I. Executive Summary

I. Executive Summary

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

1. Purpose of this Draft EIR

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

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

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

In accordance with Section 15128 of the CEQA Guidelines, an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the Draft EIR. An Initial

Study was prepared for the Project and a Notice of Preparation (NOP) was distributed for public comment to the State Clearinghouse, Governor's Office of Planning and Research, responsible agencies, and other interested parties on March 29, 2019, for a 30-day review period. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City determined through the Initial Study the potential for significant impacts in the following environmental issue areas:

- Air Quality
- Cultural Resources
- Energy Resources
- Geology and Soils (paleontological resources)
- Greenhouse Gas Emissions
- Land Use and Planning
- Noise
- Population and Housing
- Public Services (fire protection, police protection, schools)
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems (water supply/infrastructure, wastewater, and energy infrastructure)

The City determined through the Initial Study that the Project would not have the potential to cause significant impacts related to: aesthetics; agriculture and forestry resources; air quality (odors); geology and soils (except for paleontological resources); hazards and hazardous materials; hydrology and water quality; land use and planning (division of an established community); mineral resources; public services (parks, libraries); recreation; utilities and service systems (telecommunications); and wildfires. Therefore, these areas were not analyzed further in this Draft EIR. The Initial Study demonstrating that no significant impacts would occur for these issue areas is included in Appendix A.1 of this Draft EIR.

3. Draft EIR Organization

This Draft EIR is comprised of the following sections:

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

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

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

IV. Environmental Impact Analysis. This section contains the environmental setting, Project and cumulative impact analyses, project design features, mitigation measures (where necessary), and conclusions regarding the level of significance after mitigation for each of the following environmental issues: air quality; cultural resources; energy; geology and soils (paleontological resources); greenhouse gas emissions; land use and planning; noise; population and housing; public services (fire protection, police protection, schools); transportation; tribal cultural resources; and utilities and service systems (water supply and infrastructure, wastewater, energy infrastructure).

V. Alternatives. This section provides an analysis of a reasonable range of alternatives to the Project including: No Project/No Build Alternative; Commercial Office Alternative; Reduced Density Alternative; and Residential Alternative.

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

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

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

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

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

- Appendix A Initial Study, NOP, and NOP Comment Letters
  - Appendix A.1 Initial Study
  - Appendix A.2 Notice of Preparation
  - Appendix A.3 NOP Comment Letters and Scoping Meeting Comments
- Appendix B Technical Appendix for Air Quality and Greenhouse Gas Emissions
  - Appendix B.1 Air Quality and Greenhouse Gas Emissions Methodology
  - Appendix B.2 Air Quality Worksheet and Modeling Output Files
  - Appendix B.3 Greenhouse Gas Worksheets and Modeling Output Files
- Appendix C Archaeological Resources Report
- Appendix D Energy Resources Calculations
- Appendix E Historical Resources Technical Report
- Appendix F Land Use Plan Consistency Analysis Tables
- Appendix G Noise Calculation Worksheets
- Appendix H Population and Housing Calculations
- Appendix I Public Service Provider Response Letters
  - Appendix I.1 Los Angeles Fire Department Letter
  - Appendix I.2 Los Angeles Police Department Letter

  - Appendix I.3 Los Angeles Unified School District Letter
- Appendix J Appendix for Transportation
  - Appendix J.1 Transportation Assessment
  - Appendix J.2 Los Angeles Department of Transportation Assessment Letter
- Appendix K Appendix for Tribal Cultural Resources
  - Appendix K.1 Tribal Cultural Resources Report
  - Appendix K.2 City AB 52 Consultation Letter
  - Appendix K.3 City AB 52 Consultation Closure Letter
- Appendix L Utility Infrastructure Technical Report
- Appendix M Water Supply Assessment
- Appendix N VMT Calculator Output for the Alternatives
- Appendix O Paleontological Resources Appendix

4. Existing Project Site Conditions

The Project Site is located at 332, 350, and 358 South Olive Street; 351 and 361 South Hill Street; and 417 and 425 West 4th Street within the City of Los Angeles Central City Community Plan (Community Plan) area and the Bunker Hill Specific Plan area. The Project Site is generally bounded by Angels Flight (a funicular) to the north, 4th Street to the south, Hill Street to the east, and Olive Street and California Plaza[1] to the west.

