

VI. Alternatives to the Proposed Project

A. Introduction

Under CEQA, and as indicated in California Public Resources Code (PRC) Section 21002.1(a), the identification and analysis of a reasonable range of alternatives to a project is a fundamental aspect of the environmental review process and is required to ensure the consideration of ways to mitigate or avoid the significant environmental effects of a project, while still meeting the general Project objectives. If specific economic, social, or other conditions make infeasible such alternatives, individual projects may be approved in spite of one or more significant effects.

Direction regarding the consideration and discussion of project alternatives in an EIR is provided in *State 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 comparable 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 decision-making and public participation. An EIR is not required to consider alternatives which are infeasible.

The State CEQA Guidelines emphasize that the selection of Project alternatives be based primarily on the ability to reduce significant impacts relative to the proposed Project, “even if these alternatives would impede to some degree the attainment of the Project objectives, or would be more costly.”¹ The State CEQA Guidelines further direct that the range of alternatives be guided by a “rule of reason,” such that only those alternatives necessary to permit a reasoned choice are analyzed.²

In selecting Project alternatives for analysis, potential alternatives should be feasible. The State CEQA Guidelines Section 15126.6(f)(1) explains that:

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site.

¹ CEQA Guidelines Section 15126.6(b).

² CEQA Guidelines Section 15126.6(f).

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 analysis of alternatives, 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.

1. Objectives of the Project

Section II, Project Description, of this Draft EIR sets forth the Project Objectives defined by the Applicant and the Lead Agency. The underlying purpose of the Project is to create a mixed-use development that complements the uses and market needs for the South Park neighborhood and greater Central City community by rehabilitating and reconstructing the long vacant Morrison Hotel and turning it into a safe and habitable hotel with a range of ground-floor commercial uses, which enhance the City’s economic base. The Project Objectives are as follows:

1. Preserve the existing Morrison Hotel by rehabilitating major character-defining features and incorporating a diversity of commercial uses to highlight the hotel’s history, while making the building safe and habitable through a seismic retrofit and upgrading the building to meet current safety standards.
2. Adaptively reusing the long vacant SRO hotel as a high-density mixed-use project that further revitalizes the area adjacent to the Convention Center and maximizes the economic viability of the Site.
3. Create a mixed-use hotel complex that maximizes the density of hotel rooms on an urban infill location in walking distance to the Convention Center and public transit to further smart growth land use planning practices aligned with policies to reduce greenhouse gas emissions and vehicle miles traveled, as well as the Mayor’s goal of 8,000 hotel rooms by the Convention Center by 2020.
4. Maximize residential density and floor area in Downtown within walking distance of jobs-rich centers to help meet the demand for new housing opportunities in proximity to public transit, including Metro’s A Line and E Line.
5. Create a cultural and arts destination with a range of commercial uses, including event spaces, gallery and museum space, and restaurants that support one of the Central City Community Plan’s primary goals of creating a vibrant and active 24-hour downtown.
6. Enhance and further activate the pedestrian experience at the intersection of Hope Street and Pico Boulevard by providing street-oriented uses, such as restaurants, gallery and museum space, and creating a transparent ground floor with a landscaped courtyard and pedestrian connections.
7. Expand the economic base of the City and provide employment opportunities and new sources of tax revenue 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.

2. Alternatives Rejected as Infeasible

The *State CEQA Guidelines* Section 15126.6(c) recommends that an EIR identify alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the *State CEQA Guidelines*, among the factors that may be used to eliminate alternatives 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 that have been considered and rejected as infeasible are discussed below.

a) Alternative Project Site

The Project Applicant owns the Project Site, and its location is conducive to the development of a mixed-use project. The Project Site is located in the South Park subarea of the Central City Community Plan Area which is characterized by a mix of uses including residential, medical, commercial, and retail uses. These uses make the Project Site particularly suitable for development of a mixed-use development that would provide new hotel rooms, residential units, restaurant, and museum uses that would serve the community and promote walkability.

The Project Site is also well-served by transit and is located within a TPA. The Pico Metro Station is located approximately 600 feet walking distance from the Project Site. As discussed in **Section III, Environmental Setting**, of this Draft EIR, 172 Related Projects are proposed for the Project Study Area, many of which are located within the Pico Station service area. Considering the development pressure within the TPA, available underutilized building sites of a size to accommodate the scale and density of the Project are scarce. It is not anticipated that the applicant would be able to find an equivalent-sized building site that is not the subject of another building project in proximity to the Pico Station or that is currently underutilized.

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. Additionally, considering the mix of uses in the South Park subarea, which include sensitive uses, it is possible that development of the Project at an alternative site could potentially be closer to sensitive uses and thus may produce other environmental impacts that would otherwise not occur at the current Project Site or result in greater environmental impacts when compared with the Project. Therefore, an alternative site is not considered feasible as the Project Applicant does not own another suitable site that would achieve the underlying purpose and objectives of the Project, and an alternative site would not likely avoid the Project's significant impacts requiring mitigation. Thus, this alternative was rejected from further consideration.

b) Alternative Onsite Uses

Development of the Project Site with uses not consistent with the Site's underlying high density residential zoning, such as light or heavy industrial uses, would not achieve the Project Objectives and would not be appropriate within the context of the surrounding commercial and residential community. In addition, for the purpose of this analysis, other uses not contemplated or considered as feasible Project Alternatives would be redevelopment of the Project Site with an all-residential use. An all-residential use would not fulfill the majority of the Project Objectives, which generally seek a high-density, mixed-used development, including hotel, consistent with the uses and density envisioned for the Central City Community Plan area and greater Downtown area in both the current Central City Community Plan and pending Central City Community Plan Update/DTLA 2040. Therefore, alternative uses, such as industrial and all-residential would not meet the primary Project Objectives of the Project and are not considered feasible alternatives to the Project.

c) Alternative Addressing the Significant Unavoidable Construction-Related Noise and Vibration Impacts of the Project

As discussed in **Section IV.H, Noise**, of this Draft EIR, the Project would result in short-term significant unavoidable construction-related noise and vibration (human annoyance) impacts. Specifically, Project construction activities would result in significant unavoidable construction-related noise impacts related to on-site construction activities, as well as significant unavoidable vibration (human annoyance) impacts related to off-site construction traffic. The following approaches were considered, but rejected as infeasible, to substantially reduce or avoid these impacts:

- Approach (a) – Extended Construction Duration: An approach that extends the construction period, thus reducing the amount of daily construction activity that would occur under the Project, was also evaluated. This approach was rejected for the following reasons:
 - Construction noise levels are dependent on the number of construction equipment (on-site equipment or off-site construction trucks). It is anticipated the number of on-site construction equipment and off-site construction haul trips on a daily basis would be reduced under this approach. However, since the on-site sourced construction noise would significantly impact the adjacent multifamily residential land uses for those occupied units above the second floor, an extended construction duration would not avoid or reduce the impact to a less than significant level, but may prolong, and thereby worsen, the significant impact as there is no feasible mitigation to attenuate the noise at the higher floors of those adjacent buildings.
 - The off-site construction vibration impacts (human annoyance) from the haul trucks would continue to be significant as haul trucks would still be required during

construction, and the significant impact may be prolonged, and thereby worsened, due to the extended duration.

- **Approach (b) – Significantly Reduced Development:** An approach that would significantly reduce the amount of development that would occur under the Project, to the extent that the significant construction-related noise and vibration impacts of the Project would be avoided or substantially reduced, was also considered. However, due to the close proximity of the sensitive receptors (i.e., directly across from the Project Site) and a constrained Project Site that does not have the space to create a meaningful buffer zone, the construction of a significantly smaller project would not mitigate the on-site construction noise impacts of the Project, especially at the upper levels of the adjacent residential buildings. In addition, the off-site construction vibration impacts from haul trucks (human annoyance) associated with this option would still be significant since haul trucks would still be required to construct a reduced project, and a reduced project would not attenuate the vibration of a haul truck traveling by sensitive receptors along the roadways.

As discussed above, neither of the above approaches would feasibly substantially reduce or avoid the significant and unavoidable impacts associated with on-site construction noise or off-site construction vibration. This is because the significant unavoidable construction-related noise and vibration impacts of the Project are heavily influenced by the close proximity of the Project Site and the proposed haul route to existing noise- and vibration-sensitive uses rather than the amount, duration, and type of Project construction activities. Therefore, an alternative that includes one or more of these approaches would not substantially reduce or eliminate the significant noise and vibration impacts of the Project and thus no further consideration of these approaches in the EIR is required.

3. Alternatives Selected for Analysis

As indicated above, the intent of the Alternatives analysis is to avoid or substantially lessen any of the significant effects of a project. Based on the analysis in the environmental topic subsections presented in **Section IV, Environmental Impact Analysis**, of this Draft EIR, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with regard to historical resources and noise. Accordingly, the following Alternatives to the Project have been selected for evaluation based on the significant environmental impacts of the Project, the objectives established for the Project (listed in **Section II, Project Description**, of this Draft EIR), the feasibility of the Alternatives considered, public input received during the scoping period, and the existing zoning designation on the Project Site:

- Alternative 1: No Project/No Build Alternative
- Alternative 2: Reduced Density Alternative
- Alternative 3: Morrison Preservation Alternative—Hotel Use
- Alternative 4: Morrison Preservation Alternative—Office Use

- Alternative 5: DTLA 2040 – Compliant Alternative

Table VI-1, Project and Alternative Components Comparison, shown further below, shows the differences between the various components of the alternatives.

4. Alternatives Analysis Format

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

- The analysis of alternatives compares the potential environmental impacts of the four alternatives with those of the Project for each of the environmental topics analyzed in detail 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**, as applicable. Where appropriate, the evaluation is divided between temporary impacts that would occur during the Project’s construction phase, and impacts that would occur during the Project’s operation phase.
- 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.”
- A relative comparison of the alternative’s impacts and consistency with Project Objectives is provided at the end of the section. Pursuant to CEQA Guidelines Section 15126.6(e)(2) an “Environmentally Superior Alternative” is identified.

Table VI-2, Comparison of Impacts Under Project and Alternatives, starting on page VI-8 below, summarizes the results of the CEQA analysis for each resource area addressed in **Section IV, Environmental Impact Analysis**, for the Project, and addressed below for the alternatives.

**Table VI-1
Project and Alternative Components Comparison**

Use	Project	Alternative 1: No Project	Alternative 2: Reduced Density	Alternative 3: Morrison Preservation —Hotel Use	Alternative 4: Morrison Preservation —Office Use	Alternative 5: DTLA 2040 - Compliant
Total Floor Area (sf)	420,303	79,176	337,956	420,303	420,303	477,671
Total FAR	7.5:1	1.4:1	6:1	7.5:1	7.5:1	8.75:1
Residential (units)	136	0	104	136	136	159
Hotel Rooms	444	0	284	444	270	518
Office (sf)	0	0	0	0	36,532 sf	0
Restaurant (sf)	10,785	0	8,628	4,470	4,470	7,176
Ground Floor/Retail/Gallery/ Co-Working Space (sf)	0	0	2,495	7,775	7,775	3,881
Museum (sf)	11,091	0	8,318	0	0	12,938
Ground Floor Storage ²	0	0	0	3,484	3,484	0
Maximum Stories	25	4	20	25	25	29
Maximum Height (ft)	325	52	235	325	325	360
Parking Spaces	233	32	165	250	258	0
Subterranean Levels	3	0	3	4 ¹	4 ¹	0

Notes: sf = square feet; ft = feet

¹ Alternative does not include parking underneath the Morrison Hotel.

² Storage required based on implementation of comprehensive seismic program, which requires installation of shotcrete shear walls along the perimeter of the Morrison Hotel and around the light courts. These walls make the center of the Morrison Hotel on the first floor non-functional with limited access and no windows. Storage is the only feasible use for this area.

Source: EcoTierra Consulting, 2021.

**Table VI-2
Comparison of Impacts Under Project and Alternatives**

Issue	Project	Alternative 1: No Project	Alternative 2: Reduced Density	Alternative 3: Morrison Preservation— Hotel Use	Alternative 4: Morrison Preservation— Office Use	Alternative 5: DTLA Compliant
A. Air Quality						
<i>Construction</i>						
<i>Regional / Local Emissions</i>	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
<i>TACs</i>	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Greater (Less than Significant)	Greater (Less than Significant)	Less (Less than Significant)
<i>Operation</i>						
<i>Regional / Local Emissions</i>	Less than Significant	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)
<i>TACs</i>	Less than Significant	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Greater (Less than Significant)
B. Cultural Resources						
<i>Historical - Direct</i>	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Less (Less than Significant with mitigation)	Less (Less than Significant with mitigation)	Similar (Significant and Unavoidable)
<i>Historical – Indirect</i>	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)
<i>Archaeological</i>	Less than Significant with Mitigation	Less (No Impact)	Similar (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)

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Issue	Project	Alternative 1: No Project	Alternative 2: Reduced Density	Alternative 3: Morrison Preservation— Hotel Use	Alternative 4: Morrison Preservation— Office Use	Alternative 5: DTLA Compliant
C. Energy						
<i>Construction</i>	Less than Significant	Less (No Impact)	Less (Less than Significant)	Greater (Less than Significant)	Greater (Less than Significant)	Similar (Less than Significant)
<i>Operation</i>						
<i>Energy Consumption</i>	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Greater (Less than Significant)
<i>Plan Consistency</i>	Less than Significant	Less (No Impact)	Greater (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)
D. Geology and Soils						
<i>Geology</i>	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
<i>Paleontological Resources</i>	Less than Significant with Mitigation	Less (No Impact)	Similar (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						
<i>GHG Emissions</i>	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Greater (Less than Significant)
F. Hydrology and Water Quality						
<i>Groundwater</i>	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)

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Issue	Project	Alternative 1: No Project	Alternative 2: Reduced Density	Alternative 3: Morrison Preservation— Hotel Use	Alternative 4: Morrison Preservation— Office Use	Alternative 5: DTLA Compliant
G. Land Use and Planning						
<i>Plan Consistency</i>	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
H. Noise						
Noise						
<i>Construction</i>	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Greater (Significant and Unavoidable)	Greater (Significant and Unavoidable)	Similar (Significant and Unavoidable)
<i>Operation</i>	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)	Similar (Less than Significant with Mitigation)
Vibration						
<i>Construction</i>	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Greater (Significant and Unavoidable)	Greater (Significant and Unavoidable)	Less (Significant and Unavoidable)
<i>Operation</i>	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
I. Population and Housing						
<i>Indirect Growth</i>	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
<i>Direct Growth</i>	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)

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Issue	Project	Alternative 1: No Project	Alternative 2: Reduced Density	Alternative 3: Morrison Preservation— Hotel Use	Alternative 4: Morrison Preservation— Office Use	Alternative 5: DTLA Compliant
<i>Displacement</i>	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
J. Public Services						
<i>Fire Protection</i>						
<i>Construction</i>	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)
<i>Operation</i>	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)
<i>Police Protection</i>						
<i>Construction</i>	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)
<i>Operation</i>	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)
<i>Libraries</i>						
<i>Construction</i>	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
<i>Operation</i>	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)
K. Transportation						
<i>Plan Consistency</i>	Less than Significant	Greater (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)

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Issue	Project	Alternative 1: No Project	Alternative 2: Reduced Density	Alternative 3: Morrison Preservation— Hotel Use	Alternative 4: Morrison Preservation— Office Use	Alternative 5: DTLA Compliant
<i>VMT Analysis</i>	Less than Significant	Less (No Impact)	Greater (Less than Significant)	Greater (Less than Significant)	Greater (Less than Significant)	Greater (Less than Significant)
<i>Emergency Access</i>	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
L. Tribal Cultural Resources						
<i>Tribal Cultural Resources</i>	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
M. Utilities						
<i>Water</i>						
<i>Construction</i>	Less than Significant	Less (No Impact)	Less (Less than Significant)	Greater (Less than Significant)	Greater (Less than Significant)	Less (Less than Significant)
<i>Operation</i>	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)
<i>Wastewater</i>						
<i>Construction</i>	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
<i>Operation</i>	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)
<i>Solid Waste</i>						
<i>Construction</i>	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Greater (Less than Significant)

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Issue	Project	Alternative 1: No Project	Alternative 2: Reduced Density	Alternative 3: Morrison Preservation— Hotel Use	Alternative 4: Morrison Preservation— Office Use	Alternative 5: DTLA Compliant
<i>Operation</i>	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)
<i>Dry Utilities</i>						
<i>Construction</i>	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)
<i>Operation</i>	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)
<i>Source (Table): EcoTierra Consulting, Inc., 2021.</i>						

B. Alternative 1 – No Project/No Build

1. Description

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which a proposed project does not proceed. CEQA Guidelines Section 15126.6l(3)(B) states that “in certain instances, the No Project Alternative means ‘no build’ wherein the existing environmental setting is maintained.” Accordingly, for purposes of this analysis, Alternative 1, the No Project/No Build Alternative, assumes that the Project would not be approved and no new development would occur within the Project Site. Thus, the physical conditions of the Project Site would generally remain as they are today. Under Alternative 1, the existing buildings would remain, including two, one-story and one, two-story commercial industrial buildings; the four-story Morrison Hotel; and an associated, approximately 9,461-square-foot surface parking lot. The commercial industrial buildings would continue to be used as office/warehouses.

The Morrison Hotel would remain uninhabitable and in its current condition. The existing deterioration of the wood framing, steel beams, and column supports on all levels from exposure to weather, fire, dry rot, and lack of maintenance as a vacant building for over 15 years would remain the same to the extent feasible. To the extent required by law, the Morrison Hotel would be maintained to prevent further deterioration. The partial rehabilitation, reconstruction, and demolition contemplated by the Proposed Project would not be implemented. Neither would the seismic retrofit program contemplated by the structural engineer (Englekirk) in Attachment H to Appendix C.1 to bring the Morrison Hotel into compliance with Life Safety and Collapse Prevention requirements. No new construction would occur.

Additionally, the existing 111 single residency-occupancy units (SRO units) at the Morrison Hotel would remain uninhabitable and unoccupied. The 111 off-site replacement affordable housing units contemplated at 407-413 East 5th Street and/or at a qualified alternative site as part of the Replacement Housing Plan approved by the CRA/LA Governing Board on August 1, 2019 would not be constructed.

