V. Alternatives

V. Alternatives

1. Introduction

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

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

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

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

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

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

2. Overview of Selected Alternatives

As indicated above, the intent of the alternatives is to reduce the significant impacts of a project. Based on the analysis provided in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant Project-level and cumulative impacts that cannot be feasibly mitigated with respect to on-site noise during construction, on-site vibration during construction (pursuant to the threshold for human annoyance), and off-site vibration (pursuant to the threshold for human annoyance) during construction. In addition, as evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, cumulative on-site noise, and cumulative off-site noise and vibration impacts from haul trucks would be significant and unavoidable.

Accordingly, based on the significant environmental impacts of the Project, the objectives established for the Project (refer to Section II, Project Description, of this Draft EIR), and the feasibility of the potential alternatives, the alternatives to the Project listed below were selected for evaluation. The rationale for selecting the range or alternatives was based on the likelihood of the alternatives being able to avoid or substantially lessen one or more of the potentially significant impacts, the intent to revitalize the Project Site by developing a high-quality mixed-use development that provides new multi-family housing and neighborhood-serving retail and restaurant uses that serve the community and promote walkability.

- Alternative 1: No Project/No Build Alternative
- Alternative 2: Zoning Compliant Mixed-Use Alternative
- Alternative 3: Zoning Compliant Office Alternative
- Alternative 4: Zoning Compliant Hotel Alternative

- Alternative 5: Proposed Hollywood Community Plan Update Compliant Mixed-Use Alternative

Each of these alternatives is described in the sections that follow. In addition, CEQA Guidelines Section 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible, and such potential alternatives are also discussed below.

3. Alternatives Considered and Rejected as Infeasible

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

- **Alternative Project Site:** The Project Applicant already owns the Project Site, and its location is conducive to the development of a mixed-use project. The Project Site is located on a section of Hollywood Boulevard characterized by medium to high-density, low- and high-rise commercial and multi-family structures. These uses make the Project Site particularly suitable for development of a mixed-use development that provides new multi-family housing and neighborhood-serving commercial uses that serve the community and promote walkability. The Project Site is also well-served by transit. Furthermore, the Project Applicant cannot reasonably acquire, control, or access an alternative site in a timely fashion that would result in implementation of a project with similar uses and square footage. Given its urban location, if an alternative site in the Hollywood area that could accommodate the Project could be found, it would be expected that the significant and unavoidable impacts associated with construction noise and on- and off-site vibration due to construction would also occur. Additionally, considering the mixes of uses in the Hollywood area where sensitive uses may be located closer, development of the Project at an alternative site could potentially produce other environmental impacts that would otherwise not occur at the current Project Site and result in greater environmental impacts when compared with the Project. Therefore, an alternative site is not considered feasible as the Project Applicant does not own another suitable site that would achieve the underlying purpose and objectives of the Project, and an alternative site would not likely avoid the Project's significant impacts. Furthermore, an alternative Project Site would not include the beneficial rehabilitation and restoration of the Attie Building, which is included in the Project. Thus, this alternative was rejected from further consideration.

- **Alternative to avoid significant noise and vibration impacts:** Various alternatives were considered with the goal of avoiding the Project's significant construction noise and vibration impacts. However, on-site construction noise levels would be highest during the demolition phase, which would occur under any scenario other than the No Project/No Build Alternative. Specifically, noise and vibration impacts from on-site construction activities would continue to occur as part of the demolition phase and periodic use of large trucks during all phases of construction. No feasible alternative to avoid these impacts was identified.

- **Alternative that would restore the 6430-6434 Hollywood Boulevard building:** An alternative was considered that would restore the 6430-6434 Hollywood Boulevard building back to an earlier appearance. Restoration as a treatment is defined as "the act or process of accurately depicting the form, features, and character of a property as it appeared at a particular period of time by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period."[1] However, due to a lack of sufficient documentation, either physical or photographic, it would not be possible to restore the appearance in conformance with the Secretary of the Interior's Standards, specifically Restoration Standard 7 which states, "replacement of missing features from the restoration period will be substantiated by documentary and physical evidence. A false sense of history will not be created by adding conjectural features, features from other properties, or by combining features that never existed together historically." No photographs have been located that clearly depict the façade of the building during the period of significance. In addition, given the substantial alterations over time, it is highly unlikely any historic fabric remains. Therefore, restoration of the 6430-6434 Hollywood Boulevard building was determined to be infeasible.

4. Alternatives Analysis Format

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the project objectives, identified in Section II, Project Description, of this Draft EIR, would be substantially attained by the alternative.[2] The evaluation of each of the alternatives follows the process described below:

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[1] *National Park Service, Technical Preservation Services, Restoration as a Treatment and Standards for Restoration, www.nps.gov/tps/standards/four-treatments/treatment-restoration.htm, accessed January 28, 2020.*

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

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

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

   - Less: Where the net impact of the alternative would be clearly less adverse or more beneficial than the impact of the Project, the comparative impact is said to be "less."
   - Greater: Where the net impact of the alternative would clearly be more adverse or less beneficial than the Project, the comparative impact is said to be "greater."
   - Similar: Where the impact of the alternative and Project would be roughly equivalent, the comparative impact is said to be "similar."

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

A summary matrix that compares the impacts associated with the Project with the impacts of each of the analyzed alternatives is provided below in Table V-1 on page V-6.

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning Compliant Mixed-Use Alternative	Alternative 3: Zoning Compliant Office Alternative	Alternative 4: Zoning Compliant Hotel Alternative	Alternative 5: Proposed Hollywood Community Plan Update Compliant Mixed-Use Alternative
A. AIR QUALITY						
Construction						
Regional Emissions	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Localized Emissions	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Toxic Air Contaminants	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Operation						
Regional and Localized Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Toxic Air Contaminants	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
B. CULTURAL RESOURCES						
Historic Resources	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning Compliant Mixed-Use Alternative	Alternative 3: Zoning Compliant Office Alternative	Alternative 4: Zoning Compliant Hotel Alternative	Alternative 5: Proposed Hollywood Community Plan Update Compliant Mixed-Use Alternative
Archaeological Resources	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)	Less (Less Than Significant With Mitigation)
C. ENERGY						
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
D. GEOLOGY AND SOILS—PALEONTOLOGICAL RESOURCES						
Paleontological Resources	Less Than Significant With Mitigation	Less (No Impact)	Less (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)
E. GREENHOUSE GAS EMISSIONS						
Greenhouse Gas Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning Compliant Mixed-Use Alternative	Alternative 3: Zoning Compliant Office Alternative	Alternative 4: Zoning Compliant Hotel Alternative	Alternative 5: Proposed Hollywood Community Plan Update Compliant Mixed-Use Alternative
F. LAND USE						
Physically Divide a Community	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Conflict with Land Use Plans	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
G. NOISE						
Construction[3]						
On-Site Noise	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Off-Site Noise[4]	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)

[3] *Cumulative on- and off-site noise impacts and cumulative on- and off-site vibration impacts with respect to human annoyance during Project construction would be significant and unavoidable.*

[4] *Project-level off-site noise impacts are less than significant. The Project's cumulative significant and unavoidable cumulative impact is presented herein.*

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning Compliant Mixed-Use Alternative	Alternative 3: Zoning Compliant Office Alternative	Alternative 4: Zoning Compliant Hotel Alternative	Alternative 5: Proposed Hollywood Community Plan Update Compliant Mixed-Use Alternative
On-Site Vibration (Building Damage)	Less Than Significant With Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
On-Site Vibration (Human Annoyance)	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Off-Site Vibration (Building Damage)	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Off-Site Vibration (Human Annoyance)	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Operation						
On-Site Noise	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Off-Site Noise	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning Compliant Mixed-Use Alternative	Alternative 3: Zoning Compliant Office Alternative	Alternative 4: Zoning Compliant Hotel Alternative	Alternative 5: Proposed Hollywood Community Plan Update Compliant Mixed-Use Alternative
H. PUBLIC SERVICES						
Fire Protection						
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Police Protection						
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Schools						
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning Compliant Mixed-Use Alternative	Alternative 3: Zoning Compliant Office Alternative	Alternative 4: Zoning Compliant Hotel Alternative	Alternative 5: Proposed Hollywood Community Plan Update Compliant Mixed-Use Alternative
Libraries						
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Parks and Recreation						
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
I. TRANSPORTATION						
Conflict with Plans	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Vehicle Miles Travelled	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Greater (Less Than Significant)	Greater (Less Than Significant)	Similar (Less Than Significant)
Hazardous Design Features	Less Than Significant	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning Compliant Mixed-Use Alternative	Alternative 3: Zoning Compliant Office Alternative	Alternative 4: Zoning Compliant Hotel Alternative	Alternative 5: Proposed Hollywood Community Plan Update Compliant Mixed-Use Alternative
Emergency Access	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
J. TRIBAL CULTURAL RESOURCES						
Tribal Cultural Resources	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
K. UTILITIES AND SERVICE SYSTEMS						
Water Supply and Infrastructure						
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Wastewater						
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning Compliant Mixed-Use Alternative	Alternative 3: Zoning Compliant Office Alternative	Alternative 4: Zoning Compliant Hotel Alternative	Alternative 5: Proposed Hollywood Community Plan Update Compliant Mixed-Use Alternative
Energy Infrastructure						
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)

Source: Eyestone Environmental, 2020.

5. Project Objectives

CEQA Guidelines Section 15124(b) states that the project description shall contain "a statement of the objectives sought by the proposed project." Section 15124(b) of the CEQA Guidelines further states that "the statement of objectives should include the underlying purpose of the project." The underlying purpose of the Project is to revitalize the Project Site by developing an integrated mixed-use development that provides new multi-family housing opportunities and neighborhood-serving retail, office, and restaurant uses that serve the community and promote walkability while also rehabilitating the Attie Building. As set forth in the CEQA Guidelines, the Project's basic and fundamental objectives are provided below.

- Create a high density, mixed-use development at a location served by public transit and locate residential uses in in a transit priority area;
- Redevelop and improve the visual character of the Project Site with a high density residential, office, and commercial infill development;
- Rehabilitate the historic Attie Building and preserve its use as commercial space;
- Provide housing near public transit by constructing new residential dwelling units with varying mixes of number of-bedrooms, in an infill location close to commercial and office uses;
- Provide workforce housing to help meet the City's housing goals;
- Create a street-level identity for the Project Site and improve the pedestrian experience through the introduction of active street-adjacent uses such as neighborhood-serving commercial uses;
- Promote community benefits, economic development, and job creation, by creating construction and retail jobs, providing economic benefit to the City, and providing community benefits through workforce housing;
- Create an environmentally sensitive development, by incorporating sustainable and green building design and construction that reduces waste, manages water use efficiently and conserves energy, and by providing employment, housing, and shopping opportunities within easy access of established public transit.

V. Alternatives

A. Alternative 1: No Project/No Build Alternative

1. Description of the Alternative

In accordance with the CEQA Guidelines, the No Project Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states in part that, "in certain instances, the No Project Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, Alternative 1, the No Project/No Build Alternative, assumes that the Project would not be approved and no new development would occur within the Project Site. Thus, the physical conditions of the Project Site would generally remain as they are today. The Project Site is currently occupied by four low-rise commercial buildings that comprise a total of 29,200 square feet of floor area as well as surface parking. Included in this floor area is the 9,000-square-foot Attie Building located at the corner of Hollywood Boulevard and Wilcox Avenue, which is a contributing structure to the Hollywood Boulevard Commercial and Entertainment District.[5] No new construction would occur.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

The No Project/No Build Alternative would not alter the existing commercial strip center or require any construction activities on the Project Site. Therefore, Alternative 1 would not result in any construction emissions. Therefore, no construction-related air

[5] *The Hollywood Boulevard Commercial and Entertainment District is a 12 block area of the commercial core of Hollywood that contains examples of architecture from the 1920s and 1930s. The district includes 63 contributing properties and was listed in the National Register of Historic Places in 1984. Source: Hollywood Heritage, Inc., "Policies and Procedures," www.hollywoodheritage.org/policies-and-procedures, accessed January 7, 2020, and National Park Service, "National Register of Historic Places Inventory—Nomination Form," March 6, 1985.*

quality impacts associated with regional and localized emissions would occur under Alternative 1, and impacts would be less than the less-than-significant impacts of the Project.

(b) Toxic Air Contaminants

Since construction activities would not occur on the Project Site, the No Project/No Build Alternative would not generate substantial toxic air contaminants (TACs). Therefore, no impacts associated with the release of TACs would occur under Alternative 1. As such, TAC impacts under the No Project/No Build Alternative would be less when compared to the less-than-significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

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

(b) Toxic Air Contaminants

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

b. Cultural Resources

(1) Historical Resources

The Attie Building, which is a contributing structure to the Hollywood Boulevard Commercial and Entertainment District, is located on the Project Site. No demolition, grading, or other earthwork activities that could potentially affect this or nearby historical resources would occur under the No Project/No Build Alternative. Therefore, impacts to historical resources would not occur under Alternative 1, and impacts would be less when compared to the Project, which would be less than significant. However, under

Alternative 1, the Attie Building would not be rehabilitated and restored as it would be under the Project.

(2) Archaeological Resources

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

c. Energy

The No Project/No Build Alternative would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the energy demand on the Project Site. No impacts related to energy would occur under the No Project/No Build Alternative, and impacts would be less when compared to the less-than-significant impacts of the Project.

d. Geology and Soils—Paleontological Resources

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

e. Greenhouse Gas Emissions

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

f. Land Use

(1) Physical Division of a Community

Since the No Project/No Build Alternative would not develop new land uses on the Project Site, the existing on-site and/or off-site land uses would not be altered, and existing

land use relationships would remain. Therefore, no impacts related to physical division of a community would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Conflict With Land Use Plans

Under the No Project/No Build Alternative, there would be no changes to the physical or operational characteristics of the existing on-site commercial uses and adjacent paved surface areas. No land use approvals or permits would be required. Therefore, Alternative 1 would not result in any inconsistencies with existing land use plans and policies that govern the Project Site, including those that were adopted for the purpose of avoiding or mitigating an environmental effect. No impacts associated with conflicts with land use regulations and plans would occur, and impacts would be less than the less-than-significant impacts of the Project. However, it should be noted that, unlike the Project, Alternative 1 would not advance local and regional planning objectives that promote infill development in urban centers near public transit. Specifically, the Project Site would remain a low-rise commercial use with adjacent paved surface areas. There would be no new development on-site that would enhance the street frontage and pedestrian experience along Hollywood Boulevard.

g. Noise

(1) Construction

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

(2) Operation

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

h. Public Services

(1) Fire Protection

No construction or changes to existing land uses and operations on-site would occur under Alternative 1. Therefore, there would be no potential to increase the level of activity on the Project Site or increase the service population for the Los Angeles Fire Department (LAFD) stations that would serve the Project Site such that the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility. No impacts to fire facilities would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Police Protection

No construction or changes to existing land uses and operations on-site would occur under Alternative 1. Therefore, there would be no potential to increase the level of activity on the Project Site or increase the service population for the Los Angeles Police Department (LAPD) station that would serve the Project Site such that the addition of a new police station or the expansion, consolidation, or relocation of an existing facility. No impacts to police facilities would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(3) Schools

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

(4) Libraries

The No Project/No Build Alternative would not construct new development or increase operations on-site. Therefore, Alternative 1 would not increase the library service population such that the addition of new library facilities or the expansion, consolidation, or relocation of an existing facility. No impacts to library facilities would occur under the No Project/No Build Alternative, and impacts would be less than the Project's less-than-significant impact on libraries.

(5) Parks and Recreation

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

i. Transportation

Since the No Project/No Build Alternative would not develop new or additional land uses on the Project Site, Alternative 1 would not generate any additional vehicle trips or alter existing access or circulation within the Project Site during operation. Therefore, no impacts would occur with respect to operational traffic, including conflicts with programs, plans, ordinances, or policies addressing the circulation system; vehicle miles traveled (VMT); hazardous design features; and emergency access. Therefore, impacts under the No Project/No Build Alternative would be less when compared to the Project, which would be less than significant.

j. Tribal Cultural Resources

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

k. Utilities and Service Systems

(1) Water Supply and Infrastructure

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

(2) Wastewater

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

(3) Energy Infrastructure

The No Project/No Build Alternative would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the energy demand on the Project Site and no impact to the associated energy infrastructure would occur. Impacts would be less when compared to the less-than-significant impacts of the Project.

3. Comparison of Impacts

The No Project/No Build Alternative would avoid the Project's significant and unavoidable on- and off-site construction noise impacts and on- and off-site construction vibration impacts. Alternative 1 would also avoid the Project's less-than-significant-with-mitigation on-site construction vibration impacts associated with building damage. Furthermore, the No Project/No Build Alternative would avoid the Project's cumulative on- and off-site construction noise impacts, as well as the Project's cumulative on- and off-site construction vibration impacts related to human annoyance. Impacts associated with the remaining environmental issues would be less than those of the Project.

4. Relationship of the Alternative to Project Objectives

Under the No Project/No Build Alternative, the existing commercial strip center and surface parking areas would continue to operate on the Project Site and no new development would occur. As such, Alternative 1 would not meet the underlying purpose of the Project or the Project objectives. Specifically, Alternative 1 would not meet the following Project objectives:

- Create a high density, mixed-use development at a location served by public transit and locate residential uses in in a transit priority area;
- Redevelop and improve the visual character of the Project Site with a high density residential, office, and commercial infill development;

- Rehabilitate the historic Attie Building and preserve its use as commercial space;
- Provide housing near public transit by constructing new residential dwelling units with varying mixes of number of-bedrooms, in an infill location close to commercial and office uses;
- Provide workforce housing to help meet the City's housing goals;
- Create a street-level identity for the Project Site and improve the pedestrian experience through the introduction of active street-adjacent uses such as neighborhood-serving commercial uses;
- Promote community benefits, economic development, and job creation, by creating construction and retail jobs, providing economic benefit to the City, and providing community benefits through workforce housing;
- Create an environmentally sensitive development, by incorporating sustainable and green building design and construction that reduces waste, manages water use efficiently and conserves energy, and by providing employment, housing, and shopping opportunities within easy access of established public transit.

Overall, the No Project/No Build Alternative would not meet the Project's underlying purpose to revitalize the infill Project Site by developing a high-quality mixed-use development that provides new multi-family housing and neighborhood-serving retail, restaurant, and office uses that serve the Hollywood community and promote walkability.

