similar to the Project, is below the threshold of significance for the Central APC of 7.6 work VMT per employee.⁶⁰

In regard to the regional-serving retail component, Alternative 4 would reduce the Project's retail floor area. The City's model estimated a total daily VMT of 96,937,000 miles within a 12-mile radius from the Project TAZ when run without the retail components of Alternative 4. With all the Alternative 4 retail uses included, the model estimated a total daily VMT of 96,904,000 miles within a 12-mile radius from the Project TAZ. This is a net decrease of 33,000 daily miles from the network before the retail was added. This decrease in VMT is not considered to be a significant impact since impact is considered to be significant when any increase in VMT due to retail occurs. Therefore, Alternative 4

⁵⁹ The VMT analysis of retail uses for the Project presents a worst case scenario based on additional outdoor programming that would occur under the Project with the Deck Concept. Although the Project analysis presents a worst case scenario, the retail VMT impact findings for the Project would not be materially different if the added outdoor programming were not included.

⁶⁰ Fehr & Peers, *Analysis of 670 Mesquit Project Alternatives Technical Memorandum*, October 8, 2021. Provided in Appendix P of this Draft EIR.

would be consistent with the requirements of CEQA Guidelines Section 15064.3, Subdivision (b) and would avoid the Project's significant and unavoidable regional retail VMT impact. Impacts would be less than significant and less compared to the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept is estimated to generate a total of 27,493 daily vehicle trips and a total daily VMT of 198,540. The daily residential VMT per capita and daily work VMT per employee are estimated at 4.0 and 6.6, respectively. Both would be below the thresholds for the Central APC.

As indicated for the Project, under the Project with the Deck Concept, the model estimated a net increase of 32,000 daily miles, or a 0.03 percent increase in VMT from the network with retail uses included. This increase in VMT is considered to be a significant impact, due to the significance criteria identifying an impact when any increase in VMT due to retail occurs. Elements of Mitigation Measure TRAF-MM-1 related to pedestrian, bicycle, and transit amenities would help to reduce retail trip making and would partially offset the increase in VMT projected for the Project with the Deck Concept's retail uses. However, impacts related to VMT would continue to be significant and unavoidable under the Project with the Deck Concept.

Alternative 4 is estimated to generate a total of 13,754 daily vehicle trips and a total daily VMT of 101,518. The daily per capita residential VMT for Alternative 4 is not applicable since there are no residential uses proposed for Alternative 4. The daily work VMT per employee is estimated at 6.4 and, similar to the Project with the Deck Concept, is below the threshold of significance for the Central APC of 7.6 work VMT per employee.⁶¹

In regard to the regional-serving retail component, Alternative 4 would reduce the Project's retail floor area. The City's model estimated a total daily VMT of 96,937,000 miles within a 12-mile radius from the Project TAZ when run without the retail components of Alternative 4. With all the Alternative 4 retail uses included, the model estimated a total daily VMT of 96,904,000 miles within a 12-mile radius from the Project TAZ. This is a net decrease of 33,000 daily miles from the network before the retail was added. This decrease in VMT is not considered to be a significant impact since impact is considered to be significant when any increase in VMT due to retail occurs. Therefore, Alternative 4 would be consistent with the requirements of CEQA Guidelines Section 15064.3, Subdivision (b) and would avoid the Project with the Deck Concept's significant and unavoidable regional retail VMT impact. Impacts would be less than significant and less compared to the Project with the Deck Concept.

⁶¹ Fehr & Peers, *Analysis of 670 Mesquit Project Alternatives Technical Memorandum*, October 8, 2021. Provided in Appendix P of this Draft EIR.

(iii) *Design Hazards*

(a) Project

As discussed in Section IV.L, *Transportation*, of this Draft EIR, the Project and its proposed driveways would not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses and impacts on local safety would be less than significant. However, the Project would add car lengths to the US-101 Southbound freeway near the 7th Street Off-ramp such that it would constitute a potential safety issue. Specifically, the addition of traffic generated by the Project is projected to increase the overflow onto the mainline lanes by six cars in the AM peak hour and 2 cars in the PM peak hour (assuming an average queue storage length of 25 feet per car) for the US-101 Southbound Off-ramp to 7th Street in both Future Base (2026 and 2040) plus Project scenarios. Therefore, the Project would potentially substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses and impacts on freeway safety would be potentially significant. The Project would implement Mitigation Measure TRAF-MM-2 to signalize the intersection of the US-101 Southbound Off-ramp and 7th Street, which would sufficiently reduce the off-ramp queue and would not extend onto the freeway mainline. However, since the intersection is within the jurisdiction of another public agency (Caltrans), and the improvement would involve a decision by Caltrans, the City cannot guarantee that Caltrans will agree with implementation of this mitigation measure. Therefore, it is conservatively concluded that the impacts related to freeway safety would remain significant and unavoidable.

Alternative 4, as with the Project, would provide new sidewalks around the perimeter of the Project Site all of which would be accessible to the neighborhood. Similar to the Project, Alternative 4 would provide access locations that would be designed to the City standards and would provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety. All roadways and driveways will intersect at right angles. Street trees and other potential impediments to adequate driver and pedestrian visibility would be minimal and would be designed to applicable City standards and requirements. Pedestrian entrances separated from vehicular driveways would provide access from the adjacent streets, parking facilities, and transit stops. The provided driveways would be designed to comply with LADOT standards. Therefore, Alternative 4 would not substantially increase geometric hazards due to a design feature or incompatible uses, and impacts on local safety would be less than significant.

Regarding freeway safety, Alternative 4 is projected to increase the queue onto the mainline lines by five car lengths compared to the six car lengths projected under the Project.⁶² Similar to the Project, Alternative 4 would be required to implement Mitigation Measure TRAF-MM-2 to signalize the intersection of the US-101 Southbound Off-ramp

⁶² Fehr & Peers, *Analysis of 670 Mesquit Project Alternatives Technical Memorandum*, October 8, 2021. Provided in Appendix P of this Draft EIR.

and 7th Street, which would sufficiently reduce the off-ramp queue and would not extend onto the freeway mainline. However, since the intersection is within the jurisdiction of another public agency (Caltrans), and the improvement would involve a decision by Caltrans, the City cannot guarantee that Caltrans will agree with implementation of this mitigation measure. Therefore, it is conservatively concluded that the impacts related to freeway safety would remain significant and unavoidable. However, as Alternative 4 would result in fewer car lengths projected onto the mainline lines than the Project, impacts would be less than the Project.

(b) Project with the Deck Concept

The Project with the Deck Concept would feature several points of pedestrian access that include new sidewalks and bicycle parking facilities. The Project with the Deck Concept and its driveways would not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. However, traffic generated by the Project with the Deck Concept would increase the overflow onto the freeway mainline lanes by more than two cars for the US-101 Southbound Off-ramp to 7th Street. Therefore, because the Project with the Deck Concept would potentially substantially increase geometric hazards due to a design feature, impacts on freeway safety would be potentially significant. The Project with the Deck Concept would implement Mitigation Measure TRAF-MM-2 to signalize the intersection of the US-101 Southbound Off-ramp and 7th Street. Since the intersection is within the jurisdiction of Caltrans, and the improvement would involve a decision by Caltrans, the City cannot guarantee that Caltrans will agree with implementation of this mitigation measure. As such, impacts related to design hazards under the Project with the Deck Concept would be significant and unavoidable.

As with the Project with the Deck Concept, Alternative 4's access locations would provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety. Pedestrian entrances separated from vehicular driveways would provide access from the adjacent streets, parking facilities, and transit stops. The provided driveways would be designed to comply with LADOT standards. Therefore, Alternative 4 would not substantially increase geometric hazards due to a design feature or incompatible uses, and impacts on local safety would be less than significant.

Regarding freeway safety, Alternative 4 would be projected to increase the queue onto the mainline lines by five car lengths. Similar to the Project with the Deck Concept, Alternative 4 would be required to implement Mitigation Measure TRAF-MM-2 to signalize the intersection of the US-101 Southbound Off-ramp and 7th Street, which would sufficiently reduce the off-ramp queue and would not extend onto the freeway mainline. However, since the intersection is within the jurisdiction of Caltrans, and the improvement would involve a decision by Caltrans, the City cannot guarantee that Caltrans will agree with implementation of this mitigation measure. Therefore, it is conservatively concluded that the impacts related to freeway safety would remain significant and unavoidable. However, as Alternative 4 would result in fewer car lengths projected onto the mainline

lines than the Project with the Deck Concept, impacts compared to the Project with the Deck Concept would be less.