2. Comparative Analysis

Alternative 1 assumes the development of the Related Projects listed in **Section III, Environmental Setting**, of this Draft EIR. The potential environmental impacts associated with Alternative 1 are described below and are compared to the environmental impacts that would result from the implementation of the Project as described in **Section IV, Environmental Impact Analysis**, of this Draft EIR.

a) Air Quality

(1) Construction

(a) *Regional and Localized Air Quality Impacts*

As detailed in **Section IV.A, Air Quality**, of this Draft EIR, construction of the Project would result in less-than-significant impacts with regard to regional and localized air quality emissions. Alternative 1 would not alter the existing commercial industrial or Morrison Hotel buildings or surface parking lot or result in new construction. Accordingly, Alternative 1 would not result in any construction emissions associated with construction worker and truck traffic, fugitive dust from demolition and excavation, or the use of heavy-duty construction equipment, and construction-related regional and localized air quality impacts would not occur. **Therefore, no construction-related air quality impacts associated with regional and localized emissions would occur under Alternative 1, and the impacts would be less than the less-than-significant impacts of the Project.**

(b) *Toxic Air Contaminants*

As detailed in **Section IV.A, Air Quality**, of this Draft EIR, construction of the Project would result in less-than-significant toxic air contaminants (TACs) impacts. As no construction activities would occur, Alternative 1 would not result in diesel particulate emissions that could generate substantial TACs. **Therefore, no impacts associated with the release of TACs would occur under Alternative 1, and the impacts would be less than the less-than-significant impacts of the Project.**

(2) Operation

(a) *Regional and Localized Air Quality Impacts*

As detailed in **Section IV.A, Air Quality**, of this Draft EIR, operation of the Project would result in less-than-significant impacts with regard to regional and localized air quality emissions. Alternative 1 would not result in new development or increased operations that could generate additional operational emissions related to vehicular traffic or the consumption of electricity and natural gas beyond what is currently generated by the Project Site. Existing uses applicable to the generation of air quality emissions at the Project Site include the existing surface parking lot. As the existing surface parking lot accommodates existing trips in the vicinity and does not independently generate trips, the existing Project Site does not generate substantive air quality emissions. **Therefore, operational air quality impacts associated with regional and localized emissions would be less than significant under Alternative 1 and less than the less-than-significant operational air quality impacts of the Project.**

(b) *Toxic Air Contaminants*

As detailed in **Section IV.A, Air Quality**, of this Draft EIR, operation of the Project would result in less-than-significant TAC impacts. As no new development or increase in the intensity of the

existing uses on the Project Site would occur, Alternative 1 would not result in diesel particulate emissions that could generate substantial TACs beyond what is currently generated by the Project Site. As previously discussed, the existing Project Site does not generate substantive air quality emissions. **Therefore, impacts associated with the release of TACs would be less than significant under Alternative 1 and less than the less-than-significant operational TAC impacts of the Project.**

b) Cultural Resources

(1) Historical Resources

As detailed in **Section IV.B, Cultural Resources**, of this Draft EIR, direct impacts to historical resources from construction and operation of the Project would require MM CUL-1; however, the impact would remain significant and unavoidable. Alternative 1 would not involve demolition or other construction activities, such as earthmoving or jackhammering that could directly impact on-site or adjacent historical resources. Additionally, no new development or uses would occur that could indirectly impact historical resources in the vicinity of the Project Site, including 1200 S. Hope Street, 1223-1225 S. Hope Street, 1201 S. Grand Avenue, and 1221-1225 S. Grand Avenue. As discussed in **Section IV.B**, the existing Morrison Hotel is currently in a deteriorated condition. Alternative 1 would not provide the Project's rehabilitation benefit and the seismic retrofit program contemplated by the structural engineer (Englekirk) would not be implemented. The Morrison Hotel would remain uninhabitable and in its current condition. To the extent required by law, the Morrison Hotel would be maintained to prevent further deterioration. **Therefore, impacts to historical resources under Alternative 1 would be less than significant and less than the significant and unavoidable impacts of the Project.**

(2) Archaeological Resources

As detailed in **Section IV.B, Cultural Resources**, of this Draft EIR, impacts to archaeological resources from construction and operation of the Project would be less than significant with implementation of mitigation measures MM CUL-2 and MM CUL-3. Grading and other earthwork activities would not occur under Alternative 1. **Therefore, there would be no potential for Alternative 1 to impact subsurface archaeological resources, and the impacts would be less than the Project's impacts, which would be less-than-significant with mitigation.**

c) Energy Conservation

As detailed in **Section IV.C, Energy**, of this Draft EIR, construction and operation of the Project would have a less-than-significant impact with regard to energy consumption. Construction activities would not occur under Alternative 1. Alternative 1 would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not generate any new demand for energy, and no impacts related to energy would occur. **As such, no impacts to energy conservation would occur under Alternative 1, and the impact would be less when compared to the less-than-significant impacts of the Project.**

d) Geology and Soils

(1) Geology and Soils

As detailed in **Section IV.D, Geology and Soils**, of this Draft EIR, impacts related to geology and soils from construction and operation of the Project would be less than significant. No new development would be introduced to the Project Site under Alternative 1, and no grading, excavation, or other earthwork activities would occur. Therefore, Alternative 1 would not directly or indirectly cause adverse effects related to geologic hazards such as fault rupture, strong seismic shaking, liquefaction, seismically induced settlement, soil stability, subsidence, or expansive soil. **Therefore, no impacts related to geology and soils would occur under Alternative 1, and the impacts would be less than the less-than-significant impacts of the Project.**

(2) Paleontological Resources

As detailed in **Section IV.D, Geology and Soils**, of this Draft EIR, impacts related paleontological resources would be less than significant with implementation of mitigation measure MM GEO-1. As no grading or other earthwork activities would occur under Alternative 1, there would be no potential for Alternative 1 to impact subsurface paleontological resources. **As such, no impacts on paleontological resources would occur under Alternative 1, which would be less than the Project's less-than-significant-with-mitigation impacts**

e) Greenhouse Gas Emissions

As detailed in **Section IV.E, Greenhouse Gas Emissions**, of this Draft EIR, the impacts of combined construction and operational GHG emissions of the Project would be less than significant. Alternative 1 would not result in new development or increased operations that could generate additional operational GHG emissions related to vehicular traffic, the consumption of electricity and natural gas, solid waste generation, or water demand beyond what is currently generated by the Project Site. **As such, no impacts associated with GHG emissions would occur under Alternative 1 and the impacts would be less than the less-than-significant impacts of the Project.**

f) Hydrology and Water Quality – Groundwater

As detailed in **Section IV.F, Hydrology and Water Quality**, of this Draft EIR, neither construction nor operation of the Project would encounter groundwater or conflict with groundwater management plans and impacts would be less than significant. Under Alternative 1, no grading or excavation would occur and there would be no potential to encounter groundwater. Furthermore, no changes in land use would occur under Alternative 1 and no conflicts with groundwater management would occur. **As such, no impacts to hydrology and water quality under Alternative 1 would occur and impacts would be less than the Project's less-than-significant impacts.**

g) Land Use and Planning

As detailed in **Section IV.G, Land Use and Planning**, of this Draft EIR, impacts related to land use would be less than significant under the Project. Under Alternative 1, no new development would occur. There would be no changes to the physical or operational characteristics of the existing on-site uses and 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. However, unlike the Project, Alternative 1 would not further regional and local policies to provide housing, enhance pedestrian activity, or increase transit use. Additionally, this alternative would not implement the objectives of the proposed DTLA 2040 Plan, which designates the Project Site as Transit Core. **Nevertheless, because no changes would occur under Alternative 1, no land use impacts would occur, which would be less than the less-than-significant impacts of the Project.**

h) Noise

As detailed in **Section IV.H, Noise**, of this Draft EIR, on-site noise- and off-site vibration-related impacts from construction would be significant and unavoidable even after implementation of mitigation measures MM NOI-1, MM NOI-3, and MM NOI-4. Noise- and vibration-related impacts from operation of the Project would be less than significant with implementation of mitigation measure MM NOI-2. Under Alternative 1, no grading, excavation, or construction would occur, and therefore, no construction-related noise or vibration would be generated on-site or off-site. Alternative 1 would not develop new uses on the Project Site and no changes to existing site operation would occur. Additionally, there would be no new vehicle trips generated under Alternative 1. Therefore, no new stationary or mobile noise or vibration sources would be introduced to the Project Site or Project vicinity. **As such, no impacts associated with on-site or off-site construction or operational noise and vibration would occur under Alternative 1, and impacts would avoid the Project's significant construction-related noise and vibration impacts and would be less than the less-than-significant operation-related noise impacts.**

i) Population and Housing

As detailed in **Section IV.I, Population and Housing**, of this Draft EIR, impacts related to population and housing would be less than significant under the Project. Under Alternative 1, no structures would be constructed on the Project Site that would house residents or generate additional employees. The existing 111 SRO units would remain uninhabitable and unoccupied. The 111 off-site replacement affordable housing units would not be constructed. As such, Alternative 1 would not induce population growth in the area. **Therefore, there would be no impact to population and housing under Alternative 1, which would be less than the Project's less-than-significant impact.**

j) Public Services

(1) Fire Protection

As detailed in **Section IV.J.1, Public Services – Fire Protection**, of this Draft EIR, under the Project, impacts to fire protection services would be less than significant. Under Alternative 1, no new construction would occur on the Project Site and, therefore, no construction activities, or new mixed-use development, which could increase demand for services from the Los Angeles Fire Department (LAFD), would occur at the Project Site that would require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service. Additionally, under Alternative 1, there would be no change to fire flows requirements or emergency access on the Project Site. **Therefore, Alternative 1 would have no impact on fire protection and emergency services, which would be less than the Project’s less-than-significant impacts.**

(2) Police Protection

As detailed in **Section IV.J.2, Public Services – Police Protection**, of this Draft EIR, under the Project, impacts to police protection services would be less than significant. Under Alternative 1, no new construction would occur on the Project Site and, therefore, no construction activities, or a new mixed-use development, which could result in increased demand for services from the Los Angeles Police Department (LAPD), would occur at the Project Site that would require the addition of a new police station or the expansion, consolidation, or relocation of an existing facility in order to maintain service. Additionally, under Alternative 1, there would be no change to emergency access, security, or design features on the Project Site. **Therefore, Alternative 1 would have no impact on police protection services, which would be less than the Project’s less-than-significant impacts.**

(3) Libraries

As detailed in **Section IV.J.5, Public Services – Libraries**, of this Draft EIR, under the Project, impacts to library services would be less than significant. Under Alternative 1, no new construction would occur on the Project Site and, therefore, no new population, which could demand library services, would be introduced to the Project Site. As such, Alternative 1 would not create a need for new or physically altered libraries. **Therefore, there would be no impact on library services, which would be less than the Project’s less-than-significant impact.**

k) Transportation

(1) Plan Consistency

As detailed in **Section IV.K, Transportation**, of this Draft EIR, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant. Under Alternative 1, the Project Site would remain as commercial industrial and hotel buildings and

surface parking lot and would not provide pedestrian enhancements along Hope Street and Pico Boulevard or bicycle facilities and would, therefore, be less consistent with the Mobility Plan 2035 than the Project. Furthermore, Alternative 1 would not provide the beneficial effects of the Project with respect to transportation plans (e.g., Mobility Plan 2035, Vision Zero Action Plan, Transit Oriented Communities Guidelines, and SCAG RTP/SCS, etc.), including providing electric vehicle chargers, or improving the walkability in the area. **Therefore, the impact of Alternative 1 with regard to compatibility with plan, ordinance or policy addressing circulation system, including transit, roadway, bicycle and pedestrian facilities would be less than significant and similar to the less-than-significant impacts of the Project.**

(2) VMT Analysis

As detailed in **Section IV.K, Transportation**, of this Draft EIR, the Project would result in an estimated 3.5 daily household VMT per capita, which is below than the Central APC significance threshold of 6.0 VMT per capita, and an estimated 6.7 daily work VMT per employee, which is less than the Central APC significance threshold of 7.6 VMT per employee. Alternative 1 would retain the existing uses and no new development would occur; no net increase in VMT would result. **Therefore, no impacts related to VMT would occur under Alternative 1, which would be less than the less-than-significant impact of the Project.**

(3) Emergency Access

As discussed in **Section IV.K, Transportation**, of this Draft EIR, impacts related to emergency access during construction and operation of the Project would be less than significant. In addition, the Project would implement project design feature PDF TR-1, which requires a Construction Staging and Traffic Management Plan to ensure that emergency access is maintained, establish safety procedures and re-routing for temporary lane closures, and prevent worker and haul trips from prohibiting emergency vehicle access to the Site and surrounding area. Under Alternative 1, no new development would occur and no change to the emergency access of the Project Site or surroundings would occur. **As such, no impacts to emergency access would occur under Alternative 1, which would be less than the Project's less-than-significant impacts.**

I) Tribal Cultural Resources

As detailed in **Section IV.L, Tribal Cultural Resources**, of this Draft EIR, under the Project, impacts to tribal cultural resources would be less than significant. Grading and other earthwork activities would not occur under Alternative 1. Therefore, there would be no potential for Alternative 1 to impact subsurface tribal cultural resources. **As such, Alternative 1 would have no impact on tribal cultural resources, which would be less than the Project's less-than-significant impact.**

m) Utility and Service Systems

(1) Water

As detailed in **Section IV.M.1, Utility and Service Systems – Water**, of this Draft EIR, impacts to water supply and infrastructure under the Project would be less than significant. Under Alternative 1, no new construction would occur on the Project Site, and therefore, no new residential or commercial uses would be developed which would demand water. **As no increase in water use would occur as a result of either construction or operation, no impacts would occur under Alternative 1, which would be less than the Project’s less-than-significant impacts.**

(2) Wastewater

As detailed in **Section IV.M.2, Utility and Service Systems – Wastewater**, of this Draft EIR, impacts to wastewater infrastructure under the Project would be less than significant. Under Alternative 1, no new construction would occur on the Project Site, and therefore, no new residential or commercial uses would be developed which would generate wastewater. **As no increase in wastewater generation would occur as a result of either construction or operation, no impacts would occur under Alternative 1, and the impact would be less than the Project’s less-than-significant impacts.**

(3) Solid Waste

As detailed in **Section IV.M.3, Utility and Service Systems – Solid Waste**, of this Draft EIR, impacts to solid waste facilities under the Project would be less than significant. Under Alternative 1, no demolition or new construction would occur on the Project Site, and therefore, no demolition debris would be generated, and no new residential or commercial uses would generate solid waste. **As no increase in solid waste generation would occur as a result of either construction or operation, no impacts would occur under Alternative 1, and the impact would be less than the Project’s less-than-significant impacts.**

(4) Dry Utilities

As detailed in **Section IV.M.4, Utility and Service Systems – Dry Utilities**, of this Draft EIR, impacts to dry utilities under the Project would be less than significant. Construction activities would not occur under Alternative 1. Additionally, Alternative 1 would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, and impacts related to dry utilities would not occur. **As such, no impacts to dry utilities would occur under Alternative 1 and the impact would be less when compared to the less-than-significant impacts of the Project.**

3. Relationship to Project Objectives

Under Alternative 1, the existing commercial industrial and hotel buildings and surface parking lot would remain, and no new development would occur. Alternative 1 would avoid the impacts of the Project. However, it would not meet the Project's underlying purpose to create a mixed-use development that complements the uses and market needs for the South Park neighborhood and greater Central City community by rehabilitating and reconstructing the long vacant Morrison Hotel and turning it into a safe and habitable hotel with a range of ground-floor commercial uses, which enhance the City's economic base. Alternative 1 would also achieve none of the basic Project objectives:

1. Preserve the existing Morrison Hotel by rehabilitating major character-defining features and incorporating a diversity of commercial uses to highlight the hotel's history, while making the building safe and habitable through a seismic retrofit and upgrading the building to meet current safety standards.
2. Adaptively reusing the long vacant SRO hotel as a high-density mixed-use project that further revitalizes the area adjacent to the Convention Center and maximizes the economic viability of the Site.
3. Create a mixed-use hotel complex that maximizes the density of hotel rooms on an urban infill location in walking distance to the Convention Center and public transit to further smart growth land use planning practices aligned with policies to reduce greenhouse gas emissions and vehicle miles traveled, as well as the Mayor's goal of 8,000 hotel rooms by the Convention Center by 2020.
4. Maximize residential density and floor area in Downtown within walking distance of job-rich centers to help meet the demand for new housing opportunities in proximity to public transit, including Metro's A Line and E Line.
5. Create a cultural and arts destination with a range of commercial uses, including event spaces, gallery and museum space, and restaurants that support one of the Central City Community Plan's primary goals of creating a vibrant and active 24-hour downtown.
6. Enhance and further activate the pedestrian experience at the intersection of Hope Street and Pico Boulevard by providing street-oriented uses, such as restaurants, gallery and museum space, and creating a transparent ground floor with a landscaped courtyard and pedestrian connections.
7. Expand the economic base of the City and provide employment opportunities and new sources of tax revenue 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.

C. Alternative 2 – Reduced Density

1. Description

Alternative 2 would involve the demolition of approximately 32,550 square feet of existing commercial industrial buildings and surface parking lot. The existing 46,626-square-foot, 111 SRO unit Morrison Hotel would be partially rehabilitated, reconstructed, and demolished. The total floor area of Alternative 2 would be approximately 337,956 square feet, with 104 dwelling units and 284 guest rooms. Alternative 2 would include 165 parking spaces to be located within three subterranean levels up to 36 feet in depth, and this alternative would also seek a reduced parking supply variance to provide 165 parking spaces whereas 250 parking spaces are required per LAMC. Similar to the Project, the parking entry ramp would be accessed via the covered entry from Hope Street and underground parking would be across the entire Project Site, including under the Morrison Hotel. The subterranean levels would also include some hotel and residential back-of-house and storage uses and an immersive museum. Alternative 2 would reduce the total floor area of development by approximately 20 percent, resulting in a 6:1 Floor Area Ratio (FAR).

Similar to the Project, the existing four-story Morrison Hotel, at the southwesterly portion of the Project Site, would be adaptively reused into a new hotel. The adaptive reuse of the hotel would include removal of an approximately 12,280-square-foot existing inner wing, the demolition of the majority of the north and full east elevations and light courts, partial rehabilitation and reconstruction of the existing Morrison Hotel as well as protection and shoring of the portions of the structure that will remain. The Existing Hotel would include 87 rooms within the remaining wings, surrounding a landscaped 3,488-square-foot open space courtyard accessible from the Existing Hotel and Hotel Expansion. The Existing Hotel would also include a 3,866-square-foot restaurant space in the southwestern corner, at the corner of Hope Street and Pico Boulevard. A 2,189-square-foot loggia accessed from Hope Street, the entry courtyard, and Hotel Expansion would be located on the ground floor. A courtyard on Hope Street would provide entry to the hotel lobby check-in and the gallery loggia. Hotel guest rooms would be located on Levels 2 through 4 of the existing Morrison Hotel. The height of the Existing Hotel would remain as it currently exists, at four stories and approximately 52 feet high.

The Hotel Expansion would be located along the eastern and northeastern portions of the Project Site. Hotel uses, including an 8,318-square-foot immersive museum, 2,495-square-foot loggia/coworking space, 2,094-square-foot lobby/bar, approximately 9,000 square feet of event and meeting spaces, a 788-square-foot fitness area, and 197 guestrooms, would be located on the first subterranean level, levels 1 through 9 of the Hotel Expansion, and levels 1 through 5 of the Hotel/Residential Tower. Two high-ceiling event/ballrooms would be located on level 2, and two meeting spaces would be located on level 3, with an event/ballroom and 2,642-square-foot amenity terrace located on level 5. A hotel pool, 1,259-square-foot restaurant/roof bar, and a 1,286-square-foot covered and 2,758-square-foot uncovered outdoor terrace would be located on

Level 9. The Hotel Expansion would be 9 stories and approximately 110 feet tall compared to 15 stories and approximately 193 feet tall under the Project.

A residential lobby would be provided at the northwestern portion of the Hotel/Residential Tower on the ground floor, which would be accessed from a covered driveway entry from Hope Street. Residential amenity areas would be located on level 6, and the remaining residential uses would be located on levels 7 through 20 of the Hotel/Residential Tower. A rooftop pool, covered and uncovered terraces, gym, and lounges for residents would be located on level 20. The Hotel/Residential Tower would be 20 stories and approximately 235 feet tall compared to 25 stories and approximately 325 feet tall under the Project.

Lighting, signage, landscaping, security, sustainability features, and off-site improvements would be the same as under the Project. The construction period would be reduced from 36 months to 29 months due to the reduction in gross floor area. Similar to the Project, soil export would be 130,000 cubic yards.