The Project Site includes approximately 2.24 acres that contains Metro's B (formerly Red) and D (formerly Purple) Lines Pershing Square Station portal, a publicly accessible staircase running along the historic Angels Flight funicular and connecting Hill Street to Olive Street and California Plaza, and mostly landscaped vacant land. An underground portion of the Metro B and D Lines Pershing Square Station portal underlays the southeasterly portion of the Project Site. The topography of the Project Site slopes down from the northwest along Olive Street at approximately 355 feet above mean sea level to the southeast near the Hill Street/4th Street intersection at approximately 285 feet mean sea level (an elevation differential of 70 feet). The perimeter of the Project Site (except for the Metro portal and stairway) has been fenced and closed to public access for

[1] *California Plaza refers to the open space associated with One California Plaza (the towers).*

several years. The resulting existing condition for the majority of the Project Site is mostly unmaintained and unused landscaped area.

The Project Site is designated by the Central City Community Plan as Regional Center Commercial and is zoned C2-4D (Commercial, Height District 4 with Development Limitations).

5. Description of the Proposed Project

The Project would involve a two-tower mixed-use development consisting of: 180 residential for-sale condominium units; 252 residential apartments (including a mix of market rate and affordable units, with affordable housing comprising five percent [e.g., 13] of the total for-rent units); two hotels with a combined total of 515 guest rooms, restaurants, ballrooms, meeting rooms, and amenities (fitness/spa); and 72,091 square feet of general commercial (retail/restaurant) uses. The proposed uses would be distributed through a series of terraced levels in a podium structure and two towers (Tower A and Tower B) that would be constructed above a three-level subterranean parking garage with 750 parking spaces. The Project would also provide public and private open space areas totaling 56,881 square feet and would retain the existing on-site Metro B and D Lines Pershing Square Station portal. In all, the Project would result in up to 1,269,150 square feet of floor area with a maximum floor area ratio (FAR) of up to 13:1.

Tower A would include 63 floors with a building height of up to 854 feet. Tower B would include 42 floors with a building height of up to 494 feet. Tower A and Tower B would be built on a podium structure over a three-level subterranean parking garage to a depth of approximately 70 feet below ground surface as measured from the elevation of Hill Street adjacent the Project Site. The subterranean garage would include 750 parking spaces with mechanical automobile parking lifts to reduce the number of parking levels required. In an effort to provide a pedestrian-friendly environment, no above-ground parking would be provided other than the vehicle entrances, pick-up/drop-off areas, and the loading dock.

The Project would require the removal of existing landscaping and the excavation and export of approximately 334,000 cubic yards of soil. For environmental review purposes, it is anticipated that Project construction would commence in September 2022 and be completed in June 2026 (with full occupancy anticipated in 2028).

The Project would be consistent with the existing Regional Center Commercial Central City Community Plan land use designation and C2-4D zoning of the Project Site.

6. Areas of Controversy

Based on the NOP comment letters and scoping meeting comments provided in Appendix A.3 of this Draft EIR, issues known to be of concern included, but were not limited to, Project impacts on: air quality; greenhouse gas emissions (GHGs); land use; population and housing; transportation, and water supply. In addition, comments were provided by: the South Coast Air Quality Management District (SCAQMD) regarding the provision of air quality analysis, alternatives analysis, and the identification of any required mitigation measures in accordance with CEQA and SCAQMD's Air Quality Handbook; the Southern California Association of Governments (SCAG) regarding Project consistency with its 2016 Regional Transportation Plan (RTP), including its Sustainable Communities Strategy (SCS); Metro regarding issues germane to Metro's statutory responsibility in relation to the Metro B and D Lines Pershing Square Station portal (including Project consistency with Metro's Adjacent Development Handbook) and Metro's bus service in the area; Caltrans regarding impacts to the capacity of Caltrans freeways and on-ramps; the Department of Toxic Substances Control (DTSC) with regard to documentation of potential hazards; and the Los Angeles Department of Water and Power (LADWP) regarding the need for a Water Supply Assessment (WSA) for the Project. Lastly, several members of the public provided comments expressing opposition to the Project for reasons including, but not limited to, its impacts on aesthetics, cultural impacts on the Historic Core, neighborhood disruption, affordable housing, traffic, transit, parking, construction impacts on the Metro B and D Lines Pershing Square Station portal and Angels Flight, and the overall "livability" of the area. Refer to Appendix A.3 of this Draft EIR for copies of the NOP comment letters and comments received during the scoping meeting.