(iv) *Emergency Access*

(a) Project

As discussed in Section IV.L, *Transportation*, of this Draft EIR, Project construction activities would result in less than significant impacts to emergency access. The Project would also implement a Construction Traffic Management Plan (see TRAF-PDF-1). The Project's construction activities would not require a new, or significantly interfere with an existing risk management, emergency response, or evacuation plan. During operation, a section of Mesquit Street, a designated Collector Street, would be permanently closed for the development of the Mesquit Paseo between 6th Street and 7th Street. Mesquit Street, which is not currently accessible from 7th Street because of 7th Street's elevated approach to the 7th Street Bridge, consists entirely of the two-block segment between 6th Street and 7th Street. Mesquit Street, thus, does not currently provide through access to surrounding neighborhoods. With development, access to Mesquit Street and the Paseo would continue to be accessible from 6th Street and emergency access would be newly available from 7th Street. As such, the Project would not result in inadequate emergency access during construction.

For Project operation, the site plan for the Project would be reviewed prior to issuance of a building permit to ensure that all Los Angeles Fire Department fire safety requirements (including those related to emergency access) are met as part of the City's standard plan check review process. Impacts would be less than significant.

The Project Site is located in an established urban area served by the surrounding roadway network. Drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic.

Similar to the Project, Alternative 4 would implement TRAF-PDF-1 to ensure that emergency access and emergency response implementation would be maintained during construction. During operation under Alternative 4, a section of Mesquit Street, a designated Collector Street, would be permanently closed for the development of the Mesquit Paseo between 6th Street and 7th Street. Mesquit Street, which is not currently accessible from 7th Street because of 7th Street's elevated approach to the 7th Street Bridge, consists entirely of the two-block segment between 6th Street and 7th Street. Mesquit Street, thus, does not currently provide through access to surrounding neighborhoods. With development, access to Mesquit Street and the Paseo would continue to be accessible from 6th Street and emergency access would be newly available from 7th Street. With review and approval of Project Site access and circulation plans by the LAFD, Alternative 4, as with the Project, would not impair implementation of or physically interfere with adopted emergency response or emergency evacuation plans.

Impacts regarding emergency access under Alternative 4 would be less than significant and similar to the Project.

(b) Project with the Deck Concept

Construction activities for the Project with the Deck Concept could potentially affect emergency access to the Project Site and surroundings. However, construction activities for the Project with the Deck Concept would not require full street closures and most activities would be confined to the Project Site. With implementation of Project Design Feature TRAF-PDF-1, Construction Traffic Management Plan, the Project with the Deck Concept's construction activities would not significantly interfere with an existing risk management, emergency response, or evacuation plan. Further, the site plan for the Project with the Deck Concept would be reviewed prior to issuance of a building permit to ensure that all Los Angeles Fire Department fire safety requirements (including those related to emergency access) are met as part of the City's standard plan check review process. The Project with the Deck Concept would not result in inadequate emergency access during construction. During operation, a section of Mesquit Street, a designated Collector Street, would be permanently closed for the development of the Mesquit Paseo between 6th Street and 7th Street. Mesquit Street, which is not currently accessible from 7th Street because of 7th Street's elevated approach to the 7th Street Bridge, consists entirely of the two-block segment between 6th Street and 7th Street. Mesquit Street, thus, does not currently provide through access to surrounding neighborhoods. With development, access to Mesquit Street and the Paseo would continue to be accessible from 6th Street and emergency access would be newly available from 7th Street. As such, the changes on Mesquit Street would not adversely affect emergency vehicle access. No other street closures that would affect emergency access in and around the Project Site are anticipated. Impacts associated with emergency access under the Project with the Deck Concept would be less than significant.

Similar to the Project with the Deck Concept, Alternative 4 would implement TRAF-PDF-1 to ensure that emergency access and emergency response implementation would be maintained during construction. Further, the site plan for the Project would be reviewed prior to issuance of a building permit to ensure that all Los Angeles Fire Department fire safety requirements (including those related to emergency access) are met as part of the City's standard plan check review process. All driveways and the internal circulation would be subject to LAFD review to confirm adequate access is provided internally for on-site emergency vehicle access. As with the Project with the Deck Concept, during operation of Alternative 4, a section of Mesquit Street, a designated Collector Street, would be permanently closed for the development of the Mesquit Paseo between 6th Street and 7th Street. Mesquit Street, which is not currently accessible from 7th Street because of 7th Street's elevated approach to the 7th Street Bridge, consists entirely of the two-block segment between 6th Street and 7th Street. Mesquit Street, thus, does not currently provide through access to surrounding neighborhoods. With development, access to Mesquit Street and the Paseo would continue to be accessible from 6th Street and emergency access would be newly available from 7th Street. With review and

approval of Project Site access and circulation plans by the LAFD, Alternative 4, as with the Project with the Deck Concept, would not impair implementation of or physically interfere with adopted emergency response or emergency evacuation plans. Impacts regarding emergency access under Alternative 4 and the Project with the Deck Concept would be less than significant and similar.

(m) *Tribal Cultural Resources*

(i) *Project*

Construction activities for the Project would involve excavation for subterranean parking and other ground-disturbing activities. As discussed in Section IV.M, *Tribal Cultural Resources*, of this Draft EIR, no known tribal cultural resources would be affected by the Project. The Los Angeles River is a known landmark for prehistoric habitation and trading, with native American trade routes leading to and from the river basin. Due to the Project Site's proximity to the river, there is the potential for unknown buried tribal cultural resources to be encountered during Project construction activities. This is considered to be a potentially significant impact. Thus, mitigation measures are proposed to require monitoring for tribal cultural resources and treatment of such resources, if encountered. With implementation of the required mitigation measures, potentially significant impacts under the Project would be reduced to a less than significant level.

Alternative 4 would not include construction of a Deck and would excavate to approximately four levels for subterranean parking. No known tribal cultural resources would be affected by Alternative 4. However, similar to the Project, Alternative 4, would be required to implement mitigation measures in the event unknown buried tribal cultural resources are encountered during construction activities. With mitigation, Alternative 4, as with the Project, would result in less-than-significant impacts to tribal cultural resources. As excavation depths and volumes would be reduced under Alternative 4, potential impacts to tribal cultural resources under Alternative 4 would be less than the Project.

(ii) *Project with the Deck Concept*

Construction activities for the Project with the Deck Concept involve excavation for subterranean parking and other ground-disturbing activities. As discussed in Section IV.M, *Tribal Cultural Resources*, of this Draft EIR, no known tribal cultural resources would be affected by the Project. The Los Angeles River is a known landmark for prehistoric habitation and trading, with native American trade routes leading to and from the river basin. Due to the Project Site's proximity to the river, there is the potential for unknown buried tribal cultural resources to be encountered during Project construction activities. This is considered to be a potentially significant impact. Thus, mitigation measures are proposed to require monitoring for tribal cultural resources and treatment of such resources, if encountered. With implementation of the required mitigation measures, potentially significant impacts under the Project with the Deck Concept would be reduced to a less than significant level.

Alternative 4 would not include construction of a Deck and would excavate to approximately four levels for subterranean parking. No known tribal cultural resources would be affected by Alternative 4. However, similar to the Project with the Deck Concept, Alternative 4, would be required to implement mitigation measures in the event unknown buried tribal cultural resources are encountered during construction activities. With mitigation, Alternative 4, as with the Project with the Deck Concept, would result in less-than-significant impacts to tribal cultural resources. As excavation depths and volumes would be reduced under Alternative 4, and as Alternative 4 would not include excavation for the deck, potential impacts to tribal cultural resources under Alternative 4 would be less than the Project with the Deck Concept.

(n) *Utilities and Service Systems – Water, Wastewater, and Solid Waste*

(i) *Wastewater*

(a) *Project*

As discussed in Section IV.N.1, *Wastewater*, of this Draft EIR, Project construction would include all necessary on-site and off-site sewer pipe improvements and connections to adequately connect to the City's existing sewer system. The design of the connections would be developed by a registered engineer and approved by the BOE. All necessary improvements would be verified through the permit approval process of obtaining a sewer connection permit from the City. Project construction would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. The Project would pay the required sewer connection fees to help offset the Project's contribution to the City's wastewater collection infrastructure needs and would require approval of sewer permits prior to connection to the sewer system. During Project operation, the Project's increase in wastewater generation would represent a negligible increase in the wastewater volumes treated at the HWRP and the Hyperion Sanitary Sewer System. Therefore, Project operation would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant.

Alternative 4 would generate additional wastewater and increase demand on the HWRP and the Hyperion Sanitary Sewer System. **Table V-19, *Wastewater Generation during Alternative 4 Operation***, shows that Alternative 4 would result in an estimated average gross wastewater generation of approximately 394,639 gpd. Alternative 4 would have an estimated net wastewater generation volume of 388,477 gpd or approximately 0.388 mgd. This estimate does not account for reductions in wastewater generation that would result from required compliance with applicable LAMC requirements or water conservation measures, as presented in Project Design Feature WS-PDF-1.