2. Comparative Analysis

Alternative 2 assumes the development of the Related Projects listed in **Section III, Environmental Setting**, of this Draft EIR. The potential environmental impacts associated with Alternative 2 are described below and are compared to the environmental impacts that would result from the implementation of the Project as described in **Section IV, Environmental Impact Analysis**, of this Draft EIR.

a) Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

As detailed in **Section IV.A, Air Quality**, of this Draft EIR, construction of the Project would result in less-than-significant impacts with regard to regional and localized air quality emissions. Alternative 2 would involve the same amount of demolition, grading, and excavation as the Project; however, the overall amount of building construction would be less than the Project due to the reduction in total floor area and the elimination of five aboveground levels. Therefore, the overall amount of construction activities and duration under Alternative 2 would be less than that of the Project. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days when maximum construction activities occur. Because maximum daily conditions are used for measuring impact significance, regional and localized impacts on these days would be similar to those of the Project. Furthermore, Alternative 2 would be located at similar distances from sensitive receptors as the Project. **Therefore, impacts associated with regional and localized construction emissions under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.**

(b) *Toxic Air Contaminants*

As detailed in **Section IV.A, Air Quality**, of this Draft EIR, construction of the Project would result in less-than-significant toxic air contaminants (TACs) impacts. 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 and, accordingly, because Alternative 2 would require similar amounts of grading and excavation as the Project, construction emissions of TACs generated by Alternative 2 would be similar to those of the Project. **Therefore, TAC impacts would be less than significant under Alternative 2 and similar to the less-than-significant TAC impacts of the Project.**

(2) Operation

(a) *Regional and Localized Air Quality Impacts*

As detailed in **Section IV.A, Air Quality**, of this Draft EIR, operation of the Project would result in less-than-significant impacts with regard to regional and localized air quality emissions. As discussed below in **Section VI.C.k.2**, Alternative 2 would result in fewer daily trips and a reduction in the total daily VMT as compared to the Project. Since the amount of vehicular emissions is based on the number of daily trips, the vehicular emissions generated by Alternative 2 would be less than the emissions generated by the Project. In addition, since the overall size of hotel and residential uses would be reduced under Alternative 2 and the calculation of energy consumption is based on the size of proposed uses, the consumption of electricity and natural gas would also be reduced compared to the Project. **Therefore, regional air quality impacts under Alternative 2 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 2 would not introduce any major new sources of air pollution within the Project Site. As discussed above, the number of vehicle trips generated by Alternative 2 would be less than the vehicle trips generated by the Project. **As such, localized impacts under Alternative 2 would be less than significant, and less than the less-than-significant impacts of the Project.**

(b) *Toxic Air Contaminants*

As detailed in **Section IV.A, Air Quality**, of this Draft EIR, operation of the Project would result in less-than-significant TAC impacts. Due to the reduction in daily trips and total daily VMT that would occur under Alternative 2, mobile source emissions generated by Alternative 2 would be correspondingly reduced compared to the mobile source emissions generated by the Project. **Therefore, TAC impacts would be less than significant under Alternative 2 and less than the less-than-significant TAC impacts of the Project.**

b) Cultural Resources

(1) Historical Resources

(a) Direct Impacts

As detailed in **Section IV.B, Cultural Resources**, of this Draft EIR, following implementation of mitigation measure MM CUL-1, direct impacts to the Morrison Hotel (an historical resource) would remain significant and unavoidable due to the loss of all the interior historic fabric of the building, including all of the public circulation, lobby, stairs, corridors, floors, ceilings, and roof structure causes material impairment under CEQA. Similar to the Project, Alternative 2 would adaptively reuse and expand the on-site Morrison Hotel, which would alter the interior fabric of the building and require mitigation measure MM CUL-1. As under the Project, despite retaining, rehabilitating, restoring, and reconstructing certain physical characteristics and the most visually recognizable features, the Morrison Hotel would no longer be able to convey its historic significance for eligibility to be listed in the National Register, California Register, and as an HCM as an early twentieth century Beaux-Arts tourist hotel. **Thus, direct impacts to historical resources under Alternative 2 would remain significant and unavoidable after implementation of MM CUL-1, similar to the Project.**

(b) Indirect Impacts

As detailed in **Section IV.B, Cultural Resources**, of this Draft EIR, indirect impacts to nearby historical resources from construction and operation of the Project would be less than significant. As with the Project, Alternative 2 would alter the immediate surroundings of off-site historical resources in the vicinity by constructing a new building on the Project Site and increasing the density of the Project Site. Such off-site resources include 1200 S. Hope Street, 1223-1225 S. Hope Street, 1201 S. Grand Avenue, and 1221-1225 S. Grand Avenue. The design of the proposed building under Alternative 2 would be similar to that of the Project in terms of architectural style, building materials and colors, but would be reduced in maximum height by five levels. Accordingly, Alternative 2 would appear diminished in views of and from nearby historical resources as compared to the Project. **Thus, indirect impacts to historical resources under Alternative 2 would be less-than-significant and less than the less-than-significant impacts of the Project.**

(2) Archaeological Resources

As detailed in **Section IV.B, Cultural Resources**, of this Draft EIR, impacts to archaeological resources from construction and operation of the Project would be less than significant with implementation of mitigation measures MM CUL-2 and MM CUL-3. Alternative 2 would construct the same number of subterranean parking levels as the Project. Therefore, the potential for Alternative 2 to uncover subsurface archaeological resources would be similar to that of the Project and, as under the Project, mitigation measures MM CUL-2 and MM CUL-3 would also be required for Alternative 2. **Accordingly, impacts to archaeological resources under**

Alternative 2 would be less-than-significant-with-mitigation, similar to the less-than-significant-with-mitigation impacts of the Project.

c) Energy Conservation

(1) Construction

As detailed in **Section IV.C, Energy**, of this Draft EIR, construction of the Project would have a less-than-significant impact with regard to energy consumption. As with the Project, Alternative 2 would also be subject to State and federal regulations that reduce the inefficient, wasteful, and unnecessary consumption of energy. Furthermore, under Alternative 2, due to the reduction of total floor area and elimination of five aboveground levels, the construction period length and overall intensity of activities would be reduced compared to the Project. Therefore, the amount of electricity and petroleum-based fuel required for construction of Alternative 2 would be correspondingly reduced compared to the Project. **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

(a) Energy Consumption

As detailed in **Section IV.C, Energy**, of this Draft EIR, operation of the Project would have a less-than-significant impact with regard to energy consumption. Based on the 82,347-square-foot reduction in total development that would occur under Alternative 2 as compared to the Project, electricity and natural gas consumption for Alternative 2 would be correspondingly reduced compared to the Project. In addition, as discussed below in **Section VI.C.k.2**, Alternative 2 would result in fewer daily trips and a reduction in the total daily VMT as compared to the Project. Accordingly, the associated consumption of petroleum-based fuels under Alternative 2 would also be correspondingly reduced. Furthermore, similar to the Project, Alternative 2 would implement the Title 24 energy conservation standards, which would improve energy efficiency and reduce impacts on consumption of energy resources. As with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 2 would not be wasteful, inefficient, or unnecessary. **Therefore, impacts related to the consumption of energy resources under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.**

(b) Conflicts with Energy Efficiency Plans

As detailed in **Section IV.C, Energy**, of this Draft EIR, operation of the Project would have a less-than-significant impact with regard to conflicts with energy efficiency plans. As with the Project, Alternative 2's design would comply with existing energy standards and incorporate features to reduce energy consumption and would, accordingly, not conflict with energy efficiency plans. However, although Alternative 2 would generate fewer daily trips and a reduction in the total daily VMT as compared to the Project, as discussed below in **Section VI.C.k.2**, Alternative 2 would result in a higher per capita household VMT than the Project. A lower total VMT but higher per

capita VMT indicates that although Alternative 2 would consume a lower amount of energy, it would not be as energy efficient as the Project and would, therefore, not be as compatible with energy efficiency plans. **Therefore, the impact related to conflicts with energy efficiency plans under Alternative 2 would be less than significant but greater than the Project's less-than-significant impact.**

d) Geology and Soils

(1) Geology and Soils

As detailed in **Section IV.D, Geology and Soils**, of this Draft EIR, impacts related to geology and soils from construction and operation of the Project would be less than significant. Under Alternative 2 impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, liquefaction, seismically induced settlement, soil stability, and subsidence would be similar to those under the Project because such impacts are a function of the Project Site's underlying geologic conditions rather than the type or amount of land use proposed. As such, although Alternative 2 would eliminate five aboveground levels as compared to the Project, the potential for encountering unstable soils would be substantially similar. Alternative 2 would comply with the same regulatory requirements as the Project to ensure that the soils underlying the Project Site can adequately support the proposed development. As with the Project, Alternative 2 would be designed and constructed to conform to the current seismic design provisions of the California Building Code and the Los Angeles Building Code. Alternative 2 would also be required to provide a final design-level geotechnical report, subject to LADBS review and approval, prior to the issuance of grading permits, to identify and minimize seismic risks. **Therefore, under Alternative 2, impacts related to geology and soils would be less than significant and similar to those of the Project.**

(2) Paleontological Resources

As detailed in **Section IV.D, Geology and Soils**, of this Draft EIR, impacts related paleontological resources would be less than significant with implementation of mitigation measure MM GEO-1. Alternative 2 would construct the same number of subterranean parking levels as the Project. Therefore, the potential for Alternative 2 to uncover subsurface paleontological resources would be the same as that of the Project. Therefore, because Alternative 2 would also require excavation into moderate paleontological sensitivity sediments, mitigation measure MM GEO-1 would also be required. **As such, impacts to paleontological resources under Alternative 2 would be less than significant with mitigation and similar to the less-than-significant-with-mitigation impacts of the Project.**

e) Greenhouse Gas Emissions

As detailed in **Section IV.E, Greenhouse Gas Emissions**, of this Draft EIR, the impacts of combined construction and operational GHG emissions of the Project would be less than significant. GHG emissions from a development project are determined in large part by the number of daily trips and total daily VMT generated and energy consumption from proposed land

uses. Alternative 2 would result in 82,347 square feet less development compared to the Project. Furthermore, as detailed below under **Section VI.C.k.2**, Alternative 2 would generate fewer daily trips and a reduction in total daily VMT as compared to the Project. Therefore, under Alternative 2, the VMT generation and energy and water consumption from proposed land uses would be reduced compared to the Project due to the reduction of the proposed building and uses. As such, the amount of GHG emissions generated by Alternative 2 would be less than the amount generated by the Project. As with the Project, Alternative 2 would be designed to comply with CalGreen and the City's Green Building Ordinance, as applicable. Accordingly, similar to the Project, Alternative 2 would be consistent with the GHG reduction goals and objectives included in adopted State, regional, and local regulatory plans. **Therefore, 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) Hydrology and Water Quality – Groundwater

As detailed in **Section IV.F, Hydrology and Water Quality**, of this Draft EIR, neither construction nor operation of the Project would encounter groundwater or conflict with groundwater management plans and impacts would be less than significant. Alternative 2 would also not encounter groundwater, as no changes to the depth of excavation or number of subterranean levels are proposed as compared to the Project. Furthermore, as with the Project, Alternative 2 would receive its water from LADWP, which along with the California Department of Water Resources, has protection programs in place to prevent the overdrafting of groundwater. As with the Project, Alternative 2 would be required to implement water conservation measures consistent with Title 24 and the City's Green Building Code and would not conflict with sustainable groundwater management. **Therefore, impacts to hydrology and water quality under Alternative 2 would be less than significant and similar to the Project's less-than-significant impacts.**

g) Land Use and Planning

As detailed in **Section IV.G, Land Use and Planning**, of this Draft EIR, impacts related to land use would be less than significant under the Project. Alternative 2 would seek the same general discretionary actions as the Project: a Vesting Tentative Tract; a Master Conditional Use; a Conditional Use; and a Zone Variance. As with the Project, with approval of the requests, Alternative 2 would be in conformance with applicable provisions of the LAMC and General Plan, would revitalize an infill site by locating residential and commercial uses at a site targeted for high density in close proximity to transit, and would enhance the pedestrian environment and promote alternative forms of transportation to reduce VMT. As such, Alternative 2 would also not conflict with local and regional land use plans applicable to the Project Site. Additionally, as with the Project, this alternative would be generally consistent with the proposed DTLA 2040 Plan, which in its current draft form, designates the Project Site as Transit Core with no vehicular parking minimums and maximum FAR between 10:1 and 13:1. **Therefore, land use impacts under Alternative 2 would be less than significant and similar to the land use impacts of the Project.**

h) Noise

(1) Noise

(a) Construction

As detailed in **Section IV.H, Noise**, of this Draft EIR, on-site noise impacts from construction would be significant and unavoidable even after implementation of mitigation measures MM NOI-1. Alternative 2 would require the same amount of excavation and soil export as the Project and would, accordingly, result in the same level of noise associated with haul trucks. Due to the reduction in the total floor area as compared to the Project, there would be a reduction in the amount and the overall duration of construction and associated on-site noise under Alternative 2, however, on-site construction activities and the associated construction noise would be similar to the Project 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 levels during maximum activity days, which are used for measuring impact significance, would therefore be similar to those of the Project and would require mitigation measure MM NOI-1. **As such, construction noise impacts under Alternative 2 would be significant and unavoidable from on-site construction noise to adjacent sensitive receptors as under the Project.**

(b) Operation

As detailed in **Section IV.H, Noise**, of this Draft EIR, noise impacts from operation of the Project would be less than significant with implementation of mitigation measure MM NOI-2. As with the Project, the operational noise generated under Alternative 2 would be typical of residential and commercial land uses. Under Alternative 2, as with the Project, parking would also be shielded to avoid parking noise impacts to adjacent properties. Noise generated by mechanical equipment has the potential to be greater under Alternative 2 compared to the Project, as the building would be five stories shorter, placing mechanical equipment closer to receptors. However, as with the Project, the mechanical equipment would still be required to comply with regulatory limits, which would reduce and minimize mechanical noise impacts. Alternative 2 would also implement mitigation measure MM NOI-2 to reduce operational noise from amplified music to less-than-significant levels. Similar to the Project, new vehicle trips would be generated along study area roadways, however, as detailed below under **Section VI.C.k.2**, Alternative 2 would generate fewer daily trips than the Project. Thus, Alternative 2 would generate less traffic noise than the Project. **Therefore, operational noise impacts under Alternative 2 would be less than significant with mitigation but, due to the reduced traffic noise, less than the Project's less-than-significant-with-mitigation impacts.**

(2) Vibration

(a) Construction

As detailed in **Section IV.H, Noise**, of this Draft EIR, off-site vibration impacts from construction haul trucks would be significant and unavoidable even with implementation of mitigation measures

MM NOI-3 and MM NOI-4. Both Alternative 2 and the Project would generate on-site vibration from the use of heavy-duty excavation, grading and construction equipment and off-site vibration along the proposed construction haul route from construction trucks. As discussed previously, both Alternative 2 and the Project would also have roughly the same peak day construction activity and be located the same distance from sensitive receptors. Thus, as with the project, Alternative 2 would require mitigation measures MM NOI-3 and MM NOI-4 to reduce construction vibration impacts to people and buildings along the eastern property boundary. **Therefore, on-site construction vibration impacts under Alternative 2 would be less than significant with mitigation but off-site construction vibration impacts would remain significant and unavoidable, similar to the less-than-significant-with-mitigation and significant unavoidable impacts of the Project, respectively.**

(b) Operation

As detailed in **Section IV.H, Noise**, of this Draft EIR, sources of vibration related to operation of the Project would include mechanical equipment and on-site vehicle circulation, including delivery trucks. These same sources of operational vibration would occur under Alternative 2. As with the Project, building mechanical equipment installed as part of Alternative 2 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units mounted at the roof level that would include vibration-attenuation mounts to reduce vibration transmission, such that associated vibration would not be perceptible at the off-site sensitive receptors. Similarly, as with the Project, the vast majority of on-site vehicular circulation would occur within the proposed on-site subterranean parking structure. In addition, as described in **Section IV.H**, delivery trucks rarely generate vibration that exceeds thresholds for damage or annoyance. **Therefore, similar to the Project, operational vibration impacts (both building damage and human annoyance) would be less than significant under Alternative 2.**

i) Population and Housing

(1) Population Growth

As detailed in **Section IV.I, Population and Housing**, of this Draft EIR, indirect population growth impacts would be less than significant under the Project. As under the Project, Alternative 2 would not require the extension of roadways or infrastructure to an undeveloped area and would be supported by the existing infrastructure. **As such, indirect population growth impacts of Alternative 2 would be less than significant, similar to the Project.**

As detailed in **Section IV.I, Population and Housing**, of this Draft EIR, direct population growth impacts would be less than significant under the Project. Alternative 2 would develop 32 fewer residential units and 174 fewer hotel rooms, and would reduce the overall size of the development at the Project Site by 82,347 square-feet. Accordingly, Alternative 2 would generate fewer residents and employees than the Project. **As such, direct population growth impacts of Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.**

(2) Displacement

As detailed in **Section IV.I, Population and Housing**, of this Draft EIR, the displacement impacts of the Project would be less than significant. As with the Project, Alternative 2 would adaptively reuse and expand the Morrison Hotel, which currently contains 111 vacant SRO units. However, as detailed in **Section IV.I**, these units have been approved for replacement at 407-413 East 5th Street and/or at a qualified alternative site by the City Planning Commission and, as with the Project, the displacement of these units would not represent a substantial number of housing units. **Therefore, displacement impacts under Alternative 2 would be less than significant and similar to those of the Project.**

j) Public Services

(1) Fire Protection

(a) Construction

As detailed in **Section IV.J.1, Public Services – Fire Protection**, of this Draft EIR, under the Project, impacts to fire protection services during construction would be less than significant. The types of construction activities that would be required for Alternative 2 and associated fire risks would be similar to those of the Project. Similar to the Project, implementation of “good housekeeping” procedures by the construction contractors and the work crews would minimize these risks. During construction of Alternative 2, emergency access to the Project Site and surrounding vicinity could be impacted by construction activities, however, construction impacts are temporary in nature and would not cause lasting access effects to emergency services and the duration of construction required for Alternative 2 would be reduced by 7 months compared to the Project. In addition, construction work and haul truck trips would occur outside of typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related impacts. Furthermore, construction-related traffic would not significantly impact LAFD emergency response within the vicinity as emergency vehicles normally have a variety of options for avoiding traffic. As with the Project, a Construction Staging and Traffic Management Plan (PDF TR-1) would be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. As under the Project, Alternative 2 would not result in the need for new or altered government facilities (i.e., fire stations). **Therefore, construction-related impacts related to fire protection services under Alternative 2 would be less than significant and, due to the reduced construction period, less than the less-than-significant impacts of the Project.**

(b) Operation

As detailed in **Section IV.J.1, Public Services – Fire Protection**, of this Draft EIR, under the Project, impacts to fire protection services during operation would be less than significant. Similar to the Project, Alternative 2 would implement all applicable City Building Code and Fire Code requirements. Alternative 2 proposes 32 fewer residential units than the Project; as well as 82,347 less building square footage as compared to the Project. Therefore, the demand for services from

the LAFD would be correspondingly reduced under Alternative 2 due to fewer people on the Project Site, smaller size of building requiring fire suppression, and reduced square footage of uses requiring the need for fire and emergency service. **Therefore, Alternative 2's demand for fire protection services would be less than significant and less than the Project's less-than-significant impact.**

(2) Police Protection

(a) Construction

As detailed in **Section IV.J.2, Public Services – Police Protection**, of this Draft EIR, under the Project, impacts to police protection services during construction would be less than significant. The types of construction activities that would be required for Alternative 2 would be similar to those of the Project, however, the overall duration of construction would be reduced compared to the Project. Furthermore, Project Alternative 2 would implement PDF POL-1 and PDF POL-3 to reduce the demand for police protection services during construction. During construction of Alternative 2, emergency access to the Project Site and surrounding vicinity could be impacted by construction activities. However, construction impacts are temporary in nature and would not cause lasting access effects to emergency services and the duration of required for Alternative 2 would be reduced by 7 months compared to the Project. In addition, construction work and haul truck trips would occur outside of typical weekday commuter morning and afternoon peak periods and emergency vehicles normally have a variety of options for avoiding traffic. As with the Project, Construction Staging and Traffic Management Plan, project design feature PDF TR-1 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 to police protection services under Alternative 2 would be less than significant and, due to the reduced construction period, would be less than the less-than-significant impacts of the Project.**

(b) Operation

As detailed in **Section IV.J.2, Public Services – Police Protection**, of this Draft EIR, under the Project, impacts to police protection services during operation would be less than significant. Alternative 2 proposes 32 fewer residential units than the Project; as well as 82,347 less building square footage as compared to the Project. Therefore, the demand for services from the LAPD would be incrementally reduced due to fewer people on the Project Site and the reduced square footage of uses requiring the need for police services. As with the Project, Alternative 2 would implement PDF POL-2 and PDF POL-3 to improve safety through Project Site design and preparation of an Emergency Procedures Plan. **Therefore, impacts to police protection under Alternative 2 would be less than significant and less than the Project's less-than-significant impacts.**

(3) Libraries

(a) Construction

As detailed in **Section IV.J.3, Public Services – Libraries**, of this Draft EIR, under the Project, impacts to library services during construction would be less than significant. Similar to the Project, Alternative 2 would result in a temporary increase of construction workers on the Project Site. However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities. Therefore, construction employment generated by Alternative 2 would not result in a notable increase in the resident population or a corresponding demand for library services in the vicinity of the Project Site. **As such, impacts to library facilities during construction of Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.**

(b) Operation

As detailed in **Section IV.J.3, Public Services – Libraries**, of this Draft EIR, under the Project, impacts to library services during operation would be less than significant. Residents are considered the primary users of library facilities. Alternative 2 proposes 32 fewer residential units than the Project. Therefore, the potential demand for library services would be reduced in comparison to the Project. Alternative 2 would also generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, etc.) that could potentially be applied toward the provision of new library facilities and related staffing in the Downtown Community, as deemed appropriate. **Accordingly, impacts to library facilities under Alternative 2 would be less than significant and, due to the decrease in number of residents, would be less than the Project's less-than-significant impacts.**

k) Transportation

(1) Plan Consistency

As detailed in **Section IV.K, Transportation**, of this Draft EIR, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant. Similar to the Project, Alternative 2 would provide pedestrian enhancements along S. Hope Street and W. Pico Boulevard, bicycle facilities, and electric vehicle chargers; as well as improve the walkability in the area. Therefore, as with the Project, Alternative 2 would be compatible with circulation system plans. **As such, the impact of Alternative 2 with regard to compatibility with plan, ordinance or policy addressing circulation system, including transit, roadway, bicycle and pedestrian facilities would be less than significant and similar to the less-than-significant impacts of the Project.**

(2) VMT Analysis

As detailed in **Section IV.K, Transportation**, of this Draft EIR, the Project would result in a total daily VMT of 22,722. The Project would result in 3.5 daily household VMT per capita, which is below than the Central APC significance threshold of 6.0 VMT per capita, and an estimated 6.7 daily work VMT per employee, which is less than the Central APC significance threshold of 7.6 VMT per employee. Alternative 2 would result in an estimated total daily VMT of 14,432;³ a reduction of 8,290 total daily VMT as compared to the Project. Alternative 2 would result in a 3.6 daily household VMT per capita, which is below the Central APC significance threshold of 6.0 VMT per capita, but slightly more than the Project's daily household VMT per capita of 3.5. In addition, Alternative 2 would result in an estimated 6.7 daily work VMT per employee, which is less than the Central APC significance threshold of 7.6 VMT per employee and the same as the daily work VMT per employee for the Project. **As such, the impact of Alternative 2 with regard to daily household VMT per capita and work VMT per employee would be less than significant but with regard to per capita household VMT, slightly greater than the Project's less-than-significant impact.**