V. Alternatives

B. Alternative 2: Zoning Compliant Mixed-Use Alternative

1. Description of the Alternative

Under this Alternative, the Project Site would be developed in accordance with the existing C4-2D-SN (Commercial, Height District 2 with Development Limitation) zoning for the Project Site which permits a wide array of land uses, such as retail stores, offices, hotels, schools, parks, and theaters, as well as multi-family residential uses in conjunction with the Regional Center Commercial land use designation. Under existing zoning, no height limit applies to the Project Site. Like the Project, this alternative would include residential and neighborhood-serving commercial uses. However, in accordance with the Development Limitation, development would be subject to a FAR limitation of 2.0:1. Thus, Alternative 2 would develop a total of approximately 123,952 square feet of uses on the Project Site compared to the Project's 278,892 square feet of uses. Alternative 2 would retain the Attie Building on-site for continued use as commercial space, but unlike the Project, the building would not be rehabilitated and restored. The proposed uses would be comprised of approximately 125 multi-family residential units (compared to the Project's 260 units, up to 10 percent of which would be workforce housing[6]), 14,600 square feet of retail uses, and 3,200 square feet of restaurant uses (compared to 11,020 square feet of retail uses, 3,580 square feet of office uses, and 3,200 square feet of restaurant uses with the Project). These uses would be located in the Attie Building and new buildings between one and eight stories with a maximum height of 90 feet, which is less than the maximum height of 160 feet with the Project. Unlike the Project, which includes workforce housing, all of the residential units would be market rate. The Zoning Compliant Mixed-Use Alternative would provide approximately 15,238 square feet of open space. Alternative 2 would include 222 parking spaces located in 0.5 ground level and two above-grade parking levels, which is less than the 420 parking spaces provided by the Project. The Zoning Compliant Mixed-Use Alternative would also include 125 long-term and 13 short-term bicycle parking spaces located on Level 1. Unlike the Project, the vehicular parking provided does not account for a permitted 10-percent reduction, pursuant to the Los Angeles Bicycle Parking Ordinance (LAMC Section 12.21-A,4). Vehicular access to the

[6] *Per the Los Angeles Housing and Community Investment Department, the qualifying maximum income level for workforce housing is 150 percent of the area median income based on family size.*

Project Site would be provided via a new driveway on Wilcox Avenue, similar to the Project. Pedestrian access would be provided via the sidewalks along Hollywood Boulevard and Wilcox Avenue. With reduced density and square footage, the overall length and intensity of construction would be less than that of the Project. Construction of Alternative 2 would require less excavation and grading since no subterranean parking levels would be constructed and total floor area would be reduced by 154,940 square feet. Accordingly, the overall total amount of construction activities and duration under Alternative 2 would be less than that of the Project. Additionally, unlike the Project, Alternative 2 would not seek certification under Assembly Bill (AB) 900, the *Jobs and Economic Improvement through Environmental Leadership Act*.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

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

Under Alternative 2, because the overall amount of construction would be reduced in comparison to the Project, the number of truck trips would also be reduced in comparison to the Project and excavation for the two subterranean parking levels proposed under the Project would not be required. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, regional and localized impacts on these days would be similar to the less than significant impacts of the Project.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 2 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. Overall construction emissions

generated by Alternative 2 would be less than those of the Project because Alternative 2 would require less overall construction due to the decrease in building height and overall square footage, fewer truck trips, and no excavation for subterranean parking levels. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 2 would be less when compared to the less-than-significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Similar to the Project, operational regional air pollutant emissions associated with Alternative 2 would be generated by vehicle trips to the Project Site and the consumption of electricity and natural gas. As discussed below in Section V.B.2.g.(2), development of Alternative 2 would result in fewer daily trips than the Project. As vehicular emissions depend on the number of trips, vehicular sources would result in a smaller increase in air emissions compared to the Project. In addition, because the overall square footage would be reduced when compared to the Project, demand for electricity and natural gas would be less than the Project, which are already reduced as a result of the Project's application for certification under AB 900, which requires LEED Gold® certification or better. Therefore, impacts associated with regional operational emissions would be less than significant and less than the Project.

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

(b) Toxic Air Contaminants

As discussed in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include diesel particulate matter from delivery trucks associated with the Project's retail, restaurant, and office uses, though with reduced square footage, fewer truck trips would be anticipated. However, the proposed uses associated with the Project, and similarly with Alternative 2, are not considered land uses that generate substantial TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not proposed by

the Project or Alternative 2. Similar to the Project, Alternative 2 would not release substantial amounts of TACs and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Potential TAC impacts under Alternative 2 would be less than significant and similar to those of the Project.

b. Cultural Resources

(1) Historical Resources

Alternative 2 would retain the Attie Building on-site for continued use as commercial space, but unlike the Project, the building would not be rehabilitated and restored. Alternative 2 would not adversely affect the significance of the Attie Building, the only historic resource on the Project Site, but would not provide the rehabilitation of the building and restoration of the storefronts and other missing features. Ground floor retail spaces that have been significantly altered on both the exterior and interior would remain in their current condition. Like the Project, the Alternative 2's development adjacent to the Attie Building and along Wilcox Avenue would not materially alter historic resources in the Hollywood Boulevard Commercial and Entertainment District and impair their eligibility as such resources. As such, the Zoning Compliant Mixed-Use Alternative would not cause direct or indirect impacts to historic resources. Therefore, similar to the Project, impacts to historical resources would be less than significant, although the Attie Building would not be rehabilitated and restored.

(2) Archaeological Resources

Alternative 2 would not construct any subterranean parking levels. Therefore, the potential for Alternative 2 to uncover subsurface archaeological resources would be reduced when compared to that of the Project, which would require the construction of two subterranean parking levels. Nevertheless, Alternative 2 would comply with the same regulatory requirements and would implement the same mitigation measure as the Project in the event that archaeological resources are uncovered during site grading activities. Therefore, impacts to archeological resources would remain less than significant with mitigation, and would be less than the impacts of the Project, which would also be less than significant with mitigation.

c. Energy

(1) Construction

Similar to the Project, construction activities associated with Alternative 2 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities

necessitating electrical power. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. In addition, LADWP has confirmed that the supply in the Project area would have the capacity to serve the Project Site. Furthermore, as with the Project, construction activities would require energy demand that is not wasteful, inefficient, or unnecessary and would not be expected to have an adverse impact on available energy resources. Therefore, impacts on energy resources associated with short-term construction activities would be less than significant under Alternative 2 and less than the less-than-significant impacts of the Project.

(2) Operation

As with the Project, operation of Alternative 2 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions, though with less development, overall demand for energy would be less than the Project. Additionally, as previously discussed, Alternative 2 would result in fewer daily vehicle trips than the Project. Thus, the associated consumption of petroleum-based fuels under Alternative 2 would also be less than the Project. Accordingly, under Alternative 2, the total energy consumption would be less than that of the Project. Similar to the Project, Alternative 2 would implement project design features which would improve energy efficiency and reduce impacts on consumption of energy resources. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 2 would not be wasteful, inefficient, or unnecessary. However, such project design features would be less stringent than the Project, which requires LEED Gold® certification or better as part of its AB 900 certification. Like the Project, Alternative 2 would comply with Title 24 requirements for "Solar Ready Buildings" which requires a certain area of rooftop to be set aside for installation of solar panels and would include the provision of conduit that is appropriate for future photovoltaic and solar thermal collectors. However, unlike the Project, solar panels would not be installed. In addition, due to the Project Site's location, other on-site renewable energy sources would not be feasible to install on-site as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, fuel cells, landfill gas, municipal solid waste, wind, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Furthermore, Alternative 2 would be located in proximity to a variety of public transit options and would incorporate features to reduce vehicle trips, thereby reducing transportation fuel usage. Therefore, impacts to energy resources under Alternative 2 would be less than significant, and less than the less-than-significant impacts of the Project.

d. Geology and Soils—Paleontological Resources

Alternative 2 would not construct any subterranean parking levels. Therefore, the potential for Alternative 2 to uncover subsurface paleontological resources would be reduced when compared to that of the Project, which would require the construction of two subterranean parking levels. Nevertheless, Alternative 2 would comply with the same regulatory requirements and would implement the same mitigation measure as the Project in the event paleontological resources are uncovered during site grading activities. Therefore, impacts to paleontological resources would remain less than significant with mitigation, but would be less than the impacts of the Project, which also would be less than significant with mitigation.

e. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily trips generated and energy consumption from proposed land uses. As discussed above, Alternative 2 would involve a similar mix of land uses as the Project, but would reduce the total amount of development on the Project Site by 154,940 square feet. Therefore, under Alternative 2, the total energy and water consumption would be reduced compared to the Project, which are already reduced as a result of the Project's application for certification under AB 900, which requires LEED Gold® certification or better. Additionally, as discussed in Section V.B.2.g.(2), the number of trips generated by Alternative 2 would be less than the number of trips generated by the Project. Thus, the amount of GHG emissions generated by Alternative 2 would be less than the amount generated by the Project. As with the Project, Alternative 2 would incorporate project design features to reduce GHG emissions and would be designed to comply with the City's Green Building Ordinance, as applicable. However, such project design features would be less stringent than the Project, because Alternative 2 would not apply for certification under AB 900 and require LEED Gold® certification or net zero GHG emissions. Nevertheless, with compliance with the City's Green Building Ordinance and the implementation of appropriate sustainability features, it is anticipated that Alternative 2 would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 2 would be less than significant, and less than the less-than-significant impacts of the Project.

f. Land Use

(1) Physically Divide a Community

Alternative 2 would develop residential, retail, and restaurant uses that are permitted by the Project Site's current Regional Center Commercial land use designation and C4-2D-SN zone. The proposed uses under Alternative 2 would be compatible with and

would complement existing and future development in the Project area, which is generally comprised of residential, commercial, and entertainment uses along Hollywood Boulevard and Wilcox Avenue. Therefore, similar to the Project, Alternative 2 would not disrupt, divide, or isolate any existing neighborhoods or communities and impacts associated with the physical division of a community would be less than significant and similar to the impacts of the Project.

(2) Conflict With Land Use Plans

As previously described, Alternative 2 would develop a 1-story commercial building and an 8-story mixed-use building with residential, retail, and restaurant uses on the Project Site. Alternative 2 would comply with the Project Site's existing Regional Center Commercial land use designation and C4-2D-SN (Commercial, Height District 2 with Development Limitation, Signage Supplemental Use District) zoning which permits retail uses. The proposed building under Alternative 2 would have a maximum height of 90 feet, which is permitted under the C4-2D-SN zone since the zoning designation does not impose a height limit. Alternative 2 would also comply with the maximum floor area ratio (FAR) of 2:1 imposed by the "D" Development Limitation of the Project Site's zoning, pursuant to Ordinance 165,652. Since Alternative 2 would comply with the permitted land use and existing zoning requirements, Alternative 2 would also be generally consistent with the overall intent of the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site, including Southern California Association of Governments' (SCAG) regional plans, the General Plan Framework Element, the Hollywood Community Plan, the Hollywood Redevelopment Plan, and the Los Angeles Municipal Code (LAMC). Therefore, impacts related to conflicts with land use plans would be less than significant and less than the less-than-significant impacts of the Project since Alternative 2 would require fewer discretionary actions.

g. Noise

(1) Construction

Alternative 2 would involve the same general phases of construction as the Project (i.e., demolition, site grading, building construction, and finishing/landscape installation), but would not require the amount of excavation and soil export as the Project since Alternative 2 would not construct any subterranean parking levels. As with the Project, construction of Alternative 2 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Since Alternative 2 would not require the extent of site excavation and soil export necessary under the Project, the amount and the overall duration of construction would be reduced. Notwithstanding, on-site construction activities and the associated construction noise and vibration levels would be expected to be similar during maximum activity days since only the overall

duration, and not the daily intensity of construction activities and associated equipment noise, would decrease under Alternative 2 when compared to the Project. Noise and vibration levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Furthermore, like the Project, Alternative 2 would require demolition of the existing non-historic buildings on-site. Therefore, noise and vibration impacts due to on-site construction activities under Alternative 2 would also be similar to those that would occur under the Project. Alternative 2 would comply with the same applicable regulatory requirements and implement the same project design features and mitigation measures as the Project to reduce on-site noise and vibration levels pursuant to the threshold for human annoyance during construction. As with the Project, construction of Alternative 2 would result in significant and unavoidable impacts with respect to on -site noise and vibration during construction, as well as significant and unavoidable cumulative off-site noise impacts. In addition, similar to the Project, with implementation of mitigation measures, on-site vibration impacts (pursuant to the threshold for building damage) to the Attie Building would be reduced to a less-than-significant level for Alternative 2.

As discussed in Section IV.G, Noise, of this Draft EIR, the highest number of construction trucks would occur during the grading/excavation phase. Since Alternative 2 would not require the extent of site excavation and soil export necessary under the Project, the number of construction haul trucks, and thereby trips, would be reduced. Thus, it can be reasonably concluded that temporary noise and vibration impacts (pursuant to the threshold for building damage[7]) from off-site construction traffic generated by Alternative 2 would also be less than significant and less than the impacts of the Project. However, although construction haul trucks and trips would be reduced under Alternative 2, vibration created by construction trucks traveling between the Project Site and the Hollywood Freeway could exceed the threshold of significance for human annoyance for sensitive uses. Thus, similar to the Project, it is conservatively assumed that temporary and intermittent off-site vibration impacts (pursuant to the threshold for human annoyance) under Alternative 2 would be significant and unavoidable.

Additionally, similar to the Project, Alternative 2 would result in potentially significant cumulative off-site construction noise and vibration impacts related to human annoyance.

(2) Operation

As described in Section IV.G, Noise, of this Draft EIR, sources of operational noise include: (a) on-site stationary noise sources such as outdoor mechanical equipment (i.e.,

[7] *A significance criteria of 0.12 peak particle velocity (PPV) is utilized for historic structures that are extremely susceptible to vibration damage.*

HVAC equipment), activities associated with the outdoor courtyards, parking facilities, and loading dock/trash collection areas; and (b) off-site mobile (roadway traffic) noise sources. Similar to the Project, on-site mechanical equipment used during operation of Alternative 2 would comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 decibels (dBA). In addition, under Alternative 2, the proposed loading dock and trash collection areas would be enclosed and located on the ground level, similar to the Project. Thus, noise impacts from mechanical equipment, loading docks, and trash collection areas would also be similar to the Project. Outdoor noise sources associated with open space areas would be similar to the Project because these areas would include the same uses and would be located at similar distances from sensitive receptors as the Project. Alternative 2 would provide fewer vehicle parking spaces than the Project; however, since the above-ground parking levels would be fully enclosed, potential noise associated with parking facilities would be substantially similar to that of the Project. The overall composite noise levels generated by Alternative 2 would be substantially similar to the Project. As such, on-site noise impacts under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

As discussed further below in Section V.B.2.g.(2), Alternative 2 would result in fewer daily vehicle trips than the Project. Accordingly, off-site noise impacts associated with traffic would be less than the Project's less-than-significant impacts.

h. Public Services

(1) Fire Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 2 would be similar to that of the Project. However, less grading and excavation would be required due to the elimination of subterranean parking and the overall duration of construction would be reduced compared to the Project due to the reduced square footage. Construction would occur in compliance with all applicable federal, state, and local requirements pertaining to materials handling, construction worker safety, and worksite staging, reducing the need for fire protection services. Additionally, access to the Project Site and the surrounding vicinity could be impacted by construction activities under Alternative 2, such as temporary lane closures, roadway/access improvements, and the construction of utility line connections. Furthermore, construction activities also would generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term and temporary for the area, construction activities could temporarily affect emergency response for emergency vehicles

along Hollywood Boulevard, and other main connectors due to delays caused by traffic during the construction phase. However, as with the Project, construction worker and haul truck trips would be expected to occur outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. Furthermore, like the Project, a Construction Traffic Management Plan would be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Therefore, based on the above, construction-related impacts related to the need for new or altered government facilities (i.e., fire stations) under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As discussed in Section IV.H.1, Public Services—Fire Protection of this Draft EIR, the Project Site would be served by Fire Station No. 27, the "first-in" station, as well as Fire Stations No. 82. Alternative 2 would develop fewer multi-family residential units on-site (125 du vs. 260 du) and more retail square footage than the Project (14,600 vs. 11,020), but the same amount of restaurant square footage (3,200), and no office uses (0 square feet with Alternative 2 vs. 3,580 square feet with the Project). The reduction in residential units would result in a smaller increase in service population when compared to the Project. Specifically, Alternative 2 would generate 304 residents and the retail and restaurant uses would generate approximately 48 employees compared to 632 residents and 56 employees with the Project. Thus, the demand for fire protection and emergency medical services would be reduced compared to the Project. In addition, similar to the Project, Alternative 2 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Therefore, impacts related to the need for the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility would be less than significant under Alternative 2 and less than the less-than-significant impacts of the Project due to a reduction in the service population compared to the Project.

(2) Police Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 2 would be similar to that of the Project. However, less grading and excavation would be required due to the lack of subterranean parking and the overall duration of construction would be reduced compared to the Project due to the reduced amount of development. Similar to the Project, the demand for police protection services during construction of Alternative 2 would be partially offset by the removal of the existing commercial uses on the Project Site. In addition, the daytime population at the Project Site during construction would be temporary in nature. Alternative 2 would implement the same project design

feature as the Project, which includes temporary security measures such as fencing, lighting, and locked entry to reduce the potential for theft and vandalism on the Project Site, thereby reducing the demand for police protection services.

Construction activities under Alternative 2 could also affect emergency response for police vehicles along Hollywood Boulevard and main connectors due to delays caused by traffic during the construction phase. However, given the permitted hours of construction and nature of construction projects, most, if not all, of the construction worker trips would occur outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. In addition, a Construction Traffic Management Plan, including a Worksite Traffic Control Plan, would be implemented during Project construction to ensure that adequate and safe access is available within and near the Project Site during construction activities. Therefore, construction-related impacts related to the need for new or altered government facilities (i.e., police stations) under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

Alternative 2 would develop residential, retail, and restaurant uses on the Project Site and would generate a police service population of approximately 435 persons (381 residents and 54 employees) based on the police service population conversion factors provided in the *L.A. CEQA Thresholds Guide*. This estimate is less than the Project's estimated police service population of 763 persons. Therefore, while Alternative 2 would increase the existing police service population of the Hollywood Community Police Station, it would do so to a lesser extent than the Project. Like the Project, Alternative 2 would not decrease the current officer-to-resident ratio for the Hollywood Area. Furthermore, Alternative 2 would implement the same project design features as the Project requiring on-site security features, appropriate lighting to ensure security, and the prevention of concealed spaces. The project design features would help offset the increase in demand for police protection services generated by Alternative 2. Thus, as with the Section IV.H.2, Public Services—Police Protection, the Project would result in less than significant impacts, therefore, the reduction in size of Alternative 2 would not result in the need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts. Moreover, although traffic generated by Alternative 2 would have the potential to affect emergency vehicle response to the Project Site and surrounding properties due to delays caused by the additional traffic, drivers of police emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Therefore, impacts related to the need for the addition of a new police station or the expansion, consolidation, or relocation of an existing facility would be less than significant and less than the less-than-significant impacts of the Project since the police service population generated by Alternative 2 would be less.

(3) Schools

(a) Construction

Similar to the Project, Alternative 2 would generate part-time and full-time jobs associated with its construction between the start of construction and full buildout. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by Alternative 2. Therefore, the construction employment generated by Alternative 2 would not result in a notable increase in the resident population or a corresponding demand for schools in the vicinity of the Project Site. Impacts on school facilities during construction under Alternative 2 would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

Alternative 2 would develop fewer multi-family residential units, more retail uses, and the same amount of restaurant uses on the Project Site as the Project. Because residential uses are the greatest driver of student generation, the total number of students generated would be reduced compared to the Project. Specifically, the 125 multi-family residential units, 14,600 square feet of retail uses, and 3,200 square feet of restaurant uses proposed by Alternative 2 would generate 66 students consisting of 35 elementary school students, 10 middle school students, and 21 high school students. In comparison, the Project would generate 125 students consisting of 67 elementary school students, 19 middle school students, and 39 high school students. Thus, the increased demand for school services provided by LAUSD would be reduced under Alternative 2 compared to the Project. Furthermore, pursuant to Senate Bill (SB) 50, the Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of Project-related school impacts. Therefore, payment of applicable development school fees to the LAUSD would offset the impact of additional student enrollment at schools serving the Project area. Impacts related to schools would be less than significant under Alternative 2 and less than the less-than-significant impacts of the Project.