**TABLE V-19
WASTEWATER GENERATION DURING ALTERNATIVE 4 OPERATION**

Land Use	Units	Generation Rate (gpd/unit)	Total Wastewater Generation (gpd)
Existing to Be Removed			
Cold Storage	205,393 sf	30/1,000 sf	6,162
Proposed			
Restaurant: full Service Indoor Seat ^a	40,000 sf (2,667 seats)	30/seat	80,010
Retail	10,000sf	25/1,000 sf	250
Office Building w/ Cooling Towers	944,055 sf	170/1,000 sf	160,489
Health Club/Spa	62,148 sf	650/1,000 sf	44,267
Gallery Space/Museum	93,617 sf	0.03/sf	2,809
Water Features ^b	2,400 cf		17,952
Reflecting Pools ^b	4,800 cf		35,904
Pools ^b	6,000 cf		44,880
Spas ^b	1,080 cf		8,078
<i>Gross Wastewater Generation</i>			394,639
Less Existing to Be Removed			-6,162
Net Increase			388,477

NOTE(S):

sf = square feet; cf = cubic feet; gpd = gallons per day

^a It is assumed that each seat requires 15 square feet.^b It is assumed that similar water features, pools, and spas would be provided for Alternative 4 as for the Project.

SOURCE: ESA, 2021.

Comparatively, the Project is estimated to increase on-site wastewater generation by 558,306 gpd or 0.558 mgd. Similar to the Project, the increase in wastewater generation by Alternative 4 would be within the capacity limits of the conveyance and treatment facilities serving the Project Site as determined in the WWSI for the Project. Similar to the Project, impacts on wastewater conveyance and treatment systems under Alternative 4 would be less than significant. Further, because Alternative 4 would generate a lower volume of wastewater, impacts under Alternative 4 would be less than the Project.

(b) Project with the Deck Concept

The minimal wastewater generation during construction of the Project with the Deck Concept would not require the construction of new or expansion of existing facilities, and, given the small amount of wastewater, construction activities are not anticipated to exceed the capacity of existing wastewater conveyance and treatment systems.

Operation of the Project with the Deck Concept would generate approximately 558,306 gpd or 0.558 mgd of wastewater. Event programming proposed under the Project with the Deck Concept would be temporary and would not occur every day and throughout the day. Therefore, it is unlikely that any wastewater generated during these events, above 0.558 mgd would be more than the current remaining capacities at the HWRP. The Project with the Deck Concept would pay the required sewer connection fees to help offset the Project with the Deck Concept's contribution to the City's wastewater collection infrastructure needs and would require approval of sewer permits prior to connection to the sewer system. Impacts to wastewater infrastructure and treatment under the Project with the Deck Concept would be, thus, less than significant.

Alternative 4 would have an estimated net wastewater generation volume of 388,487 gpd or 0.388 mgd. As with the Project with the Deck Concept, this volume is within the capacity limits of the conveyance and treatment facilities serving the Project Site as determined in the WWSI for the Project. Similar to the Project with the Deck Concept, impacts on wastewater conveyance and treatment systems under Alternative 4 would be less than significant. Further, because Alternative 4 would generate a lower volume of wastewater, impacts under Alternative 4 would be less than the Project with the Deck Concept.

(ii) *Water Supply*

(a) Project

As discussed in Section IV.N.2, *Water Supply*, of this Draft EIR, water demand during Project construction would be substantially less than the existing water consumption at the Project Site. In order to accommodate the Project's operational water use, the Project would be required to upgrade the water mains serving the Project to ensure adequate water flow, pressure, and capacity are available for the Project. Project contractors would coordinate with LADWP to identify the locations and depth of all lines, LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. Therefore, existing water infrastructure would meet the limited and temporary water demand necessary for construction of the Project. The design and installation of new service connections are required to meet applicable City standards. Construction impacts associated with the installation of water distribution lines below surface would primarily involve trenching in order to place the water distribution lines below grade and reconnect existing domestic and fire water services for the affected surrounding properties and would be limited to on-site and minor off-site (street right-of-way and sidewalk) construction activities. Project construction would not require or result in the construction of new water facilities or expansion of existing facilities, construction of new facilities, and construction impacts on water supply would be less than significant.

In regard to Project operation, following installation of the new service connections to accommodate the Project's additional water and fire flow requirements, LADWP determined that the water distribution infrastructure would have sufficient capacity to serve the Project Site. The Project's approved WSA determined that there are adequate water supplies available from existing LADWP entitlements and supplies to meet the

Project's projected water demand, in addition to existing and planned future demand on LADWP, annually during normal, single-dry, and multiple-dry water years over the next 20 years, as required by SB 610, as well as through at least 2040 (the planning horizon of the LADWP's 2015 UWMP). Sufficient domestic water supplies are available to service the Project and reasonably foreseeable future development during normal, dry and multiple dry-years. Operational impacts on water supply would be less than significant.

Alternative 4 would increase demand on water supplies and infrastructure. As shown in **Table V-208, *Estimated Water Demand for Alternative 4***, Alternative 4 would generate an estimated net water demand of 277,411 gpd or 310.78 afy.

In comparison, the approved WSA for the Project indicated that the Project would have a water demand of 439,943 gpd or 492.83 afy. As with the Project, Alternative 4's water demand projections would therefore be within LADWP's 2015 UWMP's projected increases in Citywide water demands, while anticipating multi-dry year water conditions through the planning horizon of 2040. Furthermore, similar to the Project, operation of Alternative 4 would require upgrades to the water mains serving the Project Site to ensure adequate water flow, pressure, and capacity for Alternative 4. With regulatory compliance to the LAMC and coordination with LADWP, operation of Alternative 4, as with the Project, would not result in the relocation or construction of new or expanded water facilities, the construction or relocation of which would cause significant environmental effects. Similar to the Project, operational impacts on water infrastructure under Alternative 4 would be less than significant. Further, because Alternative 4 would generate less water demand than the Project, impacts under Alternative 4 would be less than the Project.

(b) Project with the Deck Concept

During construction of the Project with the Deck Concept, water use would be substantially less than the existing water consumption at the Project Site. The Project with the Deck Concept would, similar to the Project, be required to upgrade the water mains serving the Project with the Deck Concept to ensure adequate water flow, pressure, and capacity are available. Construction of the Project with the Deck Concept would include the same necessary on- and off-site improvements and connections as needed under the Project. With compliance with existing regulations and requirements of the LADWP, impacts on water supply resulting from construction activities would be less than significant. With implementation of regulatory water conservation measures, operation of the Project with the Deck Concept would result in a demand of 439,943 gpd or 492.83 afy. Operation of the Project with the Deck Concept would not include additional uses that are not already analyzed under the Project. Additional event programming, as compared to the Project, proposed under the Project with the Deck Concept would be temporary and would not occur every day and throughout the day. Therefore, as determined by the WSA, the 2015 UWMP's projections for water demand and supply would include the water demand required for the Project with the Deck Concept. Adequate water supplies from existing LADWP entitlements and supplies would be available to meet the Project with the Deck Concept's projected water demand through at least 2040. Impacts related to water supply and infrastructure under the Project with the Deck Concept would be less than significant.

**TABLE V-20
ESTIMATED WATER DEMAND FOR ALTERNATIVE 4**

Proposed Uses	Quantity	Water Use Factor (gpd/unit) ^a	Base Demand (gpd)	Water Efficiency Requirements Ordinance Savings (gpd) ^b	Net Proposed Water Demand	
					(gpd)	(afy)
Restaurant: Full Service	40,000 sf (2,667 seats)	30/seat	80,010			
General Retail	10,000 sf	0.03/sf	300			
Office	944,055 sf	0.12/sf	113,287			
Office Lobby	12,026 sf	0.05/sf	601			
Gallery Space ^c	93,617 sf	0.03/sf	2,809			
Water Features	1,200 sf		113			
Gym	68,102 sf	0.65/sf	44,266			
Base Demand Adjustment (Commercial) ^d			1,767			
<i>Subtotal</i>			243,153	31,901	211,252	236.66
Landscaping ^e	101,117 sf		9,445	5,154	4,291	4.81
Covered Parking Structure	555,191 sf	0.02/sf	366	0	365	0.41
Cooling Tower Total	6,000 tons	25.25	151,470	30,294	121,176	135.74
Proposed Total			404,434	67,349	337,085	378
Less Existing Uses to Be Removed					-58,526	-65.56
Less Additional Conservation ^e					-1,112	-1.25
Net Additional Water Demand					277,411	310.78

NOTE(S):

- ^a Water Use Factor is based on City's Department of Public Works, Bureau of Sanitation sewer generation rates.
- ^b The Water Efficiency Requirements Ordinance Savings used for Alternative 4 are the same as those provided in the approved WSA for the Project.
- ^c Water conservation due to conservation commitments, as detailed in approved WSA for the Project and as WSA-PDF1, is the same as the Project as for Alternative 4, as Alternative 4 would apply the same conservation commitments as under the Project.
- ^d The base demand adjustment for the commercial uses is estimated based on the base demand adjustment provided in the approved WSA for the Project. In the approved WSA for the Project, the base demand adjustment for the commercial uses is approximately 0.7 percent of the estimated water demand for the commercial uses. Therefore, the base demand adjustment for Alternative 4's commercial uses is approximately 0.7 percent of the estimated water demand for the commercial uses.
- ^e Landscaping water use for Alternative 4 uses the same estimates as provided in the approved WSA for the Project. As Alternative 4 would provide less open space, and therefore less landscaping, than the Project, this is a conservative estimate for Alternative 4.