(3) Emergency Access

As discussed in **Section IV.K, Transportation**, of this Draft EIR, impacts related to emergency access during construction and operation of the Project would be less than significant. In addition, the Project would implement project design feature PDF TR-1, which requires a Construction Staging and Traffic Management Plan to ensure that emergency access is maintained, establish safety procedures and re-routing for temporary lane closures, and prevent worker and haul trips from prohibiting emergency vehicle access to the Site and surrounding area. As with the Project, Alternative 2 would maintain emergency access during construction and implement PDF TR-1 to address traffic and access control during construction. Furthermore, construction impacts are temporary in nature and would not cause lasting access effects to emergency services. During operation, all circulation improvements that are proposed for the Project Site would comply with the Fire Code, including any additional access requirements of the LAFD. In addition, emergency vehicles normally have a variety of options for avoiding traffic. **As such, impacts to emergency access during construction and operation of Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.**

I) Tribal Cultural Resources

As detailed in **Section IV.L, Tribal Cultural Resources**, of this Draft EIR, under the Project, impacts to tribal cultural resources would be less than significant. Alternative 2 would construct the same number of subterranean levels as proposed by the Project. Therefore, the potential for Alternative 2 to uncover subsurface tribal cultural resources would be the same as that of the Project. Moreover, the City has established a standard condition of approval to address inadvertent discovery of tribal cultural resources and reduce any potential impacts to less than

³ *Overland Traffic Consultants, Inc., Morrison Mixed-Use Alternatives Project Summary, November 11, 2020.*

significant. As with the Project, this standard condition of approval would be applied to Alternative 2. **Accordingly, impacts to tribal cultural resources under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.**

m) Utility and Service Systems

(1) Water

(a) Construction

As detailed in **Section IV.M.1, Utility and Service Systems – Water**, of this Draft EIR, impacts to water supply and infrastructure during construction of the Project would be less than significant. Similar to the Project, construction activities associated with Alternative 2 would generate a short-term demand for water. However, this demand would be less than the Project as Alternative 2 would require a shorter construction period as compared to the Project. Accordingly, since the water demand for construction activities under Alternative 2 would be less than the Project, the temporary and intermittent demand for water during construction under Alternative 2 would also 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 2. Furthermore, as with the Project, the design and installation of new service connections under Alternative 2 would be required to meet applicable City regulations and standards. **Therefore, impacts on water supply and infrastructure associated with short-term construction activities under Alternative 2 would be less than significant and less than the Project’s less-than-significant impacts.**

(b) Operation

As detailed in **Section IV.M.1, Utility and Service Systems – Water**, of this Draft EIR, impacts to water supply and infrastructure during operation of the Project would be less than significant. Alternative 2 would develop 32 fewer residential units, 160 fewer hotel rooms, and an overall development 82,347 square-feet smaller than the Project; a reduction of approximately 20 percent. Accordingly, Alternative 2 would have an approximately 20 percent reduced water demand as compared to the Project. Therefore, as with the Project, the estimated water demand for Alternative 2 would be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040. In addition, the existing water distribution infrastructure would be adequate to serve Alternative 2 since the water demand would be lower than the Project. Furthermore, similar to the Project, under Alternative 2, the Applicant would construct the necessary on-site water infrastructure and off-site connections to the LADWP system pursuant to applicable City requirements to accommodate the new building. **Therefore, Alternative 2’s impacts to water would be less than significant and less than the Project’s less-than-significant impacts.**

(2) Wastewater

(a) Construction

As detailed in **Section IV.M.2, Utility and Service Systems – Wastewater**, of this Draft EIR, impacts to wastewater infrastructure during construction of the Project would be less than significant. Under Alternative 2, similar to the Project, temporary facilities such as portable restrooms 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 not cause an increase in wastewater flows to the municipal sewer system. Therefore, construction of Alternative 2 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. 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 sewer lines in the streets adjacent to the Project Site. Similar to the Project, a Construction Staging and Traffic Management Plan, project design feature PDF TR-1, 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 Project's less than significant impacts.**

(b) Operation

As detailed in **Section IV.M.2, Utility and Service Systems – Wastewater**, of this Draft EIR, impacts to wastewater infrastructure during construction of the Project would be less than significant. Alternative 2 would develop 32 fewer residential units, 160 fewer hotel rooms, and an overall development 82,347 square-feet smaller than the Project; a reduction of approximately 20 percent. Accordingly, Alternative 2 would generate approximately 20 percent less wastewater as compared to the Project. Therefore, similar to the Project, the wastewater generated by Alternative 2 would be accommodated by the existing capacity of the HWRP, and Alternative 2 would not result in a determination by the wastewater treatment provider that it does not have adequate capacity to serve the increase in demand. Furthermore, given that Alternative 2 would result in less daily wastewater compared to that of the Project, the existing sewer system would also have capacity to serve Alternative 2. All related sanitary sewer connections and on-site infrastructure under Alternative 2 would be designed and constructed in accordance with applicable Bureau of Sanitation regulations, standards, and policies. **As such, 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) Solid Waste

(a) Construction

As detailed in **Section IV.M.3, Utility and Service Systems – Solid Waste**, of this Draft EIR, impacts to solid waste facilities during construction of the Project would be less than significant. Because Alternative 2 would demolish the same improvements on the Project Site, the amount of demolition debris generated by Alternative 2 would be the same as the Project, however, due to the reduced development amount proposed under Alternative 2 compared to the Project, Alternative 2 would generate less total solid waste than the Project. Furthermore, as with the Project, Alternative 2 would be required to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris in accordance with the City’s Green Building Code. Like the Project, Alternative 2 would represent a very small percentage of the inert waste disposal capacity in the region. Therefore, Alternative 2 would not create a need for additional solid waste disposal facilities to adequately handle the construction-generated inert waste. **As such, construction impacts related to solid waste under Alternative 2 would be less than significant and less than the Project’s less-than-significant impacts.**

(b) Operation

As detailed in **Section IV.M.3, Utility and Service Systems – Solid Waste**, of this Draft EIR, impacts to solid waste facilities during operation of the Project would be less than significant. Alternative 2 would develop 32 fewer residential units, 160 fewer hotel rooms, and an overall development 82,347 square-feet smaller than the Project; a reduction of approximately 20 percent. As a result, operation of Alternative 2 would generate approximately 20 percent less solid waste than operation of the Project. Since the solid waste generated by Alternative 2 would be less than the Project, the existing landfill serving the Project Site would also have the capacity to accommodate the disposal needs of Alternative 2 and, therefore, Alternative 2 would not result in the need for an additional recycling or disposal facility. Similar to the Project, as Alternative 2 would be required to divert a minimum of 50 percent of solid waste from landfills in accordance with SB 939, it would therefore, comply with federal, State, and local management statutes and regulations. **Therefore, Alternative 2’s operational impacts to solid waste would be less than significant and less than the Project’s less-than-significant impacts.**

(4) Dry Utilities

(a) Construction

As detailed in **Section IV.M.4, Utility and Service Systems – Dry Utilities**, of this Draft EIR, impacts to dry utilities during construction of the Project would be less than significant. Construction activities typically do not consume natural gas or require telecommunication services. Furthermore, before construction begins, the Project Applicant would coordinate with applicable regulatory agencies and telecommunication providers to identify the location of existing underground dry utilities and to implement orderly installation of new on-site and connection to existing off-site electrical, natural gas, and telecommunication facilities in order to prevent accidental encroachment or service interruptions. However, 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 electricity 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, due to the reduced construction period, less than the less-than-significant impacts of the Project.**

(b) Operation

As detailed in **Section IV.M.4, Utility and Service Systems – Dry Utilities**, of this Draft EIR, impacts to dry utilities during operation of the Project would be less than significant. As Alternative 2 proposes a development that would be approximately 20 percent smaller than under the Project, electricity, and natural gas consumption for Alternative 2 would be approximately 20 percent less than under the Project. Furthermore, similar to the Project, Alternative 2 would adhere to the Title 24 energy conservation standards, which would improve energy efficiency and reduce impacts on consumption of energy resources. Telecommunications services would be provided from existing suppliers through established service procedures. Therefore, Alternative 2 would not require the need for relocation or construction of new or expanded electric, natural gas, or telecommunication facilities. **Therefore, impacts to dry utilities during operation of Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.**

3. Relationship to Project Objectives

Alternative 2 would include the same components as the Project but the overall square footage and number of residential units and hotel rooms would be reduced by approximately 20 percent. Similar to the Project, the existing four-story Morrison Hotel, at the southwesterly portion of the Project Site, would be adaptively reused into a new hotel. The adaptive reuse of the hotel would include removal of an approximately 12,280-square-foot existing inner wing, the demolition of the majority of the north and full east elevations and light courts, partial rehabilitation and reconstruction of the existing Morrison Hotel as well as protection and shoring of the portions of the structure that will remain. Three levels of underground parking would be spread across the entire Project Site, including under the Morrison Hotel.

Alternative 2 would meet Objectives 1, 5, and 6 to the same extent as the Project because the Morrison Hotel would be partially rehabilitated, demolished, and reconstructed to create more useable ground-floor commercial uses (including restaurant, gallery, and immersive museum) while preserving the major character-defining features of the existing hotel. Like the Project, Alternative 2 would also activate and improve the existing pedestrian experience at Hope Street and Pico Boulevard.

1. Preserve the existing Morrison Hotel by rehabilitating major character-defining features and incorporating a diversity of commercial uses to highlight the hotel's history, while

making the building safe and habitable through a seismic retrofit and upgrading the building to meet current safety standards.

5. Create a cultural and arts destination with a range of commercial uses, including event spaces, gallery and museum space, and restaurants that support one of the Central City Community Plan's primary goals of creating a vibrant and active 24-hour downtown.
6. Enhance and further activate the pedestrian experience at the intersection of Hope Street and Pico Boulevard by providing street-oriented uses, such as restaurants, gallery and museum space, and creating a transparent ground floor with a landscaped courtyard and pedestrian connections.

Alternative 2 would meet the underlying purpose of the Project to create a mixed-use development that complements the uses and market needs for the South Park neighborhood and greater Central City community by rehabilitating and reconstructing the long vacant Morrison Hotel and turning it into a safe and habitable hotel with a range of round-floor commercial uses. However, it would only meet to a lesser extent the remainder of the purpose, which is to enhance the City's economic base because Alternative 2 reduces the number of hotel rooms, residential units, and commercial uses thereby reducing the economic base and employment opportunities created by the Project.

Alternative 2 would partially meet, or meet to a lesser extent, Objectives 2, 3, 4, and 7 because it includes a mix of residential and hotel uses as well as ground-floor restaurants and other commercial uses in an urban infill location near transit. Because Alternative 2 would provide fewer residential units and hotel rooms than the Project, it would not create residential density and floor area in Downtown within walking distance of jobs-rich centers to help meet the demand for new housing opportunities in proximity to public transit, including Metro's A Line and E Line, to the same extent as the Project. The reduced size of Alternative 2 would also not as fully create a mixed-use hotel complex that maximizes the density of hotel rooms on an urban infill location in walking distance to the Convention Center and public transit to further smart growth land use planning practices aligned with policies to reduce greenhouse gas emissions and vehicle miles traveled, as well as the Mayor's goal of 8,000 hotel rooms by the Convention Center by 2020. The shorter construction duration for Alternative 2, as well as the reduced hotel and commercial floor area, would also not as fully meet the Project objective of providing construction and permanent jobs, attracting commercial tenants and hotel operators, and increasing hotel patrons that collectively increase City tax revenues directly and indirectly.

2. Adaptively reusing the long vacant SRO hotel as a high-density mixed-use project that further revitalizes the area adjacent to the Convention Center and maximizes the economic viability of the Site.
3. Create a mixed-use hotel complex that maximizes the density of hotel rooms on an urban infill location in walking distance to the Convention Center and public transit to further smart growth land use planning practices aligned with policies to reduce greenhouse gas emissions and vehicle miles traveled, as well as the Mayor's goal of 8,000 hotel rooms by the Convention Center by 2020.

4. Maximize residential density and floor area in Downtown within walking distance of jobs-rich centers to help meet the demand for new housing opportunities in proximity to public transit, including Metro's A Line and E Line.

7. Expand the economic base of the City and provide employment opportunities and new sources of tax revenue 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.

Alternative 2's impacts would be less than the Project's impacts or similar to the Project's impacts. However, Alternative 2 would result in slightly greater impacts related to household VMT per capita and, as a result, would be less compatible with energy efficiency plans. Alternative 2 would also not eliminate the Project's significant and unavoidable direct impacts to historical resources or on-site and off-site construction noise and vibration impacts, or the need for mitigation to reduce impacts related to historical, archaeological, and paleontological resources, construction- and operation-related noise, and construction-related vibration.

D. Alternative 3 – Morrison Preservation— Hotel Use

1. Description

Alternative 3 would involve the demolition of approximately 32,550 square feet of existing commercial industrial buildings, the rehabilitation of the existing 46,626-square-foot, 111-unit SRO Existing Hotel for continued use as hotel space, expansion of the Existing Hotel to incorporate new hotel uses, and construction of a Hotel/Residential Tower. The total floor area of Alternative 3 would be the same as under the Project, approximately 420,303 square feet, with 136 dwelling units and 444 guest rooms. Alternative 3 would include four subterranean levels under the Hotel/Residential Tower only, up to 48 feet in depth, including 250 parking spaces. Unlike the Project, this alternative would not seek a reduced parking supply variance. Unlike the Project, there would be no subterranean parking under the Existing Hotel. Similar to the Project, the parking entry ramp would be accessed via the entry from Hope Street. The subterranean levels would also include some hotel and residential back-of-house and storage uses. As with the Project, Alternative 3 would result in a FAR of 7.5:1.

Under Alternative 3, the existing four-story Morrison Hotel, at the southwesterly portion of the Project Site, would retain the 111 existing SRO units and existing ground-level lobby and retail spaces. The height of the Existing Hotel would remain as it currently exists, at four stories and approximately 52 feet high. Unlike the Project, Alternative 3 would implement the comprehensive seismic retrofit program recommended by Englekirk to make the building safe and habitable. As described in more detail in the Project Description, the design and existing deterioration of the Morrison Hotel make the building unsafe in its current condition, so retaining the existing building necessitates extensive upgrades. Alternative 3 contemplates implementation of the comprehensive seismic retrofit program, which is based on provisions of ASCE 41-13, Seismic Rehabilitation of Existing Buildings and the 2016 California Building Code, Chapter 4 Prescription Compliance Method. The seismic retrofit would require substantial improvements, including, but not limited to shotcrete shear walls around the perimeter of the building and around the light wells; new anchor connections between the URM walls and the wood diaphragm; and new plywood diaphragms throughout the floors over the existing diagonal sheathing.

The construction of sheer walls along the perimeter of the building and around the light wells limits the amount of useable floor area on the first floor of the Morrison Hotel.⁴ Given that, the ground floor restaurant, gallery spaces, and immersive museum can no longer be accommodated. Alternative 3 retains the existing hotel lobby and small retail spaces, and converts the windowless floor area around the lightwells in the center of the building to storage.

⁴ Refer to Figure SK-01.2 in Attachment H of Appendix C.1 to this Draft EIR for the first floor retrofit schematic design by the structural engineer Englekirk.

In addition to the seismic retrofit program, Englekirk recommended a comprehensive materials assessment of all steel girders, columns, and connections. Englekirk concluded that a comprehensive materials assessment is not feasible given that the steel girders and columns on the 1st Floor are encased in concrete and supporting the URM walls and wood floors on the upper levels. As such, the ultimate feasibility of the seismic program is unknown since a comprehensive materials assessment is not feasible.

The Hotel Expansion would be located along the eastern and northeastern portions of the Project Site. A courtyard on Hope Street would provide entry to the hotel lobby check-in and the gallery loggia. Hotel uses, including a 3,327-square-foot loggia/coworking space, 2,792-square-foot lobby/bar, approximately 12,000 square feet of event and meeting spaces, a 1,050-square-foot fitness area, and 270 guestrooms, would be located on the first subterranean level, levels 1 through 15 of the Hotel Expansion, and levels 1 through 5 of the Hotel/Residential Tower. Two high-ceiling event/ballrooms would be located on level 2, and two meeting spaces would be located on level 3, with an event/ballroom and 3,523-square-foot amenity terrace located on level 5. A hotel pool, 1,678-square-foot restaurant/roof bar, and a 1,715-square-foot covered and 3,677-square-foot uncovered outdoor terrace would be located on Level 15. The Hotel Expansion would be 15 stories and approximately 191 feet tall, which would be the same number of stories as under the Project but approximately 2 feet shorter in height.

A residential lobby would be provided at the northwestern portion of the Hotel/Residential Tower on the ground floor, which would be accessed from a covered driveway entry from Hope Street. Residential amenity areas would be located on level 6, and the remaining residential uses would be located on levels 7 through 20 of the Hotel/Residential Tower. A rooftop pool, covered and uncovered terraces, gym, and lounges for residents would be located on level 20. The Hotel/Residential Tower would be 25 stories and approximately 325 feet tall, which would be the same number of stories and height as under the Project.

Lighting, signage, open space, landscaping, security, sustainability features, and off-site improvements would be the same as under the Project. Due to the additional subterranean level proposed under Alternative 3, the grading and excavation construction phase would be extended by approximately 1.5 months to 6.5 months and soil export would be increased by approximately 43,333 cubic yards to approximately 173,333 cubic yards.

2. Comparative Analysis

Alternative 3 assumes the development of the Related Projects listed in **Section III, Environmental Setting**, of this Draft EIR. The potential environmental impacts associated with Alternative 3 are described below and are compared to the environmental impacts that would result from the implementation of the Project as described in **Section IV, Environmental Impact Analysis**, of this Draft EIR.

a) Air Quality

(1) Construction

(a) *Regional and Localized Air Quality Impacts*

As detailed in **Section IV.A, Air Quality**, of this Draft EIR, construction of the Project would result in less-than-significant impacts with regard to regional and localized air quality emissions. Alternative 3 would involve the same amount of demolition as the Project; however, the additional subterranean level would require a longer construction grading/excavation period and additional soil export as compared to the Project. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days when maximum construction activities occur. Because maximum daily conditions are used for measuring impact significance, regional and localized impacts on these days would be similar to those of the Project. Furthermore, Alternative 3 would be located at the same distances from sensitive receptors as the Project. **Therefore, impacts associated with regional and localized construction emissions under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.**

(b) *Toxic Air Contaminants*

As detailed in **Section IV.A, Air Quality**, of this Draft EIR, construction of the Project would result in less-than-significant toxic air contaminants (TACs) impacts. 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 and, accordingly, because Alternative 3 would require greater amounts of grading and excavation as the Project, construction emissions of TACs generated by Alternative 3 would be greater than those of the Project. However, as with the Project, construction of Alternative 3 would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and federal levels that would protect sensitive receptors from substantial concentrations of TACs including: applicable AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities; CARB's Air Toxics Control Measure limiting diesel powered equipment and vehicle idling to no more than 5 minutes at a location; CARB's In-Use Off-Road Diesel Vehicle Regulation; and the requirements of SCAQMD Rule 1403 if asbestos is found during the demolition activities. Compliance with these regulations and laws would minimize emissions of TACs during construction. **Therefore, while TAC impacts would be less than significant under Alternative 3, they would be greater than the less-than-significant TAC impacts of the Project.**

(2) Operation

(a) *Regional and Localized Air Quality Impacts*

As detailed in **Section IV.A, Air Quality**, of this Draft EIR, operation of the Project would result in less-than-significant impacts with regard to regional and localized air quality emissions. Since the overall size of Alternative 3 would be the same as the Project and the calculation of energy

consumption is based on the size of proposed uses, the consumption of electricity and natural gas would be the same as compared to the Project. However, as discussed below in **Section VI.D.k.2**, Alternative 3 would result in fewer daily trips and a reduction in the total daily VMT as compared to the Project. Since the amount of vehicular emissions is based on the number of daily trips, the vehicular emissions generated by Alternative 3 would be less than the emissions generated by the Project. **Therefore, 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. As discussed below, the number of vehicle trips and total daily VMT generated by Alternative 3 would be less than the vehicle trips and total daily VMT generated by the Project. **As such, localized impacts under Alternative 3 would be less than significant, and less than the less-than-significant impacts of the Project.**

(b) *Toxic Air Contaminants*

As detailed in **Section IV.A, Air Quality**, of this Draft EIR, operation of the Project would result in less-than-significant TAC impacts. Due to the reduction in daily trips and total daily VMT that would occur under Alternative 3, mobile source emissions generated by Alternative 3 would be correspondingly reduced compared to the mobile source emissions generated by the Project. **Therefore, TAC impacts would be less than significant under Alternative 3 and less than the less-than-significant TAC impacts of the Project.**

b) Cultural Resources

(1) Historical Resources

(a) *Direct Impacts*

As detailed in **Section IV.B, Cultural Resources**, of this Draft EIR, following implementation of mitigation measure MM CUL-1, direct impacts to the Morrison Hotel (an historical resource) would remain significant and unavoidable due to the loss of all the interior historic fabric of the building, including all of the public circulation, lobby, stairs, corridors, floors, ceilings, and roof structure, which would cause material impairment under CEQA. Alternative 3 assumes implementation of the program recommended by Englekirk⁵, the seismic retrofit program requires extensive updates to the interior, including, but not limited to new anchor connections between the URM walls and the wood diaphragm and new plywood diaphragms throughout the floors over the existing diagonal sheathing. At a minimum, and to the extent feasible, this would result in the removal and replacement of all floors, ceilings, roof structure, and walls in the lobby, corridors, and rooms.