(4) Libraries

(a) Construction

Similar to the Project, construction of Alternative 2 would result in a temporary increase of construction workers on the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for

construction labor, construction workers are not likely to relocate their households as a consequence of Project construction. Therefore, construction employment generated by Alternative 2 would not result in a notable increase in the resident population or a corresponding demand for library services in the vicinity of the Project Site.

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

(b) Operation

Residents are considered the primary users of library facilities. Alternative 2 would develop fewer residential uses than the Project and would therefore have a smaller service population. Specifically, the 125 residential units developed under Alternative 2 would result in approximately 304 residents compared to the 632 residents generated by the Project. In addition, the proposed retail and restaurant uses in Alternative 2 would generate fewer employees than the proposed retail, restaurant, and office uses included in the Project (i.e., 48 employees vs. 56 employees). As is the case with the Project, the existing library facilities serving the Project Site would not meet the recommended building size standards set forth in the 2007 Branch Facilities Plan under future conditions. However, as noted in Section IV.H.4, Public Services - Libraries, there are currently no plans to expand these libraries or develop additional facilities to serve the area. These libraries will continue to operate without meeting the recommended building size standards. Thus, both direct and indirect demand for library services under Alternative 2 would be less than the less-than-significant impacts of the Project.

(5) Parks and Recreation

(a) Construction

Similar to the Project, construction of Alternative 2 would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, the likelihood that construction workers would relocate their households as a consequence of working on the Project is negligible. Therefore, the construction

workers associated with Alternative 2 would not result in a notable increase in the residential population of the Project Site vicinity, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site.

As with the Project, during construction of Alternative 2, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. Furthermore, while there is a potential for construction workers to spend their lunch breaks at the parks and recreational facilities near the Project Site, lunch breaks typically are not long enough for workers to take advantage of such facilities and return to work within the allotted time (e.g., 30 to 60 minutes). Therefore, it is unlikely that construction workers would utilize any parks and recreational facilities near the Project Site during the construction of Alternative 2.

In addition, as with the Project, construction of Alternative 2 would not be expected to result in access restrictions to City parks and recreation facilities in the vicinity of the Project Site, nor interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity.

Based on the above analysis, construction of Alternative 2 would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services or interfere with existing park usage. Therefore, impacts on parks and recreational facilities during construction of Alternative 2 would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

Based on the reduced number of residential units, Alternative 2 would be required to provide less open space than the Project. Specifically, per LAMC Section 12.21G, Alternative 2 would be required to provide 14,000 square feet of open space, which is less than the 29,150 square feet required by the Project. Alternative 2 would provide 15,238 square feet of open space which exceeds this requirement. Thus, Alternative 2 would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities. Similar to the Project, while it is possible that employees of Alternative 2 may utilize local parks and recreational facilities, the increased demand would be negligible as it is anticipated that employees and visitors would also primarily utilize on-site open space during their time spent at the Project Site, resulting in a negligible demand for surrounding parks and recreational facilities. Also similar to the Project, under Alternative 2 the applicant would be required to pay park and recreation fees to the City that could be use add or improve park facilities in the project vicinity. Therefore, impacts to

park and recreation facilities would be less than significant under Alternative 2, and less than the less-than-significant impacts of the Project.

i. Transportation

As discussed above, Alternative 2 would develop 123,952 square feet of uses on the Project Site compared to the Project's 278,892 square feet of uses, which would result in a lower on-site population than the Project. Specifically, using the City's VMT calculator, the proposed uses for Alternative 2 would result in a total on-site population of 282 persons compared to 635 with the Project.[8] As such, impacts to transit, bicycle, and pedestrian facilities would be less than the less-than-significant impacts of the Project. Additionally, as discussed further below, impacts with respect to VMT would be less than significant, similar to the Project. Therefore, impacts associated with a potential conflict with a program, plan, ordinance, or policy addressing the circulation system would be similar to the Project's less than significant impacts.

With respect to VMT, accounting for the same project design features as the Project, Alternative 2 would generate 1,599 total household VMT and 220 total work VMT.[9] As detailed in the Los Angeles Department of Transportation's (LADOT) Transportation Assessment Guidelines, because the total square footage of the retail and restaurant components of Alternative 2 is less than 50,000 square feet and considered local serving, the VMT per employee for these uses was not considered for purposes of identifying significant work VMT impacts. Thus, based on the population assumptions, Alternative 2 would generate an average household VMT of 5.5 per capita, which would fall below the significance threshold for the Central Area Planning Commission (APC) which is 6.0. Additionally, like the Project, Alternative 2 is a mixed-use development which is favored under VMT methodology. Therefore, impacts with respect to conflicts with CEQA Guidelines Section 15064.3, subdivision (b) would be similar to the Project's less than significant impacts.

Furthermore, Alternative 2 would not introduce hazardous design features, so like the Project, no impact would occur. Lastly, similar to the Project, Alternative 2 would not interfere with emergency access and impacts would be less than significant.

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[8] *Gibson Transportation Consulting, Inc., "Traffic Analysis of Project Alternatives for the Hollywood & Wilcox Project," December 16, 2019. See Appendix Q of this Draft EIR.*

[9] *Gibson Transportation Consulting, Inc., "Traffic Analysis of Project Alternatives for the Hollywood & Wilcox Project," December 16, 2019. See Appendix Q of this Draft EIR.*

j. Tribal Cultural Resources

Alternative 2 would not construct any subterranean parking levels. Therefore, the potential for Alternative 2 to uncover subsurface tribal cultural resources would be reduced when compared to that of the Project. Accordingly, impacts to tribal cultural resources would be less than the less-than-significant impacts of the Project.

k. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 2 would generate a short-term demand for water. This demand would be less than the Project due to the reduction in the amount and duration of construction that would be required under Alternative 2. This demand would also be less than existing conditions. As evaluated in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of construction. Since the water demand for construction activities would be reduced, the temporary and intermittent demand for water during construction under Alternative 2 would also be expected to be met by the City's available water supplies. Similarly, the existing City of Los Angeles Department of Water and Power (LADWP) water infrastructure would be adequate to provide the water flow necessary to serve Alternative 2. Furthermore, as with the Project, the design and installation of new service connections under Alternative 2 would be required to meet applicable City standards. Therefore, impacts on water supply and infrastructure associated with short-term construction activities would be less than significant under Alternative 2, and would be less than the less-than-significant impacts of the Project.

(b) Operation

Alternative 2 would develop 125 multi-family residential units, 14,600 square feet of retail uses, and 3,200 square feet of restaurant uses. As shown in Table V-2 on page V-39, as with the Project, Alternative 2 would result in a net increase in demand for water from the Project Site. However, the net water demand generated by Alternative 2 of 51,027 gallons per day (gpd) would be lower than the 69,453 gpd in net water demand generated by the Project. However, both figures are conservative in that they assume the pool would be drained and refilled on a daily basis which would not be the case. Regardless, the estimated water demand for the Project would not exceed the available supplies projected by LADWP. Therefore, the estimated net water demand under Alternative 2 would also be within the available and projected water supplies for normal,

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

Land Use	Unit	Generation Factor[a]	Total Water Demand/ Wastewater Generation (gpd)
Existing			
Office	17,280 sf	120 gpd/1,000 sf	2,074
Retail	11,920	25 gpd/1,000 sf	298
Subtotal			*2,372*
Proposed			
Apartment: Studio	10 du	75 gpd/du	750
Apartment: 1 Bedroom	67 du	110 gpd/du	7,370
Apartment: 2 Bedrooms	42 du	150 gpd/du	6,300
Apartment: 3 Bedrooms	6 du	190 gpd/du	1,140
Retail	14,600 sf	25 gpd/1,000 sf	365
Restaurant	3,200 sf	720 gpd/1,000 sf	2,304
Open Space	15,238 sf	50 gpd/1,000 sf	762
Pool	4,600 cf	7.48 gal/cf	34,408
Subtotal			*53,399*
Total Net Water Demand/ Wastewater Generation			**51,027**

du = dwelling unit

gpd = gallons per day

sf = square feet

[a] *Sewage generation calculations are based on generation factors provided by City of Los Angeles Bureau of Sanitation (LASAN).*

Source: Eyestone Environmental, 2020.

single-dry, and multi-dry years through the year 2040. In addition, the existing water distribution infrastructure would be adequate to serve Alternative 2 since the water demand would be lower than the Project and the Project Site's existing uses. Furthermore, similar to the Project, the Applicant would construct the necessary on-site water infrastructure and off-site connections to the LADWP water system pursuant to applicable City requirements under Alternative 2 to accommodate the new building. Thus, impacts to water supply under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

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

Additionally, as with the Project, Alternative 2 may include construction activities associated with the installation of new or relocated sewer connections, including, a 150-foot sewer main extension which is discussed further below. Such activities would be confined to trenching in order to place the sewer lines below surface and would be limited to the on-site wastewater conveyance infrastructure and minor off-site work associated with connections to the City's sewer lines in the streets adjacent to the Project Site. Similar to the Project, a Construction Traffic Management Plan would be implemented during the construction of Alternative 2 to reduce impacts to pedestrian and traffic flow, including emergency vehicle access, which could occur due to temporary off-site utility work. Therefore, construction-related impacts to the wastewater system under Alternative 2 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

Alternative 2 would develop 125 multi-family residential units, 14,600 square feet of retail uses, and 3,200 square feet of restaurant uses. As shown in Table V-2 on page V-39, as with the Project, Alternative 2 would result in a net increase in wastewater flows from the Project Site. However, the net wastewater generated by Alternative 2 of 51,027 gpd would be lower than the net 69,453 gpd in wastewater generated by the Project. It is noted that both figures are conservative in that they assume the pool would be drained and refilled on a daily basis which would not be the case. Similar to the Project, the wastewater generated by Alternative 2 would be accommodated by the existing capacity of the Hyperion Water Reclamation Plant (HWRP) and impacts with respect to treatment capacity would be less than significant.

As with the Project, sewer service for Alternative 2 would be provided utilizing new or existing on-site sewer connections to the existing sewer lines in the vicinity of the Project Site. Based on information provided by LASAN, the 8-inch sewer mains in Hollywood

Boulevard and Wilcox Avenue adjacent to the Project Site do not currently have capacity to serve the Project due to high flows downstream of the Project Site at Sunset Boulevard and Wilcox Avenue. LASAN currently has plans to address the capacity issue through maintenance or pipe size upgrades in the sewer lines. If additional capacity is created, discharge into these lines would be viable. However, as no timeframe has been established for maintenance or pipe size upgrades, Alternative 2, like the Project, would require an extension of the sewer main that currently terminates 150 feet west of the Project Site. As noted above, impacts associated with this extension would be temporary and less than significant. Given that Alternative 2 would result in less daily wastewater compared to that of the Project, the sewer system would also have capacity to serve Alternative 2. Furthermore, additional detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for Alternative 2 during the permitting process. All related sanitary sewer connections and on-site infrastructure under Alternative 2 would be designed and constructed in accordance with applicable standards.

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

(3) Energy Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 2 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. Therefore, impacts on energy infrastructure associated with short-term construction activities would be less than significant under Alternative 2 and less than the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 2 would generate an increased consumption of electricity and natural gas relative to existing conditions. However, the consumption of electricity and natural gas under Alternative 2 would be less than the Project because of the reduced amount of construction, and the corresponding impact on energy infrastructure would be less than the Project. Therefore, impacts to energy infrastructure under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above, Alternative 2 would not avoid the Project's significant and unavoidable impacts with respect to on- and off-site noise and vibration during construction, nor would it avoid the significant and unavoidable cumulative impacts with respect to off-site construction noise and vibration. All other impacts would be less than or similar to those of the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 2 would develop a similar mix of uses to the Project, but the number of multi-family residential units would be significantly reduced and no office uses would be provided. Also, as a result of the reduced number of residential units, all of the residential units included in Alternative 2 would be market rate. Alternative 2 would also not rehabilitate and restore the Attie Building. As such, Alternative 2 would only partially meet the Project's underlying purpose of revitalizing the Project Site by developing an integrated mixed-use development that provides new multi-family housing opportunities and neighborhood-serving retail, office, and restaurant uses that serve the community and promote walkability while also rehabilitating the Attie Building. Alternative 2 would not meet the following basic Project objectives:

- Provide workforce housing to help meet the City's housing goals.
- Promote community benefits, economic development, and job creation, by creating construction and retail jobs, providing economic benefit to the City, and providing community benefits through workforce housing.

Alternative 2 would meet the following objectives, although to a lesser extent than the Project due to the reduced number of dwelling units:

- Create a high density, mixed-use development at a location served by public transit and locate residential uses in in a transit priority area;
- Redevelop and improve the visual character of the Project Site with a high density residential, office, and commercial infill development.
- Provide housing near public transit by constructing new residential dwelling units with varying mixes of number of-bedrooms, in an infill location close to commercial and office uses.
- Create an environmentally sensitive development, by incorporating sustainable and green building design and construction that reduces waste, manages water

use efficiently and conserves energy, and by providing employment, housing, and shopping opportunities within easy access of established public transit.

Alternative 2 would also not meet the following objective to the same extent as the Project because the Attie Building would be retained for commercial use only and would not be rehabilitated and restored:

- Rehabilitate the historic Attie Building and preserve its use as commercial space.

Alternative 2 would also satisfy the following objective to the same extent as the Project:

- Create a street-level identity for the Project Site and improve the pedestrian experience through the introduction of active street-adjacent uses such as neighborhood-serving commercial uses.

Alternative 2 would revitalize an underutilized project site with new buildings in an area located near a variety of transit options. Although Alternative 2 would meet one of the Project objectives to the same extent as the Project, it would not meet the objectives related to providing workforce housing and would meet objectives associated with providing residential uses to a lesser extent than the Project. Alternative 2 would also not meet the objective to rehabilitate and restore the Attie Building. Also, Alternative 2 would only partially meet the Project's underlying objective and would do so to a lesser extent than the Project.

V. Alternatives

C. Alternative 3: Zoning Compliant Office Alternative

1. Description of the Alternative

Under this Alternative, the Project Site would be developed in accordance with the existing C4-2D-SN (Commercial, Height District 2 with Development Limitation) zoning for the Project Site, which permits a wide array of land uses, such as retail stores, offices, hotels, schools, parks, and theaters. Under the existing zoning, no height limit applies to the Project Site. In addition, in accordance with the Development Limitation, development would be subject to a FAR limitation of 2.0:1. Alternative 3 would replace the residential uses proposed by the Project with office uses but would still include retail and restaurant uses. Thus, under the existing zoning and the uses currently permitted on the Project Site, Alternative 3 proposes the development of approximately 106,152 square feet of office uses, 14,600 square feet of retail uses, and 3,200 square feet of restaurant uses in the Attie Building and new buildings up to 11 stories and a maximum height of 140 feet, which is less than the Project's maximum height of 160 feet. Alternative 3 would retain the Attie Building on-site for continued use as commercial space, but unlike the Project, the building would not be rehabilitated and restored. The Zoning Compliant All Office Alternative would include 246 parking spaces located in one ground level and two above grade parking levels. Alternative 3 would also include 31 long-term and 20 short-term bicycle parking spaces located on Level 1. Unlike the Project, the vehicular parking provided does not account for a permitted 10-percent reduction, pursuant to the Los Angeles Bicycle Parking Ordinance (LAMC Section 12.21-A,4). Vehicular access to the Project Site would be provided via a new driveway on Wilcox Avenue, similar to the Project. Pedestrian access would be provided via the sidewalks along Hollywood Boulevard and Wilcox Avenue. Architectural elements, lighting, and signage would be similar to that of the Project. Construction of Alternative 3 would require less excavation and grading compared to the Project since no subterranean parking levels would be constructed and total floor area would be reduced by 154,940 square feet. Accordingly, the overall total amount of construction activities and duration under Alternative 3 would be less than that of the Project. Additionally, unlike the Project, Alternative 3 would not seek certification under AB 900, the *Jobs and Economic Improvement through Environmental Leadership Act*.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

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

Under Alternative 3, because the overall amount of construction would be reduced in comparison to the Project, the number of truck trips would also be reduced in comparison to the Project and excavation for the two subterranean parking levels proposed under the Project would not be required. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, regional and localized impacts on these days would be similar to the less than significant impacts of the Project.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 3 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. Overall construction emissions generated by Alternative 3 would be less than those of the Project because Alternative 3 would require less overall construction due to the decrease in building height and overall square footage, fewer truck trips, and no excavation for subterranean parking levels. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 3 would be less when compared to the less-than-significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

The Zoning Compliant All Office Alternative would reduce the total square footage of uses on the Project Site by 154,940 square feet as compared to the Project. Thus, as discussed below in Section V.C.2.g.(2), Alternative 3 would generate fewer daily trips than the Project. Operational regional air pollutant emissions associated with Alternative 3 would be generated by vehicle trips to the Project Site, which are the largest contributors to operational air pollutant emissions, and the consumption of electricity and natural gas. Since the amount of vehicular emissions is based on the number of trips generated, the overall pollutant emissions generated by Alternative 3 would be less than the emissions generated by the Project because the number of vehicular trips is less. Therefore, under Alternative 3, total contributions to regional air pollutant emissions during operation would be less than the Project's contribution. Accordingly, regional air quality impacts under Alternative 3 would be less than significant, and less than the less-than-significant impacts of the Project.

With regard to on-site localized emissions, as with the Project, Alternative 3 would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, localized impacts from on-site emission sources associated with Alternative 3 would also be less than significant. Such impacts would be less than those of the Project due to the reduction in overall floor area, which would result in less on-site operational air emissions compared to the Project. Localized operational impacts are determined primarily by peak-hour intersection traffic volumes. While as noted above, total daily vehicle trips are reduced compared to the Project, A.M. and P.M. peak-hour trips would be slightly greater than the Project. While the potential localized CO concentrations at nearby intersections could marginally increase as a result of the increased traffic, localized CO concentrations would remain well below SCAQMD significance thresholds. Because the localized impact analysis for the Project did not result in any significant impacts, localized impacts under Alternative 3 would also be less than significant. However, such impacts would be greater than those of the Project due to the increased trips during the peak traffic periods. Overall, Alternative 3 would result in greater localized emissions impacts compared to those of the Project.