SOURCE: ESA, 2021.

Alternative 4 would generate an estimated net water demand of 277,411gpd or 310.78 afy. As with the Project with the Deck Concept, Alternative 4's water demand projections would be within LADWP's 2015 UWMP's projected increases in Citywide water demands, while anticipating multi-dry year water conditions through the planning horizon of 2040. Furthermore, similar to the Project with the Deck Concept, Alternative 4 be required to upgrade the water mains serving to ensure adequate water flow, pressure, and capacity are available. Construction of alternative would include the same necessary on- and off-site improvements and connections as needed under the Project with the Deck Concept. With regulatory compliance to the LAMC and coordination with LADWP, as with the Project with the Deck Concept operation of Alternative 4, would not result in the relocation or construction of new or expanded water facilities, the construction or relocation of which would cause significant environmental effects. Similar to the Project, operational impacts on water infrastructure under Alternative 4 would be less than significant. Further, because Alternative 4 would generate less water demand than the Project, impacts under Alternative 4 would be less than the Project with the Deck Concept.

(iii) *Solid Waste*

(a) Project

Demolition of the Project would generate approximately 203,953 tons of post-diversion C&D waste. As discussed in Section IV.N.3, *Solid Waste*, of this Draft EIR, all C&D waste collected at the Project Site would be taken to a City-certified waste processing facility for sorting and final distribution and disposal. The C&D waste is anticipated to be disposed of at the County's Azusa Land Reclamation landfill or one of the Inert Debris Engineered Fill Operations located in the County that is permitted to receive C&D waste or exported to an out-of-county facility currently accepting waste from Los Angeles County, all of which have remaining disposal capacity to receive the Project's C&D waste. Therefore, Project construction would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and construction impacts on solid waste would be less than significant.

Operation of the Project's commercial and residential uses, post-diversion, would generate approximately 3,369 net tons of solid waste a year and 18,462 net pounds of solid waste per day. The Project's estimated annual solid waste generation (post-diversion) would represent a negligible amount of the County's annual waste generation and remaining capacity of the County's landfills. The Project's operational waste generation would not exceed the permitted capacity of disposal facilities serving the Project and would not alter the ability of the County to address landfill needs via existing capacity and other planned strategies and measures for ensuring sufficient landfill capacity exists to meet the needs of the County. Therefore, the County's City-certified waste processing facilities would have sufficient permitted capacity to accommodate the Project's operational waste disposal needs. Project operation would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and impacts would be less than significant.

Alternative 4 would increase solid waste generation at the Project Site that would need to be landfilled. Alternative 4 would demolish the same buildings and hardscape, but would reduce floor area from 1,792,103 square feet of buildings under the Project to a total of 1,149,820 square feet under Alternative 4. As such, Alternative 4 would reduce the Project's overall C&D waste. In addition, Alternative 4 would construct one less building (Building 1 would not be constructed) than under the Project. The C&D waste generated by construction of Alternative 4 would be disposed of at the County's Azusa Land Reclamation landfill or one of the Inert Debris Engineered Fill Operations located in the County that is permitted to receive C&D waste or exported to an out-of-county facility currently accepting waste from Los Angeles County, all of which have remaining disposal capacity to receive the C&D waste. Similar to the Project, Alternative 4 construction would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and construction impacts on solid waste would be less than significant under both the Project and Alternative 4. However, with the reduction in scale of construction, impacts related to C&D solid waste would be less compared to the Project.

Alternative 4s estimated solid waste output during operation is presented in **Table V-21, *Estimated Operational Generation for Alternative 4.***

As shown in Table V-21, Alternative 4 would generate, post-diversion, 2,852 net tons of solid waste per year and 15,631 net pounds of solid waste per day.

The Sunshine Canyon Landfill, the primary recipient of Class III solid waste from the City, has a maximum daily capacity of 12,100 tons per day and a disposal rate of 6,919 tons per day, indicating a residual daily capacity of 5,181 tons per day. Alternative 4's net addition of 9.14 net tons per day⁶³ would represent 0.18 percent of Sunshine Canyon's residual daily capacity, assuming diversion. By comparison, the Project, with diversion, would generate approximately 3,369 tons per year (10.79 tons per day) of solid waste, representing approximately 0.21 percent of Sunshine Canyon's residual capacity.

Similar to the Project, Alternative 4's additional solid waste generation would be accommodated by the County's City-certified waste processing facilities. Alternative 4's operation would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Similar to the Project, impacts with respect to solid waste under Alternative 4 would be less than significant. Further, because Alternative 4's construction and operation would generate less solid waste compared to the Project, impacts under Alternative 4 would be less than the Project.

⁶³ Alternative 4's daily disposal in tons assumes that landfills operate six days per week. 52 weeks * 6 days = 312 days. Therefore, Alternative 4's daily disposal is calculated by 2,852 net tons per year/ 312 days = 9.14 net tons per day.

**TABLE V-21
ESTIMATED OPERATIONAL SOLID WASTE GENERATION FOR ALTERNATIVE 4**

Land Use	Quantity^a	Daily Generation Factor^b	Solid Waste Generation (tons/year)	Solid Waste Generation (lbs/day)
Proposed New Uses				
Office	944,055 sf (3,776 emp)	2.02 tons/emp/year	7,628	41,797
Retail	10,000 sf (20 emp)	1.96 tons/emp/year	39	214
Restaurant	40,000 sf (160 emp)	1.96 tons/emp/year	314	1,721
Studio/Gallery	93,617 sf (94 emp)	1.96 tons/emp/year	184	1,008
Gym	62,148 sf (62 emp)	1.96 tons/emp/year	122	668
<i>Proposed Subtotal^d</i>	<i>(4,112 emp)</i>	—	<i>8,287</i>	<i>45,408</i>
<i>Existing Uses^e</i>	<i>205,393 sf (218 emp)</i>		<i>(137)</i>	<i>(748)</i>
Net Increase (pre-diversion)	—	—	8,150	44,660
Net Increase (post-diversion)^f	—	—	2,852	15,631

NOTE(S):

lb = pounds; sf = square feet; emp = employees

a Number of employees per use are detailed in Table V-X, Estimate of Alternative 3's Employment, in this Chapter, above.

b Generation factors are provided by CalRecycle's Disposal and Diversion Rates for Business Groups, <https://www2.calrecycle.ca.gov/wastecharacterization/businessgroup rates>. Accessed November 1, 2021.

c Commercial uses include the gym, restaurants, retail, and studio/event/gallery/museum uses.

d Totals may not add up due to rounding.

e Existing subtotal is taken from Table IV.N.3-1, in Section IV. N.3. In Chapter IV of this Draft EIR. The amount here is based on the post-diversion existing operational generation as using a lower number for the existing uses would result in a higher net increase for the Project.

f Based on an anticipated diversion rate of 65 percent for operations, which was assumed in the CoIWMP 2019 Annual Report. This is conservative as the actual diversion is likely to be higher with increasing compliance with the state's recycling goal of 75 percent.

SOURCE: ESA, 2021.

(b) Project with the Deck Concept

Demolition of the Project with the Deck Concept would generate approximately 204,166 tons of C & D waste. Operation of the Project with the Deck Concept's commercial and residential uses would generate approximately 3,369 tons a year (post diversion), which would be substantially less than the remaining capacity of the landfills currently serving the Project Site. While event programming would be proposed under the Project with the Deck Concept, these events would be temporary and would not occur every day and

throughout the day. Therefore, it is likely that the solid waste generated during these particular events would not be more than the current remaining capacities at the landfills, and the additional solid waste generated by the Project's temporary events would be less than what is generated by the residential and commercial components of the Project with the Deck Concept. Thus, the conclusions regarding impact significance presented above under the Project would be the same and apply to operation of the Project with the Deck Concept. Impacts related to the capacity of local infrastructure and state and local standards under the Project with the Deck Concept would be less than significant.

Alternative 4 would result in similar demolition C&D waste as the Project with the Deck Concept but as a smaller development project, would reduce the Project with the Deck Concept's overall construction waste. As with the Project with the Deck Concept, Alternative 4 would not exceed State or local standards, or exceed the capacity of local infrastructure. Under both the Project with the Deck Concept and Alternative 4, C&D solid waste generation would be less than significant. However, because of the reduced scale of development, construction impacts would be less under Alternative 4 compared to the Project. During operation, Alternative 4 would generate approximately 2,852 net tons per year of solid waste requiring landfill disposal. By comparison, the Project with the Deck Concept, with diversion, would generate approximately 3,369 net tons of solid waste per year. Similar to the Project with the Deck Concept, Alternative 4's additional solid waste generation would be accommodated by the County's City-certified waste processing facilities. Alternative 4's operation would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts with respect to solid waste generation and landfill capacity under Alternative 4 would be less than significant. Further, because Alternative 4 construction and operation would generate less solid waste than the Project with the Deck Concept, impacts under Alternative 4 would be less.