7. Public Review Process

The City prepared an Initial Study and circulated an NOP for public comment to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties on March 29, 2019, for a 30-day review period. The City also carried out a public scoping meeting for the Project on April 9, 2019. The Initial Study, NOP, NOP comment letters, and scoping meeting comments are included in Appendix A.3 of this Draft EIR.

This Draft EIR is being circulated for a 45-day public comment period. Following the public comment period, a Final EIR will be prepared that will include responses to the comments raised regarding this Draft EIR.

8. Summary of Environmental Impacts

Table I-1 on page I-9 summarizes the environmental impacts of the Project evaluated in this Draft EIR. Based on the analysis in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant and unavoidable environmental impacts relative to: Construction Noise and Vibration (on-site construction noise, on-site and off-site construction vibration impacts related to human annoyance). Cumulative impacts associated with on- and off-site noise during construction, off-site traffic noise during operation, and off-site vibration during construction related to human annoyance, would also be significant and unavoidable.

Table I-1
Summary of Impacts Under the Project

Environmental Topic	Project Impact Determination
A. AIR QUALITY	
Regional Emissions	
Construction	Less Than Significant with Mitigation
Operation	Less Than Significant
Localized Emissions	
Construction	Less Than Significant
Operation	Less Than Significant
Toxic Air Contaminants	
Construction	Less Than Significant
Operation	Less Than Significant
B. CULTURAL RESOURCES	
Historical Resources	Less Than Significant
Archaeological Resources	Less Than Significant
Human Remains	Less Than Significant
C. ENERGY	
Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources	
Construction	Less Than Significant
Operation	Less Than Significant
Conflict with Plans for Renewable Energy or Energy Efficiency	Less Than Significant
D. GEOLOGY AND SOILS (PALEONTOLOGICAL RESOURCES)	
Paleontological Resources	Less Than Significant with Mitigation
E. GREENHOUSE GAS EMISSIONS	
GHG Emissions	Less Than Significant
Conflict with GHG Reduction Plans/Policies/Regulations	Less Than Significant
F. LAND USE AND PLANNING	
Conflict with Land Use Plans	Less Than Significant
G. NOISE	
Construction	
On-Site Noise[a]	**Significant Unavoidable**
Off-Site Noise[b]	Less Than Significant
On-Site Vibration (Building Damage)	Less Than Significant
On-Site Vibration (Human Annoyance)	**Significant Unavoidable**
Off-Site Vibration (Building Damage)	Less Than Significant
Off-Site Vibration (Human Annoyance)[c]	**Significant Unavoidable**
Operation	
On-Site Noise	Less Than Significant

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

Environmental Topic	Project Impact Determination
Off-Site Noise[d]	Less Than Significant
Vibration	Less Than Significant
H. POPULATION AND HOUSING	
Construction	Less Than Significant
Operation	Less Than Significant
I. PUBLIC SERVICES	
Fire Protection	
Construction	Less Than Significant
Operation	Less Than Significant
Police Protection	
Construction	Less Than Significant
Operation	Less Than Significant
Schools	
Construction	Less Than Significant
Operation	Less Than Significant
J. TRANSPORTATION	
Conflict with Transportation Plans	Less Than Significant
Vehicle Miles Traveled	Less Than Significant
Hazardous Design Features or Incompatible Uses	Less Than Significant
Emergency Access	Less Than Significant
K. TRIBAL CULTURAL RESOURCES	
Tribal Cultural Resources	Less Than Significant
L. UTILITIES AND SERVICE SYSTEMS	
Water Supply and Infrastructure	
Construction	Less Than Significant
Operation	Less Than Significant
Wastewater	
Construction	Less Than Significant
Operation	Less Than Significant
Energy Infrastructure	
Construction	Less Than Significant
Operation	Less Than Significant

[a] *As discussed in Section IV.G, Noise, of this Draft EIR, cumulative impacts from on-site noise sources during construction would be significant and unavoidable.*

[b] *As discussed in Section IV.G, Noise, of this Draft EIR, cumulative impacts from off-site noise sources during construction would be significant and unavoidable.*

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

Environmental Topic	Project Impact Determination
[c] *As discussed in Section IV.G, Noise, of this Draft EIR, cumulative impacts from off-site vibration sources during construction would be significant and unavoidable in terms of human annoyance.*	
[d] *As discussed in Section IV.G, Noise, of this Draft EIR, cumulative impacts from off-site noise sources during operation would be significant and unavoidable.*	
Source: Eyestone Environmental, December 2020.	