(b) Toxic Air Contaminants

As discussed in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include diesel particulate matter from delivery trucks associated with the Project's retail, restaurant, and office uses. However, the uses associated with the Project, and similarly with Alternative 3, are not considered land uses that generate substantial TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not

proposed by the Project or Alternative 3. Similar to the Project, Alternative 3 would not release substantial amounts of TACs and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Potential TAC impacts under Alternative 3 would be less than significant and similar to those of the Project.

b. Cultural Resources

(1) Historical Resources

Alternative 3 would retain the Attie Building on-site for continued use as commercial space, but unlike the Project, the building would not be rehabilitated and restored. Alternative 3 would not adversely affect the significance of the Attie Building, the only historic resource on the Project Site, but would not provide the rehabilitation of the building and restoration of the storefronts and other missing features. Ground floor retail spaces that have been significantly altered on both the exterior and interior would remain in their current condition. Like the Project, Alternative 3's development adjacent to the Attie Building and along Wilcox Avenue would not materially alter historic resources in the Hollywood Boulevard Commercial and Entertainment District and impair their eligibility as such resources. As such, the Zoning Compliant Office Alternative would not cause direct or indirect impacts to historic resources. Therefore, similar to the Project, impacts to historical resources would be less than significant, although the Attie Building would not be rehabilitated and restored.

(2) Archaeological Resources

Alternative 3 would not construct any subterranean parking levels. Therefore, the potential for Alternative 3 to uncover subsurface archaeological resources would be reduced when compared to that of the Project, which would require the construction of two subterranean parking levels. Nevertheless, Alternative 3 would comply with the same regulatory requirements and would implement the same mitigation measure as the Project in the event that archaeological resources are uncovered during site grading activities. Therefore, impacts to archeological resources would remain less than significant with mitigation, and would be less than the impacts of the Project, which would also be less than significant with mitigation.

c. Energy

(1) Construction

Similar to the Project, construction activities associated with Alternative 3 would consume electricity to supply and convey water for dust control and, on a limited basis,

may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. In addition, LADWP has confirmed that the supply in the Project area would have the capacity to serve the Project Site. Furthermore, as with the Project, construction activities would require energy demand that is not wasteful, inefficient, or unnecessary and would not be expected to have an adverse impact on available energy resources. Therefore, impacts on energy resources associated with short-term construction activities would be less than significant under Alternative 3 and less than the less-than-significant impacts of the Project.

(2) Operation

As with the Project, operation of Alternative 3 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions, though with less development, overall demand for energy would be less than the Project. Additionally, as previously discussed, Alternative 3 would result in fewer daily vehicle trips than the Project. Thus, the associated consumption of petroleum-based fuels under Alternative 3 would also be less than the Project. Accordingly, under Alternative 3, the total energy consumption would be less than that of the Project. Similar to the Project, Alternative 3 would implement project design features which would improve energy efficiency and reduce impacts on consumption of energy resources. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 3 would not be wasteful, inefficient, or unnecessary. However, such project design features would be less stringent than the Project, which requires LEED Gold® certification or better as part of its AB 900 certification. Like the Project, Alternative 3 would comply with Title 24 requirements for "Solar Ready Buildings" which requires a certain area of rooftop to be set aside for installation of solar panels and would include the provision of conduit that is appropriate for future photovoltaic and solar thermal collectors. However, unlike the Project, solar panels would not be installed. In addition, due to the Project Site's location, other on-site renewable energy sources would not be feasible to install on-site as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, fuel cells, landfill gas, municipal solid waste, wind, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Furthermore, Alternative 3 would be located in proximity to a variety of public transit options and would incorporate features to reduce vehicle trips, thereby reducing transportation fuel usage. Therefore, impacts to energy resources under Alternative 3 would be less than significant, but greater than the less-than-significant impacts of the Project.

d. Geology and Soils—Paleontological Resources

Alternative 3 would not construct any subterranean parking levels. Therefore, the potential for Alternative 3 to uncover subsurface paleontological resources would be reduced when compared to that of the Project, which would require the construction of two subterranean parking levels. Nevertheless, Alternative 3 would comply with the same regulatory requirements and would implement the same mitigation measure as the Project in the event paleontological resources are uncovered during site grading activities. Therefore, impacts to paleontological resources would remain less than significant with mitigation, but would be less than the impacts of the Project, which also would be less than significant with mitigation.

e. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily trips generated and energy consumption from proposed land uses. Due to the overall reduction in development, Alternative 3 would result in less demand for electricity and water than the Project, which are already reduced as a result of the Project's application for certification under AB 900, which requires LEED Gold® certification or better. In addition, without a residential component, the demand for natural gas would be reduced compared to the Project. Therefore, under Alternative 3, the total energy and water consumption would be reduced compared to the Project. Furthermore, as discussed in Section V.C.2.g.(2), the number of daily vehicle trips generated by Alternative 3 would be less than the number of trips generated by the Project. Thus, the amount of GHG emissions generated by Alternative 3 would be less than the amount generated by the Project. As with the Project, Alternative 3 would incorporate project design features to reduce GHG emissions and would be designed to comply with the City's Green Building Ordinance, as applicable. However, such project design features would be less stringent than the Project, because Alternative 3 would not apply for certification under AB 900 and require LEED Gold® certification or net zero GHG emissions. Nevertheless, with compliance with the City's Green Building Ordinance and the implementation of appropriate sustainability features, it is anticipated that Alternative 3 would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 3 would be less than significant, and less than the less-than-significant impacts of the Project.

f. Land Use

(1) Physically Divide a Community

Alternative 3 would develop office, retail, and restaurant uses that are permitted by the Project Site's current Regional Center Commercial land use designation and C4-2D-SN

zone. The proposed uses under Alternative 3 would be compatible with and would complement existing and future development in the Project area, which is generally comprised of residential, commercial, and entertainment uses along Hollywood Boulevard and Wilcox Avenue. Therefore, similar to the Project, Alternative 3 would not disrupt, divide, or isolate any existing neighborhoods or communities and impacts associated with the physical division of a community would be less than significant and similar to the impacts of the Project.

(2) Conflicts With Land Use Plans

As previously described, Alternative 3 would develop 1-story and 11-story commercial buildings with retail, restaurant, and office uses on the Project Site. Alternative 3 would comply with the Project Site's existing Regional Center Commercial land use designation and C4-2D-SN (Commercial, Height District 2 with Development Limitation, Signage Supplemental Use District) zoning which permits retail uses. The proposed building under Alternative 3 would have a maximum height of 140 feet, which is less than that of the Project, which is permitted under the C4-2D-SN zone since the zoning designation does not impose a height limit. Alternative 3 would also comply with the maximum FAR of 2:1 imposed by the "D" Development Limitation of the Project Site's zoning, pursuant to Ordinance 165,652. Since Alternative 3 would comply with the permitted land use and existing zoning requirements, Alternative 3 would also be generally consistent with the overall intent of the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site, including SCAG's regional plans, the General Plan Framework Element, the Hollywood Community Plan, the Hollywood Redevelopment Plan, and the LAMC. Therefore, impacts related to conflicts with land use plans would be less than significant and less than the less-than-significant impacts of the Project since Alternative 3 would require fewer discretionary actions.

g. Noise

(1) Construction

Alternative 3 would involve the same general phases of construction as the Project (i.e., site grading and excavation, building construction, and finishing/landscape installation), but would not require as much excavation and soil export as the Project since Alternative 3 would not construct any subterranean parking levels. As with the Project, construction of Alternative 3 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Since Alternative 3 would not require the extent of site excavation and soil export necessary under the Project, the amount and the overall duration of construction would be reduced. Notwithstanding, on-site construction activities and the associated construction noise and vibration levels would be expected to be similar during maximum activity days since only the overall

duration, and not the daily intensity of construction activities and associated equipment noise, would decrease under Alternative 3 when compared to the Project. Noise and vibration levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Furthermore, like the Project, Alternative 3 would require demolition of the existing non-historic buildings on-site. Therefore, noise and vibration impacts due to on-site construction activities under Alternative 3 would also be similar to those that would occur under the Project. Alternative 3 would comply with the same applicable regulatory requirements and implement the same project design features and mitigation measures as the Project to reduce on-site noise and vibration levels pursuant to the threshold for human annoyance during construction. As with the Project, construction of Alternative 3 would result in significant and unavoidable impacts with respect to on- and off-site noise and vibration during construction. In addition, similar to the Project, with implementation of mitigation measures, on-site vibration impacts (pursuant to the threshold for building damage) to the Attie Building would be reduced to a less-than-significant level for Alternative 3.

As discussed in Section IV.G, Noise, of this Draft EIR, the highest number of construction trucks would occur during the grading/excavation phase. Since Alternative 3 would not require the extent of site excavation and soil export necessary under the Project, the number of construction haul trucks, and thereby trips, would be reduced. Thus, it can be reasonably concluded that temporary noise and vibration impacts (pursuant to the threshold for building damage[10]) from off-site construction traffic generated by Alternative 3 would also be less than significant and less than the impacts of the Project. However, although construction haul trucks and trips would be reduced under Alternative 3, vibration created by construction trucks traveling between the Project Site and the Hollywood Freeway could exceed the threshold of significance for human annoyance for sensitive uses. Thus, similar to the Project, it is conservatively assumed that temporary and intermittent vibration impacts (pursuant to the threshold for human annoyance) under Alternative 3 would be significant and unavoidable.

Additionally, similar to the Project, Alternative 3 would result in potentially significant cumulative off-site construction noise and vibration impacts related to human annoyance.

(2) Operation

As described in Section IV.G, Noise, of this Draft EIR, sources of operational noise include: (a) on-site stationary noise sources such as outdoor mechanical equipment (i.e., HVAC equipment), activities associated with the outdoor courtyards, parking facilities, and

[10] *A significance criteria of 0.12 PPV is utilized for historic structures that are extremely susceptible to vibration damage.*

loading dock/trash collection areas; and (b) off-site mobile (roadway traffic) noise sources. Similar to the Project, on-site mechanical equipment used during operation of Alternative 3 would comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 decibels (dBA). In addition, under Alternative 3, the proposed loading dock and trash collection areas would be enclosed and located on the ground level, similar to the Project. Thus, noise impacts from mechanical equipment, loading docks, and trash collection areas would also be similar to the Project. Since no residential uses are proposed, the Zoning Compliant Office Alternative would not include open space areas. Therefore, outdoor noise sources would be less than the Project. While Alternative 3 would provide fewer vehicle parking spaces than the Project, the above-ground parking levels would be fully enclosed. As such, potential noise associated with parking facilities would be similar to that of the Project. The overall composite noise levels generated by Alternative 3 would be similar to the Project. As such, on-site noise impacts under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

As discussed further below in Section V.C.2.g.(2), Alternative 3 would result in fewer daily vehicle trips than the Project. Accordingly, off-site noise impacts associated with traffic would be less than the Project's less-than-significant impacts.

h. Public Services

(1) Fire Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 3 would be similar to that of the Project. However, less grading and excavation would be required due to the lack of subterranean parking. In addition, the overall duration of construction would be reduced compared to the Project due to the reduced square footage. Construction would occur in compliance with all applicable federal, state, and local requirements pertaining to materials handling, construction worker safety, and worksite staging, reducing the need for fire protection services. Additionally, access to the Project Site and the surrounding vicinity could be impacted by construction activities under Alternative 3, such as temporary lane closures, roadway/access improvements, and the construction of utility line connections. Furthermore, construction activities also would generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term and temporary for the area, construction activities could temporarily affect emergency response for emergency vehicles along Hollywood Boulevard, and other main connectors due to delays caused by traffic during the construction phase. However, as with the Project, construction worker and haul

truck trips would be expected to occur outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. Furthermore, like the Project, a Construction Traffic Management Plan would be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Therefore, based on the above, the need for new or altered government facilities (i.e., fire stations) under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As discussed in Section IV.H.1, Public Services—Fire Protection, of this Draft EIR, the Project Site would be served by Fire Station No. 27, the "first-in" station, as well as Fire Stations No. 82. Alternative 3 would not develop residential uses, and the overall square footage would be reduced. As such, the resulting increase in service population would be less than the Project. Specifically, the proposed uses in the Zoning Compliant Office Alternative would generate a service population of 557 people, consisting of 40 retail employees, 508 office employees, and 9 restaurant employees, compared to 632 residents and 56 employees with the Project. Thus, the demand for fire protection and emergency medical services would be reduced compared to the Project. In addition, similar to the Project, Alternative 3 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Therefore, impacts related to the need for a new fire station or the expansion, consolidation, or relocation of an existing facility would be less than significant under Alternative 3 and less than the less-than-significant impacts of the Project due to a reduction in the service population compared to the Project.

(2) Police Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 3 would be similar to that of the Project. However, less grading and excavation would be required due to the lack of subterranean parking. The overall duration of construction would also be reduced compared to the Project due to the reduced amount of development. Similar to the Project, the demand for police protection services during construction of Alternative 3 would be partially offset by the removal of the existing commercial uses on the Project Site. In addition, the daytime population at the Project Site during construction would be temporary in nature. Alternative 3 would implement the same project design feature as the Project, which includes temporary security measures such as fencing, lighting, and locked entry to reduce the potential for theft and vandalism on the Project Site, thereby reducing the demand for police protection services.

As with the Project, construction activities under Alternative 3 could also affect emergency response for police vehicles along Hollywood Boulevard and main connectors due to delays caused by traffic during the construction phase. However, given the permitted hours of construction and nature of construction projects, most, if not all, of the construction worker trips would occur outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. In addition, a Construction Traffic Management Plan, including a Worksite Traffic Control Plan, would be implemented during Project construction to ensure that adequate and safe access is available within and near the Project Site during construction activities. Therefore, construction-related impacts the need for new or altered government facilities (i.e., police stations) under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

Alternative 3 would develop office, retail, and restaurant uses on the Project Site and would generate a police service population of approximately 479 persons based on the police service population conversion factors provided in the *L.A. CEQA Thresholds Guide*. This estimate is less than the Project's estimated police service population of 763 persons. Therefore, as with the Project, Alternative 3 would increase the existing police service population of the Hollywood Community Police Station but would do so to a lesser extent than the Project. Like the Project, Alternative 3 would not decrease the current officer-to-resident ratio for the Hollywood Area. Furthermore, Alternative 3 would implement the same project design features as the Project requiring on-site security features, appropriate lighting to ensure security, and the prevention of concealed spaces. The project design features would help offset the increase in demand for police protection services generated by Alternative 3. As described in Section IV.H.2, Public Services—Police Protection, of this Draft EIR, the Project was determined to have less than significant impacts; therefore, Alternative 3 would not result in the need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts. Moreover, although traffic generated by Alternative 3 would have the potential to affect emergency vehicle response to the Project Site and surrounding properties due to delays caused by the additional traffic, drivers of police emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Therefore, impacts related to the need for the addition of a new police station or the expansion, consolidation, or relocation of an existing facility would be less than significant and less than the less-than-significant impacts of the Project since the police service population generated by Alternative 3 would be less.

(3) Schools

(a) Construction

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

(b) Operation

The Zoning Compliant Office Alternative does not include the development of residential uses. Thus, Alternative 3 would not directly generate school-aged children and a corresponding demand for school services. Therefore, implementation of Alternative 3 would not result in a direct increase in the number of students within the service area of the LAUSD. As such, the increased demand for school services provided by the LAUSD would be reduced under Alternative 3 compared to the Project. In addition, the number of students that could be indirectly generated by Alternative 3 as a result of employment opportunities associated with the proposed office, retail, and restaurant uses would not be anticipated to be substantial because most employees would likely reside in the vicinity of the Project Site. Furthermore, pursuant to SB 50, the Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of Project-related school impacts. Therefore, payment of applicable development school fees to the LAUSD would offset the impact of additional student enrollment at schools serving the Project area. Impacts related to schools would be less than significant under Alternative 3 and less than the less-than-significant impacts of the Project.

(4) Libraries

(a) Construction

Similar to the Project, construction of the Zoning Compliant Office Alternative would result in a temporary increase of construction workers on the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their

households as a consequence of Project construction. Therefore, construction employment generated by Alternative 3 would not result in a notable increase in the resident population or a corresponding demand for library services in the vicinity of the Project Site.

In addition, it is unlikely that construction workers would visit Project-area libraries on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. As such, impacts to library facilities and services during construction of Alternative 3 would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

Residents are considered the primary users of library facilities. Alternative 3 would develop office, retail, and restaurant uses and would not include the development of residential uses. Thus, implementation of Alternative 3 would not result in a direct increase in the number of residents. In addition, as employees of Alternative 3 would be more likely to use library facilities near their homes during non-work hours and given that some of the employment opportunities generated by Alternative 3 would be filled by people already residing in the vicinity of the Project Site, employees and the potential indirect population generation attributable to those employees would generate minimal demand for library services. As such, any indirect or direct demand for library services generated by the employees of Alternative 3 would be negligible. Impacts on library facilities and services would be less than significant and less than the less-than-significant impacts of the Project.

(5) Parks and Recreation

(a) Construction

Similar to the Project, construction of the Zoning Compliant Office Alternative would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, the likelihood that construction workers would relocate their households as a consequence of working on the Project is negligible. Therefore, the construction workers associated with Alternative 3 would not result in a notable increase in the residential population of the Project Site vicinity, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site.

As with the Project, during construction of Alternative 3, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. Furthermore, while there is a potential for construction workers to spend their lunch breaks at the parks and recreational facilities near the Project Site, lunch breaks typically are not long enough for workers to take advantage of such facilities and return to work within the allotted time (e.g., 30 to 60 minutes). Therefore, it is unlikely that construction workers would utilize any parks and recreational facilities near the Project Site during the construction of Alternative 3.

In addition, as with the Project, construction of Alternative 3 would not be expected to result in access restrictions to City parks and recreation facilities in the vicinity of the Project Site, nor interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the vicinity of the Project Site.

Based on the above analysis, construction of Alternative 3 would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services or interfere with existing park usage. Therefore, impacts on parks and recreational facilities during construction of Alternative 3 would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

Residents are considered the primary users of parks and recreation facilities. Alternative 3 would develop office, retail, and restaurant uses and would not include the development of residential uses. Thus, implementation of Alternative 3 would not result in on-site residents who would utilize nearby parks and/or recreational facilities. In addition, while it is possible that employees and patrons of Alternative 3 may utilize local parks and recreational facilities, the increased demand would be partially off-set by the reduction in employees attributed to the removal of the 20,200 square feet of existing uses on the Project Site that would be removed as part of Alternative 3. Therefore, Alternative 3 would result in a reduced demand for public parks and recreation services compared to the Project, and the operation of Alternative 3 would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services or interfere with existing park usage. Impacts to park and recreation facilities would be less than significant under Alternative 3 and less than the less-than-significant impacts of the Project.

i. Transportation

As discussed above, Alternative 3 would develop 123,952 square feet of uses on the Project Site compared to the Project's 278,892 square feet of uses, which would result in a

lower on-site population than the Project. Specifically, using the City's VMT calculator, the proposed uses for Alternative 3 would result in a total on-site population of 467 persons compared to 635 with the Project.[11] As such, impacts to transit, bicycle, and pedestrian facilities would be less than the less-than-significant impacts of the Project. Additionally, as discussed further below, impacts with respect to VMT would be less than significant like the Project. Therefore, impacts associated with a potential conflict with a program, plan, ordinance, or policy addressing the circulation system would be similar to the Project's less than significant impacts.