(iv) *Electric Power, Natural Gas, and Telecommunications Infrastructure*

(a) Project

As discussed in Section IV.N.4, *Electric Power, Natural Gas, and Telecommunications Infrastructure*, of this Draft EIR, energy (electric power and natural gas) associated with Project construction would require the Project Applicant to coordinate any potential removals or relocations with LADWP and the SoCalGas. Construction impacts associated with the installation of new telecommunication infrastructure would be of short duration and would cease to occur when installation is complete. Furthermore, no upgrades to off-site telecommunications facilities are anticipated. Therefore, the construction of the Project is not anticipated to adversely affect the electric power, natural gas, and telecommunications infrastructure serving the surrounding uses or utility system capacity and would not require the construction of new energy facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects. Construction impacts would be less than significant.

As determined in Section IV.C, *Energy*, of this Draft EIR, the Project's annual net increase in operational electricity and natural gas usage would not require additional infrastructure beyond proposed utilities installed on-site during construction.

The LADWP's projected load forecasts for electricity and LADWP 2017 Power Strategic Long-Term Resource Plan identifies adequate energy resources to support future generation capacity. The Project would not require additional infrastructure (i.e., a substation) beyond proposed utilities installed on-site during construction. Therefore, during Project operations, it is expected that LADWP's existing infrastructure, planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand.

Regarding natural gas, based on the Project's small fraction of total natural gas consumption for the region, ongoing SoCalGas long-range planning efforts to provide natural gas for this service region, and sufficient existing infrastructure, it is expected that SoCalGas' existing and planned natural gas supplies and infrastructure would be sufficient to meet the Project's demand for natural gas. Furthermore, SoCalGas has stated that it has "facilities in the area" of the Project Site and that "service would be in accordance with SoCalGas' policies and extension rules on file with the California Public Utilities Commission (Commission) at the time contractual arrangements are made."⁶⁴

Telecommunication providers already deliver their services to a large number of commercial and residential buildings in in the vicinity of the Project Site, and it is anticipated that existing telecommunications facilities would be sufficient to support the Project's needs for telecommunication services. As such, no upgrades to off-site telecommunications facilities are anticipated. Therefore, the Project would not create the need for additional off-site telecommunications infrastructure, which could cause significant environmental effects.

Alternative 4 would develop the Project Site and increase the scale of development above existing conditions. However, similar to the Project, Alternative 4 would implement various Project Design Features, including AQ-PDF-1 (natural gas fire place prohibition); GHG-PDF-1 (Green Building Features); and WS-PDF-1 (Water Conservation Features), such that additional infrastructure beyond the proposed utilities installed on-site during construction would not be required. As Alternative 4 would be built on the same Project Site as the Project, existing telecommunications facilities would be sufficient to support Alternative 4's needs for telecommunication services as under the Project. Therefore, Alternative 4 would not require the construction of new energy facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects. Impacts would be less than significant under both the Project and Alternative 2. However, due to the reduction in overall development scale, impacts under Alternative 4 would be less compared to the Project.

⁶⁴ SoCalGas, Will Serve – 670 Mesquit St, Los Angeles. Included in Appendix E of this Draft EIR.

(b) Project with the Deck Concept

The Project with the Deck Concept would result in a demand for electricity, natural gas, and telecommunication services. The LADWP's projected load forecasts for electricity and LADWP 2017 Power Strategic Long-Term Resource Plan identifies adequate energy resources to support future generation capacity throughout the City. Therefore, during operation, it is expected that existing and planned electricity (including lighting for outdoor events on the Deck), natural gas, and telecommunications infrastructure would be sufficient to support the Project with the Deck Concept's electricity demand. The Project with the Deck Concept would not require additional infrastructure (i.e., a substation) beyond proposed utilities installed on-site during construction. As natural gas and telecommunication providers already deliver their services to a large number of commercial and residential buildings in the vicinity of the Project Site, it is anticipated that existing natural gas and telecommunications facilities would be sufficient to support the Project with the Deck Concept's needs for natural gas and telecommunication services. Because natural gas, electricity, and telecommunications infrastructure is in place to serve the Project Site, the Project with the Deck Concept would not require or result in the relocation or construction of new or expanded facilities, the construction or relocation of which could cause significant effects upon the environment. Impacts under the Project with the Deck Concept would be less than significant.

Based on the reduction in occupancy (3,894 new occupants (employees) under Alternative 4 compared to 5,266 new occupants (residents and employees) under the Project with the Deck Concept), Alternative 4 would reduce demand with respect to the available supply or distribution infrastructure capabilities. As such, Alternative 4, as with the Project with the Deck Concept, would not result in a specific need to construct new electric power, natural gas, or telecommunications facilities or in the expansion of existing facilities, the construction of which could cause significant environmental effects. Because electric power, natural gas, and telecommunications facilities are currently available within the area and have adequate capacity to serve either the Project with the Deck Concept or Alternative 4, impacts to these services under the Project with the Deck Concept and Alternative 4 would be less than significant. However, due to the reduction in overall development scale, impacts under Alternative 4 would be less compared to the Project with the Deck Concept.

(3) Relationship of the Alternative to Project Objectives

As described above, Alternative 4 would develop 944,055 square feet of office, 40,000 square feet of restaurant, 10,000 square feet of retail, 93,617 square feet of studio/event/gallery/museum, and 62,148 square feet of gym uses. The floor area for the office, studio/event/gallery/museum, and gym uses would be the same as the Project; the retail and restaurant floor area would be reduced compared to the Project. Alternative 4 would not include any residential or hotel uses. Alternative 4 would provide 131,353 square feet of open space and no Deck, reducing both the Project's 141,876 square feet of open space and eliminating the Project's 132,000-square-foot Deck. Alternative 4 would reduce the Project's FAR from 7.5:1 to 4.8:1. Because of the focus of Alternative 4

on office, studio/event/ gallery/museum, and gym uses, it would be substantially consistent with the following objectives:

6. Provide innovative architectural design in a unique, prominent location along the Los Angeles River, between the Ribbon of Light Bridge and the City's proposed PARC Improvements, and the historic 7th Street Bridge.
9. Create a sign district encompassing the Project Site that: complements the Ribbon of Light Bridge and proposed PARC Improvements, highlights the presence of and connectivity to the Los Angeles River, helps to establish the Ribbon of Light Bridge and 7th Street Bridge as a gateway from the eastern side of the Los Angeles to the Arts District, ensures the economic vitality of the Project tenants, thereby contributing to the City's economic base, and builds off of the artistic character of the neighborhood.

The following Project Objectives would be met, but not to a lower extent under Alternative 4 as the Project:

2. Redevelop the site with high-jobs-producing land uses that increase economic activity on the Project Site and in the Project area.
5. Provide a wide range of entertainment, restaurant, and recreational amenities for Downtown residents and visitors from throughout the City.
8. Create pedestrian and bicycle connections that link the 7th Street Bridge with landscaped open space within the Project Site and the City's proposed PARC Improvements, Ribbon of Light Bridge, and potential future Metro Arts District/6th Street Station, to reduce travel time, unite the Arts District neighborhoods and Boyle Heights communities, while increasing physical and visual access to the Los Angeles River.

Because Alternative 4, as with the Project, would not include a Deck, nor would Alternative 4 provide residential or hotel uses, it would not meet the following objectives:

1. Develop a mixed-use infill Project that can accommodate creative office, commercial, and residential uses.
3. Provide much-needed market-rate and affordable multi-family housing.
4. Provide needed hotel rooms in an underserved part of Downtown Los Angeles.
7. Provide a variety of publicly accessible at-grade and generous above-grade open spaces for Project occupants that take advantage of the Project's stepped building design, Los Angeles River frontage, nearby public improvements and opportunities for river access and panoramic views.
10. Maximize the opportunity to construct a multi-use deck over the Railway Properties, along the Los Angeles River, that would connect the 7th Street Bridge with the City's Ribbon of Light Bridge and proposed PARC Improvements that would open space for the Arts District and Boyle Heights, complementing future public programming and enhancing public views of the Los Angeles River.

7. Environmentally Superior Alternative

Section 15126.6(e)(2) of the State *CEQA Guidelines* indicates that an analysis of alternatives to a proposed Project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR and that if the “no Project” alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible Alternatives includes (1) the No Project/No Build Alternative, (2) the Reduced Retail and Increased Office with Charter School Alternative, (3) the Reduced Retail and Increased Office and Gym Use Alternative, and (4) the No Residential/Reduced Intensity Alternative.