9. Project Design Features

a. Greenhouse Gas Emissions

Project Design Feature GHG-PDF-1: The design of the new buildings shall incorporate features of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) program to be capable of meeting the standards of LEED Silver or equivalent green building standards under LEED v4. Specific sustainability features that are integrated into the Project design to enable the Project to achieve LEED® Silver certification will include, but are not limited to the following:

a. Use of Energy Star–labeled products and appliances.

b. Use of light-emitting diode (LED) lighting or other energy-efficient lighting technologies, such as occupancy sensors or daylight harvesting and dimming controls, where appropriate, to reduce electricity use.

c. Water-efficient plantings with drought-tolerant species;

d. Fenestration designed for solar orientation; and

e. Pedestrian- and bicycle-friendly design with short-term and long-term bicycle parking.

Project Design Feature GHG-PDF-2: The Project shall prohibit the use of natural gas-fueled fireplaces in the proposed residential units except for Tower A Penthouse levels 57 through 61.

b. Noise

Project Design Feature NOI-PDF-1: Power construction equipment (including combustion engines), fixed or mobile, will be equipped with state-of-the-art noise shielding and muffling devices (consistent with manufacturers' standards). All equipment will be properly maintained

to assure that no additional noise, due to worn or improperly maintained parts, would be generated.

Project Design Feature NOI-PDF-2: All outdoor mounted mechanical equipment will be screened from off-site noise-sensitive receptors. The equipment screen shall be impermeable (i.e., solid material with minimum weight of 2 pounds per square feet) and break the line-of-sight from the equipment to the off-site noise-sensitive receptors.

Project Design Feature NOI-PDF-3: All loading docks will be acoustically screened from off-site noise-sensitive receptors.

Project Design Feature NOI-PDF-4: Project construction will not include the use of driven (impact) pile systems.

Project Design Feature NOI-PDF-5: Outdoor amplified sound systems, if any, will be designed so as not to exceed the maximum noise level of 70 dBA ($L_{eq\text{-}1hr}$) at a distance of 15 feet from the amplified speaker sound systems at the Level 5 Terrace location and the Lower California Plaza Terrace (Level 6), 75 dBA ($L_{eq\text{-}1hr}$) at Level PB1, Level 1, Level 3, Level 4, Level 5 (Hotel Pool Deck), and Level 6 (Hotel Lobby) exterior spaces; 80 dBA ($L_{eq\text{-}1hr}$) at a distance of 25 feet at Tower A Level 20 Terrace; and 85 dBA ($L_{eq\text{-}1hr}$) at a distance of 25 feet at Tower A Level 41 and Tower B Level 42 Terraces. A qualified noise consultant will provide written documentation that the design of the system complies with this maximum noise level.

Project Design Feature NOI-PDF-6: The final design of the Project shall include a noise attenuation feature (such as a plexiglass barrier) at least 6-feet high, along the eastern boundary of the Level 5 Terrace to shield noise sources on that terrace from the residential useable outdoor space at the receptor location immediately to the northeast of the Project Site.

c. Public Services—Police Protection

Project Design Feature POL-PDF-1: During construction, the Applicant shall implement temporary security measures including security fencing (e.g., chain-link fencing), low-level security lighting, and locked entry (e.g., padlocked gates or guard-restricted access) to limit access by the general public. Regular private security patrols during non-construction hours shall also be provided.

Project Design Feature POL-PDF-2: During operation, the Project shall incorporate a 24-hour/seven-day security plan to ensure the safety of its residents and site visitors. The Project's security plan could include, but not be limited to, the following design features:

- Installing and utilizing a 24-hour security camera network throughout the underground parking structure, the elevators, the

common and amenity spaces, the lobby areas, and the rooftop and ground level outdoor open spaces;

- Controlling access to all building elevators, hotel rooms, residences, and resident-only common areas;
- Maintaining staff on-site, including at the lobby concierge desk and within the car valet area. Designated staffers shall be dedicated to monitoring the Project's security cameras and directing staff to locations where any suspicious activity is viewed; and
- Training staff on security policies for the Project's buildings. Duties of the security personnel would include, but not be limited to, assisting residents and visitors with site access, monitoring entrances and exits of buildings, managing and monitoring fire/life/safety systems, and patrolling the property.

Project Design Feature POL-PDF-3: The Project shall provide lighting of buildings and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings.

Project Design Feature POL-PDF-4: The Project shall provide lighting of parking areas to maximize visibility and reduce areas of concealment.