The interior of the Morrison Hotel would also be converted from 111 existing SRO units to 87 hotel rooms to allow for bathrooms in each hotel room. Unlike the Project, Alternative 3 would not

⁵ *The full scope of the seismic upgrades needed is not known at this time and cannot be determined because a comprehensive materials assessment is not feasible given the design of the Morrison Hotel.*

remove the east elevation of the Morrison Hotel and partially reconstruct the north elevation, or demolish the majority of two of four exterior elevations, roof, and all interior floors, stairs, and corridors. Alternative 3 would retain the building as an E-shape.

Like the Project, the Morrison Hotel would continue the historic use as a hotel and includes rehabilitation of the most visually recognizable character-defining features of the Morrison Hotel at the south, west and partial north elevations, including ground level storefronts with transoms, glazed brick, cast stone entrance surround and inset tiled entrance, cast stone beltway, and galvanized iron frieze. Missing or altered features including some window infill and leaded prism glass storefront transoms would be restored to their original appearance. Alternative 3 would also reconstruct the previously removed cornice and raised parapet. Given the extensive upgrades needed to ensure the safety and habitability of the Morrison Hotel, impacts from Alternative 3 would be significant without mitigation.

With mitigation contemplated as part of MM-CUL-1, the retention and rehabilitation, including restoration and reconstruction as necessary, of the key character-defining features on the primary south, west, and partial north elevations is sufficient to convey the historic and architectural significance of the subject property as an early twentieth century Beaux-Arts tourist hotel designed by master architects Morgan, Walls and Morgan. The restoration, reconstruction, and rehabilitation proposed by the Project would be an improvement of existing conditions for the most visually recognizable character-defining features at the Project Site, including the features on the primary south, west, and partial north elevations. Additionally, Alternative 3 would retain the existing shape of the building and would not demolish and reconstruct all of the interior historic fabric of the building. As such, impacts would be less than the Project and less than significant with mitigation incorporated. **Thus, direct impacts to historical resources under Alternative 3 would be less-than-significant and less than the significant and unavoidable impacts of the Project.**

(b) Indirect Impacts

As detailed in **Section IV.B, Cultural Resources**, of this Draft EIR, indirect impacts to nearby historical resources from construction and operation of the Project would be less than significant. As with the Project, Alternative 3 would alter the immediate surroundings of off-site historical resources in the vicinity by constructing a new building on the Project Site and increasing the density of the Project Site. Such off-site resources include 1200 S. Hope Street, 1223-1225 S. Hope Street, 1201 S. Grand Avenue, and 1221-1225 S. Grand Avenue. The design of the proposed building under Alternative 3 would be similar to that of the Project in terms of architectural style, building materials and colors, and height. Accordingly, Alternative 3 would appear similar in views of and from nearby historical resources as compared to the Project. **Thus, indirect impacts to historical resources under Alternative 3 would be less-than-significant and similar to the less-than-significant impacts of the Project.**

(2) Archaeological Resources

As detailed in **Section IV.B, Cultural Resources**, of this Draft EIR, impacts to archaeological resources from construction and operation of the Project would be less than significant with

implementation of mitigation measures MM CUL-2 and MM CUL-3. Alternative 3 would construct an additional level of subterranean parking levels as the Project, but the footprint of the subterranean parking would be smaller than the Project. Therefore, the potential for Alternative 3 to uncover subsurface archaeological resources would be less than that of the Project and, as under the Project, mitigation measures MM CUL-2 through MM CUL-3 would also be required for Alternative 3. **Accordingly, impacts to archaeological resources under Alternative 3 would be less-than-significant-with-mitigation, and less than the less-than-significant-with-mitigation impacts of the Project.**

c) Energy Conservation

(1) Construction

As detailed in **Section IV.C, Energy**, of this Draft EIR, construction of the Project would have a less-than-significant impact with regard to energy consumption. Because the construction period length and overall intensity of activities would be greater under Alternative 3 as compared to the Project, the amount of electricity and petroleum-based fuel required for construction of Alternative 3 would be greater than under the Project. However, as with the Project, Alternative 3 would also be subject to State and federal regulations that reduce the inefficient, wasteful, and unnecessary consumption of energy. **Therefore, while impacts on energy resources associated with short-term construction activities would be less than significant under Alternative 3, due to the increased construction period required for the additional subterranean level, they would be greater than the less-than-significant impacts of the Project.**

(2) Operation

(a) Energy Consumption

As detailed in **Section IV.C, Energy**, of this Draft EIR, operation of the Project would have a less-than-significant impact with regard to energy consumption. Because the total development that would occur under Alternative 3 would be the same as the Project, electricity and natural gas consumption for Alternative 3 would be similar to that of the Project. Furthermore, similar to the Project, Alternative 3 would implement the Title 24 energy conservation standards, which would improve energy efficiency and reduce impacts on consumption of energy resources. Accordingly, as with the Project, the consumption of electricity and natural gas under Alternative 3 would not be wasteful, inefficient, or unnecessary. However, as discussed below in **Section VI.D.k.2**, Alternative 3 would result in fewer daily trips and a reduction in the total daily VMT as compared to the Project. Accordingly, the associated consumption of petroleum-based fuels under Alternative 3 would also be correspondingly reduced. **Therefore, impacts related to the consumption of energy resources under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.**

(b) Conflicts with Energy Efficiency Plans

As detailed in **Section IV.C, Energy**, of this Draft EIR, operation of the Project would have a less-than-significant impact with regard to conflicts with energy efficiency plans. As with the Project,

Alternative 3's design would comply with existing energy standards and incorporate features to reduce energy consumption and would, accordingly, not conflict with energy efficiency plans. Furthermore, although Alternative 3 would generate fewer daily trips and a reduction in the total daily VMT as compared to the Project, as discussed below in **Section VI.D.k.2**, Alternative 3 would result in the same household VMT per capita and work VMT per employee as the Project. A similar per capita and per employee VMT indicates that Alternative 3 would have a similar transportation fuel efficiency as the Project and would, therefore, be similarly compatible with energy efficiency plans. **Therefore, the impact related to conflicts with energy efficiency plans under Alternative 3 would be less than significant and similar to the Project's less-than-significant impact.**

d) Geology and Soils

(1) Geology and Soils

As detailed in **Section IV.D, Geology and Soils**, of this Draft EIR, impacts related to geology and soils from construction and operation of the Project would be less than significant. Under Alternative 3, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, liquefaction, seismically induced settlement, soil stability, and subsidence would be similar to those under the Project because such impacts are a function of the Project Site's underlying geologic conditions rather than the type or amount of land use proposed. As such, the potential for encountering unstable soils would be substantially similar. Alternative 3 would comply with the same regulatory requirements as the Project to ensure that the soils underlying the Project Site can adequately support the proposed development. As with the Project, Alternative 3 would be designed and constructed to conform to the current seismic design provisions of the California Building Code and the Los Angeles Building Code. Alternative 3 would also be required to provide a final design-level geotechnical report, subject to LADBS review and approval, prior to the issuance of grading permits, to identify and minimize seismic risks. **Therefore, under Alternative 3, impacts related to geology and soils would be less than significant and similar to those of the Project.**

(2) Paleontological Resources

As detailed in **Section IV.D, Geology and Soils**, of this Draft EIR, impacts related paleontological resources would be less than significant with implementation of mitigation measure MM GEO-1. Alternative 3 would construct an additional subterranean parking level as compared to the Project, but the footprint of the subterranean parking would be smaller than the Project. Therefore, the potential for Alternative 3 to uncover subsurface paleontological resources would be less than that of the Project. Therefore, because Alternative 3 would also require mitigation measure MM GEO-1 to reduce potential impacts to a less-than-significant level. **As such, impacts to paleontological resources under Alternative 3 would be less than significant with mitigation and less than the less-than-significant-with-mitigation impacts of the Project.**

e) Greenhouse Gas Emissions

As detailed in **Section IV.E, Greenhouse Gas Emissions**, of this Draft EIR, the impacts of combined construction and operational GHG emissions of the Project would be less than significant. As with the Project, Alternative 3 would be designed to comply with CalGreen and the City's Green Building Ordinance, as applicable. Accordingly, similar to the Project, Alternative 3 would be consistent with the GHG reduction goals and objectives included in adopted State, regional, and local regulatory plans. GHG emissions from a development project are determined in large part by the number of daily trips and total daily VMT generated and energy consumption from proposed land uses. Alternative 3 would result in the same amount of development as the Project and would, accordingly, result in similar energy and water consumption as the Project. However, as detailed below under Section **VI.D.k.2**, Alternative 3 would generate fewer daily trips and a reduction in total daily VMT as compared to the Project. As such, the amount of GHG emissions generated by Alternative 3 would be less than the amount generated by the Project. **Therefore, 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) Hydrology and Water Quality – Groundwater

As detailed in **Section IV.F, Hydrology and Water Quality**, of this Draft EIR, neither construction nor operation of the Project would encounter groundwater or conflict with groundwater management plans and impacts would be less than significant. Although Alternative 3 would require excavation to a depth of 48 feet below the ground surface, 12 feet deeper than the Project, as described in the Preliminary Geotechnical Engineering Investigation Report by GeoConcepts, Inc., seeps/perched groundwater⁶ was encountered during exploration at depths of 157.5 and 187.5 feet.⁷ As such, Alternative 3 would also not encounter groundwater. Furthermore, as with the Project, Alternative 3 would receive its water from LADWP, which along with the California Department of Water Resources, has protection programs in place to prevent the overdrafting of groundwater. As with the Project, Alternative 3 would be required to implement water conservation measures consistent with Title 24 and the City's Green Building Code and would not conflict with sustainable groundwater management. **Therefore, impacts to hydrology and water quality under Alternative 3 would be less than significant and similar to the Project's less-than-significant impacts.**

⁶ "Perched groundwater" refers to an aquifer that occurs above the regional water table. This occurs when there is an impermeable layer of rock or sediment or relatively impermeable layer above the main water table/aquifer but below the land surface. Perched groundwater is typically not used for drinking water supply.

⁷ GeoConcepts, Inc., *Preliminary Geotechnical Engineering Investigation – Proposed 13-story Hotel Expansion Over Partial One Level Subgrade Parking and 22-Story Residential Building Over 3-4 Levels Subgrade Parking – 1246 S. Hope Street and 427 W. Pico Boulevard Los Angeles, California, March 31, 2017.*

g) Land Use and Planning

As detailed in **Section IV.G, Land Use and Planning**, of this Draft EIR, impacts related to land use would be less than significant under the Project. Alternative 3 would seek the same general discretionary actions as the Project: a Vesting Tentative Tract; a Master Conditional Use; a Conditional Use; and a Zone Variance. As with the Project, with approval of the requests, Alternative 3 would be in conformance with applicable provisions of the LAMC and General Plan, would revitalize an infill site by locating residential and commercial uses at a site targeted for high density in close proximity to transit, and would enhance the pedestrian environment and promote alternative forms of transportation to reduce VMT. As such, Alternative 3 would also not conflict with local and regional land use plans applicable to the Project Site. Additionally, as with the Project, this alternative would be generally consistent with the proposed DTLA 2040 Plan, which in its current draft form, designates the Project Site as Transit Core with no vehicular parking minimums and maximum FAR between 10:1 and 13:1. **Therefore, land use impacts under Alternative 3 would be less than significant and similar to the land use impacts of the Project.**

h) Noise

(1) Noise

(a) Construction

As detailed in **Section IV.H, Noise**, of this Draft EIR, on-site noise impacts from construction would be significant and unavoidable even after implementation of mitigation measure MM NOI-1. Because Alternative 3 would have the same total floor area as the Project, the amount and the overall duration of construction and associated on-site noise under Alternative 3 would be the same as the Project. However, Alternative 3 would require a greater amount of excavation and soil export than the Project would. Therefore, Alternative 3 would result in a greater level of noise associated with haul trucks. Accordingly, noise levels during construction of Alternative 3 would therefore be similar to those of the Project and would require mitigation measure MM NOI-1. **As such, on-site construction noise impacts under Alternative 3 would be significant and unavoidable at a greater degree than the significant and unavoidable impacts of the Project.**

(b) Operation

As detailed in **Section IV.H, Noise**, of this Draft EIR, noise impacts from operation of the Project would be less than significant with implementation of mitigation measure MM NOI-2. As with the Project, the operational noise generated under Alternative 3 would be typical of mixed-use land uses. Under Alternative 3, as with the Project, parking would also be shielded to avoid parking noise impacts to adjacent properties. Noise generated by mechanical equipment under Alternative 3 would be similar to that generated under the Project, as the building proposed under both Alternative 3 and the Project would be the same height, placing mechanical equipment at the same distance to receptors. Furthermore, as with the Project, the mechanical equipment

would be required to comply with regulatory limits, which would reduce and minimize mechanical noise impacts. Alternative 3 would also implement mitigation measure MM NOI-2 to reduce operational noise from amplified music to less-than-significant levels. Similar to the Project, new vehicle trips would be generated along study area roadways, however, as detailed below under **Section VI.D.k.2**, Alternative 3 would generate fewer daily trips and a reduction in total daily VMT as compared to the Project. Thus, Alternative 3 would generate less traffic noise than the Project. **Therefore, operational noise impacts under Alternative 3 would be less than significant with mitigation but, due to the reduced traffic noise, less than the Project's less-than-significant-with-mitigation impacts.**

(2) Vibration

(a) Construction

As detailed in **Section IV.H, Noise**, of this Draft EIR, off-site vibration impacts from construction haul trucks would be significant and unavoidable even with implementation of mitigation measures MM NOI-3 and MM NOI-4. Both Alternative 3 and the Project would generate on-site vibration from the use of heavy-duty excavation, grading and construction equipment and off-site vibration along the proposed construction haul route from construction trucks. As discussed previously, both Alternative 3 and the Project would also have roughly the same peak day and overall amount of construction activity and be located the same distance from sensitive receptors, but Alternative 3 would require more soil export which would generate more haul trucks. As with the Project, Alternative 3 would require mitigation measures MM NOI-3 and MM NOI-4 to reduce construction vibration impacts to people and buildings along the eastern property boundary. **Therefore, off-site construction vibration impacts from haul trucks under Alternative 3 would be significant and unavoidable due to haul trucks causing human annoyance to sensitive uses along the route, and to a greater degree than the significant and unavoidable vibration impacts of the Project.**

(b) Operation

As detailed in **Section IV.H, Noise**, of this Draft EIR, sources of vibration related to operation of the Project would include mechanical equipment and on-site vehicle circulation, including delivery trucks. These same sources of operational vibration would occur under Alternative 3. As with the Project, building mechanical equipment installed as part of Alternative 3 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units mounted at the roof level that would include vibration-attenuation mounts to reduce vibration transmission, such that associated vibration would not be perceptible at the off-site sensitive receptors. Similarly, as with the Project, the vast majority of on-site vehicular circulation would occur within the proposed on-site subterranean parking structure. In addition, as described in **Section IV.H**, delivery trucks rarely generate vibration that exceeds thresholds for damage or annoyance. **Therefore, similar to the Project, operational vibration impacts (both building damage and human annoyance) would be less than significant under Alternative 3.**

i) Population and Housing

(1) Population Growth

As detailed in **Section IV.I, Population and Housing**, of this Draft EIR, indirect population growth impacts would be less than significant under the Project. As under the Project, Alternative 3 would not require the extension of roadways or infrastructure to an undeveloped area and would be supported by the existing infrastructure. **As such, indirect population growth impacts of Alternative 3 would be less than significant, similar to the Project.**

As detailed in **Section IV.I, Population and Housing**, of this Draft EIR, direct population growth impacts would be less than significant under the Project. Alternative 3 would develop the same number of residential units and hotel rooms and the same overall size of development as the Project. Accordingly, Alternative 3 would generate the same number of residents and similar number of employees as the Project. Therefore, as with the Project, Alternative 3's generation of residents and employees would represent a nominal percentage of SCAG's estimated growth for the City and its provision of housing and employment within an infill site in proximity to transit would be consistent with regional and local goals. **As such, direct population growth impacts of Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.**

(2) Displacement

As detailed in **Section IV.I, Population and Housing**, of this Draft EIR, the displacement impacts of the Project would be less than significant. As with the Project, Alternative 3 would adaptively reuse and expand the Morrison Hotel, which currently contains 111 vacant SRO units. However, as detailed in **Section IV.I**, these units have been approved for replacement at 407-413 East 5th Street and/or at a qualified alternative site by the City Planning Commission and, as with the Project, the displacement of these units would not represent a substantial number of housing. **Therefore, displacement impacts under Alternative 3 would be less than significant and similar to those of the Project.**

j) Public Services

(1) Fire Protection

(a) Construction

As detailed in **Section IV.J.1, Public Services – Fire Protection**, of this Draft EIR, under the Project, impacts to fire protection services during construction would be less than significant. The types of construction activities that would be required for Alternative 3 and the associated fire risks would be similar to those of the Project with the exception of increased grading and excavation phase by an additional 1.5 months and increased soil export for the additional subterranean level. Similar to the Project, implementation of “good housekeeping” procedures by the construction contractors and the work crews would minimize these risks. During construction

of Alternative 3, emergency access to the Project Site and surrounding vicinity could be impacted by construction activities, however, construction impacts are temporary in nature and would not cause lasting access effects to emergency services. In addition, construction work and haul truck trips would occur outside of typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related impacts. Furthermore, construction-related traffic would not significantly impact LAFD emergency response within the vicinity as emergency vehicles normally have a variety of options for avoiding traffic. As with the Project, a Construction Staging and Traffic Management Plan (PDF TR-1) would be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. As under the Project, Alternative 3 would not result in the need for new or altered government facilities (i.e., fire stations). **Therefore, construction-related impacts related to fire protection services under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.**

(b) *Operation*

As detailed in **Section IV.J.1, Public Services – Fire Protection**, of this Draft EIR, under the Project, impacts to fire protection services during operation would be less than significant. Similar to the Project, Alternative 3 would implement all applicable City Building Code and Fire Code requirements. Alternative 3 proposes the same number of residential and hotel units as the Project, as well as the same building square footage as the Project. Therefore, the demand for services from the LAFD would be correspondingly similar under Alternative 3. **Therefore, Alternative 3's demand for fire protection services would be less than significant and similar to the Project's less-than-significant impact.**

(2) Police Protection

(a) *Construction*

As detailed in **Section IV.J.2, Public Services – Police Protection**, of this Draft EIR, under the Project, impacts to police protection services during construction would be less than significant. The types of construction activities that would be required for Alternative 3 would be similar to those of the Project with the exception of increased grading and excavation phase by an additional 1.5 months and increased soil export for the additional subterranean level. Furthermore, as with the Project, Alternative 3 would implement PDF POL-1 and PDF POL-3 to reduce the demand for police protection services during construction. During construction of Alternative 3, emergency access to the Project Site and surrounding vicinity could be impacted by construction activities. However, construction impacts are temporary in nature and would not cause lasting access effects to emergency services. In addition, construction work and haul truck trips would occur outside of typical weekday commuter morning and afternoon peak periods and emergency vehicles normally have a variety of options for avoiding traffic. As with the Project, a Construction Staging and Traffic Management Plan, project design feature PDF TR-1, 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 to police protection services**

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

(b) Operation

As detailed in **Section IV.J.2, Public Services – Police Protection**, of this Draft EIR, under the Project, impacts to police protection services during operation would be less than significant. Alternative 3 proposes the same number of residential and hotel units as the Project, as well as the same building square footage as the Project. Therefore, the demand for services from the LAPD would be correspondingly similar under Alternative 3. As with the Project, Alternative 3 would implement PDF POL-2 and PDF POL-3 to improve safety through Project Site design and preparation of an Emergency Procedures Plan. **Therefore, impacts to police protection under Alternative 3 would be less than significant and similar to the Project’s less-than-significant impacts.**

(3) Libraries

(a) Construction

As detailed in **Section IV.J.3, Public Services – Libraries**, of this Draft EIR, under the Project, impacts to library services during construction would be less than significant. Similar to the Project, Alternative 3 would result in a temporary increase of construction workers on the Project Site. However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities even with the increased grading and excavation phase. Therefore, construction employment generated by Alternative 3 would not result in a notable increase in the resident population or a corresponding demand for library services in the vicinity of the Project Site. **As such, impacts to library facilities during construction of Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.**