A comparative summary of the environmental impacts anticipated under each Alternative to the environmental impacts associated with the Project and the Project with the Deck Concept is provided in **Table V-22, Comparison of Impacts Associated with the Alternatives and the Project/Project with the Deck Concept**, based on the detailed evaluation of the potential impacts associated with each Alternative, above. Note, as discussed in footnote “a” in Table V-22, that in the column below “Project” in the table header, two rows are provided for each environmental topic. The conclusion of significance in the upper of the two rows represents the Project, and the lower of the two rows represent the Project with Deck Concept. Regarding the two rows for each environmental topic under Alternative 1 through Alternative 4, the upper of the two rows represents the comparison to the Project and the lower of the two rows represents the comparison to the Project with the Deck Concept.

As indicated in Table V-22, the No Project/No Build Alternative would have no direct impacts on the environment and, as such compared to the Project and other Alternatives would not result in any environmental impacts. Further, the No Project/No Build Alternative would avoid the Project’s significant and unavoidable cumulative increase of construction and operation criteria pollutants; construction noise and vibration impacts; inconsistency with CEQA Section 15064.3 related to regional retail VMT; and roadway design hazards (freeway safety). Therefore, the No Project/No Build Alternative is considered the overall environmentally superior Alternative.

However, Alternative 1 would not provide the beneficial effects of the Project and other Alternatives. As shown in **Table V-23, Ability of Alternatives to Meet Project Objectives**, the No Project/No Build Alternative would not meet any of the objectives of the Project.

TABLE V-22
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT/PROJECT WITH THE DECK CONCEPT

Use or Feature	Project^a	Alternative 1: No Project/ No Build	Alternative 2: Reduced Retail and Increased Office with Charter School	Alternative 3: Reduced Retail with Increased Office and Gym Use	Alternative 4: No Residential/ Reduced Intensity	
Air Quality						
Consistency or Conflict with Air Quality Management Plan	Project	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Cumulative Increase of Criteria Pollutants – Construction	Project	Significant and Unavoidable with Mitigation	Less (No Impact)	Greater (Significant and Unavoidable with Mitigation)	Greater (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)
	Project with the Deck Concept	Significant and Unavoidable with Mitigation	Less (No Impact)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)
Cumulative Increase of Criteria Pollutants – Operation	Project	Significant and Unavoidable with Mitigation	Less (No Impact)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Less (Less than Significant)
	Project with the Deck Concept	Significant and Unavoidable with Mitigation	Less (No Impact)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Less (Less than Significant)
Exposure of Sensitive Receptors to Pollutant Concentrations – Localized Emissions – Construction	Project	Less than Significant with Mitigation	Less (No Impact)	Greater (Less than Significant with Mitigation)	Greater (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
	Project with the Deck Concept	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)

TABLE V-22
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT/PROJECT WITH THE DECK CONCEPT

Use or Feature	Project^a	Alternative 1: No Project/ No Build	Alternative 2: Reduced Retail and Increased Office with Charter School	Alternative 3: Reduced Retail with Increased Office and Gym Use	Alternative 4: No Residential/ Reduced Intensity	
Exposure of Sensitive Receptors to Pollutant Concentrations – Localized Emissions – Operation	Project	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Exposure of Sensitive Receptors to Pollutant Concentrations – Carbon Monoxide Hotspots	Project	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Exposure of Sensitive Receptors to Pollutant Concentrations Toxic Air Contaminants – Construction	Project	Less than Significant	Less (No Impact)	Greater (Less than Significant)	Greater (Less than Significant)	Less (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Exposure of Sensitive Receptors to Pollutant Concentrations Toxic Air Contaminants – Operation	Project	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Cultural Resources						
Historical Resources	Project	Less than Significant with Mitigation	Less (No Impact)	Greater (Less than Significant with Mitigation)	Greater (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
	Project with the Deck Concept	Less than Significant with Mitigation	Less (No Impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)

TABLE V-22
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT/PROJECT WITH THE DECK CONCEPT

Use or Feature		Project^a	Alternative 1: No Project/ No Build	Alternative 2: Reduced Retail and Increased Office with Charter School	Alternative 3: Reduced Retail with Increased Office and Gym Use	Alternative 4: No Residential/ Reduced Intensity
Archaeological Resources	Project	Less than Significant with Mitigation	Less (No Impact)	Greater (Less than Significant with Mitigation)	Greater (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
	Project with the Deck Concept	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Human Remains	Project	Less than Significant	Less (No Impact)	Greater (Less than Significant)	Greater (Less than Significant)	Less (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Energy						
Efficient Energy Consumption	Project	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Conflict with Plans for Renewable Energy or Energy Efficiency	Project	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Geology and Soils						
Seismic Hazards	Project	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)

TABLE V-22
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT/PROJECT WITH THE DECK CONCEPT

Use or Feature		Project^a	Alternative 1: No Project/ No Build	Alternative 2: Reduced Retail and Increased Office with Charter School	Alternative 3: Reduced Retail with Increased Office and Gym Use	Alternative 4: No Residential/ Reduced Intensity
Soil Erosion or Loss of Topsoil	Project	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Unstable Geologic Units	Project	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Expansive Soils	Project	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Paleontological Resources	Project	Less than Significant with Mitigation	Less (No Impact)	Greater (Less than Significant with Mitigation)	Greater (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
	Project with the Deck Concept	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Greenhouse Gas Emissions						
Greenhouse Gas Impacts – Conflict with Applicable Plans	Project	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)

TABLE V-22
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT/PROJECT WITH THE DECK CONCEPT

Use or Feature	Project^a	Alternative 1: No Project/ No Build	Alternative 2: Reduced Retail and Increased Office with Charter School	Alternative 3: Reduced Retail with Increased Office and Gym Use	Alternative 4: No Residential/ Reduced Intensity	
Hazards and Hazardous Materials						
Transport, Use, or Disposal of Hazardous Materials	Project	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
Accidental Release of Hazardous Materials	Project	Less than Significant with Mitigation	Less (No Impact)	Greater (Less than Significant with Mitigation)	Greater (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
	Project with the Deck Concept	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Use of Hazardous Materials within One-Quarter Mile of a School	Project	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Listed Hazardous Materials Sites	Project	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Emergency Response Plans	Project	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)

TABLE V-22
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT/PROJECT WITH THE DECK CONCEPT

Use or Feature	Project^a	Alternative 1: No Project/ No Build	Alternative 2: Reduced Retail and Increased Office with Charter School	Alternative 3: Reduced Retail with Increased Office and Gym Use	Alternative 4: No Residential/ Reduced Intensity	
Hydrology and Water Quality						
Water Quality Standards and Groundwater Quality – Construction	Project	Less than Significant with Mitigation	Less (No Impact)	Greater (Less than Significant with Mitigation)	Greater (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
	Project with the Deck Concept	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Water Quality Standards and Groundwater Quality – Operation	Project	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
Decreases in Groundwater Supplies or Recharge	Project	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
Alteration of Drainage Patterns – Construction	Project	Less than Significant	Less (No Impact)	Greater (Less than Significant)	Greater (Less than Significant)	Less (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Alteration of Drainage Patterns – Operation	Project	Less than Significant	Less (No Impact)	Greater (Less than Significant)	Greater (Less than Significant)	Similar (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)

**TABLE V-22
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT/PROJECT WITH THE DECK CONCEPT**

Use or Feature		Project^a	Alternative 1: No Project/ No Build	Alternative 2: Reduced Retail and Increased Office with Charter School	Alternative 3: Reduced Retail with Increased Office and Gym Use	Alternative 4: No Residential/ Reduced Intensity
Implementation of Water Quality Control Plans	Project	Less than Significant with Mitigation	Less (No Impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
	Project with the Deck Concept	Less than Significant with Mitigation	Less (No Impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Land Use and Planning						
Land Use – Physically Divide a Community	Project	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Land Use – Conflict with Applicable Plans	Project	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Noise						
Noise Standards Construction	Project	Significant and Unavoidable with Mitigation	Less (No Impact)	Greater (Significant and Unavoidable with Mitigation)	Greater (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)
	Project with the Deck Concept	Significant and Unavoidable with Mitigation	Less (No Impact)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)

**TABLE V-22
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT/PROJECT WITH THE DECK CONCEPT**

Use or Feature	Project^a	Alternative 1: No Project/ No Build	Alternative 2: Reduced Retail and Increased Office with Charter School	Alternative 3: Reduced Retail with Increased Office and Gym Use	Alternative 4: No Residential/ Reduced Intensity	
Noise Standards Operation	Project	Less than Significant with Mitigation	Less (No Impact)	Greater (Less than Significant with Mitigation)	Greater (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
	Project with the Deck Concept	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Groundborne Vibration and Human Annoyance Construction	Project	Significant and Unavoidable with Mitigation	Less (No Impact)	Greater (Significant and Unavoidable with Mitigation)	Greater (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)
	Project with the Deck Concept	Significant and Unavoidable with Mitigation	Less (No Impact)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)
Groundborne Vibration and Human Annoyance Operation	Project	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Population and Housing						
Population and Housing Impacts	Project	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)

TABLE V-22
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT/PROJECT WITH THE DECK CONCEPT