With respect to VMT, Alternative 3 does not include residential uses and would not result in any household VMT per capita. When accounting for the same project design features as the Project, the proposed office and commercial uses would result in 2,761 total work VMT, which equates to an average work VMT per employee of 5.9, compared to 4.5 for the Project.[12] While this is greater than the Project, the work VMT per employee for Alternative 3 would fall below the significance threshold for the Central APC of 7.6. Nevertheless, impacts with respect to conflicts with CEQA Guidelines Section 15064.3, subdivision (b) would be greater than the Project because VMT methodology favors mixed use projects, but impacts would remain less than significant.

Furthermore, Alternative 3 would not introduce hazardous design features, so like the Project, no impact would occur. Lastly, similar to the Project, Alternative 3 would not interfere with emergency access and impacts would be less than significant.

j. Tribal Cultural Resources

Alternative 3 would not construct any subterranean parking levels. Therefore, the potential for Alternative 3 to uncover subsurface tribal cultural resources would be reduced when compared to that of the Project. Accordingly, impacts to tribal cultural resources would be less than the less-than-significant impacts of the Project.

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[11] *Gibson Transportation Consulting, Inc., "Traffic Analysis of Project Alternatives for the Hollywood & Wilcox Project," December 16, 2019. See Appendix Q of this Draft EIR.*

[12] *Gibson Transportation Consulting, Inc., "Traffic Analysis of Project Alternatives for the Hollywood & Wilcox Project," December 16, 2019. See Appendix Q of this Draft EIR.*

k. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar the Project, construction activities associated with Alternative 3 would generate a short-term demand for water. This demand would be less than the Project due to the reduction in the amount and duration of construction that would be required under Alternative 3. This demand would also be less than existing conditions. As evaluated in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of construction. Since the water demand for construction activities would be reduced, the temporary and intermittent demand for water during construction under Alternative 3 would also be expected to be met by the City's available water supplies. Similarly, the existing LADWP water infrastructure would be adequate to provide the water flow necessary to serve Alternative 3. Furthermore, as with the Project, the design and installation of new service connections under Alternative 3 would be required to meet applicable City standards. Therefore, impacts on water supply and infrastructure associated with short-term construction activities would be less than significant under Alternative 3, and would be less than the less-than-significant impacts of the Project.

(b) Operation

Alternative 3 would develop 106,152 square feet of office uses, 14,600 square feet of retail uses, and 3,200 square feet of restaurant uses. As shown in Table V-3 on page V-60, Alternative 3 would result in a net increase in demand for water from the Project Site of 13,035 gpd, which is lower than the 69,453 gpd in net water demand generated by the Project. Therefore, the estimated water demand for the Project would not exceed the available supplies projected by LADWP. Therefore, the estimated net water demand under Alternative 3 would also be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040. In addition, the existing water distribution infrastructure would be adequate to serve Alternative 3 since the water demand would be lower than the Project and the Project Site's existing uses. Furthermore, similar to the Project, the Applicant would construct the necessary on-site water infrastructure and off-site connections to the LADWP water system pursuant to applicable City requirements under Alternative 3 to accommodate the new building. Thus, impacts to water supply under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

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

Land Use	Unit	Generation Factor[a]	Total Water Demand/ Wastewater Generation (gpd)
Existing			
Office	17,280 sf	120 gpd/1,000 sf	2,074
Retail	11,920 sf	25 gpd/1,000 sf	298
Subtotal			*2,372*
Proposed			
Retail	14,600 sf	25 gpd/1,000 sf	365
Restaurant	3,200 sf	720 gpd/1,000 sf	2,304
Office	106,152 sf	120 gpd/1,000 sf	12,738
Subtotal			*15,407*
Total Net Water Demand/ Wastewater Generation			**13,035**

gpd = gallons per day
sf = square feet
[a] *Sewage generation calculations are based on generation factors provided by City of Los Angeles Bureau of Sanitation (LASAN).*
Source: Eyestone Environmental, 2020.

(2) Wastewater

(a) Construction

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

Additionally, as with the Project, Alternative 3 may include construction activities associated with the installation of new or relocated sewer connections, including a 150-foot sewer main extension which is discussed further below. Such activities would be confined to trenching in order to place the sewer lines below surface and would be limited to the on-site wastewater conveyance infrastructure and minor off-site work associated with

connections to the City's sewer lines in the streets adjacent to the Project Site. Similar to the Project, a Construction Traffic Management Plan would be implemented during the construction of Alternative 3 to reduce impacts to pedestrian and traffic flow, including emergency vehicle access, which could occur due to temporary off-site utility work. Therefore, construction-related impacts to the wastewater system under Alternative 3 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

The Zoning Compliant Office Alternative would develop 106,152 square feet of office uses, 14,600 square feet of retail uses, and 3,200 square feet of restaurant uses. As shown in Table V-3 on page V-60, Alternative 3 would result in a net increase in wastewater flows from the Project Site of 13,035 gpd, which is lower than the 69,453 gpd in net wastewater generated by the Project. Similar to the Project, the wastewater generated by Alternative 3 would be accommodated by the existing capacity of the HWRP and impacts with respect to treatment capacity would be less than significant.

As with the Project, sewer service for Alternative 3 would be provided utilizing new or existing on-site sewer connections to the existing sewer lines in the vicinity of the Project Site. Based on information provided by LASAN, the 8-inch sewer mains in Hollywood Boulevard and Wilcox Avenue adjacent to the Project Site do not currently have capacity to serve the Project due to high flows downstream of the Project Site at Sunset Boulevard and Wilcox Avenue. LASAN currently has plans to address the capacity issue through maintenance or pipe size upgrades in the sewer lines. If additional capacity is created, discharge into these lines would be viable. However, as no timeframe has been established for maintenance or pipe size upgrades, Alternative 3, like the Project, would require an extension of the sewer main that currently terminates 150 feet west of the Project Site. As noted above, impacts associated with this extension would be temporary and less than significant. Given that Alternative 3 would result in less daily wastewater compared to that of the Project, the sewer lines would also have capacity to serve Alternative 3. Furthermore, additional detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for Alternative 3 during the permitting process. All related sanitary sewer connections and on-site infrastructure under Alternative 3 would be designed and constructed in accordance with applicable standards.

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

(3) Energy Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 3 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. Therefore, impacts on energy infrastructure associated with short-term construction activities would be less than significant under Alternative 3 and less than the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 3 would generate an increased consumption of electricity and natural gas relative to existing conditions. However, the consumption of electricity and natural gas under Alternative 3 would be less than the Project because of the reduced amount of construction, and the corresponding impact on energy infrastructure would be less than the Project. Therefore, impacts to energy infrastructure under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above, Alternative 3 would not avoid the Project's significant and unavoidable impacts with respect to on -site noise and vibration during construction, nor would it avoid the significant and unavoidable cumulative impacts with respect to off-site construction noise and vibration. Alternative 3 would also result in greater VMT impacts than the Project, but impacts would be less than significant. All other impacts would be less than or similar to those of the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 3 would revitalize the Project Site with office, retail, and restaurant uses, but would not include any residential development. As such, Alternative 3 would only partially meet the Project's underlying purpose of revitalizing the Project Site by developing an integrated mixed-use development that provides new multi-family housing opportunities, including workforce housing, and neighborhood-serving retail, office, and restaurant uses that serve the community and promote walkability. In addition, Alternative 3 would not

meet any of the Project objectives pertaining to housing and would not rehabilitate and restore the Attie Building. Alternative 3 would, however, meet the following objective:

- Create a street-level identity for the Project Site and improve the pedestrian experience through the introduction of active street-adjacent uses such as neighborhood-serving commercial uses.

Alternative 3 would revitalize an underutilized project site with new buildings in an area located near a variety of transit options. However, Alternative 3 would not meet the Project's underlying purpose and would not meet any of the objectives pertaining to housing, including the provision of workforce housing and locating housing near public transit. Alternative 3 would also not rehabilitate and restore the Attie Building.

V. Alternatives

D. Alternative 4: Zoning Compliant Hotel Alternative

1. Description of the Alternative

Under this Alternative, the Project Site would be developed in accordance with the existing C4-2D-SN (Commercial, Height District 2 with Development Limitation) zoning for the Project Site, which permits a wide array of land uses, such as retail stores, offices, hotels, schools, parks, and theaters. Under existing zoning, no height limit applies to the Project Site. In accordance with the Development Limitation, development would be subject to a FAR limitation of 2.0:1. Alternative 4 would replace the residential uses proposed by the Project with hotel uses but would still include retail and restaurant uses. Thus, Alternative 4 would develop an approximately 106,152 square foot hotel that would include 197 rooms, 14,600 square feet of retail uses, and 3,200 square feet of restaurant uses. Alternative 4 would retain the Attie Building on-site for continued use as commercial space, but unlike the Project, the building would not be rehabilitated and restored. The proposed uses would be located in the Attie Building and new buildings up to 11 stories and a maximum height of 130 feet, which is less than the Project's maximum height of 160 feet. The Zoning Compliant Hotel Alternative would include 124 parking spaces located in one ground level and one above-grade parking level. The Zoning Compliant Hotel Alternative would also include 19 long-term and 19 short-term bicycle parking spaces located on Level 1. Unlike the Project, the vehicular parking provided does not account for a permitted 10-percent reduction, pursuant to the Los Angeles Bicycle Parking Ordinance (LAMC Section 12.21-A,4). Vehicular access to the Project Site, including a pick-up/ drop-off area, would be provided via a new driveway on Wilcox Avenue, similar to the Project. Pedestrian access would be provided via the sidewalks along Hollywood Boulevard and Wilcox Avenue. Architectural elements, lighting, and signage would be similar to that of the Project. Construction of Alternative 4 would require less excavation and grading compared to the Project since no subterranean parking levels would be constructed and total floor area would be reduced by 154,940 square feet. Accordingly, the overall total amount of construction activities and duration under Alternative 4 would be less than that of the Project. Additionally, unlike the Project, Alternative 4 would not seek certification under AB 900, the *Jobs and Economic Improvement through Environmental Leadership Act*.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

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

Under Alternative 4, because the overall amount of construction would be reduced in comparison to the Project, the number of truck trips would also be reduced in comparison to the Project and excavation for the two subterranean parking levels proposed under the Project would not be required. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, regional and localized impacts on these days would be similar to the less than significant impacts of the Project.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 4 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. Overall construction emissions generated by Alternative 4 would be less than those of the Project because Alternative 4 would require less overall construction due to the decrease in building height and overall square footage, fewer truck trips, and no excavation for subterranean parking levels. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 4 would be less when compared to the less-than-significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Similar to the Project, operational regional air pollutant emissions associated with Alternative 4 would be generated by vehicle trips to the Project Site and the consumption of electricity and natural gas. As discussed below in Section V.D.2.g.(2), development of Alternative 4 would result in fewer daily trips than the Project. As vehicular emissions depend on the number of trips, vehicular sources would result in a smaller increase in air emissions compared to the Project. In addition, because the overall square footage would be reduced when compared to the Project, demand for electricity and natural gas would be less than the Project, which are already reduced as a result of the Project's application for certification under AB 900, which requires LEED Gold® certification or better. Therefore, impacts associated with regional operational emissions would be less than significant and less than the Project.

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 4 would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, localized impacts from on-site emission sources associated with Alternative 4 would also be less than significant. Such impacts would be less than those of the Project due to the overall decrease in building area. Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. As discussed further below in Section V.D.2.g.(2), the number of net new peak-hour trips generated with Alternative 4 would be less than the Project. Therefore, impacts would be less than significant and less than the Project's less than significant impacts.

(b) Toxic Air Contaminants

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

b. Cultural Resources

(1) Historical Resources

Alternative 4 would retain the Attie Building on-site for continued use as commercial space, but unlike the Project, the building would not be rehabilitated and restored. Alternative 4 would not adversely affect the significance of the Attie Building, the only historic resource on the Project Site, but would not provide the rehabilitation of the building and restoration of the storefronts and other missing features. Ground floor retail spaces that have been significantly altered on both the exterior and interior would remain in their current condition. Like the Project, Alternative 4's development adjacent to the Attie Building and along Wilcox Avenue would not materially alter historic resources in the Hollywood Boulevard Commercial and Entertainment District and impair their eligibility as such resources. As such, the Zoning Compliant Hotel Alternative would not cause direct or indirect impacts to historic resources. Therefore, similar to the Project, impacts to historical resources would be less than significant, although the Attie Building would not be rehabilitated and restored.

(2) Archaeological Resources

Alternative 4 would not construct any subterranean parking levels. Therefore, the potential for Alternative 4 to uncover subsurface archaeological resources would be reduced when compared to that of the Project, which would require the construction of two subterranean parking levels. Nevertheless, Alternative 4 would comply with the same regulatory requirements and would implement the same mitigation measure as the Project in the event that archaeological resources are uncovered during site grading activities. Therefore, impacts to archeological resources would remain less than significant, and would be less than the Project, which would also be less than significant with mitigation.

c. Energy

(1) Construction

Similar to the Project, construction activities associated with Alternative 4 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. In addition, LADWP has confirmed that the supply in the Project area would have the capacity to serve the Project Site. Furthermore, as with the Project, construction activities would require energy demand that is not wasteful, inefficient, or unnecessary and would not be expected to have an adverse impact on available energy resources. Therefore, impacts on energy resources associated with short-term construction activities

would be less than significant under Alternative 4 and less than the less-than-significant impacts of the Project.

(2) Operation

As with the Project, operation of Alternative 4 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions, though with less development, overall demand for energy would be less than the Project. Additionally, as previously discussed, Alternative 4 would result in fewer daily vehicle trips than the Project. Thus, the associated consumption of petroleum-based fuels under Alternative 4 would also be less than the Project. Accordingly, under Alternative 4, the total energy consumption would be less than that of the Project. Similar to the Project, Alternative 4 would implement project design features which would improve energy efficiency and reduce impacts on consumption of energy resources. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 4 would not be wasteful, inefficient, or unnecessary. However, such project design features would be less stringent than the Project, which requires LEED Gold® certification or better as part of its AB 900 certification. Like the Project, Alternative 4 would comply with Title 24 requirements for "Solar Ready Buildings" which requires a certain area of rooftop to be set aside for installation of solar panels and would include the provision of conduit that is appropriate for future photovoltaic and solar thermal collectors. However, unlike the Project, solar panels would not be installed. In addition, due to the Project Site's location, other on-site renewable energy sources would not be feasible to install on-site as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, fuel cells, landfill gas, municipal solid waste, wind, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Furthermore, Alternative 4 would be located in proximity to a variety of public transit options and would incorporate features to reduce vehicle trips, thereby reducing transportation fuel usage. Therefore, impacts to energy resources under Alternative 4 would be less than significant, but greater than the less-than-significant impacts of the Project.

d. Geology and Soils—Paleontological Resources

Alternative 4 would not construct any subterranean parking levels. Therefore, the potential for Alternative 4 to uncover subsurface paleontological resources would be reduced when compared to that of the Project, which would require the construction of two subterranean parking levels. Nevertheless, Alternative 4 would comply with the same regulatory requirements and would implement the same mitigation measure as the Project in the event paleontological resources are uncovered during site grading activities. Therefore, impacts to paleontological resources would remain less than significant with

mitigation, but would be less than the impacts of the Project, which also would be less than significant with mitigation.

e. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily trips generated and energy consumption from proposed land uses. Due to the overall reduction in development, Alternative 4 would result in less demand for electricity and water than the Project, which are already reduced as a result of the Project's application for certification under AB 900, which requires LEED Gold® certification or better. In addition, without a residential component, the demand for natural gas would be reduced compared to the Project. Therefore, under Alternative 4, the total energy and water consumption would be reduced compared to the Project. Additionally, as discussed in Section V.D.2.g.(2), the number of trips generated by Alternative 4 would be less than the number of trips generated by the Project. Thus, the amount of GHG emissions generated by Alternative 4 would be less than the amount generated by the Project. As with the Project, Alternative 4 would incorporate project design features to reduce GHG emissions and would be designed to comply with the City's Green Building Ordinance, as applicable. However, such project design features would be less stringent than the Project, because Alternative 4 would not apply for certification under AB 900 and require LEED Gold® certification or net zero GHG emissions. Nevertheless, with compliance with the City's Green Building Ordinance and the implementation of appropriate sustainability features, it is anticipated that Alternative 4 would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 4 would be less than significant, and less than the less-than-significant impacts of the Project.

f. Land Use

(1) Physically Divide a Community

Alternative 4 would develop office, retail, and restaurant uses that are permitted by the Project Site's current Regional Center Commercial land use designation and C4-2D-SN zone. The proposed uses under Alternative 4 would be compatible with and would complement existing and future development in the Project area, which is generally comprised of residential, commercial, and entertainment uses along Hollywood Boulevard and Wilcox Avenue. Therefore, similar to the Project, Alternative 4 would not disrupt, divide, or isolate any existing neighborhoods or communities and impacts associated with the physical division of a community would be less than significant and similar to the impacts of the Project.

(2) Conflict With Land Use Plans

As previously described, Alternative 4 would develop one story and 11-story buildings with retail, restaurant, and hotel uses on the Project Site. Alternative 4 would comply with the Project Site's existing Regional Center Commercial land use designation and C4-2D-SN (Commercial, Height District 2 with Development Limitation, Signage Supplemental Use District) zoning which permits commercial uses. The proposed building under Alternative 4 would have a maximum height of 130 feet, which is less than that of the Project, which is permitted under the C4-2D-SN zone since the zoning designation does not impose a height limit. Alternative 4 would also comply with the maximum FAR of 2:1 imposed by the "D" Development Limitation of the Project Site's zoning, pursuant to Ordinance 165,652. Since Alternative 4 would comply with the permitted land use and existing zoning requirements, Alternative 4 would also be generally consistent with the overall intent of the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site, including SCAG's regional plans, the General Plan Framework Element, the Hollywood Community Plan, the Hollywood Redevelopment Plan, and the LAMC. Therefore, impacts related to conflicts with land use plans would be less than significant and less than the less-than-significant impacts of the Project since Alternative 4 would require fewer discretionary actions.

g. Noise

(1) Construction

Alternative 4 would involve the same general phases of construction as the Project (i.e., site grading and excavation, building construction, and finishing/landscape installation), but would require less excavation and soil export compared to the Project since Alternative 4 would not construct any subterranean parking levels. As with the Project, construction of Alternative 4 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Since Alternative 4 would not require the extent of site excavation and soil export necessary under the Project, the amount and the overall duration of construction would be reduced. Notwithstanding, on-site construction activities and the associated construction noise and vibration levels would be expected to be similar during maximum activity days since only the overall duration, and not the daily intensity of construction activities and associated equipment noise, would decrease under Alternative 4 when compared to the Project. Noise and vibration levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Furthermore, like the Project, Alternative 4 would require demolition of the existing non-historic buildings on-site. Therefore, noise and vibration impacts due to on-site construction activities under Alternative 4 would also be similar to those that would occur under the Project. Alternative 4 would comply with the same applicable regulatory requirements and implement the same project design features and mitigation measures as the Project to reduce on-site noise and

vibration levels pursuant to the threshold for human annoyance during construction. As with the Project, construction of Alternative 4 would result in significant and unavoidable impacts with respect to on- and off-site noise and vibration during construction. In addition, similar to the Project, with implementation of mitigation measures, on-site vibration impacts (pursuant to the threshold for building damage) to the Attie Building would be reduced to a less-than-significant level for Alternative 4.