(b) Operation

As detailed in **Section IV.J.3, Public Services – Libraries**, of this Draft EIR, under the Project, impacts to library services during operation would be less than significant. Residents are considered the primary users of library facilities. Alternative 3 proposes the same number of residential units as the Project. Therefore, the potential demand for library services would be the same under Alternative 3 in comparison to the Project. Alternative 3 would also generate revenues to the City’s General Fund (in the form of property taxes, sales tax, business tax, etc.) that could potentially be applied toward the provision of new library facilities and related staffing in the Downtown Community, as deemed appropriate. **Accordingly, impacts to library facilities under Alternative 3 would be less than significant and similar to the Project’s less-than-significant impacts.**

k) Transportation

(1) Plan Consistency

As detailed in **Section IV.K, Transportation**, of this Draft EIR, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant. Similar to the Project, Alternative 3 would provide pedestrian enhancements along S. Hope Street and W. Pico Boulevard, bicycle facilities, and electric vehicle chargers; as well as improve the walkability in the area. Therefore, as with the Project, Alternative 3 would be compatible with circulation system plans. **As such, the impact of Alternative 3 with regard to compatibility with plan, ordinance or policy addressing circulation system, including transit, roadway, bicycle and pedestrian facilities would be less than significant and similar to the less-than-significant impacts of the Project.**

(2) VMT Analysis

As detailed in **Section IV.K, Transportation**, of this Draft EIR, the Project would result in a total daily VMT of 22,722. The Project would result in 3.5 daily household VMT per capita, which is below the Central APC significance threshold of 6.0 VMT per capita, and an estimated 6.7 daily work VMT per employee, which is less than the Central APC significance threshold of 7.6 VMT per employee. Alternative 3 would result in an estimated total daily VMT of 19,872;⁸ a reduction of 2,850 total daily VMT as compared to the Project. Alternative 3 would result in a 3.9 daily household VMT per capita, which is below the Central APC significance threshold of 6.0 VMT per capita, but greater than the Project's daily household VMT per capita of 3.5. In addition, Alternative 3 would result in an estimated 7.2 daily work VMT per employee, which is less than the Central APC significance threshold of 7.6 VMT per employee, but greater than the Project's daily work VMT per employee of 6.7. **As such, the impact of Alternative 3 with regard to daily household VMT per capita and work VMT per employee would be less than significant, but greater than the Project's less-than-significant impact.**

(3) Emergency Access

As discussed in **Section IV.K, Transportation**, of this Draft EIR, impacts related to emergency access during construction and operation of the Project would be less than significant. In addition, the Project would implement project design feature PDF TR-1, which requires a Construction Staging and Traffic Management Plan to ensure that emergency access is maintained, establish safety procedures and re-routing for temporary lane closures, and prevent worker and haul trips from prohibiting emergency vehicle access to the Site and surrounding area. As with the Project, Alternative 3 would maintain emergency access during construction and implement PDF TR-1 to address traffic and access control during construction. Furthermore, construction impacts are temporary in nature and would not cause lasting access effects to emergency services. During

⁸ *Overland Traffic Consultants, Inc., Morrison Mixed-Use Alternatives Project Summary, November 11, 2020.*

operation, all circulation improvements that are proposed for the Project Site would comply with the Fire Code, including any additional access requirements of the LAFD. In addition, emergency vehicles normally have a variety of options for avoiding traffic. **As such, impacts to emergency access during construction and operation of Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.**

I) Tribal Cultural Resources

As detailed in **Section IV.L, Tribal Cultural Resources**, of this Draft EIR, under the Project, impacts to tribal cultural resources would be less than significant. Alternative 3 would construct an additional subterranean level than proposed by the Project, but the footprint of the subterranean parking would be smaller than the Project. Therefore, the potential for Alternative 3 to uncover subsurface tribal cultural resources would be less than that of the Project. However, the City has established a standard condition of approval to address inadvertent discovery of tribal cultural resources and reduce any potential impacts to less than significant. As with the Project, this standard condition of approval would be applied to Alternative 3. **Accordingly, impacts to tribal cultural resources under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.**

m) Utility and Service Systems

(1) Water

(a) Construction

As detailed in **Section IV.M.1, Utility and Service Systems – Water**, of this Draft EIR, impacts to water supply and infrastructure during construction of the Project would be less than significant. Similar to the Project, construction activities associated with Alternative 3 would generate a short-term demand for water. Because Alternative 3 would require a longer construction period as compared to the Project, this demand would be greater than that of the Project. However, the increase in construction duration and additional amount of grading/excavation requiring dust-control watering would be minimal and the temporary and intermittent demand for water during construction under Alternative 3 would also 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 regulations and standards. **Therefore, impacts on water supply and infrastructure associated with short-term construction activities under Alternative 3 would be less than significant but greater than the Project's less-than-significant impacts.**

(b) Operation

As detailed in **Section IV.M.1, Utility and Service Systems – Water**, of this Draft EIR, impacts to water supply and infrastructure during operation of the Project would be less than significant. Alternative 3 would result in a similar amount and type of development as the Project. Accordingly,

Alternative 3 would have a similar water demand as compared to the Project. Therefore, as with the Project, the estimated water demand for Alternative 3 would 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 similar to that of the Project. Furthermore, similar to the Project, under Alternative 3, the Applicant would construct the necessary on-site water infrastructure and off-site connections to the LADWP system pursuant to applicable City requirements to accommodate the new building. **Therefore, Alternative 3's impacts to water would be less than significant and similar to the Project's less-than-significant impacts.**

(2) Wastewater

(a) Construction

As detailed in **Section IV.M.2, Utility and Service Systems – Wastewater**, of this Draft EIR, impacts to wastewater infrastructure during construction of the Project would be less than significant. Under Alternative 3, similar to the Project, temporary facilities such as portable restrooms 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 not cause an increase in wastewater flows to the municipal sewer system. Therefore, construction of Alternative 3 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 3 may include construction activities associated with the installation of new or relocated sewer connections. 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 sewer lines in the streets adjacent to the Project Site. Similar to the Project, a Construction Staging and Traffic Management Plan, project design feature PDF TR-1, 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 Project's less than significant impacts.**

(b) Operation

As detailed in **Section IV.M.2, Utility and Service Systems – Wastewater**, of this Draft EIR, impacts to wastewater infrastructure during construction of the Project would be less than significant. Alternative 3 would result in a similar amount and type of development as the Project. Accordingly, Alternative 3 would result in a similar amount of wastewater generation as compared to the Project. Therefore, similar to the Project, the wastewater generated by Alternative 3 would be accommodated by the existing capacity of the HWRP, and Alternative 3 would not result in a determination by the wastewater treatment provided that it does not have adequate capacity to serve the increase in demand. Furthermore, given that Alternative 3 would result in similar daily wastewater compared to that of the Project, the existing sewer system would also have capacity

to serve Alternative 3. All related sanitary sewer connections and on-site infrastructure under Alternative 3 would be designed and constructed in accordance with applicable Bureau of Sanitation regulations, standards, and policies. **As such, impacts with regard to wastewater generation and infrastructure capacity under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.**

(3) Solid Waste

(a) Construction

As detailed in **Section IV.M.3, Utility and Service Systems – Solid Waste**, of this Draft EIR, impacts to solid waste facilities during construction of the Project would be less than significant. As with the Project, Alternative 3 would adaptively reuse the Morrison Hotel, however, Alternative 3 would retain the existing interior configuration and structures. Therefore, the amount of demolition debris generated by Alternative 3 would be less than that generated by the Project. As with the Project, Alternative 3 would be required to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris in accordance with the City's Green Building Code. Like the Project, Alternative 3 would represent a very small percentage of the inert waste disposal capacity in the region. Therefore, Alternative 3 would not create a need for additional solid waste disposal facilities to adequately handle the construction-generated inert waste. **As such, construction impacts related to solid waste under Alternative 3 would be less than significant and, due to the reduced amount of demolition debris, less than the Project's less-than-significant impacts.**

(b) Operation

As detailed in **Section IV.M.3, Utility and Service Systems – Solid Waste**, of this Draft EIR, impacts to solid waste facilities during operation of the Project would be less than significant. Alternative 3 would result in a similar amount of development as the Project. Accordingly, Alternative 3 would generate a similar amount of solid waste as the Project. Therefore, similar to the Project, the existing landfill serving the Project Site would also have the capacity to accommodate the disposal needs of Alternative 3 and, therefore, Alternative 3 would not result in the need for an additional recycling or disposal facility. Similar to the Project, as Alternative 3 would be required to divert a minimum of 50 percent of solid waste from landfills in accordance with SB 939, it would therefore, comply with federal, State, and local management statutes and regulations. **Therefore, Alternative 3's operational impacts to solid waste would be less than significant and similar to the Project's less-than-significant impacts.**

(4) Dry Utilities

(a) Construction

As detailed in **Section IV.M.4, Utility and Service Systems – Dry Utilities**, of this Draft EIR, impacts to dry utilities during construction of the Project would be less than significant. Construction activities typically do not consume natural gas or require telecommunication services. 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 electricity consumed would be greater than the Project due to the increased duration of construction and additional amount of grading/excavation requiring dust-control watering. However, the increase in construction duration and additional amount of watering would be minimal and temporary and would not require additional sources of electric power. Furthermore, before construction begins, the Project Applicant would coordinate with applicable regulatory agencies and telecommunication providers to identify the location of existing underground dry utilities and to implement orderly installation of new on-site and connection to existing off-site electrical, natural gas, and telecommunication facilities in order to prevent accidental encroachment or service interruptions. **Therefore, impacts on energy infrastructure associated with short-term construction activities would be less than significant under Alternative 3, similar to the less-than-significant impacts of the Project.**

(b) Operation

As detailed in **Section IV.M.4, Utility and Service Systems – Dry Utilities**, of this Draft EIR, impacts to dry utilities during operation of the Project would be less than significant. As Alternative 3 proposes a similar amount of development as the Project, electricity, and natural gas consumption for Alternative 3 would be similar under Alternative 3 as under the Project. Furthermore, similar to the Project, Alternative 3 would adhere to the Title 24 energy conservation standards, which would improve energy efficiency and reduce impacts on consumption of energy resources. Telecommunications services would be provided from existing suppliers through established service procedures. Therefore, Alternative 3 would not require the need for relocation or construction of new or expanded electric, natural gas, or telecommunication facilities. **Therefore, impacts to dry utilities during operation of Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.**

3. Relationship to Project Objectives

Alternative 3 would include similar components as the Project but the Morrison Hotel would require implementation of a comprehensive seismic retrofit program that would eliminate the street-oriented uses on the ground floor, including the restaurants, gallery space, and immersive museum. The Hope Street and Pico Boulevard intersection would have retail spaces (like existing) and a small lobby for the new hotel. The transparent ground floor uses proposed as part of the Project would not be provided. Four levels of underground parking would be constructed under the Hotel/Residential Tower to avoid construction under the Morrison Hotel.

Alternative 3 would meet Objective 3 to the same extent as the Project because the Alternative would create a mixed-use hotel complex that maximizes the density of hotel rooms on an urban infill location near transit and the Convention Center.

3. Create a mixed-use hotel complex that maximizes the density of hotel rooms on an urban infill location in walking distance to the Convention Center and public transit to further smart growth land use planning practices aligned with policies to reduce greenhouse gas

emissions and vehicle miles traveled, as well as the Mayor's goal of 8,000 hotel rooms by the Convention Center by 2020.

Alternative 3 would meet the underlying purpose of the Project to create a mixed-use development by rehabilitating and reconstructing the long vacant Morrison Hotel and turning it into a safe and habitable hotel. Alternative 3 would not include the museum, gallery, or restaurant uses at the corner of Hope Street and Pico Boulevard. Therefore, it would only partially meet the remaining purpose to complement the existing uses and market needs in the South Park neighborhood by creating a range of ground-floor commercial uses. Alternative 3 reduces the amount of ground-floor commercial uses and the overall square footage thereby reducing the economic base and employment opportunities created by the Project.

Alternative 3 would partially meet, or meet to a lesser extent, Objectives 1, 2, 4, and 7 because if the seismic retrofit program can be implemented, Alternative 3 would not demolish and reconstruct the interior of the Morrison Hotel and would retain more character-defining features than the Project. Alternative 3 would retain the historic use of the Morrison Hotel. However, Alternative 3 would not include the proposed restaurant and cultural uses on the ground-floor that were proposed to highlight the Morrison Hotel's history and connection to The Doors. Alternative 3 would largely keep the ground-floor uses as is, and make 3,484 square feet at the first floor non-functional with limited accessibility, which does not maximize the economic viability of the Project Site or attract commercial tenants because it reduces the overall commercial floor area and the ground-floor spaces cannot be utilized as a restaurant.

1. Preserve the existing Morrison Hotel by rehabilitating major character-defining features and incorporating a diversity of commercial uses to highlight the hotel's history, while making the building safe and habitable through a seismic retrofit and upgrading the building to meet current safety standards.
2. Adaptively reusing the long vacant SRO hotel as a high-density mixed-use project that further revitalizes the area adjacent to the Convention Center and maximizes the economic viability of the Site.
4. Maximize residential density and floor area in Downtown within walking distance of jobs-rich centers to help meet the demand for new housing opportunities in proximity to public transit, including Metro's A Line and E Line.
7. Expand the economic base of the City and provide employment opportunities and new sources of tax revenue 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.

Alternative 3 would not meet Objectives 5 and 6 because the implementation of a comprehensive seismic retrofit program would eliminate the street-oriented uses on the ground floor, including the restaurants, gallery space, and immersive museum. The transparent ground floor uses proposed as part of the Project would not be provided. As such, Alternative 3 would not create a

cultural and arts destination or enhance the pedestrian experience at Hope Street and Pico Boulevard.

5. Create a cultural and arts destination with a range of commercial uses, including event spaces, gallery and museum space, and restaurants that support one of the Central City Community Plan's primary goals of creating a vibrant and active 24-hour downtown.
6. Enhance and further activate the pedestrian experience at the intersection of Hope Street and Pico Boulevard by providing street-oriented uses, such as restaurants, gallery and museum space, and creating a transparent ground floor with a landscaped courtyard and pedestrian connections.

Alternative 3's impacts would generally be either less than the Project's impacts or similar to the Project's impacts. In addition, Alternative 3 would eliminate the Project's significant and unavoidable direct impact to historical resources with incorporation of mitigation. However, due to the increased duration of construction and soil export/hauling required the additional subterranean level, on-site construction noise and off-site vibration impacts would still be significant and unavoidable and to a greater degree than under the Project. Additionally, construction-related impacts related to TAC emissions, energy consumption, noise, and water consumption would be greater under Alternative 3 than under the Project. Furthermore, Alternative 3 would not eliminate the need for mitigation to reduce impacts related to historical, archaeological, and paleontological resources, and operation related noise. Alternative 3 would also result in greater, albeit still less-than-significant, impacts to VMT compared to the Project.

E. Alternative 4 – Morrison Preservation— Office Use

1. Description

Alternative 4 would involve the demolition of approximately 32,550 square feet of existing commercial industrial buildings, the change of use of the existing 46,626-square-foot, 111-unit SRO Existing Hotel as office space, expansion of the Existing Hotel to incorporate new hotel uses, and construction of a Hotel/Residential Tower. The total floor area and number of residential dwelling units proposed under Alternative 4 would be the same as under the Project, approximately 420,303 square feet with 136 dwelling units, however, due to the elimination of hotel uses from the Existing Hotel, only 270 hotel guest rooms would be developed under Alternative 4. Alternative 4 would include four subterranean levels under the Hotel/Residential Tower only up to 48 feet in depth, and include 258 parking spaces. Unlike the Project, there would be no subterranean parking under the Existing Hotel. Similar to the Project, the parking entry ramp would be accessed via the entry from Hope Street. The subterranean levels would also include some hotel and residential back-of-house and storage uses. As with the Project, Alternative 4 would result in a FAR of 7.5:1.

Under Alternative 4, the existing four-story Morrison Hotel, at the southwesterly portion of the Project Site, would involve a change of use to new office space. The Existing Hotel would convert the 111 existing SRO units into 111 office suites while retaining the existing ground-level lobby and retail spaces. Unlike Alternative 3, Alternative 4 would not require expanding the size or reconfiguring the existing units because the offices would utilize shared bathrooms on each floor, rather than bathrooms in each office suite. The height of the Existing Hotel would remain as it currently exists, at four stories and approximately 52 feet high.

Unlike the Project, Alternative 4 would implement the comprehensive seismic retrofit program recommended by Englekirk to make the building safe and habitable. As described in more detail in the Project Description, the design and existing deterioration of the Morrison Hotel make the building unsafe in its current condition, so retaining the existing building necessitates extensive upgrades. Alternative 4 contemplates implementation of the comprehensive seismic retrofit program, which is based on provisions of ASCE 41-13, Seismic Rehabilitation of Existing Buildings and the 2016 California Building Code, Chapter 4 Prescription Compliance Method. The seismic retrofit would require substantial improvements, including, but not limited to shotcrete shear walls around the perimeter of the building and around the light wells; new anchor connections between the URM walls and the wood diaphragm; and new plywood diaphragms throughout the floors over the existing diagonal sheathing.

The construction of sheer walls along the perimeter of the building and around the light wells limits the amount of useable floor area on the first floor of the Morrison Hotel.⁹ Given that, the ground floor restaurant, gallery spaces, and immersive museum can no longer be accommodated. Alternative 4 retains the existing hotel lobby and small retail spaces, and converts the windowless floor area around the lightwells in the center of the building to storage.

In addition to the seismic retrofit program, Englekirk recommended a comprehensive materials assessment of all steel girders, columns, and connections. Englekirk concluded that a comprehensive materials assessment is not feasible given that the steel girders and columns on the 1st Floor are encased in concrete and supporting the URM walls and wood floors on the upper levels. As such, the ultimate feasibility of the seismic program is unknown since a comprehensive materials assessment is not feasible.

The Hotel Expansion would be located along the eastern and northeastern portions of the Project Site. A courtyard on Hope Street would provide entry to the hotel lobby check-in and the gallery loggia. Hotel uses, including a 3,327-square-foot loggia/coworking space, 2,792-square-foot lobby/bar, approximately 12,000 square feet of event and meeting spaces, a 1,050-square-foot fitness area, and 270 guestrooms, would be located on the first subterranean level, levels 1 through 15 of the Hotel Expansion, and levels 1 through 5 of the Hotel/Residential Tower. Two high-ceiling event/ballrooms would be located on level 2, and two meeting spaces would be located on level 3, with an event/ballroom and 3,523-square-foot amenity terrace located on level 5. A hotel pool, 1,678-square-foot restaurant/roof bar, and a 1,715-square-foot covered and 3,677-square-foot uncovered outdoor terrace would be located on Level 15. The Hotel Expansion would be 15 stories and approximately 191 feet tall, which would be the same number of stories as under the Project but approximately 2 feet shorter in height.

A residential lobby would be provided at the northwestern portion of the Hotel/Residential Tower on the ground floor, which would be accessed from a covered driveway entry from Hope Street. Residential amenity areas would be located on level 6, and the remaining residential uses would be located on levels 7 through 20 of the Hotel/Residential Tower. A rooftop pool, covered and uncovered terraces, gym, and lounges for residents would be located on level 20. The Hotel/Residential Tower would be 25 stories and approximately 325 feet tall, which would be the same number of stories and height as under the Project.

Lighting, signage, open space, landscaping, security, sustainability features, and off-site improvements would be the same as under the Project. Due to the additional subterranean level proposed under Alternative 4, the grading and excavation construction phase would be extended by approximately 1.5 months to 6.5 months and soil export would be increased by approximately 43,333 cubic yards to approximately 173,333 cubic yards.

⁹ Refer to Figure SK-01.2 in Attachment H of Appendix C.1 to this Draft EIR for the first floor retrofit schematic design by the structural engineer Englekirk.

2. Comparative Analysis

Alternative 4 assumes the development of the Related Projects listed in **Section III, Environmental Setting**, of this Draft EIR. The potential environmental impacts associated with Alternative 4 are described below and are compared to the environmental impacts that would result from the implementation of the Project as described in **Section IV, Environmental Impact Analysis**, of this Draft EIR.

a) Air Quality

(1) Construction

(a) *Regional and Localized Air Quality Impacts*

As detailed in **Section IV.A, Air Quality**, of this Draft EIR, construction of the Project would result in less-than-significant impacts with regard to regional and localized air quality emissions. Alternative 4 would involve the same amount of demolition as the Project; however, the additional subterranean level would require a longer construction grading/excavation period and additional soil export as compared to the Project. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days when maximum construction activities occur. Because maximum daily conditions are used for measuring impact significance, regional and localized impacts on these days would be similar to those of the Project. Furthermore, Alternative 4 would be located at the same distances from sensitive receptors as the Project. **Therefore, impacts associated with regional and localized construction emissions under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.**

(b) *Toxic Air Contaminants*

As detailed in **Section IV.A, Air Quality**, of this Draft EIR, construction of the Project would result in less-than-significant toxic air contaminants (TACs) impacts. 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 and, accordingly, because Alternative 4 would require greater amounts of grading and excavation as the Project, construction emissions of TACs generated by Alternative 4 would be greater than those of the Project. However, as with the Project, construction of Alternative 4 would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and federal levels that would protect sensitive receptors from substantial concentrations of TACs including: applicable AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities; CARB's Air Toxics Control Measure limiting diesel powered equipment and vehicle idling to no more than 5 minutes at a location; CARB's In-Use Off-Road Diesel Vehicle Regulation; and the requirements of SCAQMD Rule 1403 if asbestos is found during the demolition activities. Compliance with these regulations and laws would minimize emissions of TACs during construction. **Therefore, while TAC impacts**

would be less than significant under Alternative 4, they would be greater than the less-than-significant TAC impacts of the Project.