Project Design Feature POL-PDF-5: The Project shall design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites.

d. Transportation

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

- Advance, bilingual notification to adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker and equipment parking on adjacent streets.
- Temporary pedestrian and bicycle traffic controls during all construction activities adjacent to Olive Street, 4th Street, and Hill

Street to ensure pedestrian, bicycle and motor vehicle traffic safety on public rights-of-way.

- Provide traffic and sidewalk controls during construction activities adjacent to Angels Flight to ensure pedestrian safety on public rights-of-way and continued public access to Angels Flight rail operations.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Scheduling of construction activities, including but not limited to associated truck deliveries and haul trips, to reduce the effect on traffic flow on surrounding arterial streets during peak commute hours.
- Potential sequencing of construction activity for the Project to reduce the amount of construction-related traffic on arterial streets.
- Containment of construction activity within the Project Site boundaries.
- Coordination of Project construction activities with Angels Flight so as not to substantially impact Angels Flight Operations.

Project Design Feature TRA-PDF-2: To ensure the safety of pedestrians when crossing the proposed Project driveways: (1) Project driveways will remain clear of hardscapes, vegetation, or signage that could impede sight lines; and (2) sidewalk treatments will be provided across the driveways, such as pavement textures, colors, additional lighting, or other informative features that distinguish the driveway.

e. Utilities and Service Systems—Water Supply and Infrastructure

Project Design Feature WAT-PDF-1: In addition to regulatory requirements, the Project will incorporate the following water conservation features as set for in the Water Conservation Commitment Letter for the Project included as Appendix B of the WSA:

Fixtures

- Showerheads with a flow rate of 1.5 gpm (does not apply to proposed hotel rooms/uses).

Landscape and Irrigation

- Artificial Turf.
- Drip/ Subsurface Irrigation (Micro-Irrigation).
- Drought Tolerant Plants- 100 percent of total landscaping.

- Micro-Spray.
- Proper Hydro-zoning and Zoned Irrigation-(groups plants with similar water requirements together).

Pools

- Install a meter on each pool's make-up line so water use can be monitored and leaks can be identified and repaired.
- Leak Detection System for swimming pools and Jacuzzi.
- Pool/Spa recirculating filtration equipment.
- Pool splash troughs around the perimeter that drain back into the pool.
- Reuse pool backwash water for irrigation.
- Water-Saving Pool Filter.

Utilities

- Domestic Water Heating System located close proximity to point(s) of use.
- Individual metering and billing for water use for every residential dwelling unit and commercial unit.
- Tankless and on-demand Water Heaters.

LID and Best Management Practices (BMPs) for Groundwater Recharge and Stormwater Use

- Cisterns—captures stormwater runoff as it comes down through the roof gutter system.
- Catch Basin Inserts—a device that can be inserted into an existing catch basin design to provide some level of runoff contaminant removal.
- Catch Basin Screens.
- Infiltration Basins (drainage area of 5-50 acres)- captures first-flush stormwater, removes particulate pollutants and some soluble pollutants, and contributes toward recharging groundwater.
- Infiltration Trenches (drainage area of less than 5 acres)—similar to infiltration basin but used for smaller drainage areas to capture and infiltrate rainwater.
- Pervious Pavements—captures runoff by allowing storm water to pass through the pavement surface and then infiltrate into the groundwater basin.

10. Mitigation Measures

a. Air Quality

Mitigation Measure AIR-MM-1: All off-road diesel-powered equipment greater than 50 hp used during Project grading/excavation and utility trenching phases shall meet USEPA Tier 4 final emissions standards.

Mitigation Measure AIR-MM-2: During the grading/excavation and utility trenching phases, all haul trucks shall be model year 2007 or newer.

Mitigation Measure AIR-MM-3: All construction equipment shall be properly tuned and maintained in accordance with the manufacturer's specifications. The contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications.

Mitigation Measure AIR-MM-4: Contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues shall have their engines turned off after five minutes when not in use, to reduce vehicle emissions.

Mitigation Measure AIR-MM-5: To the extent possible, petroleum-powered construction activity shall utilize electricity from power poles rather than temporary diesel power generators and/or gasoline power generators. If stationary petroleum-powered construction equipment, such as generators, must be operated continuously, such equipment shall be located at least 100 feet from sensitive land uses, whenever possible.