As discussed in Section IV.G, Noise, of this Draft EIR, the highest number of construction trucks would occur during the grading/excavation phase. Since Alternative 4 would require less site excavation and soil export compared to the Project, the number of construction haul trucks and associated trips, would be reduced. Thus, it can be reasonably concluded that temporary noise and vibration impacts (pursuant to the threshold for building damage[13]) from off-site construction traffic generated by Alternative 4 would also be less than significant and less than the impacts of the Project. However, although construction haul trucks and trips would be reduced under Alternative 4, vibration created by construction trucks traveling between the Project Site and the Hollywood Freeway could exceed the threshold of significance for human annoyance for sensitive uses. Thus, similar to the Project, it is conservatively assumed that temporary and intermittent vibration impacts (pursuant to the threshold for human annoyance) under Alternative 4 would be significant and unavoidable.

Additionally, similar to the Project, Alternative 4 would result in potentially significant cumulative off-site construction noise and vibration impacts related to human annoyance.

(2) Operation

As described in Section IV.G, Noise, of this Draft EIR, sources of operational noise include: (a) on-site stationary noise sources such as outdoor mechanical equipment (i.e., HVAC equipment), activities associated with the outdoor courtyards, parking facilities, and loading dock/trash collection areas; and (b) off-site mobile (roadway traffic) noise sources. Similar to the Project, on-site mechanical equipment used during operation of Alternative 4 would comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 decibels (dBA). In addition, under Alternative 4, the proposed loading dock and trash collection areas would be enclosed and located on the ground level, similar to the Project. Thus, noise impacts from mechanical equipment, loading docks, and trash collection areas would also be similar to the Project. Outdoor noise sources associated with hotel amenities

[13] *A significance criteria of 0.12 PPV is utilized for historic structures that are extremely susceptible to vibration damage.*

would be similar to the Project's open space areas. Alternative 4 would provide fewer vehicle parking spaces than the Project; however, since the above-ground parking levels would be fully enclosed, potential noise associated with parking facilities would be similar to that of the Project. The overall composite noise levels generated by Alternative 4 would be similar to the Project. As such, on-site noise impacts under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

As discussed further below in Section V.D.2.g.(2), Alternative 4 would result in fewer daily vehicle trips than the Project. Accordingly, off-site noise impacts associated with traffic would be less than the Project's less-than-significant impacts.

h. Public Services

(1) Fire Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 4 would be similar to that of the Project. However, less grading and excavation would be required due to the lack of subterranean parking and the overall duration of construction would be reduced compared to the Project due to the reduced square footage. Construction would occur in compliance with all applicable federal, state, and local requirements pertaining to materials handling, construction worker safety, and worksite staging, reducing the need for fire protection services. Additionally, access to the Project Site and the surrounding vicinity could be impacted by construction activities under Alternative 4, such as temporary lane closures, roadway/access improvements, and the construction of utility line connections. Furthermore, construction activities also would generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term and temporary for the area, construction activities could temporarily affect emergency response for emergency vehicles along Hollywood Boulevard, and other main connectors due to delays caused by traffic during the construction phase. However, as with the Project, construction worker and haul truck trips would be expected to occur outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. Furthermore, like the Project, a Construction Traffic Management Plan would be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Therefore, construction-related impacts related to the need for new or altered government facilities (i.e. fire stations) under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project, although the construction duration would be shorter.

(b) Operation

As discussed in Section IV.H.1, Public Services—Fire Protection, of this Draft EIR, the Project Site would be served by Fire Station No. 27, the "first-in" station, as well as Fire Stations No. 82. Alternative 4 would not develop residential uses, and the overall square footage would be reduced. Therefore, the resulting increase in service population would be less than the Project. Specifically, the proposed uses in the Zoning Compliant Hotel Alternative would generate a service population of 169 people, consisting of 40 retail employees, 120 hotel employees, and 9 restaurant employees, compared to 632 residents and 56 employees with the Project. Thus, the demand for fire protection and emergency medical services would be reduced compared to the Project. In addition, similar to the Project, Alternative 4 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Therefore, impacts related to the need for the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility would be less than significant under Alternative 4 and less than the less-than-significant impacts of the Project due to a reduction in the service population compared to the Project.

(2) Police Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 4 would be similar to that of the Project. However, less grading and excavation would be required due to the lack of subterranean parking. In addition, the overall duration of construction would be reduced compared to the Project due to the reduced amount of development. Similar to the Project, the demand for police protection services during construction of Alternative 3 would be partially offset by the removal of the existing commercial uses on the Project Site. In addition, the daytime population at the Project Site during construction would be temporary in nature. Alternative 4 would implement the same project design feature as the Project, which includes temporary security measures such as fencing, lighting, and locked entry to reduce the potential for theft and vandalism on the Project Site, thereby reducing the demand for police protection services. Construction activities under Alternative 4 could also affect emergency response for police vehicles along Hollywood Boulevard and main connectors due to delays caused by traffic during the construction phase. However, given the permitted hours of construction and nature of construction projects, most, if not all, of the construction worker trips would occur outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. In addition, a Construction Traffic Management Plan, including a Worksite Traffic Control Plan, would be implemented during Project construction to ensure that adequate and safe access is available within and near the Project Site during construction activities. Therefore, construction-related impacts related to the need for new

or altered government facilities (i.e., police stations) under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

Alternative 4 would develop hotel, retail, and restaurant uses on the Project Site and would generate a police service population of approximately 350 persons based on the police service population conversion factors provided in the *L.A. CEQA Thresholds Guide*. This estimate is less than the Project's estimated police service population of 763 persons. Therefore, while Alternative 4 would increase the existing police service population of the Hollywood Community Police Station, it would do so to a lesser extent than the Project. Like the Project, Alternative 4 would not decrease the current officer-to-resident ratio for the Hollywood Area. Furthermore, Alternative 4 would implement the same project design features as the Project requiring on-site security features, appropriate lighting to ensure security, and the prevention of concealed spaces. The project design features would help offset the increase in demand for police protection services generated by Alternative 4. As described in Section IV.H.2, Public Services—Police Protection, of this Draft EIR, the Project would result in less than significant impacts, therefore, the reduction in size of Alternative 4 would not result in the need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts. Moreover, although traffic generated by Alternative 4 would have the potential to affect emergency vehicle response to the Project Site and surrounding properties due to delays caused by the additional traffic, drivers of police emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Therefore, impacts related to the need for the addition of a new police station or the expansion, consolidation, or relocation of an existing facility would be less than significant and less than the less-than-significant impacts of the Project since the police service population generated by Alternative 4 would be less.

(3) Schools

(a) Construction

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

under Alternative 4 would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

The Zoning Compliant Hotel Alternative does not include the development of residential uses. Thus, Alternative 4 would not directly generate school-aged children and a corresponding demand for school services. Therefore, implementation of Alternative 4 would not result in a direct increase in the number of students within the service area of the LAUSD. As such, the increased demand for school services provided by the LAUSD would be reduced under Alternative 4 compared to the Project. In addition, the number of students that could be indirectly generated by Alternative 4 as a result of employment opportunities associated with the proposed hotel, retail, and restaurant uses would not be anticipated to be substantial because most employees would likely reside in the Project vicinity. Furthermore, pursuant to SB 50, the Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of Project-related school impacts. Therefore, payment of applicable development school fees to the LAUSD would offset the impact of additional student enrollment at schools serving the Project area. Impacts related to schools would be less than significant under Alternative 4 and less than the less-than-significant impacts of the Project.

(4) Libraries

(a) Construction

Similar to the Project, construction of the Zoning Compliant Hotel Alternative would result in a temporary increase of construction workers on the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of Project construction. Therefore, construction employment generated by Alternative 4 would not result in a notable increase in the resident population or a corresponding demand for library services in the vicinity of the Project Site.

In addition, it is unlikely that construction workers would visit Project-area libraries on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Therefore, any increase in

usage of the libraries by construction workers is anticipated to be negligible. As such, impacts to library facilities and services during construction of Alternative 4 would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

Residents are considered the primary users of library facilities. Alternative 4 would develop hotel, retail, and restaurant uses and would not include the development of residential uses. Thus, implementation of Alternative 4 would not result in a direct increase in the number of residents. In addition, as employees of Alternative 4 would be more likely to use library facilities near their homes during non-work hours and given that some of the employment opportunities generated by Alternative 4 would be filled by people already residing in the vicinity of the Project Site, employees and the potential indirect population generation attributable to those employees would generate minimal demand for library services. As such, any indirect or direct demand for library services generated by the employees of Alternative 4 would be negligible. Impacts on library facilities and services would be less than significant and less than the less-than-significant impacts of the Project.

(5) Parks and Recreation

(a) Construction

Similar to the Project, construction of the Zoning Compliant Hotel Alternative would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, the likelihood that construction workers would relocate their households as a consequence of working on the Project is negligible. Therefore, the construction workers associated with Alternative 4 would not result in a notable increase in the residential population of the Project vicinity, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site.

As with the Project, during construction of Alternative 4, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. Furthermore, while there is a potential for construction workers to spend their lunch breaks at the parks and recreational facilities near the Project Site, lunch breaks typically are not long enough for workers to take advantage of such facilities and return to work within the allotted time (e.g., 30 to 60 minutes). Therefore, it is unlikely that construction workers would utilize any parks and recreational facilities near the Project Site during the construction of Alternative 4.

In addition, as with the Project, construction of Alternative 4 would not be expected to result in access restrictions to City parks and recreation facilities in the vicinity of the Project Site, nor interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the vicinity of the Project Site.

Based on the above analysis, construction of Alternative 4 would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services or interfere with existing park usage. Therefore, impacts on parks and recreational facilities during construction of Alternative 4 would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

Residents are considered the primary users of parks and recreation facilities. Alternative 4 would develop hotel, retail, and restaurant uses and would not include the development of residential uses. Thus, implementation of Alternative 4 would not result in on-site residents who would utilize nearby parks and/or recreational facilities. In addition, while it is possible that employees of Alternative 4 may utilize local parks and recreational facilities, the increased demand would be negligible and would be partially off-set by the reduction in employees attributed to the removal of the existing uses on the Project Site. Therefore, Alternative 4 would result in a reduced demand for public parks and recreation services compared to the Project, and the operation of Alternative 4 would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services or interfere with existing park usage. Impacts to park and recreation facilities would be less than significant under Alternative 4 and less than the less-than-significant impacts of the Project.

i. Transportation

As discussed above, Alternative 4 would develop 123,952 square feet of uses on the Project Site compared to the Project's 278,892 square feet of uses, which would result in a lower on-site population than the Project. Specifically, using the City's VMT calculator, the proposed uses for Alternative 4 would result in a total on-site population of 141 persons compared to 635 with the Project.[14] As such, impacts to transit, bicycle, and pedestrian facilities would be less than the less-than-significant impacts of the Project. Additionally, as discussed further below, impacts with respect to VMT would be less than significant, similar to the Project. Therefore, impacts associated with a potential conflict with a program, plan,

[14] *Gibson Transportation Consulting, Inc., "Traffic Analysis of Project Alternatives for the Hollywood & Wilcox Project," December 16, 2019. See Appendix Q of this Draft EIR.*

ordinance, or policy addressing the circulation system would be similar to the Project's less than significant impacts.

With respect to VMT, Alternative 4 does not include residential uses and would not result in any household VMT per capita. The proposed hotel uses would result in 787 total work VMT, which equates to an average work VMT per employee of 5.6, compared to 4.5 for the Project.[15] While this is greater than the Project, the work VMT per employee for Alternative 4 would fall below the significance threshold for the Central APC of 7.6. Nevertheless, impacts with respect to conflicts with CEQA Guidelines Section 15064.3, subdivision (b) would be greater than the Project because VMT methodology favors mixed use projects, but impacts would remain less than significant.

Furthermore, Alternative 4 would not introduce hazardous design features, so like the Project, no impact would occur. Lastly, similar to the Project, Alternative 4 would not interfere with emergency access and impacts would be less than significant.

j. Tribal Cultural Resources

Alternative 4 would not construct any subterranean parking levels. Therefore, the potential for Alternative 4 to uncover subsurface tribal cultural resources would be reduced when compared to that of the Project. Accordingly, impacts to tribal cultural resources would be less than the less-than-significant impacts of the Project.

k. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar the Project, construction activities associated with Alternative 4 would generate a short-term demand for water. This demand would be less than the Project due to the reduction in the amount and duration of construction that would be required under Alternative 4. This demand would also be less than existing conditions. As evaluated in Section IV.I.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of construction. Since the water demand for construction activities would be reduced, the temporary and intermittent demand for water during construction under Alternative 4 would also be expected to be met

[15] *Gibson Transportation Consulting, Inc., "Traffic Analysis of Project Alternatives for the Hollywood & Wilcox Project," December 16, 2019. See Appendix Q of this Draft EIR.*

by the City's available water supplies. Similarly, the existing LADWP water infrastructure would be adequate to provide the water flow necessary to serve Alternative 4. Furthermore, as with the Project, the design and installation of new service connections under Alternative 4 would be required to meet applicable City standards. Therefore, impacts on water supply and infrastructure associated with short-term construction activities would be less than significant under Alternative 4, and would be less than the less-than-significant impacts of the Project.

(b) Operation

Alternative 4 would develop 106,152 square feet of hotel uses with 197 rooms, 14,600 square feet of retail uses, and 3,200 square feet of restaurant uses. As shown in Table V-4 on page V-80, Alternative 4 would result in a net increase in demand for water from the Project Site of 58,345 gpd, which is lower than the 69,453 gpd net increase in water demand generated by the Project. However, both figures are conservative in that they assume the pool would be drained and refilled on a daily basis which would not be the case. Regardless, the estimated water demand for the Project would not exceed the available supplies projected by LADWP. Therefore, the estimated water demand for the Project would not exceed the available supplies projected by LADWP. Therefore, the estimated net water demand under Alternative 4 would also be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040. In addition, the existing water distribution infrastructure would be adequate to serve Alternative 4 since the water demand would be lower than the Project and the Project Site's existing uses. Furthermore, similar to the Project, the Applicant would construct the necessary on-site water infrastructure and off-site connections to the LADWP water system pursuant to applicable City requirements under Alternative 4 to accommodate the new building. Thus, impacts to water supply under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, during construction of Alternative 4, existing sewer laterals would be capped and no sewage would enter the public sewer system. Temporary facilities such as portable toilet and hand wash areas would be provided by the contractor at the Project Site, and sewage from these facilities would be collected and hauled off-site. As such, wastewater generation from construction activities associated with Alternative 4 would be less than existing conditions, and would not cause a measurable increase in wastewater flows. Therefore, construction of the Project would not substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the City's IRP.

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

Land Use	Unit	Generation Factor[a]	Total Water Demand/ Wastewater Generation (gpd)
Existing			
Office	17,280 sf	120 gpd/1,000 sf	2,074
Retail	11,920 sf	25 gpd/1,000 sf	298
Subtotal			*2,372*
Proposed			
Retail	14,600 sf	25 gpd/1,000 sf	365
Restaurant	3,200 sf	720 gpd/1,000 sf	2,304
Hotel	197 rm	120/rm	23,640
Pool	4,600 cf	7.48 gal/cf	34,408
Subtotal			*60,717*
Total Net Water Demand/ Wastewater Generation			**58,345**

cf = cubic feet

gpd = gallons per day

rm = room

sf = square feet

[a] *Sewage generation calculations are based on generation factors provided by City of Los Angeles Bureau of Sanitation (LASAN).*

Source: Eyestone Environmental, 2020.

Additionally, as with the Project, Alternative 4 may include construction activities associated with the installation of new or relocated sewer connections, including a 150-foot sewer main extension which is discussed further below. Such activities would be confined to trenching in order to place the sewer lines below surface and would be limited to the on-site wastewater conveyance infrastructure and minor off-site work associated with connections to the City's sewer lines in the streets adjacent to the Project Site. Similar to the Project, a Construction Traffic Management Plan would be implemented during the construction of Alternative 4 to reduce impacts to pedestrian and traffic flow, including emergency vehicle access, which could occur due to temporary off-site utility work. Therefore, construction-related impacts to the wastewater system under Alternative 4 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

The Zoning Compliant Hotel Alternative would develop 106,152 square feet of hotel uses with 197 rooms, 14,600 square feet of retail uses, and 3,200 square feet of restaurant

uses. As shown in Table V-4 on page V-80, Alternative 4 would result in a net increase in wastewater flows from the Project Site of 58,345 gpd, which is lower than the 69,453 gpd net increase of wastewater generated by the Project. However, both figures are conservative in that they assume the pool would be drained and refilled on a daily basis which would not be the case. Similar to the Project, the wastewater generated by Alternative 4 would be accommodated by the existing capacity of the HWRP and impacts with respect to treatment capacity would be less than significant.

As with the Project, sewer service for Alternative 4 would be provided utilizing new or existing on-site sewer connections to the existing sewer lines in the vicinity of the Project Site. Based on information provided by LASAN, the 8-inch sewer mains in Hollywood Boulevard and Wilcox Avenue adjacent to the Project Site do not currently have capacity to serve the Project due to high flows downstream of the Project Site at Sunset Boulevard and Wilcox Avenue. LASAN currently has plans to address the capacity issue through maintenance or pipe size upgrades in the sewer lines. If additional capacity is created, discharge into these lines would be viable. However, as no timeframe has been established for maintenance or pipe size upgrades, Alternative 4, like the Project, would require an extension of the sewer main that currently terminates 150 feet west of the Project Site. As noted above, impacts associated with this extension would be temporary and less than significant. Given that Alternative 4 would result in less daily wastewater compared to that of the Project, the sewer lines would also have capacity to serve Alternative 4. Furthermore, additional detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for Alternative 4 during the permitting process. All related sanitary sewer connections and on-site infrastructure under Alternative 4 would be designed and constructed in accordance with applicable standards.

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

(3) Energy Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 4 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. Therefore, impacts on energy infrastructure associated with short-term

construction activities would be less than significant under Alternative 4 and less than the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 4 would generate an increased consumption of electricity and natural gas relative to existing conditions. However, the consumption of electricity and natural gas under Alternative 4 would be less than the Project because of the reduced amount of construction, and the corresponding impact on energy infrastructure would be less than the Project. Therefore, impacts to energy infrastructure under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above, Alternative 4 would not avoid the Project's significant and unavoidable impacts with respect to on -site noise and vibration during construction, nor would it avoid the significant and unavoidable cumulative impacts with respect to off-site construction noise and vibration. Alternative 4 would also result in greater VMT impacts than the Project, but impacts would be less than significant. All other impacts would be less than or similar to those of the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 4 would revitalize the Project Site with hotel, retail, and restaurant uses, but would not include any residential development or rehabilitate and restore the Attie Building. As such, Alternative 4 would only partially meet the Project's underlying purpose of revitalizing the Project Site by developing an integrated mixed-use development that provides new multi-family housing opportunities and neighborhood-serving retail, office, and restaurant uses that serve the community and promote walkability while also rehabilitating the Attie Building. In addition, Alternative 4 would not meet any of the Project objectives pertaining to housing. Alternative 4 would, however, meet the following objective:

- Create a street-level identity for the Project Site and improve the pedestrian experience through the introduction of active street-adjacent uses such as neighborhood-serving commercial uses.