(2) Operation

(a) *Regional and Localized Air Quality Impacts*

As detailed in **Section IV.A, Air Quality**, of this Draft EIR, operation of the Project would result in less-than-significant impacts with regard to regional and localized air quality emissions. Since the overall size of Alternative 4 would be the same as the Project and the calculation of energy consumption is based on the size of proposed uses, the consumption of electricity and natural gas would be the same as compared to the Project. However, as discussed below in **Section VI.E.k.2**, Alternative 4 would result in fewer daily trips and a reduction in the total daily VMT as compared to the Project. Since the amount of vehicular emissions is based on the number of daily trips, the vehicular emissions generated by Alternative 4 would be less than the emissions generated by the Project. **Therefore, regional air quality impacts under Alternative 4 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 4 would not introduce any major new sources of air pollution within the Project Site. As discussed above, the number of vehicle trips and total daily VMT generated by Alternative 4 would be less than the vehicle trips and total daily VMT generated by the Project. **As such, localized impacts under Alternative 4 would be less than significant, and less than the less-than-significant impacts of the Project.**

(b) *Toxic Air Contaminants*

As detailed in **Section IV.A, Air Quality**, of this Draft EIR, operation of the Project would result in less-than-significant TAC impacts. Due to the reduction in daily trips and total daily VMT that would occur under Alternative 4, mobile source emissions generated by Alternative 4 would be correspondingly reduced compared to the mobile source emissions generated by the Project. **Therefore, TAC impacts would be less than significant under Alternative 4 and less than the less-than-significant TAC impacts of the Project.**

b) Cultural Resources

(1) Historical Resources

(a) *Direct Impacts*

As detailed in **Section IV.B, Cultural Resources**, of this Draft EIR, following implementation of mitigation measure MM CUL-1, the Project's direct impacts to the Morrison Hotel (an historical resource) would remain significant and unavoidable due to the loss of all the interior historic fabric of the building, including all of the public circulation, lobby, stairs, corridors, floors, ceilings, and roof structure, which would cause material impairment under CEQA. Alternative 4 differs by assuming implementation of the comprehensive seismic retrofit program recommended by

Englekirk.¹⁰ The program requires extensive updates to the interior, including, but not limited to new anchor connections between the URM walls and the wood diaphragm and new plywood diaphragms throughout the floors over the existing diagonal sheathing. At a minimum, and to the extent feasible, this would result in the removal and replacement of all floors, ceilings, roof structure, and walls in the lobby, corridors, and rooms.

Unlike the Project, Alternative 4 would not remove the east elevation of the Morrison Hotel, partially reconstruct the north elevation, or demolish the majority of two of four exterior elevations, roof, and all interior floors, stairs, and corridors. Alternative 4 would retain the building's E-shape. The interior of the Morrison Hotel would also be converted from 111 existing SRO units to 111 office suites to allow for the preservation of the existing configuration of the SRO units which do not provide bathrooms in each hotel room; however, the conservation would change the historic use of the Morrison Hotel.

Like the Project, the Morrison Hotel would include rehabilitation of the most visually recognizable character-defining features of the Morrison Hotel at the south, west and partial north elevations, including ground level storefronts with transoms, glazed brick, cast stone entrance surround and inset tiled entrance, cast stone beltway, and galvanized iron frieze. Missing or altered features including some window infill and leaded prism glass storefront transoms would be restored to their original appearance. Alternative 4 would also reconstruct the previously removed cornice and raised parapet. Given the extensive upgrades needed to ensure the safety and habitability of the Morrison Hotel, impacts from Alternative 4 would be significant without mitigation.

With mitigation contemplated as part of MM-CUL-1, the retention and rehabilitation, including restoration and reconstruction as necessary, of the key character-defining features on the primary south, west, and partial north elevations is sufficient to convey the historic and architectural significance of the subject property as an early twentieth century Beaux-Arts tourist hotel designed by master architects Morgan, Walls and Morgan. The restoration, reconstruction, and rehabilitation proposed by the Project would be an improvement of existing conditions for the most visually recognizable character-defining features at the Project Site, including the features on the primary south, west, and partial north elevations. Additionally, Alternative 4 would retain the existing shape of the building and would not demolish and reconstruct all of the interior historic fabric of the building. As such, impacts would be less than the Project and less than significant with mitigation incorporated. **Thus, direct impacts to historical resources under Alternative 4 would be less-than-significant and less than the significant and unavoidable impacts of the Project.**

(b) *Indirect Impacts*

As detailed in **Section IV.B, Cultural Resources**, of this Draft EIR, indirect impacts to nearby historical resources from construction and operation of the Project would be less than significant. As with the Project, Alternative 4 would alter the immediate surroundings of off-site historical resources in the vicinity by constructing a new building on the Project Site and increasing the

¹⁰ *The full scope of the seismic upgrades needed is not known at this time and cannot be determined because a comprehensive materials assessment is not feasible given the design of the Morrison Hotel.*

density of the Project Site. Such off-site resources include 1200 S. Hope Street, 1223-1225 S. Hope Street, 1201 S. Grand Avenue, and 1221-1225 S. Grand Avenue. The design of the proposed building under Alternative 4 would be similar to that of the Project in terms of architectural style, building materials and colors, and height. Accordingly, Alternative 4 would appear similar in views of and from nearby historical resources as compared to the Project. **Thus, indirect impacts to historical resources under Alternative 4 would be less-than-significant and similar to the less-than-significant impacts of the Project.**

(2) Archaeological Resources

As detailed in **Section IV.B, Cultural Resources**, of this Draft EIR, impacts to archaeological resources from construction and operation of the Project would be less than significant with implementation of mitigation measures MM CUL-2 and MM CUL-3. Alternative 4 would construct an additional level of subterranean parking levels than the Project, but the footprint of the subterranean parking would be smaller than the Project. Therefore, the potential for Alternative 4 to uncover subsurface archaeological resources would be less than that of the Project and, as under the Project, mitigation measures MM CUL-2 through MM CUL-3 would also be required for Alternative 4. **Accordingly, impacts to archaeological resources under Alternative 4 would be less-than-significant-with-mitigation, and less than the less-than-significant-with-mitigation impacts of the Project.**

c) Energy Conservation

(1) Construction

As detailed in **Section IV.C, Energy**, of this Draft EIR, construction of the Project would have a less-than-significant impact with regard to energy consumption. Because the construction period length and overall intensity of activities would be greater under Alternative 4 as compared to the Project, the amount of electricity and petroleum-based fuel required for construction of Alternative 4 would be greater than under the Project. However, as with the Project, Alternative 4 would also be subject to State and federal regulations that reduce the inefficient, wasteful, and unnecessary consumption of energy. **Therefore, while impacts on energy resources associated with short-term construction activities would be less than significant under Alternative 4, due to the increased construction period required for the additional subterranean level, they would be greater than the less-than-significant impacts of the Project.**

(2) Operation

(a) *Energy Consumption*

As detailed in **Section IV.C, Energy**, of this Draft EIR, operation of the Project would have a less-than-significant impact with regard to energy consumption. Because the total development that would occur under Alternative 4 would be the same as the Project, electricity and natural gas consumption for Alternative 4 would be similar to that of the Project. Furthermore, similar to the Project, Alternative 4 would implement the Title 24 energy conservation standards, which would

improve energy efficiency and reduce impacts on consumption of energy resources. Accordingly, as with the Project, the consumption of electricity and natural gas under Alternative 4 would not be wasteful, inefficient, or unnecessary. However, as discussed below in **Section VI.E.k.2**, Alternative 4 would result in fewer daily trips and a reduction in the total daily VMT as compared to the Project. Accordingly, the associated consumption of petroleum-based fuels under Alternative 4 would also be correspondingly reduced. **Therefore, impacts related to the consumption of energy resources under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project.**

(b) Conflicts with Energy Efficiency Plans

As detailed in **Section IV.C, Energy**, of this Draft EIR, operation of the Project would have a less-than-significant impact with regard to conflicts with energy efficiency plans. As with the Project, Alternative 4's design would comply with existing energy standards and incorporate features to reduce energy consumption and would, accordingly, not conflict with energy efficiency plans. Furthermore, although Alternative 4 would generate fewer daily trips and a reduction in the total daily VMT as compared to the Project, as discussed below in **Section VI.E.k.2**, Alternative 4 would result in the same household VMT per capita and work VMT per employee as the Project. A similar per capita and per employee VMT indicates that Alternative 4 would have a similar transportation fuel efficiency as the Project and would, therefore, be similarly compatible with energy efficiency plans. **Therefore, the impact related to conflicts with energy efficiency plans under Alternative 4 would be less than significant and similar to the Project's less-than-significant impact.**

d) Geology and Soils

(1) Geology and Soils

As detailed in **Section IV.D, Geology and Soils**, of this Draft EIR, impacts related to geology and soils from construction and operation of the Project would be less than significant. Under Alternative 4 impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, liquefaction, seismically induced settlement, soil stability, and subsidence would be similar to those under the Project because such impacts are a function of the Project Site's underlying geologic conditions rather than the type or amount of land use proposed. As such, the potential for encountering unstable soils would be substantially similar. Alternative 4 would comply with the same regulatory requirements as the Project to ensure that the soils underlying the Project Site can adequately support the proposed development. As with the Project, Alternative 4 would be designed and constructed to conform to the current seismic design provisions of the California Building Code and the Los Angeles Building Code. Alternative 4 would also be required to provide a final design-level geotechnical report, subject to LADBS review and approval, prior to the issuance of grading permits, to identify and minimize seismic risks. **Therefore, under Alternative 4, impacts related to geology and soils would be less than significant and similar to those of the Project.**

(2) Paleontological Resources

As detailed in **Section IV.D, Geology and Soils**, of this Draft EIR, impacts related paleontological resources would be less than significant with implementation of mitigation measure MM GEO-1. Alternative 4 would construct an additional subterranean parking level as compared to the Project, but the footprint of the subterranean parking would be smaller than the Project. Therefore, the potential for Alternative 4 to uncover subsurface paleontological resources would be less than that of the Project. Therefore, because Alternative 4 would also require mitigation measure MM GEO-1 to reduce potential impacts to a less-than-significant level. **As such, impacts to paleontological resources under Alternative 4 would be less than significant with mitigation and less than the less-than-significant-with-mitigation impacts of the Project.**

e) Greenhouse Gas Emissions

As detailed in **Section IV.E, Greenhouse Gas Emissions**, of this Draft EIR, the impacts of combined construction and operational GHG emissions of the Project would be less than significant. As with the Project, Alternative 4 would be designed to comply with CalGreen and the City's Green Building Ordinance, as applicable. Accordingly, similar to the Project, Alternative 4 would be consistent with the GHG reduction goals and objectives included in adopted State, regional, and local regulatory plans. GHG emissions from a development project are determined in large part by the number of daily trips and total daily VMT generated and energy consumption from proposed land uses. Alternative 4 would result in the same amount of development as the Project and would, accordingly, result in similar energy and water consumption as the Project. However, as detailed below under Section **VI.E.k.2**, Alternative 4 would generate fewer daily trips and a reduction in total daily VMT as compared to the Project. As such, the amount of GHG emissions generated by Alternative 4 would be less than the amount generated by the Project. **Therefore, 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) Hydrology and Water Quality – Groundwater

As detailed in **Section IV.F, Hydrology and Water Quality**, of this Draft EIR, neither construction nor operation of the Project would encounter groundwater or conflict with groundwater management plans and impacts would be less than significant. Although Alternative 4 would require excavation to a depth of 48 feet below the ground surface, 12 feet deeper than the Project, as described in the Preliminary Geotechnical Engineering Investigation Report by GeoConcepts, Inc., seeps/perched groundwater¹¹ was encountered during exploration at depths of 157.5 and 187.5 feet.¹² As such, Alternative 4 would also not encounter groundwater. Furthermore, as with

¹¹ "Perched groundwater" refers to an aquifer that occurs above the regional water table. This occurs when there is an impermeable layer of rock or sediment or relatively impermeable layer above the main water table/aquifer but below the land surface. Perched groundwater is typically not used for drinking water supply.

¹² GeoConcepts, Inc., *Preliminary Geotechnical Engineering Investigation – Proposed 13-story Hotel Expansion Over Partial One Level Subgrade Parking and 22-Story Residential Building Over 3-4 Levels*

the Project, Alternative 4 would receive its water from LADWP, which along with the California Department of Water Resources, has protection programs in place to prevent the overdrafting of groundwater. As with the Project, Alternative 4 would be required to implement water conservation measures consistent with Title 24 and the City's Green Building Code and would not conflict with sustainable groundwater management. **Therefore, impacts to hydrology and water quality under Alternative 4 would be less than significant and similar to the Project's less-than-significant impacts.**

g) Land Use and Planning

As detailed in **Section IV.G, Land Use and Planning**, of this Draft EIR, impacts related to land use would be less than significant under the Project. Alternative 4 would seek the same general discretionary actions as the Project: a Vesting Tentative Tract; a Master Conditional Use; a Conditional Use; and a Zone Variance. As with the Project, with approval of the requests, Alternative 4 would be in conformance with applicable provisions of the LAMC and General Plan, would revitalize an infill site by locating residential and commercial uses at a site targeted for high density in close proximity to transit, and would enhance the pedestrian environment and promote alternative forms of transportation to reduce VMT. As such, Alternative 4 would also not conflict with local and regional land use plans applicable to the Project Site. Additionally, as with the Project, this alternative would be generally consistent with the proposed DTLA 2040 Plan, which in its current draft form, designates the Project Site as Transit Core with no vehicular parking minimums and maximum FAR between 10:1 and 13:1. **Therefore, land use impacts under Alternative 4 would be less than significant and similar to the land use impacts of the Project.**

h) Noise

(1) Noise

(a) Construction

As detailed in **Section IV.H, Noise**, of this Draft EIR, on-site noise impacts from construction would be significant and unavoidable even after implementation of mitigation measure MM NOI-1. Because Alternative 4 would have the same total floor area as the Project, the amount and the overall duration of construction and associated on-site noise under Alternative 4 would be the same as the Project. However, Alternative 4 would require a greater amount of excavation and soil export than the Project would. Therefore, Alternative 4 would result in a greater level of noise associated with haul trucks. Accordingly, noise levels during construction of Alternative 4 would therefore be similar to those of the Project and would require mitigation measure MM NOI-1. **As such, on-site construction noise impacts under Alternative 4 would be significant and unavoidable at a greater degree than the significant and unavoidable impacts of the Project.**

Subgrade Parking – 1246 S. Hope Street and 427 W. Pico Boulevard Los Angeles, California, March 31, 2017.

(b) *Operation*

As detailed in **Section IV.H, Noise**, of this Draft EIR, noise impacts from operation of the Project would be less than significant with implementation of mitigation measure MM NOI-2. As with the Project, the operational noise generated under Alternative 4 would be typical of mixed-use land uses. Under Alternative 4, as with the Project, parking would also be shielded to avoid parking noise impacts to adjacent properties. Noise generated by mechanical equipment under Alternative 4 would be similar to that generated under the Project, as the building proposed under both Alternative 4 and the Project would be the same height, placing mechanical equipment at the same distance to receptors. Furthermore, as with the Project, the mechanical equipment would be required to comply with regulatory limits, which would reduce and minimize mechanical noise impacts. Alternative 4 would also implement mitigation measure MM NOI-2 to reduce operational noise from amplified music to less-than-significant levels. Similar to the Project, new vehicle trips would be generated along study area roadways, however, as detailed below under **Section VI.E.k.2**, Alternative 4 would generate fewer daily trips and a reduction in total daily VMT as compared to the Project. Thus, Alternative 4 would generate less traffic noise than the Project. **Therefore, operational noise impacts under Alternative 4 would be less than significant with mitigation but, due to the reduced traffic noise, less than the Project's less-than-significant-with-mitigation impacts.**

(2) *Vibration*

(a) *Construction*

As detailed in **Section IV.H, Noise**, of this Draft EIR, off-site vibration impacts from construction haul trucks would be significant and unavoidable even with implementation of mitigation measures MM NOI-3 and MM NOI-4. Both Alternative 4 and the Project would generate on-site vibration from the use of heavy-duty excavation, grading and construction equipment and off-site vibration along the proposed construction haul route from construction trucks. As discussed previously, both Alternative 4 and the Project would also have roughly the same peak day and overall amount of construction activity and be located the same distance from sensitive receptors, but Alternative 4 would require more soil export which would generate more haul trucks. As with the Project, Alternative 4 would require mitigation measures MM NOI-3 and MM NOI-4 to reduce construction vibration impacts to people and buildings along the eastern property boundary. **Therefore, off-site construction vibration impacts from haul trucks under Alternative 4 would be significant and unavoidable due to haul trucks causing human annoyance to sensitive uses along the route, and to a greater degree than the significant and unavoidable vibration impacts of the Project.**

(b) *Operation*

As detailed in **Section IV.H, Noise**, of this Draft EIR, sources of vibration related to operation of the Project would include mechanical equipment and on-site vehicle circulation, including delivery trucks. These same sources of operational vibration would occur under Alternative 4. As with the Project, building mechanical equipment installed as part of Alternative 4 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units mounted at the

roof level that would include vibration-attenuation mounts to reduce vibration transmission, such that associated vibration would not be perceptible at the off-site sensitive receptors. Similarly, as with the Project, the vast majority of on-site vehicular circulation would occur within the proposed on-site subterranean parking structure. In addition, as described in **Section IV.H**, delivery trucks rarely generate vibration that exceeds thresholds for damage or annoyance. **Therefore, similar to the Project, operational vibration impacts (both building damage and human annoyance) would be less than significant under Alternative 4.**

i) Population and Housing

(1) Population Growth

As detailed in **Section IV.I, Population and Housing**, of this Draft EIR, indirect population growth impacts would be less than significant under the Project. As under the Project, Alternative 4 would not require the extension of roadways or infrastructure to an undeveloped area and would be supported by the existing infrastructure. **As such, indirect population growth impacts of Alternative 4 would be less than significant, similar to the Project.**

As detailed in **Section IV.I, Population and Housing**, of this Draft EIR, direct population growth impacts would be less than significant under the Project. Alternative 4 would develop the same number of residential units and the same overall size of development as the Project. Accordingly, Alternative 4 would generate the same number of residents and similar number of employees as the Project. Therefore, as with the Project, Alternative 4's generation of residents and employees would represent a nominal percentage of SCAG's estimated growth for the City and its provision of housing and employment within an infill site in proximity to transit would be consistent with regional and local goals. **As such, direct population growth impacts of Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.**

(2) Displacement

As detailed in **Section IV.I, Population and Housing**, of this Draft EIR, the displacement impacts of the Project would be less than significant. As with the Project, Alternative 4 would adaptively reuse and expand the Morrison Hotel, which currently contains 111 vacant SRO units. However, as detailed in **Section IV.I**, these units have been approved for replacement at 407-413 East 5th Street and/or at a qualified alternative site by the City Planning Commission and, as with the Project, the displacement of these units would not represent a substantial number of housing. **Therefore, displacement impacts under Alternative 4 would be less than significant and similar to those of the Project.**

j) Public Services

(1) Fire Protection

(a) Construction

As detailed in **Section IV.J.1, Public Services – Fire Protection**, of this Draft EIR, under the Project, impacts to fire protection services during construction would be less than significant. The types of construction activities that would be required for Alternative 4 and the associated fire risks would be similar to those of the Project with the exception of increased grading and excavation phase by an additional 1.5 months and increased soil export for the additional subterranean level. Similar to the Project, implementation of “good housekeeping” procedures by the construction contractors and the work crews would minimize these risks. During construction of Alternative 4, emergency access to the Project Site and surrounding vicinity could be impacted by construction activities, however, construction impacts are temporary in nature and would not cause lasting access effects to emergency services. In addition, construction work and haul truck trips would occur outside of typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related impacts. Furthermore, construction-related traffic would not significantly impact LAFD emergency response within the vicinity as emergency vehicles normally have a variety of options for avoiding traffic. As with the Project, a Construction Staging and Traffic Management Plan (PDF TR-1) would be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. As under the Project, Alternative 4 would not result in the need for new or altered government facilities (i.e., fire stations). **Therefore, construction-related impacts related to fire protection services under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.**