Mitigation Measure AIR-MM-6: The Project would include the use of solar-powered generators, to the extent commercially available and feasible, should generators be required during construction.

b. Geology and Soils (Paleontological Resources)

Mitigation Measure GEO-MM-1: A Qualified Paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards (SVP, 2010) (Qualified Paleontologist) shall be retained prior to the approval of demolition or grading permits. The Qualified Paleontologist shall provide technical and compliance oversight of all work as it relates to paleontological resources, shall attend the Project kick-off meeting, and Project progress meetings on a regular basis, and shall be responsible for monitoring and overseeing paleontological monitors (meeting SVP standards) that will observe Project grading and excavation activities.

Mitigation Measure GEO-MM-2: Paleontological resources monitoring shall be conducted for all deeper excavations below the artificial fill Quaternary Alluvium deposits and into the sedimentary layers and San Fernando

Formation bedrock underlying the Project Site. However, depending on the conditions encountered, full-time monitoring within these layers/bedrock can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Paleontologist. The Qualified Paleontologist shall inspect the grading and excavation activities along with the paleontological monitors on a regular basis, and shall recommend whether the depth of required monitoring should be revised based on his/her observations. The Qualified Paleontologist and/or paleontological monitors shall prepare daily logs detailing the types of activities and soils observed, and any discoveries.

The Qualified Paleontologist shall have the authority to temporarily halt or divert work away from exposed fossils or potential fossils in the event such paleontological resources are encountered at the Project Site during construction or the course of any ground disturbance activities. If paleontological resources are encountered, the Applicant shall notify the City and consult with the Qualified Paleontologist to assess the significance of the find. The assessment shall be prepared in accordance with Society of Vertebrate Paleontology standards. If any find are determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City shall be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is determined to be unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

Mitigation Measure GEO-MM-3: Any significant fossils collected during project-related excavations shall be prepared to the point of identification and curated into an accredited repository with retrievable storage. The Qualified Paleontologist shall prepare a final monitoring and mitigation report for submittal to the City in order to document the results of the monitoring effort and any discoveries. If there are significant discoveries, fossil locality information and final disposition will be included with the final report which will be submitted to the appropriate repository and the City.

c. Noise

Mitigation Measure NOI-MM-1: A temporary and impermeable sound barrier shall be erected at the locations listed below. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

- Along the northwestern property line of the Project Site between the construction areas and the residential use at 300 Olive Street (receptor location R1). The temporary sound barrier shall be designed to provide a minimum 9-dBA noise reduction at the ground level of the residential use (receptor location R1).

- Along the southern property line of the Project Site between the construction areas and residential use at 417 4th Street (receptor location R2). The temporary sound barrier shall be designed to provide a minimum 9-dBA noise reduction at the ground level of receptor location R2.

11. Summary of Alternatives

This Draft EIR examined four alternatives to the Project in detail, which include the No Project/No Build Alternative, the Commercial Office Alternative, the Reduced Density Alternative, and the Residential Alternative. A general description of these alternatives is provided below. Refer to Section V, Alternatives, of this Draft EIR for a more detailed description of these alternatives, a comparative analysis of the impacts of these alternatives with those of the Project, and a description of the alternatives considered but rejected as infeasible.

a. Alternative 1: No Project/No Build Alternative

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development Project on an identifiable property consists of the circumstance under which the Project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states in part that, "in certain instances, the No Project/No Build Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, Alternative 1 assumes that no new development would occur within the Project Site. The existing conditions on the Project Site would remain. The Project Site is currently vacant, unmaintained, and fenced to prevent public access. There is an operational Metro transit station located on a portion of the Project Site. The existing conditions would be unchanged by Alternative 1.

Alternative 1 would avoid the significant unavoidable project and cumulative construction-related noise and vibration (human annoyance) impacts, and the significant unavoidable cumulative operations-related off site traffic noise impact, of the Project. Furthermore, as indicated in Table V-3 in Section V, Alternatives, of this Draft EIR, Alternative 1 would result in less impacts than the Project for all of the environmental topics evaluated in the Draft EIR (owing to a lack of development and associated environmental effects under this alternative).

b. Alternative 2: Commercial Office Alternative

Alternative 2 would develop the Project Site with office uses in Tower B and hotel, residential, and commercial uses in Tower A. Similar to the Project, Alternative 2 would be consistent with the uses permitted in the Central City Community Plan and the Bunker Hill

Specific Plan. Alternative 2 would include the development of 459,492 square feet (gsf) of office space in Tower B instead of the residential and hotel uses proposed in the Project. To provide the needed floorplates for office uses, Tower B would have a slightly larger footprint and be slightly shorter in height. Tower B would be 30 floors with a maximum height of 428 ft. Tower A and the balance of the site plan would remain the same as proposed with the Project, except that: (1) there would be less code-required open space (e.g., 35,025 sf instead of 56,881 sf) because Alternative 2 would have less residential units; and (2) there would be 400 vehicle parking spaces for Tower B and 275 vehicle parking spaces for Tower A for a total of 675 vehicle parking spaces on the Project Site. This compares to the 750 vehicle parking spaces proposed with the Project. The total floor area of 1,269,150 sf (with an FAR of approximately 13:1) would be the same as the Project.