Alternative 4 would revitalize an underutilized project site with new buildings in an area located near a variety of transit options. However, Alternative 4 would not meet the

Project's underlying purpose and would not meet any of the objectives pertaining to housing, including the provision of workforce housing and locating housing near public transit. Alternative 4 would also not rehabilitate and restore the Attie Building.

V. Alternatives

E. Alternative 5: Proposed Hollywood Community Plan Update Compliant Mixed-Use Alternative

1. Description of the Alternative

Under the proposed Community Plan Update the Project Site would be designated as a Regional Center Commercial with a corresponding zone of C4-2D-CPIO. This designation/zone would provide for a FAR limitation of 3:1 with a height limit of 75 feet. With a maximum FAR of 3:1, a total of approximately 127,375 square feet of new uses would be developed consisting of 124 multi-family dwelling units (109,575 square feet), 14,600 square feet of retail uses, and 3,200 square feet of restaurant uses. The total floor area would be reduced by 151,517 square feet compared to the Project. Alternative 5 would retain the Attie Building on-site for continued use as commercial space, but unlike the Project, the building would not be rehabilitated and restored. These uses would be located in the Attie Building and new buildings comprised of between one and seven stories with a maximum height of 75 feet, which is less than the Project's maximum height of 160 feet. Unlike the Project, which includes workforce housing, all residential units would be market rate. The Proposed Hollywood Community Plan Update Compliant Mixed-Use Alternative would provide approximately 14,375 square feet of open space. Alternative 5 would include 222 parking spaces located in one subterranean parking level, one partial ground level, and one level of above-grade parking, which is less than the 420 parking spaces provided in two subterranean, one ground level, and two levels of above-grade parking included in the Project. The Proposed Hollywood Community Plan Update Compliant Mixed-Use Alternative would also include 124 long-term and 13 short-term bicycle parking spaces located on Level 1. Unlike the Project, the vehicular parking provided does not account for a permitted 10-percent reduction, pursuant to the Los Angeles Bicycle Parking Ordinance (LAMC Section 12.21-A,4). Vehicular access to the Project Site would be provided via a new driveway on Wilcox Avenue, similar to the Project. Pedestrian access would be provided via the sidewalks along Hollywood Boulevard and Wilcox Avenue. Additionally, unlike the Project, Alternative 5 would not seek certification under AB 900, the *Jobs and Economic Improvement through Environmental Leadership Act*.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

As with the Project, construction of Alternative 5 has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Under Alternative 5, because the overall amount of construction would be reduced in comparison to the Project, the number of truck trips would also be reduced in comparison to the Project, and excavation would be approximately 50 percent less (20 feet) due to the reduction in subterranean parking levels from two to one. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, regional and localized impacts on these days would be similar to the less than significant impacts of the Project.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 5 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. Overall construction emissions generated by Alternative 5 would be less than those of the Project because Alternative 5 would require less overall construction, fewer truck trips, and less excavation for subterranean parking levels. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 5 would be less when compared to the less-than-significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Similar to the Project, operational regional air pollutant emissions associated with Alternative 5 would be generated by vehicle trips to the Project Site and the consumption of electricity and natural gas. As discussed below in Section V.E.2.g.(2), development of Alternative 5 would result in fewer daily trips than the Project. As vehicular emissions depend on the number of trips, vehicular sources would result in a smaller increase in air emissions compared to the Project. In addition, because the overall square footage would be reduced when compared to the Project, demand for electricity and natural gas would be less than the Project, which are already reduced as a result of the Project's application for certification under AB 900, which requires LEED Gold® certification or better. Therefore, impacts associated with regional operational emissions would be less than significant and less than the Project.

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 5 would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, localized impacts from on-site emission sources associated with Alternative 5 would also be less than significant. Such impacts would be less than those of the Project due to the overall decrease in building area. Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. As discussed further below in Section V.E.2.g.(2), the number of net new peak-hour trips generated with Alternative 5 would be less than the Project. Therefore, impacts would be less than significant and less than the Project's less than significant impacts.

(b) Toxic Air Contaminants

As discussed in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include diesel particulate matter from delivery trucks associated with the Project's retail, restaurant, and office uses. However, the proposed uses associated with the Project, and similarly with Alternative 5, are not considered land uses that generate substantial TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not proposed by the Project or Alternative 5. Similar to the Project, Alternative 5 would not release substantial amounts of TACs and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Thus, as with the Project, potential TAC impacts under Alternative 5 would be less than significant and similar to those of the Project.

b. Cultural Resources

(1) Historical Resources

Alternative 5 would retain the Attie Building on-site for continued use as commercial space, but unlike the Project, the building would not be rehabilitated and restored. Alternative 5 would not adversely affect the significance of the Attie Building, the only historic resource on the Project Site, but would not provide the rehabilitation of the building and restoration of the storefronts and other missing features. Ground floor retail spaces that have been significantly altered on both the exterior and interior would remain in their current condition. Like the Project, Alternative 5's development adjacent to the Attie Building and along Wilcox Avenue would not materially alter historic resources in the Hollywood Boulevard Commercial and Entertainment District and impair their eligibility as such resources. As such, Alternative 5 would not cause direct or indirect impacts to historic resources. Therefore, similar to the Project, impacts to historical resources would be less than significant, although the building would not be rehabilitated and restored.

(2) Archaeological Resources

Alternative 5 would construct fewer subterranean parking levels than the Project. Therefore, the potential for Alternative 5 to uncover subsurface archaeological resources would be reduced when compared to that of the Project due to the decrease in excavation depth. Nevertheless, Alternative 5 would comply with the same regulatory requirements and would implement the same mitigation measure as the Project in the event that archaeological resources are uncovered during site grading activities. Therefore, impacts to archeological resources would remain less than significant, and would be less than the Project, which would also be less than significant with mitigation.

c. Energy

(1) Construction

Similar to the Project, construction activities associated with Alternative 5 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. In addition, LADWP has confirmed that the supply in the Project area would have the capacity to serve the Project Site. Furthermore, as with the Project, construction activities would require energy demand that is not wasteful, inefficient, or unnecessary and would not be expected to have an adverse impact on available energy resources. Therefore, impacts on energy resources associated with short-term construction activities

would be less than significant under Alternative 5 and less than the less-than-significant impacts of the Project.

(2) Operation

As with the Project, operation of Alternative 5 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions, though with less development, overall demand for energy would be less than the Project. Additionally, as previously discussed, Alternative 5 would result in fewer daily vehicle trips than the Project. Thus, the associated consumption of petroleum-based fuels under Alternative 5 would also be less than the Project. Accordingly, under Alternative 5, the total energy consumption would be less than that of the Project. Similar to the Project, Alternative 5 would implement project design features which would improve energy efficiency and reduce impacts on consumption of energy resources. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 5 would not be wasteful, inefficient, or unnecessary. However, such project design features would be less stringent than the Project, which requires LEED Gold® certification or better as part of its AB 900 certification. Like the Project, Alternative 5 would comply with Title 24 requirements for "Solar Ready Buildings" which requires a certain area of rooftop to be set aside for installation of solar panels and would include the provision of conduit that is appropriate for future photovoltaic and solar thermal collectors. However, unlike the Project, solar panels would not be installed. In addition, due to the Project Site's location, other on-site renewable energy sources would not be feasible to install on-site as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, fuel cells, landfill gas, municipal solid waste, wind, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Furthermore, Alternative 5 would be located in proximity to a variety of public transit options and would incorporate features to reduce vehicle trips, thereby reducing transportation fuel usage. Therefore, impacts to energy resources under Alternative 5 would be less than significant, and less than the less-than-significant impacts of the Project.

d. Geology and Soils—Paleontological Resources

Alternative 5 would construct fewer subterranean parking levels than the Project. Therefore, the potential for Alternative 5 to uncover subsurface paleontological resources would be reduced when compared to that of the Project due to the decrease in excavation. Nevertheless, Alternative 5 would comply with the same regulatory requirements and would implement the same mitigation measure as the Project in the event paleontological resources are uncovered during site grading activities. Therefore, impacts to paleontological resources would remain less than significant with mitigation,

but would be less than the impacts of the Project, which also would be less than significant with mitigation.

e. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily trips generated and energy consumption from proposed land uses. As discussed above, Alternative 5 would involve a similar mix of land uses as the Project, but would reduce the total amount of development on the Project Site by 151,517 square feet. Therefore, under Alternative 5, the total energy and water consumption would be reduced compared to the Project, which are already reduced as a result of the Project's application for certification under AB 900, which requires LEED Gold® certification or better. Additionally, as discussed in Section V.E.2.g.(2), the number of trips generated by Alternative 5 would be less than the number of trips generated by the Project. Thus, the amount of GHG emissions generated by Alternative 5 would be less than the amount generated by the Project. As with the Project, Alternative 5 would incorporate project design features to reduce GHG emissions and would be designed to comply with the City's Green Building Ordinance, as applicable. However, such project design features would be less stringent than the Project, because Alternative 5 would not apply for certification under AB 900 and require LEED Gold® certification or net zero GHG emissions. Nevertheless, with compliance with the City's Green Building Ordinance and the implementation of appropriate sustainability features, it is anticipated that Alternative 5 would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 5 would be less than significant, and less than the less-than-significant impacts of the Project.

f. Land Use

(1) Physically Divide a Community

Alternative 5 would develop residential, retail, and restaurant uses that are permitted by the Project Site's proposed Regional Center Commercial land use designation and corresponding C4-2D-CPIO zone under the proposed Hollywood Community Plan update. The proposed uses under Alternative 5 would be compatible with and would complement existing and future development in the Project area, which is generally comprised of residential, commercial, and entertainment uses along Hollywood Boulevard and Wilcox Avenue. Therefore, similar to the Project, Alternative 5 would not disrupt, divide, or isolate any existing neighborhoods or communities and impacts associated with the physical division of a community would be less than significant and similar to the impacts of the Project.

(2) Conflict With Land Use Plans

As previously described, Alternative 5 would develop a 1-story commercial building and a 7-story mixed-use building with residential, retail, and restaurant uses on the Project Site. Alternative 5 would comply with the Project Site's proposed Regional Center Commercial land use designation and corresponding C4-2D-CPIO zone under the proposed Hollywood Community Plan update. The proposed building under Alternative 5 would have a maximum height of 75 feet, which is the maximum height permitted. Alternative 5 would also comply with the maximum FAR of 3:1 imposed by the proposed Hollywood Community Plan Update. Since Alternative 5 would comply with the permitted land use and proposed zoning requirements, Alternative 5 would also be generally consistent with the overall intent of the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site, including SCAG's regional plans, the General Plan Framework Element, the Hollywood Community Plan Update, the Hollywood Redevelopment Plan, and the LAMC. Therefore, impacts related to conflicts with land use plans would be less than significant and less than the less-than-significant impacts of the Project since Alternative 5 would require fewer discretionary actions.

g. Noise

(1) Construction

Alternative 5 would involve the same general phases of construction as the Project (i.e., demolition, site grading, building construction, and finishing/landscape installation), but would require less excavation and soil export compared to the Project since Alternative 5 would construct fewer subterranean parking levels. As with the Project, construction of Alternative 5 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Since Alternative 5 would require less excavation and soil export compared to the Project, the amount and the overall duration of construction would be reduced. Notwithstanding, on-site construction activities and the associated construction noise and vibration levels would be expected to be similar during maximum activity days since only the overall duration, and not the daily intensity of construction activities and associated equipment noise, would decrease under Alternative 5 when compared to the Project. Noise and vibration levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Furthermore, like the Project, Alternative 5 would require demolition of the existing non-historic buildings on-site. Therefore, noise and vibration impacts due to on-site construction activities under Alternative 5 would also be similar to those that would occur under the Project. Alternative 5 would comply with the same applicable regulatory requirements and implement the same project design features and mitigation measures as the Project to reduce on-site noise and vibration levels pursuant to the threshold for human annoyance during construction. As with the Project, construction of Alternative 5 would result in significant and unavoidable impacts with respect to on- and off-site noise and

vibration during construction. In addition, similar to the Project, with implementation of mitigation measures, on-site vibration impacts (pursuant to the threshold for building damage) to the Attie Building would be reduced to a less-than-significant level for Alternative 5.

As discussed in Section IV.G, Noise, of this Draft EIR, the highest number of construction trucks would occur during the grading/excavation phase. Since Alternative 5 would require less excavation and soil export compared to the Project, the number of construction haul trucks and associated trips, would be reduced. Thus, it can be reasonably concluded that temporary noise and vibration impacts (pursuant to the threshold for building damage[16]) from off-site construction traffic generated by Alternative 5 would also be less than significant and less than the impacts of the Project. However, although construction haul trucks and trips would be reduced under Alternative 5, vibration created by construction trucks traveling between the Project Site and the Hollywood Freeway could exceed the threshold of significance for human annoyance for sensitive uses. Thus, similar to the Project, it is conservatively assumed that temporary and intermittent vibration impacts (pursuant to the threshold for human annoyance) under Alternative 5 would be significant and unavoidable.

Additionally, similar to the Project, Alternative 5 would result in potentially significant cumulative off-site construction noise and vibration impacts related to human annoyance.

(2) Operation

As described in Section IV.G, Noise, of this Draft EIR, sources of operational noise include: (a) on-site stationary noise sources such as outdoor mechanical equipment (i.e., HVAC equipment), activities associated with the outdoor courtyards, parking facilities, and loading dock/trash collection areas; and (b) off-site mobile (roadway traffic) noise sources. Similar to the Project, on-site mechanical equipment used during operation of Alternative 5 would comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. In addition, under Alternative 5, the proposed loading dock and trash collection areas would be enclosed and located on the ground level, similar to the Project. Thus, noise impacts from mechanical equipment, loading docks, and trash collection areas would also be similar to the Project. Outdoor noise sources associated with open space areas would be similar to the Project. Alternative 5 would provide fewer vehicle parking spaces than the Project; however, since both the subterranean and aboveground parking levels would be

[16] *A significance criteria of 0.12 PPV is utilized for historic structures that are extremely susceptible to vibration damage.*

fully enclosed, potential noise associated with parking facilities would be substantially similar to that of the Project. The overall composite noise levels generated by Alternative 5 would be substantially similar to the Project. As such, on-site noise impacts under Alternative 5 would be less than significant and similar to the less-than-significant impacts of the Project.

As discussed further below in Section V.E.2.g.(2), Alternative 5 would result in fewer daily vehicle trips than the Project. Accordingly, off-site noise impacts associated with traffic would be less than the Project's less-than-significant impacts.

h. Public Services

(1) Fire Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 5 would be similar to that of the Project. However, less grading and excavation would be required due to fewer levels of subterranean parking. In addition, the overall duration of construction would be reduced compared to the Project due to the reduced square footage. Construction would occur in compliance with all applicable federal, state, and local requirements pertaining to materials handling, construction worker safety, and worksite staging, reducing the need for fire protection services. Additionally, access to the Project Site and the surrounding vicinity could be impacted by construction activities under Alternative 5, such as temporary lane closures, roadway/access improvements, and the construction of utility line connections. Furthermore, construction activities also would generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term and temporary for the area, construction activities could temporarily affect emergency response for emergency vehicles along Hollywood Boulevard, and other main connectors due to delays caused by traffic during the construction phase. However, as with the Project, construction worker and haul truck trips would be expected to occur outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. Furthermore, like the Project, a Construction Traffic Management Plan would be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Therefore, construction-related impacts related to the provision of new or altered government facilities (i.e., fire stations) under Alternative 5 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As discussed in Section IV.H.1, Public Services—Fire Protection, of this Draft EIR, the Project Site would be served by Fire Station No. 27, the "first-in" station, as well as Fire Stations No. 82. Alternative 5 would develop fewer multi-family residential units on-site (124 du vs. 260 du) and more retail square footage than the Project (14,600 vs. 11,020), but the same amount of restaurant square footage (3,200), and no office uses (0 square feet with Alternative 5 vs. 3,580 square feet with the Project). The reduction in residential units would result in a smaller increase in service population when compared to the Project. Specifically, Alternative 5 would generate 302 residents and the retail and restaurant uses would generate approximately 48 employees compared to 632 residents and 56 employees with the Project. Thus, the demand for fire protection and emergency medical services would be reduced compared to the Project. In addition, similar to the Project, Alternative 5 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Therefore, impacts related to the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility would be less than significant under Alternative 5 and less than the less-than-significant impacts of the Project due to a reduction in the service population compared to the Project.

(2) Police Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 5 would be similar to that of the Project. However, less grading and excavation would be required due to fewer levels of subterranean parking. In addition, the overall duration of construction would be reduced compared to the Project due to the reduced amount of development. Similar to the Project, the demand for police protection services during construction of Alternative 5 would be partially offset by the removal of the existing commercial uses on the Project Site. In addition, the daytime population at the Project Site during construction would be temporary in nature. Alternative 5 would implement the same project design feature as the Project, which includes temporary security measures such as fencing, lighting, and locked entry to reduce the potential for theft and vandalism on the Project Site, thereby reducing the demand for police protection services.

Construction activities under Alternative 5 could also affect emergency response for police vehicles along Hollywood Boulevard and main connectors due to delays caused by traffic during the construction phase. However, given the permitted hours of construction and nature of construction projects, most, if not all, of the construction worker trips would occur outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. In addition, a Construction Traffic Management

Plan, including a Worksite Traffic Control Plan, would be implemented during Project construction to ensure that adequate and safe access is available within and near the Project Site during construction activities. Therefore, construction-related impacts related to the need for the provision of new or expanded police facilities under Alternative 5 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

Alternative 5 would develop residential, retail, and restaurant uses on the Project Site and would generate a police service population of approximately 434 persons (380 residents and 54 employees) based on the police service population conversion factors provided in the *L.A. CEQA Thresholds Guide*. This estimate is less than the Project's estimated police service population of 763 persons. Therefore, while Alternative 5 would increase the existing police service population of the Hollywood Community Police Station, it would do so to a lesser extent than the Project. Like the Project, Alternative 5 would not decrease the current officer-to-resident ratio for the Hollywood Area. Furthermore, Alternative 5 would implement the same project design features as the Project requiring on-site security features, appropriate lighting to ensure security, and the prevention of concealed spaces. The project design features would help offset the increase in demand for police protection services generated by Alternative 5. As described in Section IV.H.2, Public Services—Police Protection, of this Draft EIR, the Project would result in less than significant impacts; therefore, the less intensive nature of Alternative 5 would not result in the need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service. Moreover, although traffic generated by Alternative 5 would have the potential to affect emergency vehicle response to the Project Site and surrounding properties due to delays caused by the additional traffic, drivers of police emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Therefore, the impact on police protection services would be less than significant and less than the less-than-significant impacts of the Project since the police service population generated by Alternative 5 would be less.