Use or Feature	Project^a	Alternative 1: No Project/ No Build	Alternative 2: Reduced Retail and Increased Office with Charter School	Alternative 3: Reduced Retail with Increased Office and Gym Use	Alternative 4: No Residential/ Reduced Intensity	
Public Services						
Fire Protection Services	Project	Less than Significant	Less (No Impact)	Greater (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Greater (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Police Protection Services	Project	Less than Significant	Less (No Impact)	Greater (Less than Significant)	Greater (Less than Significant)	Less (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Greater (Less than Significant)	Greater (Less than Significant)	Less (Less than Significant)
Schools	Project	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Parks and Recreational Facilities	Project	Less than Significant	Less (No Impact)	Greater (Less than Significant)	Greater (Less than Significant)	Less (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Greater (Less than Significant)	Greater (Less than Significant)	Less (Less than Significant)
Libraries	Project	Less than Significant	Less (No Impact)	Greater (Less than Significant)	Greater (Less than Significant)	Less (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Greater (Less than Significant)	Greater (Less than Significant)	Less (Less than Significant)

TABLE V-22
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT/PROJECT WITH THE DECK CONCEPT

Use or Feature	Project^a	Alternative 1: No Project/ No Build	Alternative 2: Reduced Retail and Increased Office with Charter School	Alternative 3: Reduced Retail with Increased Office and Gym Use	Alternative 4: No Residential/ Reduced Intensity	
Transportation						
Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities	Project	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)	Project	Significant and Unavoidable with Mitigation	Less (No Impact)	Less (Less than Significant)	Less (Significant and Unavoidable with Mitigation)	Less (Less than Significant)
	Project with the Deck Concept	Significant and Unavoidable with Mitigation	Less (No Impact)	Less (Less than Significant)	Less (Significant and Unavoidable with Mitigation)	Less (Less than Significant)
Design Hazards	Project	Significant and Unavoidable with Mitigation	Less (No Impact)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)
	Project with the Deck Concept	Significant and Unavoidable with Mitigation	Less (No Impact)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)
Emergency Access	Project	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)

TABLE V-22
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT/PROJECT WITH THE DECK CONCEPT

Use or Feature	Project ^a	Alternative 1: No Project/ No Build	Alternative 2: Reduced Retail and Increased Office with Charter School	Alternative 3: Reduced Retail with Increased Office and Gym Use	Alternative 4: No Residential/ Reduced Intensity	
Tribal Cultural Resources						
Tribal Cultural Resources	Project	Less than Significant with Mitigation	Less (No Impact)	Greater (Less than Significant with Mitigation)	Greater (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
	Project with the Deck Concept	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Utilities and Service Systems						
Wastewater	Project	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Water Supply	Project	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Solid Waste	Project	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Electric Power, Natural Gas, and Telecommunications	Project	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
	Project with the Deck Concept	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)

**TABLE V-22
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT/PROJECT WITH THE DECK CONCEPT**

Use or Feature	Project^a	Alternative 1: No Project/ No Build	Alternative 2: Reduced Retail and Increased Office with Charter School	Alternative 3: Reduced Retail with Increased Office and Gym Use	Alternative 4: No Residential/ Reduced Intensity
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NOTE(S):

^a In the column below "Project," two rows are provided for each environmental topic. The conclusion of significance in the upper of the two rows represents the Project, and the lower of the two rows represent the Project with Deck Concept. Regarding the two rows for each environmental topic under Alternative 1 through Alternative 4, the upper of the two rows represents the comparison to the Project and the lower of the two rows represents the comparison to the Project with the Deck Concept.

SOURCE: ESA, 2021

**TABLE V-23
ABILITY OF ALTERNATIVES TO MEET PROJECT OBJECTIVES**

	Project	Alternative 1: No Project/ No Build	Alternative 2: Reduced Retail and Increased Office with Charter School	Alternative 3: Reduced Retail with Increased Office and Gym Use	Alternative 4: No Residential/ Reduced Intensity
1. Develop a mixed-use infill Project that can accommodate creative office, commercial, and residential uses.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Fully Meets Objective	Does Not Meet Objective
2. Redevelop the site with high-jobs-producing land uses that increase economic activity on the Project Site and in the Project area	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective (to a lesser extent than the Project and the Project with the Deck Concept)	Fully Meets Objective (to a lesser extent than the Project and the Project with the Deck Concept)	Fully Meets Objective (to a lesser extent than the Project and the Project with the Deck Concept)

**TABLE V-23
ABILITY OF ALTERNATIVES TO MEET PROJECT OBJECTIVES**

	Project	Alternative 1: No Project/ No Build	Alternative 2: Reduced Retail and Increased Office with Charter School	Alternative 3: Reduced Retail with Increased Office and Gym Use	Alternative 4: No Residential/ Reduced Intensity
3. Provide much-needed market-rate and affordable multi-family housing.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective (to a greater extent than the Project and the Project with the Deck Concept)	Fully Meets Objective (to a greater extent than the Project and the Project with the Deck Concept)	Does Not Meet Objective
4. Provide needed hotel rooms in an underserved part of Downtown Los Angeles.	Fully Meets Objective	Does not Meet Objective	Fully Meets Objective	Fully Meets Objective	Does not Meet Objective
5. Provide a wide range of entertainment, restaurant, and recreational amenities for Downtown residents and visitors from throughout the City.	Fully Meets Objective	Does not Meet Objective	Fully Meets Objective (to a lesser extent than the Project and the Project with the Deck Concept)	Fully Meets Objective (to a lesser extent than the Project and the Project with the Deck Concept)	Fully Meets Objective (to a lesser extent than the Project and the Project with the Deck Concept)
6. Provide innovative architectural design in a unique, prominent location along the Los Angeles River, between the Ribbon of Light Bridge and the City's proposed PARC Improvements, and the historic 7th Street Bridge.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Fully Meets Objective	Fully Meets Objective

**TABLE V-23
ABILITY OF ALTERNATIVES TO MEET PROJECT OBJECTIVES**

	Project	Alternative 1: No Project/ No Build	Alternative 2: Reduced Retail and Increased Office with Charter School	Alternative 3: Reduced Retail with Increased Office and Gym Use	Alternative 4: No Residential/ Reduced Intensity
7. Provide a variety of publicly accessible at-grade and generous above-grade open spaces for Project occupants that take advantage of the Project's stepped building design, Los Angeles River frontage, nearby public improvements and opportunities for river access and panoramic views.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective (to a greater extent than the Project and to a lesser extent than the Project with the Deck Concept)	Fully Meets Objective (to a greater extent than the Project and to a lesser extent than the Project with the Deck Concept)	Does not Meet Objective
8. Create pedestrian and bicycle connections that link the 7th Street Bridge with landscaped open space within the Project Site and the City's proposed PARC Improvements, Ribbon of Light Bridge, and potential future Metro Arts District/6th Street Station, to reduce travel time, connect the Arts District neighborhoods and Boyle Heights communities, and increase physical and visual access to the Los Angeles River.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective (to a greater extent than the Project and to a lesser extent than the Project with the Deck Concept)	Fully Meets Objective (to a greater extent than the Project and to a lesser extent than the Project with the Deck Concept)	Fully Meets Objective (to a lesser extent than the Project and the Project with the Deck Concept)

**TABLE V-23
ABILITY OF ALTERNATIVES TO MEET PROJECT OBJECTIVES**

	Project	Alternative 1: No Project/ No Build	Alternative 2: Reduced Retail and Increased Office with Charter School	Alternative 3: Reduced Retail with Increased Office and Gym Use	Alternative 4: No Residential/ Reduced Intensity
9. Create a sign district encompassing the Project Site that: complements the Ribbon of Light Bridge and proposed PARC Improvements, highlights the presence of and connectivity to the Los Angeles River, helps to establish the Ribbon of Light Bridge and 7th Street Bridge as a gateway from the eastern side of the Los Angeles to the Arts District, ensures the economic vitality of the Project tenants, thereby contributing to the City's economic base, and builds off of the artistic character of the neighborhood.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Fully Meets Objective	Fully Meets Objective
10. Maximize the opportunity to construct a multi-use deck over the Railway Properties, along the Los Angeles River, that would connect the 7th Street Bridge with the City's Ribbon of Light Bridge and proposed PARC Improvements that would open space for the Arts District and Boyle Heights, complementing future public programming and enhancing public views of the Los Angeles River.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective (to a greater extent than the Project and to a lesser extent than the Project with the Deck Concept)	Fully Meets Objective (to a greater extent than the Project and to a lesser extent than the Project with the Deck Concept)	Does not Meet Objective

SOURCE: ESA, 2021

When compared to the Project, Alternative 2, the Reduced Retail and Increased Office with Charter School Alternative, would be environmentally superior from a long-term operational perspective, due in part to the fact that Alternative 2 would reduce (not avoid) the extent of the Project's significant and unavoidable with mitigation operational air quality impacts (cumulative increase of criteria pollutants) and transportation design hazards impacts (queuing at the freeway ramp). These impacts would remain significant and unavoidable under Alternative 2. Alternative 2 would avoid the Project's significant and unavoidable with mitigation impact related to inconsistency with CEQA Section 15064.3 for regional VMT impacts, as regional VMT impacts under Alternative 2 would be less than significant without mitigation. However, because Alternative 2 includes a 75,000 square foot deck, temporary construction-related impacts for the majority of environmental topics would be incrementally greater under Alternative 2 than the Project due the increase in construction duration and footprint. This includes incrementally increasing the duration of the Project's significant and unavoidable with mitigation construction-related air quality impacts (cumulative increase of criteria pollutants) and significant and unavoidable with mitigation noise and vibration impacts.