Alternative 2 would not avoid or substantially reduce the Project's significant unavoidable impacts (specifically, Project and cumulative construction-related noise and vibration, and off site cumulative operations-related traffic noise) because: (1) the amount, intensity and duration of construction activities would generally be the same between the two projects; and (2) operational traffic generation would be greater under this alternative. In fact, Alternative 2 would result in slightly greater cumulative operational traffic noise (e.g., + 0.1 dBA) than the Project owing to higher traffic generation. Furthermore, as indicated in Table V-3 in Section V, Alternatives, of this Draft EIR, Alternative 2 would result in less impacts than the Project related to operational impacts to police protection, schools, transportation (VMT), water supply/infrastructure, and wastewater (owing to fewer residential units under this alternative), and greater impacts than the Project with regard to operational air quality and TACs, GHG emissions, operational off site noise and vibration, and operational fire protection (owing primarily to higher operational traffic generation and service demand with the office uses under Alternative 2). In addition, Alternative 2 would result in significant and unavoidable regional air quality impacts during operation due to the increase in traffic. This impact would not occur under the Project. Impacts for the remaining environmental topics would be similar to those of the Project. Overall, Alternative 2 would be more impactful than the Project.

c. Alternative 3: Reduced Density Alternative

Alternative 3 would include the same types of uses proposed by the Project while reducing the amount of total new residential units and hotel, retail, restaurant and indoor amenity floor area by 25 percent. Alternative 3 would include 400 vehicle parking spaces, yet the depth of excavation on the Project Site would remain the same as the proposed Project. The total floor area for Alternative 3 would be 951,863 sf with an FAR of approximately 10:1.

Alternative 3 would not avoid or substantially reduce the Project's significant unavoidable impacts (specifically, Project and cumulative construction-related noise and vibration, and cumulative off-site operations-related traffic noise). As indicated in Table V-3 in Section V, Alternatives, of this Draft EIR, Alternative 3 would result in reduced impacts associated with operational air quality and TACs, historical resources, energy, GHG emissions, transportation, public service demand, utility demand, operational noise and vibration, population and housing, fire and police protection, schools, water supply/ infrastructure, wastewater and energy. Impacts associated with the remaining environmental topics would be similar to the Project and Alternative 3 would not result in any increases in impacts when compared with the Project. Overall, Alternative 3 would be less impactful than the Project.

d. Alternative 4: Residential Alternative

Alternative 4 would develop 577 residential units in Tower A and Tower B with a mix of general commercial and residential amenity uses within the podium (in other words, this alternative would develop additional residential uses in Towers A and B instead of the hotel uses proposed under the Project). The site plan would be similar to that of the Project and Alternative 4 would include 750 vehicle parking spaces, similar to the Project. However, there would be an additional 12,094 additional square feet of open space to satisfy Code requirements. The total floor area of 1,269,150 sf with an FAR of approximately 13:1, and building heights for Tower A and Tower B would also be the same as the Project.

Alternative 4 would not avoid or substantially reduce the Project's significant unavoidable noise and vibration impacts (specifically, Project and cumulative construction-related noise and vibration) because peak day construction activities would generally be the same between the two projects, as would the amount, intensity and duration of overall construction activities. Alternative 4 would also not avoid the Project's significant unavoidable off-site cumulative operations-related traffic noise impacts. Still, as indicated in Table V-3 in Section V, Alternatives, of this Draft EIR, Alternative 4 would have less impacts than the Project for operational air quality and TACs, GHG emissions, operational off site noise and vibration, cumulative operational traffic noise, operational transportation (VMT), and operational water supply/infrastructure (owing primarily to the lower operational trip generation and water demand under this alternative), and greater impacts than the Project for operational fire protection, schools, and police protection, wastewater, and energy infrastructure (owing to the greater number of residential units under this alternative). Overall, Alternative 4 would be less impactful than the Project.

e. Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative

among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that the No Project Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives.