(3) Schools

(a) Construction

Similar to the Project, Alternative 5 would generate part-time and full-time jobs associated with its construction between the start of construction and full buildout. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by Alternative 5. Therefore, the construction employment generated by Alternative 5 would

not result in a notable increase in the resident population or a corresponding demand for schools in the vicinity of the Project Site. Impacts on school facilities during construction under Alternative 5 would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

Alternative 5 would develop fewer multi-family residential units, more retail uses, and the same amount restaurant uses on the Project Site as the Project. Because residential uses are the greatest driver of student generation, the total number of students generated by the Project would be reduced. Specifically, the 124 multi-family residential units, 14,600 square feet of retail uses, and 3,200 square feet of restaurant uses would generate 66 students consisting of 35 elementary school students, 10 middle school students, and 21 high school students. The Project would generate 125 students consisting of 67 elementary school students, 19 middle school students, and 39 high school students. Thus, the increased demand for school services provided by LAUSD would be reduced under Alternative 5 compared to the Project. Furthermore, pursuant to SB 50, the Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of Project-related school impacts. Therefore, payment of applicable development school fees to the LAUSD would offset the impact of additional student enrollment at schools serving the Project area. Impacts related to schools would be less than significant under Alternative 5 and less than the less-than-significant impacts of the Project.

(4) Libraries

(a) Construction

Similar to the Project, construction of Alternative 5 would result in a temporary increase of construction workers on the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of Project construction. Therefore, construction employment generated by Alternative 5 would not result in a notable increase in the resident population or a corresponding demand for library services in the vicinity of the Project Site.

In addition, it is unlikely that construction workers would visit Project-area libraries on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that

construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. As such, impacts to library facilities and services during construction of Alternative 5 would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

Residents are considered the primary users of library facilities. Alternative 5 would develop fewer residential uses than the Project, and would therefore have a smaller service population. Specifically the 125 residential units developed under Alternative 5 would result in approximately 302 residents compared to the 632 residents generated by the Project. In addition, the proposed retail and restaurant uses in Alternative 5 would generate fewer employees than the proposed retail, restaurant, and office uses included in the Project (i.e., 48 employees vs. 56 employees). As is the case with the Project, the existing library facilities serving the Project Site would not meet the recommended building size standards set forth in the 2007 Branch Facilities Plan under future conditions. However, as noted in Section IV.H.4, Public Services - Libraries, there are currently no plans to expand these libraries or develop additional facilities to serve the area. These libraries will continue to operate without meeting the recommended building size standards. Thus, both direct and indirect demand for library services under Alternative 5 would be less than the less-than-significant impacts of the Project. As with the Project, cumulative impacts to library facilities and services would be less than significant with mitigation.

(5) Parks and Recreation

(a) Construction

Similar to the Project, construction of Alternative 5 would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, the likelihood that construction workers would relocate their households as a consequence of working on the Project is negligible. Therefore, the construction workers associated with Alternative 5 would not result in a notable increase in the residential population of the Project vicinity, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site.

As with the Project, during construction of Alternative 5, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. Furthermore, while there is a potential for construction workers to spend their lunch breaks at the parks and recreational facilities near the Project Site, lunch breaks typically are not long enough for

workers to take advantage of such facilities and return to work within the allotted time (e.g., 30 to 60 minutes). Therefore, it is unlikely that construction workers would utilize any parks and recreational facilities near the Project Site during the construction of Alternative 5.

In addition, as with the Project, construction of Alternative 5 would not be expected to result in access restrictions to City parks and recreation facilities in the vicinity of the Project Site, nor interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity.

Based on the above analysis, construction of Alternative 5 would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services or interfere with existing park usage. Therefore, impacts on parks and recreational facilities during construction of Alternative 5 would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

Based on the reduced number of residential units, Alternative 5 would be required to provide less open space than the Project. Specifically, per LAMC Section 12.21G, Alternative 5 would be required to provide 14,025 square feet of open space, which is less than the 29,150 square feet required by the Project. Alternative 5 would provide 14,375 square feet of open space in excess of this requirement. Thus, Alternative 5 would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities. Similar to the Project, while it is possible that employees of Alternative 5 may utilize local parks and recreational facilities, the increased demand would be negligible as it is anticipated that employees and visitors would also primarily utilize on-site open space during their time spent at the Project Site, resulting in a negligible demand for surrounding parks and recreational facilities. Also similar to the Project, under Alternative 5 the applicant would be required to pay park and recreation fees to the City that could be use add or improve park facilities in the project vicinity. Therefore, impacts to park and recreation facilities would be less than significant under Alternative 5, and less than the less-than-significant impacts of the Project.

i. Transportation

As discussed above, Alternative 5 would develop 127,375 square feet of uses on the Project Site compared to the Project's 278,892 square feet of uses, which would result in a lower on-site population than the Project. Specifically, using the City's VMT calculator, the proposed uses for Alternative 5 would result in a total on-site population of 321 persons

compared to 635 with the Project.[17] As such, impacts to transit, bicycle, and pedestrian facilities would be less than the less-than-significant impacts of the Project. Additionally, as discussed further below, impacts with respect to VMT would be less than significant, similar to the Project. Therefore, impacts associated with a potential conflict with a program, plan, ordinance, or policy addressing the circulation system would be similar to the Project's less than significant impacts.

With respect to VMT, accounting for the same project design features as the Project, Alternative 5 would generate 1,558 total household VMT and 220 total work VMT.[18] As detailed in LADOT's Transportation Assessment Guidelines, because the total square footage of the retail and restaurant components of Alternative 5 is less than 50,000 square feet and considered local serving, the VMT per employee for these uses was not considered for purposes of identifying significant work VMT impacts. Thus, based on the population assumptions, Alternative 5 would generate an average household VMT of 5.6 per capita compared to 5.5 with the Project. While this is greater than the Project, the household VMT per capita for Alternative 5 would fall below the significance threshold for the Central APC of 6.0. Additionally, like the Project, Alternative 5 is a mixed-use development which is favored under VMT methodology. Therefore, impacts with respect to conflicts with CEQA Guidelines Section 15064.3, subdivision (b) would be similar to the Project, but remain less than significant.

Furthermore, Alternative 5 would not introduce hazardous design features, so like the Project, no impact would occur. Lastly, similar to the Project, Alternative 5 would not interfere with emergency access and impacts would be less than significant

j. Tribal Cultural Resources

Alternative 5 would construct fewer subterranean parking levels and require less grading and excavation than the Project. Therefore, the potential for Alternative 5 to uncover subsurface tribal cultural resources would be reduced when compared to that of the Project. Accordingly, impacts to tribal cultural resources would be less than the less-than-significant impacts of the Project.

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[17] *Gibson Transportation Consulting, Inc., "Traffic Analysis of Project Alternatives for the Hollywood & Wilcox Project," December 16, 2019. See Appendix Q of this Draft EIR.*

[18] *Gibson Transportation Consulting, Inc., "Traffic Analysis of Project Alternatives for the Hollywood & Wilcox Project," December 16, 2019. See Appendix Q of this Draft EIR.*

k. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 5 would generate a short-term demand for water. This demand would be less than the Project due to the reduction in the amount and duration of construction that would be required under Alternative 5. This demand would also be less than existing conditions. As evaluated in Section IV.I.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of construction. Since the water demand for construction activities would be reduced, the temporary and intermittent demand for water during construction under Alternative 5 would also be expected to be met by the City's available water supplies. Similarly, the existing LADWP water infrastructure would be adequate to provide the water flow necessary to serve Alternative 5. Furthermore, as with the Project, the design and installation of new service connections under Alternative 5 would be required to meet applicable City standards. Therefore, impacts on water supply and infrastructure associated with short-term construction activities would be less than significant under Alternative 5, and would be less than the less-than-significant impacts of the Project.

(b) Operation

Alternative 5 would develop 124 multi-family residential units, 14,600 square feet of retail uses, and 3,200 square feet of restaurant uses. As shown in Table V-5 on page V-100, Alternative 5 would result in a net increase in demand for water from the Project Site of 50,994 gpd, which is lower than the 69,453 gpd net increase in water demand generated by the Project. However, both figures are conservative in that they assume the pool would be drained and refilled on a daily basis which would not be the case. Regardless, the estimated water demand for the Project would not exceed the available supplies projected by LADWP. Therefore, the estimated net water demand under Alternative 5 would also be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040. In addition, the existing water distribution infrastructure would be adequate to serve Alternative 5 since the water demand would be lower than the Project and the Project Site's existing uses. Furthermore, similar to the Project, the Applicant would construct the necessary on-site water infrastructure and off-site connections to the LADWP water system pursuant to applicable City requirements under Alternative 5 to accommodate the new building. Thus, impacts to water supply under Alternative 5 would be less than significant and less than the less-than-significant impacts of the Project.

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

Land Use	Unit	Generation Factor[a]	Total Water Demand/ Wastewater Generation (gpd)
Existing			
Office	17,280 sf	120 gpd/1,000 sf	2,074
Retail	11,920	25 gpd/1,000 sf	298
Subtotal			*2,372*
Proposed			
Apartment: Studio	10 du	75 gpd/du	750
Apartment: 1 Bedroom	65 du	110 gpd/du	7,150
Apartment: 2 Bedrooms	41 du	150 gpd/du	6,150
Apartment: 3 Bedrooms	8 du	190 gpd/du	1,520
Retail	14,600 sf	25 gpd/1,000 sf	365
Restaurant	3,200 sf	720 gpd/1,000 sf	2,304
Open Space	14,375 sf	50 gpd/1,000 sf	719
Pool	4,600 cf	7.48 gal/cf	34,408
Subtotal			*53,366*
Total Net Water Demand/ Wastewater Generation			**50,994**

du = dwelling unit
gpd = gallons per day
sf = square feet
[a] *Sewage generation calculations are based on generation factors provided by LASAN.*
Source: Eyestone Environmental, 2020.

(2) Wastewater

(a) Construction

Similar to the Project, during construction of Alternative 5, existing sewer laterals would be capped and no sewage would enter the public sewer system. Temporary facilities such as portable toilet and hand wash areas would be provided by the contractor at the Project Site, and sewage from these facilities would be collected and hauled off-site. As such, wastewater generation from construction activities associated with Alternative 5 would be less than existing conditions, and would not cause a measurable increase in wastewater flows. Therefore, construction of the Project would not substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the City's IRP.

Additionally, as with the Project, Alternative 5 may include construction activities associated with the installation of new or relocated sewer connections, including a 150-foot sewer main extension which is discussed further below. Such activities would be confined to trenching in order to place the sewer lines below surface and would be limited to the on-site wastewater conveyance infrastructure and minor off-site work associated with connections to the City's sewer lines in the streets adjacent to the Project Site. Similar to the Project, a Construction Traffic Management Plan would be implemented during the construction of Alternative 5 to reduce impacts to pedestrian and traffic flow, including emergency vehicle access, which could occur due to temporary off-site utility work. Therefore, construction-related impacts to the wastewater system under Alternative 5 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

Alternative 5 would develop 124 multi-family residential units, 14,600 square feet of retail uses, and 3,200 square feet of restaurant uses. As shown in Table V-5 on page V-100, Alternative 5 would result in a net increase in wastewater flows from the Project Site of 50,994 gpd, which is lower than the 69,453 gpd net increase in wastewater generated by the Project. However, both figures are conservative in that they assume the pool would be drained and refilled on a daily basis which would not be the case. Similar to the Project, the wastewater generated by Alternative 5 would be accommodated by the existing capacity of the HWRP and impacts with respect to treatment capacity would be less than significant.

As with the Project, sewer service for Alternative 5 would be provided utilizing new or existing on-site sewer connections to the existing sewer lines in the vicinity of the Project Site. Based on information provided by LASAN, the 8-inch sewer mains in Hollywood Boulevard and Wilcox Avenue adjacent to the Project Site do not currently have capacity to serve the Project due to high flows downstream of the Project Site at Sunset Boulevard and Wilcox Avenue. LASAN currently has plans to address the capacity issue through maintenance or pipe size upgrades in the sewer lines. If additional capacity is created, discharge into these lines would be viable. However, as no timeframe has been established for maintenance or pipe size upgrades, Alternative 5, like the Project, would require an extension of the sewer main that currently terminates 150 feet west of the Project Site. As noted above, impacts associated with this extension would be temporary and less than significant. Given that Alternative 5 would result in less daily wastewater compared to that of the Project, the sewer lines would also have capacity to serve Alternative 5. Furthermore, additional detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for Alternative 5 during the permitting process. All related sanitary sewer connections and on-site infrastructure under Alternative 5 would be designed and constructed in accordance with applicable standards.

Thus, impacts with regard to wastewater generation and infrastructure capacity under Alternative 5 would be less than significant and less than the less-than-significant impacts of the Project.

(3) Energy Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 5 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. Therefore, impacts on energy infrastructure associated with short-term construction activities would be less than significant under Alternative 4 and less than the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 5 would generate an increased consumption of electricity and natural gas relative to existing conditions. However, the consumption of electricity and natural gas under Alternative 5 would be less than the Project because of the reduced amount of construction, and the corresponding impact on energy infrastructure would be less than the Project. Therefore, impacts to energy infrastructure under Alternative 5 would be less than significant and less than the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above, Alternative 5 would not avoid the Project's significant and unavoidable impacts with respect to on- and off-site noise and vibration during construction, nor would it avoid the significant and unavoidable cumulative impacts with respect to off-site construction noise and vibration. All other impacts would be less than or similar to those of the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 5 would develop a similar mix of uses to the Project, but the number of multi-family residential units would be significantly reduced and no office uses would be provided. Also, as a result of the reduced number of residential units, all of the residential units included in Alternative 5 would be market rate; no workforce housing is included.

Alternative 5 would also not rehabilitate and restore the Attie Building. As such, Alternative 5 would only partially meet the Project's underlying purpose of revitalizing the Project Site by developing an integrated mixed-use development that provides new multi-family housing opportunities and neighborhood-serving retail, office, and restaurant uses that serve the community and promote walkability while also rehabilitating the Attie Building. Alternative 5 would not meet the following basic Project objectives:

- Rehabilitate the historic Attie Building and preserve its use as commercial space.
- Provide workforce housing to help meet the City's housing goals.
- Promote community benefits, economic development, and job creation, by creating construction and retail jobs, providing economic benefit to the City, and providing community benefits through workforce housing.

Alternative 5 would meet the following objectives, although to a lesser extent than the Project due to the reduced number of dwelling units:

- Create a high density, mixed-use development at a location served by public transit and locate residential uses in in a transit priority area.
- Redevelop and improve the visual character of the Project Site with a high density residential, office, and commercial infill development.
- Create an environmentally sensitive development, by incorporating sustainable and green building design and construction that reduces waste, manages water use efficiently and conserves energy, and by providing employment, housing, and shopping opportunities within easy access of established public transit.

Alternative 5 would also satisfy the following objective:

- Create a street-level identity for the Project Site and improve the pedestrian experience through the introduction of active street-adjacent uses such as neighborhood-serving commercial uses.

Alternative 5 would revitalize an underutilized project site with new buildings in an area located near a variety of transit options. Although Alternative 5 would meet one of the Project objectives to the same extent as the Project, it would not meet the objectives related to providing workforce housing and would meet objectives associated with providing residential uses to a lesser extent than the Project. Alternative 5 would also not rehabilitate and restore the Attie Building. In addition, Alternative 5 would only partially meet the Project's underlying objective, and would do so to a lesser extent than the Project.

V. Alternatives

F. Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that the No Project 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 Alternative 1, the No Project/No Build Alternative; Alternative 2, the Zoning Compliant Mixed-Use Alternative; Alternative 3, the Zoning Compliant Office Alternative; Alternative 4, the Zoning Compliant Hotel Alternative; and Alternative 5, the Proposed Hollywood Community Plan Update Compliant Alternative. Table V-1 beginning on page V-6 provides a comparative summary of the environmental impacts anticipated under each alternative with the environmental impacts associated with the Project. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to CEQA Guidelines Section 15126.6(c), the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project/No Build Alternative would avoid all of the Project's significant environmental impacts, including the Project's significant and unavoidable impacts related to on-site noise during construction, on-site vibration during construction (pursuant to the threshold for human annoyance), and off-site vibration (pursuant to the threshold for human annoyance) during construction. In addition, Alternative 1 would avoid the Project's significant cumulative noise impacts from off-site haul trucks. However, the No Project/No Build Alternative would not meet any of the Project objectives or achieve the Project's underlying purpose to revitalize the Project Site by developing an integrated mixed-use development that provides new multi-family housing opportunities and neighborhood-serving retail, office, and restaurant uses that serve the community and promote walkability while also rehabilitating the Attie Building.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative (Alternative 1—No Project/No Build Alternative), a comparative evaluation of the remaining alternatives indicates that Alternative 5, the Proposed Hollywood Community Plan Update Compliant Alternative,

would be the Environmentally Superior Alternative. As discussed above, Alternative 5 would not avoid the Project's significant and unavoidable environmental impacts related to noise and vibration during construction. However, Alternative 5 would reduce many of the Project's less-than-significant impacts. In addition, unlike Alternative 3, Alternative 5 would not result in significant and unavoidable impacts with respect to traffic that cannot be mitigated. Alternative 5 would not include many of the beneficial aspects of the Project however, including the installation of solar panels, reduction of indoor and outdoor water use above code requirements, and other measures proposed by the Project to achieve LEED® Gold Certification. Alternative 5 would also not provide the same reduction in VMT as the Project because it would not include a TDM Program to reduce vehicle trips by 15 percent like the Project.

However, Alternative 5 would only partially achieve the Project's underlying purpose of revitalizing the Project Site by developing an integrated mixed-use development that provides new multi-family housing opportunities and neighborhood-serving retail, office, and restaurant uses that serve the community and promote walkability while also rehabilitating the Attie Building. Specifically, Alternative 5 would provide fewer residential units than the Project and no office uses, and the Attie Building would not be rehabilitated and restored. Additionally, as all the residential units would be market rate, Alternative 5 would not meet the following Project objectives pertaining to restoration of the Attie Building or workforce housing:[19]

- Rehabilitate the historic Attie Building and preserve its use as commercial space.
- Provide workforce housing to help meet the City's housing goals.
- Promote community benefits, economic development, and job creation, by creating construction and retail jobs, providing economic benefit to the City, and providing community benefits through workforce housing.

Alternative 5 would also not meet the following objectives to the same extent as the Project:

- Create a high density, mixed-use development at a location served by public transit and locate residential uses in in a transit priority area;

[19] *While not a specific objective of the Project, by providing fewer residential units and no workforce housing, Alternative 5 would not assist the City in meeting its RHNA allocation to the same extent of the Project. Specifically, the 124 residential units included in Alternative 5 would represent 0.15 percent of the City's RHNA allocation. By comparison, the 260 residential units proposed by the Project would represent 0.32 percent of the City's RHNA allocation.*

- Redevelop and improve the visual character of the Project Site with a high density residential, office, and commercial infill development;

- Provide housing near public transit by constructing new residential dwelling units with varying mixes of number of-bedrooms, in an infill location close to commercial and office uses.

- Create an environmentally sensitive development, by incorporating sustainable and green building design and construction that reduces waste, manages water use efficiently and conserves energy, and by providing employment, housing, and shopping opportunities within easy access of established public transit.

Alternative 5 would satisfy only one objective to the same extent as the Project:

- Create a street-level identity for the Project Site and improve the pedestrian experience through the introduction of active street-adjacent uses such as neighborhood-serving commercial uses.