When compared to the Project with the Deck Concept, Alternative 2 would be environmentally superior from both an operational and construction perspective. Alternative 2 would reduce (not avoid) the extent of the Project with the Deck Concept's significant and unavoidable operational air quality impacts (cumulative increase of criteria pollutants) and transportation design hazards impacts (queuing at the freeway ramp). These impacts would remain significant and unavoidable under Alternative 2. Alternative 2 would avoid the Project with the Deck Concept's significant and unavoidable impact related to inconsistency with CEQA Section 15064.3 for regional VMT, as regional VMT impacts under Alternative 2 would be less than significant without mitigation. Further, because Alternative 2 includes a smaller deck than the Project with the Deck Concept, temporary construction-related impacts for the majority of environmental topics would be incrementally reduced under Alternative 2 compared to the Project with the Deck Concept due the decrease in construction duration and footprint. This includes incrementally reducing the extent of the Project with the Deck Concept's significant and unavoidable with mitigation construction-related air quality impacts (cumulative increase of criteria pollutants) and significant and unavoidable with mitigation construction noise and vibration impacts.

Under Alternative 2, all of the Project and Project with the Deck Concept impacts that were less than significant with mitigation would continue to be less than significant with mitigation. Alternative 2 would implement the same mitigation measures as the Project and the Project with the Deck Concept.

As shown in Table V-23, Alternative 2 would meet the majority of Project Objectives. In addition, Alternative 2 would not result in any new significant impacts compared to the Project and the Project with the Deck Concept.

When compared to the Project, Alternative 3, the Reduced Retail and Increased Office and Gym Use Alternative, would be environmentally superior from a long-term operational perspective, in part due to the fact that it would reduce (not avoid) the extent of the Project's significant and unavoidable operational air quality impacts (cumulative increase of criteria pollutants), transportation design hazards impacts (queuing at the freeway ramp), and impacts related to inconsistency with CEQA Section 15064.3 for regional VMT. These impacts would all remain significant and unavoidable with mitigation under the Project and Alternative 3. Unlike Alternative 2, Alternative 3 would not eliminate the Project's significant and unavoidable impact after mitigation related to inconsistency with CEQA Section 15064.3 for regional VMT. Because Alternative 3 includes a deck, temporary construction-related impacts for the majority of environmental topics would be incrementally greater under Alternative 3 than the Project due the increase in construction duration and footprint. This includes incrementally increasing the duration of the Project's significant and unavoidable with mitigation construction-related air quality impacts (cumulative increase of criteria pollutants) and significant and unavoidable with mitigation construction noise and vibration impacts after mitigation.

When compared to the Project with the Deck Concept, Alternative 3 would be environmentally superior from both an operational and construction perspective. Alternative 3 would reduce (not avoid) extent of the Project's significant and unavoidable operational air quality impacts (cumulative increase of criteria pollutants), transportation design hazards impacts (queuing at the freeway ramp), and impact related to inconsistency with CEQA Section 15064.3 for regional VMT. These impacts would all remain significant and unavoidable with mitigation under the Project with the Deck Concept and Alternative 3. However, unlike Alternative 2, Alternative 3 would not avoid the Project with the Deck Concept's significant and unavoidable impact related to inconsistency with CEQA Section 15064.3 for regional VMT. Because Alternative 3 includes a smaller deck than the Project with the Deck Concept, temporary construction-related impacts for the majority of environmental topics would be incrementally reduced under Alternative 3 than the Project with the Deck Concept due the decrease in construction duration and construction footprint. This includes incrementally reducing the extent of the Project with the Deck Concept's significant and unavoidable with mitigation construction-related air quality impacts (cumulative increase of criteria pollutants) and significant and unavoidable with mitigation construction noise and vibration impacts.

Under Alternative 3, all of the Project and Project with the Deck Concept impacts that were less than significant with mitigation would continue to be less than significant with mitigation. Alternative 3 would implement the same mitigation measures as the Project and the Project with the Deck Concept.

In addition, as shown in Table V-23, Alternative 3 would meet the majority of Project Objectives. In addition, Alternative 3 would not result in any new significant impacts compared to the Project and the Project with the Deck Concept.

Alternative 4, the No Residential/Reduced Intensity Alternative, would avoid the Project and Project with the Deck Concept's significant and unavoidable impacts related to operational criteria pollutant emissions and regional retail VMT.

When compared to the Project, Alternative 4, the No Residential/Reduced Intensity Alternative, would be environmentally superior from both an operational and construction perspective. All environmental topics would have impacts that are either similar to or less than the Project. Alternative 4 would reduce (not avoid) the extent of the significant and unavoidable with mitigation transportation design hazards impacts (queuing at the freeway ramp). This impact would remain significant and unavoidable with mitigation under the Project and Alternative 4. Alternative 4 would avoid the Project's significant and unavoidable with mitigation operational air quality impacts (cumulative increase of criteria pollutants) and would also avoid the Project's significant and unavoidable impact related to inconsistency with CEQA Section 15064.3 for regional VMT. Under Alternative 4, operational air quality impacts (cumulative increase of criteria pollutants) would be less than significant and VMT impacts would be less than significant without mitigation. Further, because Alternative 4 does not include a deck and with its overall smaller floor area and reduced parking levels, less construction activity would be required compared to the Project. Thus, temporary construction-related impacts for the majority of environmental topics would be incrementally reduced under Alternative 4 than the Project due the decrease in construction activities and duration. This includes reducing the duration of the Project's significant and unavoidable with mitigation construction-related air quality impacts (cumulative increase of criteria pollutants) and significant and unavoidable with mitigation construction noise and vibration impacts.

When compared to the Project with the Deck Concept, Alternative 4 would be environmentally superior from both an operational and construction perspective. All environmental topics would have impacts that are either similar to or less than the Project with the Deck Concept. Alternative 4 would reduce (not avoid) the extent of the significant and unavoidable with mitigation transportation design hazards impacts (queuing at the freeway ramp). This impact would remain significant and unavoidable with mitigation under the Project with the Deck Concept and Alternative 4. Alternative 4 would avoid the Project with the Deck Concept's significant and unavoidable operational air quality impacts (cumulative increase of criteria pollutants) and the Project with the Deck Concept's significant and unavoidable impact related to inconsistency with CEQA Section 15064.3 for regional VMT. Under Alternative 4, operational air quality impacts (cumulative increase of criteria pollutants) would be less than significant and VMT impacts would be less than significant without mitigation. Further, because Alternative 4 does not include a deck and with its overall smaller floor area and reduced parking levels, less construction would be required compared to the Project. Thus, temporary construction-related impacts for the majority of environmental topics would be incrementally reduced under Alternative 4 compared to the Project with the Deck Concept due the decrease in construction activities and duration. This includes reducing the duration of the Project with the Concept's significant and unavoidable with mitigation construction-related air quality

impacts (cumulative increase of criteria pollutants) and significant and unavoidable with mitigation construction noise and vibration impacts.

Under Alternative 4, all of the Project and Project with the Deck Concept impacts that were less than significant with mitigation would continue to be less than significant with mitigation. Alternative 4 would implement the same mitigation measures as the Project and the Project with the Deck Concept.

As shown in Table V-23, compared to the other Alternatives, Alternative 4 would not meet the majority of the Project's Objectives in full or in part. Alternative 4 would not result in any new significant impacts compared to the Project and the Project with the Deck Concept.

The State *CEQA Guidelines* require that an EIR identify an environmentally superior Alternative other than the No Project/No Build Alternative. Because Alternative 4 would avoid the Project's significant and unavoidable impact with respect to CEQA Guidelines Section 15064.3 (reduction in regional retail VMT to below the threshold level) without the need for mitigation, would avoid the Project's significant and unavoidable impact with respect to operational air quality impacts (cumulative increase of criteria pollutants), and would reduce the range of impacts to the greatest extent listed in Table V-22, *Comparison of Impacts Associated with the Alternatives and the Project/Project With the Deck Concept*, Alternative 4 is deemed the Environmentally Superior Alternative. However, as noted above, Alternative 4 would not meet the majority of the Project's Objectives in full or in part in **Table V-23, Ability of Alternatives to Meet Project Objectives**; whereas Alternatives 2 and 3 would both would meet the Project's Objectives.

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