Based on the analyses in Section IV, Environmental Impact Analysis, of this Draft EIR, the Project would result in significant unavoidable construction noise and vibration impacts (specifically, on-site construction noise, both on- and off-site construction vibration [human annoyance], and cumulative off-site operational traffic noise). Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project/No Build Alternative, would avoid these significant unavoidable impacts of the Project. Also, as indicated in Table V-3 in Section V, Alternatives, of this this Draft EIR, Alternative 1 would result in less impacts than the Project for all of the environmental issues evaluated in this Draft EIR (as opposed to Alternatives 2 through 4 which would result in less impacts than the Project for fewer of the environmental issues, and also opposed to Alternatives 2 and 4 which would actually result in greater impacts than the Project for some of the environmental issues). As such, Alternative 1 would be less impactful than both the Project and the other alternatives.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives, as summarized in Table V-3, indicates that Alternative 3, the Reduced Density Alternative, would be less impactful than both the Project and the other alternatives (e.g., Alternatives 2 and 4). While Alternative 3, like Alternatives 2 and 4, would not avoid or substantially reduce the significant unavoidable impacts of the Project, it would result in less impacts than the Project for the following environmental topics: operational air quality and TACs; historical resources; energy; GHG emissions; operational noise and vibration; population and housing; public services (police, fire, schools); transportation (VMT); and utilities (water supply/infrastructure, wastewater, energy infrastructure). In addition, Alternative 3 would not result in greater impacts than the Project for any of the other environmental issues. Thus, Alternative 3 is identified as the Environmentally Superior Alternative.

While Alternative 3 would be the Environmentally Superior Alternative, it is noted that this alternative would only partially meet the underlying purpose of the Project which is to redevelop the site by providing a high-density, mixed-use, transit- and pedestrian-oriented development that includes a mix of housing types (including affordable units) integrated with hotel, retail, restaurant and open space uses to transform the vacant site into a marquee destination and functional linkage between the Historic Core and Bunker Hill areas of downtown. Alternative 3 would only partially meet this underlying purpose because it would include lower density than the Project and thus be less transit-oriented and less of a marquee destination than the Project.

Furthermore, Alternative 3 would be less effective than the Project in meeting most of the objectives given its lower density and fewer residential units and hotel rooms. For example, Alternative 3 would be as effective as the Project in meeting the following Project objectives:

- Provide attractive and ample publicly accessible open spaces that incorporate community amenities and integrate the Angels Flight funicular into the experience of the site.

- Establish and maintain active and accessible linkages between the residential, office, and cultural amenities on Bunker Hill and in the Historic Core area to enhance the interconnectivity of these communities.

- Integrate the existing Metro portal as a component of open space and plaza design to enhance the pedestrian and transit user experience at the site.

However, Alternative 3 would be less effective than the Project in meeting the following density-based Project objectives:

- Maximize density and floor area ratio on the site with a high level of intensity to create a high-energy urban experience with an interrelated mix of land uses that function to transform the site into an iconic development.

- Create a mix of interactive land uses with expanded for-sale and for-rent housing opportunities blended together with commercial uses to enhance the 24-hour downtown experience and provide an infill development that enlivens adjacent streets and integrated public spaces.

- Develop a high-quality mixed-use project that provides residential dwelling units that contribute to the City's housing supply, while integrating hotel uses capable of enhancing the experience in Bunker Hill and contributing to the supply of downtown hotel rooms for convention and tourist activities.

- Construct an economically feasible project that expands the economic base of the City and provides employment opportunities and new sources of tax revenue for the City by providing construction and permanent jobs, attracting commercial tenants and hotel operators, and increasing hotel patrons that collectively increase City tax revenues directly and indirectly.

- Utilize public investment in public transit by redeveloping an urban infill location with on-site mass transit capabilities to further smart growth land use planning practices and align with policies related to the reduction of greenhouse gas emissions and vehicle miles travelled.

Lastly, while Alternative 3, like the Project, would be consistent with City and regional land use plans, Alternative 3 would be less effective than the Project in achieving the City's land use objectives for the Project Site. For example, Alternative 3 (10:1 FAR) would not include the density (13:1) permitted at the Project Site by the existing zoning and planned for the site by the Bunker Hill Specific Plan, nor would it provide as much transit-oriented development or as many affordable housing units as the Project. Also, because of the above, Alternative 3 would not be as effective as the Project in helping the City achieve its smart growth objectives and reducing VMT and associated air emissions.