(b) Operation

As detailed in **Section IV.J.1, Public Services – Fire Protection**, of this Draft EIR, under the Project, impacts to fire protection services during operation would be less than significant. Similar to the Project, Alternative 4 would implement all applicable City Building Code and Fire Code requirements. Alternative 4 proposes the same number of residential units as the Project, as well as the same building square footage as the Project. Therefore, the demand for services from the LAFD would be correspondingly similar under Alternative 4. **Therefore, Alternative 4’s demand for fire protection services would be less than significant and similar to the Project’s less-than-significant impact.**

(2) Police Protection

(a) Construction

As detailed in **Section IV.J.2, Public Services – Police Protection**, of this Draft EIR, under the Project, impacts to police protection services during construction would be less than significant. The types of construction activities that would be required for Alternative 4 would be similar to those of the Project with the exception of increased grading and excavation phase by an additional

1.5 months and increased soil export for the additional subterranean level. Furthermore, as with the Project, Alternative 4 would implement PDF POL-1 and PDF POL-3 to reduce the demand for police protection services during construction. During construction of Alternative 4, emergency access to the Project Site and surrounding vicinity could be impacted by construction activities. However, construction impacts are temporary in nature and would not cause lasting access effects to emergency services. In addition, construction work and haul truck trips would occur outside of typical weekday commuter morning and afternoon peak periods and emergency vehicles normally have a variety of options for avoiding traffic. As with the Project, a Construction Staging and Traffic Management Plan, project design feature PDF TR-1, 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 to police protection services under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.**

(b) Operation

As detailed in **Section IV.J.2, Public Services – Police Protection**, of this Draft EIR, under the Project, impacts to police protection services during operation would be less than significant. Alternative 4 proposes the same number of residential units and the same building square footage as the Project. Therefore, the demand for services from the LAPD would be correspondingly similar under Alternative 4. As with the Project, Alternative 4 would implement PDF POL-2 and PDF POL-3 to improve safety through Project Site design and preparation of an Emergency Procedures Plan. **Therefore, impacts to police protection under Alternative 4 would be less than significant and similar to the Project’s less-than-significant impacts.**

(3) Libraries

(a) Construction

As detailed in **Section IV.J.3, Public Services – Libraries**, of this Draft EIR, under the Project, impacts to library services during construction would be less than significant. Similar to the Project, Alternative 4 would result in a temporary increase of construction workers on the Project Site. However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities even with the increased grading and excavation phase. Therefore, construction employment generated by Alternative 4 would not result in a notable increase in the resident population or a corresponding demand for library services in the vicinity of the Project Site. **As such, impacts to library facilities during construction of Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.**

(b) Operation

As detailed in **Section IV.J.3, Public Services – Libraries**, of this Draft EIR, under the Project, impacts to library services during operation would be less than significant. Residents are considered the primary users of library facilities. Alternative 4 proposes the same number of

residential units as the Project. Therefore, the potential demand for library services would be the same under Alternative 4 in comparison to the Project. Alternative 4 would also generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, etc.) that could potentially be applied toward the provision of new library facilities and related staffing in the Downtown Community, as deemed appropriate. **Accordingly, impacts to library facilities under Alternative 4 would be less than significant and similar to the Project's less-than-significant impacts.**

k) Transportation

(1) Plan Consistency

As detailed in **Section IV.K, Transportation**, of this Draft EIR, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant. Similar to the Project, Alternative 4 would provide pedestrian enhancements along S. Hope Street and W. Pico Boulevard, bicycle facilities, and electric vehicle chargers; as well as improve the walkability in the area. Therefore, as with the Project, Alternative 4 would be compatible with circulation system plans. **As such, the impact of Alternative 4 with regard to compatibility with plan, ordinance or policy addressing circulation system, including transit, roadway, bicycle and pedestrian facilities would be less than significant and similar to the less-than-significant impacts of the Project.**

(2) VMT Analysis

As detailed in **Section IV.K, Transportation**, of this Draft EIR, the Project would result in an estimated total daily VMT of 22,722. The Project would result in 3.5 daily household VMT per capita, which is below than the Central APC significance threshold of 6.0 VMT per capita, and an estimated 6.7 daily work VMT per employee, which is less than the Central APC significance threshold of 7.6 VMT per employee. Alternative 4 would result in a total daily VMT of 17,356;¹³ a reduction of 5,366 total daily VMT as compared to the Project. Alternative 4 would result in a 3.9 daily household VMT per capita, which is below the Central APC significance threshold of 6.0 VMT per capita, but greater than the Project's daily household VMT per capita of 3.5. In addition, Alternative 4 would result in an estimated 7.4 daily work VMT per employee, which is less than the Central APC significance threshold of 7.6 VMT per employee, but greater than the Project's daily work VMT per employee of 6.7. **As such, the impact of Alternative 4 with regard to daily household VMT per capita and work VMT per employee would be less than significant, but greater than the Project's less-than-significant impact.**

(3) Emergency Access

As discussed in **Section IV.K, Transportation**, of this Draft EIR, impacts related to emergency access during construction and operation of the Project would be less than significant. In addition,

¹³ *Overland Traffic Consultants, Inc., Morrison Mixed-Use Alternatives Project Summary, November 11, 2020.*

the Project would implement project design feature PDF TR-1, which requires a Construction Staging and Traffic Management Plan to ensure that emergency access is maintained, establish safety procedures and re-routing for temporary lane closures, and prevent worker and haul trips from prohibiting emergency vehicle access to the Site and surrounding area. As with the Project, Alternative 4 would maintain emergency access during construction and implement PDF TR-1 to address traffic and access control during construction. Furthermore, construction impacts are temporary in nature and would not cause lasting access effects to emergency services. During operation, all circulation improvements that are proposed for the Project Site would comply with the Fire Code, including any additional access requirements of the LAFD. In addition, emergency vehicles normally have a variety of options for avoiding traffic. **As such, impacts to emergency access during construction and operation of Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.**

I) Tribal Cultural Resources

As detailed in **Section IV.L, Tribal Cultural Resources**, of this Draft EIR, under the Project, impacts to tribal cultural resources would be less than significant. Alternative 4 would construct an additional subterranean level than proposed by the Project, but the footprint of the subterranean parking would be smaller than the Project. Therefore, the potential for Alternative 4 to uncover subsurface tribal cultural resources would be less than that of the Project. However, the City has established a standard condition of approval to address inadvertent discovery of tribal cultural resources and reduce any potential impacts to less than significant. As with the Project, this standard condition of approval would be applied to Alternative 4. **Accordingly, impacts to tribal cultural resources under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project.**

m) Utility and Service Systems

(1) Water

(a) Construction

As detailed in **Section IV.M.1, Utility and Service Systems – Water**, of this Draft EIR, impacts to water supply and infrastructure during construction of the Project would be less than significant. Similar to the Project, construction activities associated with Alternative 4 would generate a short-term demand for water. Because Alternative 4 would require a longer construction period as compared to the Project, this demand would be greater than that of the Project. However, the increase in construction duration and additional amount of grading/excavation requiring dust-control watering would be minimal and the temporary and intermittent demand for water during construction under Alternative 4 would also be met by the City's available water supplies. Similarly, the existing LADWP water infrastructure would be adequate to provide the water flow necessary to serve Alternative 4. Furthermore, as with the Project, the design and installation of new service connections under Alternative 4 would be required to meet applicable City regulations and standards. **Therefore, impacts on water supply and infrastructure associated with**

short-term construction activities under Alternative 4 would be less than significant but greater than the Project's less-than-significant impacts.

(b) Operation

As detailed in **Section IV.M.1, Utility and Service Systems – Water**, of this Draft EIR, impacts to water supply and infrastructure during operation of the Project would be less than significant. Alternative 4 would result in a similar amount and type of development as the Project. Accordingly, Alternative 4 would have a similar water demand as compared to the Project. Therefore, as with the Project, the estimated water demand for Alternative 4 would 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 similar to that of the Project. Furthermore, similar to the Project, under Alternative 4, the Applicant would construct the necessary on-site water infrastructure and off-site connections to the LADWP system pursuant to applicable City requirements to accommodate the new building. **Therefore, Alternative 4's impacts to water would be less than significant and similar to the Project's less-than-significant impacts.**

(2) Wastewater

(a) Construction

As detailed in **Section IV.M.2, Utility and Service Systems – Wastewater**, of this Draft EIR, impacts to wastewater infrastructure during construction of the Project would be less than significant. Under Alternative 4, similar to the Project, temporary facilities such as portable restrooms 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 not cause an increase in wastewater flows to the municipal sewer system. Therefore, construction of Alternative 4 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 4 may include construction activities associated with the installation of new or relocated sewer connections. 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 sewer lines in the streets adjacent to the Project Site. Similar to the Project, a Construction Staging and Traffic Management Plan, project design feature PDF TR-1, 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 Project's less than significant impacts.**

(b) Operation

As detailed in **Section IV.M.2, Utility and Service Systems – Wastewater**, of this Draft EIR, impacts to wastewater infrastructure during construction of the Project would be less than

significant. Alternative 4 would result in a similar amount and type of development as the Project. Accordingly, Alternative 4 would result in a similar amount of wastewater generation as compared to the Project. Therefore, similar to the Project, the wastewater generated by Alternative 4 would be accommodated by the existing capacity of the HWRP, and Alternative 4 would not result in a determination by the wastewater treatment provider that it does not have adequate capacity to serve the increase in demand. Furthermore, given that Alternative 4 would result in similar daily wastewater compared to that of the Project, the existing sewer system would also have capacity to serve Alternative 4. All related sanitary sewer connections and on-site infrastructure under Alternative 4 would be designed and constructed in accordance with applicable Bureau of Sanitation regulations, standards, and policies. **As such, impacts with regard to wastewater generation and infrastructure capacity under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.**

(3) Solid Waste

(a) Construction

As detailed in **Section IV.M.3, Utility and Service Systems – Solid Waste**, of this Draft EIR, impacts to solid waste facilities during construction of the Project would be less than significant. As with the Project, Alternative 4 would adaptively reuse the Morrison Hotel, however, Alternative 4 would retain the existing interior configuration and structures. Therefore, the amount of demolition debris generated by Alternative 4 would be less than that generated by the Project. As with the Project, Alternative 4 would be required to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris in accordance with the City's Green Building Code. Like the Project, Alternative 4 would represent a very small percentage of the inert waste disposal capacity in the region. Therefore, Alternative 4 would not create a need for additional solid waste disposal facilities to adequately handle the construction-generated inert waste. **As such, construction impacts related to solid waste under Alternative 4 would be less than significant and, due to the reduced amount of demolition debris, less than the Project's less-than-significant impacts.**

(b) Operation

As detailed in **Section IV.M.3, Utility and Service Systems – Solid Waste**, of this Draft EIR, impacts to solid waste facilities during operation of the Project would be less than significant. Alternative 4 would result in a similar amount of development as the Project. Accordingly, Alternative 4 would generate a similar amount of solid waste as the Project. Therefore, similar to the Project, the existing landfill serving the Project Site would also have the capacity to accommodate the disposal needs of Alternative 4 and, therefore, Alternative 4 would not result in the need for an additional recycling or disposal facility. Similar to the Project, as Alternative 4 would be required to divert a minimum of 50 percent of solid waste from landfills in accordance with SB 939, it would therefore, comply with federal, State, and local management statutes and regulations. **Therefore, Alternative 4's operational impacts to solid waste would be less than significant and similar to the Project's less-than-significant impacts.**

(4) Dry Utilities

(a) Construction

As detailed in **Section IV.M.4, Utility and Service Systems – Dry Utilities**, of this Draft EIR, impacts to dry utilities during construction of the Project would be less than significant. Construction activities typically do not consume natural gas or require telecommunication services. 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 electricity consumed would be greater than the Project due to the increased duration of construction and additional amount of grading/excavation requiring dust-control watering. However, the increase in construction duration and additional amount of watering would be minimal and temporary and would not require additional sources of electric power. Furthermore, before construction begins, the Project Applicant would coordinate with applicable regulatory agencies and telecommunication providers to identify the location of existing underground dry utilities and to implement orderly installation of new on-site and connection to existing off-site electrical, natural gas, and telecommunication facilities in order to prevent accidental encroachment or service interruptions. **Therefore, impacts on energy infrastructure associated with short-term construction activities would be less than significant under Alternative 4, similar to the less-than-significant impacts of the Project.**

(b) Operation

As detailed in **Section IV.M.4, Utility and Service Systems – Dry Utilities**, of this Draft EIR, impacts to dry utilities during operation of the Project would be less than significant. As Alternative 4 proposes a similar amount of development as the Project, electricity, and natural gas consumption for Alternative 4 would be similar under Alternative 4 as under the Project. Furthermore, similar to the Project, Alternative 4 would adhere to the Title 24 energy conservation standards, which would improve energy efficiency and reduce impacts on consumption of energy resources. Telecommunications services would be provided from existing suppliers through established service procedures. Therefore, Alternative 4 would not require the need for relocation or construction of new or expanded electric, natural gas, or telecommunication facilities. **Therefore, impacts to dry utilities during operation of Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.**

3. Relationship to Project Objectives

Alternative 4 would include similar components as the Project but the Morrison Hotel would be converted into an office use rather than a hotel. Alternative 4 would also require implementation of a comprehensive seismic retrofit program that would eliminate the street-oriented uses on the ground floor, including the restaurants, gallery space, and immersive museum. The Hope Street and Pico Boulevard intersection would have retail spaces (like existing) and a small lobby for the new hotel. The transparent ground floor uses proposed as part of the Project would not be

provided. Four levels of underground parking would be constructed under the Hotel/Residential Tower to avoid construction under the Morrison Hotel.

Alternative 4 would meet the underlying purpose of the Project to create a mixed-use development by rehabilitating and reconstructing the long vacant Morrison Hotel. It would also meet Objective 4 by providing the same residential density and floor area as the Project within the Downtown area and within walking distance of jobs-rich centers, and in proximity to public transit. However, Alternative 4 would only partially meet the remaining purpose to rehabilitate and reconstruct the Morrison Hotel and turning it into a safe and habitable hotel that complements the existing uses and market needs in the South Park neighborhood by creating a range of ground-floor commercial uses. Alternative 4 would not include the museum, gallery, or restaurant uses at the corner of Hope Street and Pico Boulevard, and would convert the Morrison Hotel into an office use. Alternative 4 also reduces the amount of ground-floor commercial uses and the overall square footage thereby reducing the economic base and employment opportunities created by the Project.

Alternative 4 would partially meet, or meet to a lesser extent, Objectives 1, 2, 3, and 7. If the seismic retrofit program can be implemented, Alternative 4 would not demolish and reconstruct the interior of the Morrison Hotel and would retain more character-defining features than the Project. However, Alternative 4 would not include the proposed restaurant and cultural uses on the ground-floor that were proposed to highlight the Morrison Hotel's history and connection to The Doors. As such, Alternative 4 would largely keep the ground-floor uses as is, and make 3,484 square feet at the first floor non-functional with limited accessibility, which does not maximize the economic viability or floor area of the Project Site. Attracting commercial tenants to the Project Site would be rendered more difficult because Alternative 4 reduces the overall commercial floor area, the number of hotel rooms, and the ground-floor spaces cannot be utilized as a restaurant. Furthermore, constructing new office space during the COVID-19 pandemic is unlikely to be economically viable due to uncertainty regarding permanent and hybrid work from home arrangements.

1. Preserve the existing Morrison Hotel by rehabilitating major character-defining features and incorporating a diversity of commercial uses to highlight the hotel's history, while making the building safe and habitable through a seismic retrofit and upgrading the building to meet current safety standards.
2. Adaptively reusing the long vacant SRO hotel as a high-density mixed-use project that further revitalizes the area adjacent to the Convention Center and maximizes the economic viability of the Site.
3. Create a mixed-use hotel complex that maximizes the density of hotel rooms on an urban infill location in walking distance to the Convention Center and public transit to further smart growth land use planning practices aligned with policies to reduce greenhouse gas emissions and vehicle miles traveled, as well as the Mayor's goal of 8,000 hotel rooms by the Convention Center by 2020.

7. .Expand the economic base of the City and provide employment opportunities and new sources of tax revenue 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.

Alternative 4 would not meet Objectives 5 and 6 because the implementation of a comprehensive seismic retrofit program would eliminate the street-oriented uses on the ground floor, including the restaurants, gallery space, and immersive museum. The transparent ground floor uses proposed as part of the Project would not be provided. As such, Alternative 4 would not create a cultural and arts destination or enhance the pedestrian experience at Hope Street and Pico Boulevard.

5. Create a cultural and arts destination with a range of commercial uses, including event spaces, gallery and museum space, and restaurants that support one of the Central City Community Plan's primary goals of creating a vibrant and active 24-hour downtown.
6. Enhance and further activate the pedestrian experience at the intersection of Hope Street and Pico Boulevard by providing street-oriented uses, such as restaurants, gallery and museum space, and creating a transparent ground floor with a landscaped courtyard and pedestrian connections.

Alternative 4's impacts would generally be either less than the Project's impacts or similar to the Project's impacts. In addition, Alternative 4 would eliminate the Project's significant and unavoidable direct impact to historical resources with mitigation incorporated. However, due to the increased duration of construction and soil export/hauling required the additional subterranean level, on-site construction noise and off-site vibration impacts would still be significant and unavoidable and to a greater degree than under the Project. Additionally, construction-related impacts related to TAC emissions, energy consumption, noise, and water consumption would be greater under Alternative 4 than under the Project. Furthermore, Alternative 4 would not eliminate the need for mitigation to reduce impacts related to historical, archaeological, and paleontological resources, and operation related noise. Alternative 4 would also result in greater, albeit still less-than-significant, impacts to VMT compared to the Project.

F. Alternative 5 – DTLA 2040-Compliant

1. Description

Alternative 5 would involve the demolition of approximately 32,550 square feet of existing commercial industrial buildings, the adaptive reuse and expansion of the existing 46,626-square-foot, 111-unit SRO Existing Hotel, and construction of a Hotel/Residential Tower consistent with the development regulations allowed under the draft Central City Community Plan Update/DTLA 2040. The Central City Community Plan Update/DTLA 2040 designation for the site permits multi-family housing, hotel, commercial office, general retail, restaurants, bars, and theaters and allows for a base range FAR from 7:1 up to 13:1 depending on the proposed uses and the inclusion of certain community benefits.

The total floor area of Alternative 5 would be approximately 477,671 square feet, with 159 dwelling units and 518 guest rooms compared to approximately 420,303 square feet, with 136 dwelling units and 444 guest room as under the Project. As allowed under the draft Central City Community Plan Update/DTLA 2040, Alternative 5 would not provide any on-site parking. Therefore, Alternative 5 would reduce the amount of excavation required by the Project for subterranean parking. All hotel and residential back-of-house and storage uses and the immersive museum would be located above ground. Alternative 5 would increase the total floor area of development by approximately 14 percent, resulting in a FAR of 8.75:1.

Similar to the Project, the existing four-story Morrison Hotel, at the southwesterly portion of the Project Site, would be adaptively reused into a new hotel. The adaptive reuse of the hotel would be similar to the Project, and include removal of an approximately 12,280-square-foot existing inner wing, the demolition of the majority of the north and full east elevations and light courts, partial rehabilitation and reconstruction of the existing Morrison Hotel as well as protection and shoring of the portions of the structure that will remain. The Existing Hotel would include 87 guestrooms within the remaining wings, surrounding a landscaped 3,488-square-foot open space courtyard accessible from the Existing Hotel and Hotel Expansion. The Existing Hotel would also include a 3,866-square-foot restaurant space in the southwestern corner, at the corner of Hope Street and Pico Boulevard. A 2,189-square-foot loggia accessed from Hope Street, the entry courtyard, and Hotel Expansion would be located on the ground floor. A courtyard on Hope Street would provide entry to the hotel lobby check-in and the gallery loggia. Hotel guestrooms would be located on Levels 2 through 4 of the existing Morrison Hotel. The height of the Existing Hotel would remain as it currently exists, at four stories and approximately 52 feet high.

The Hotel Expansion would be located along the eastern and northeastern portions of the Project Site. Hotel uses, including a 12,938-square-foot immersive museum, 3,881-square-foot loggia/co-working space, 3,257-square-foot lobby/bar, approximately 14,034 square feet of event and meeting spaces, a 1,225-square-foot fitness area, and 431 guestrooms, would be located on levels 1 through 20 of the Hotel Expansion, and levels 1 through 5 of the Hotel/Residential Tower. Two high-ceiling event/ballrooms would be located on level 2, and two meeting spaces would be located on level 3, with an event/ballroom and 4,110-square-foot amenity terrace located on level 5. A hotel pool, 3,310-square-foot restaurant/roof bar, and a 2,000-square-foot covered and

4,289-square-foot uncovered outdoor terrace would be located on Level 20. The Hotel Expansion would be 20 stories and approximately 256 feet tall compared to 15 stories and approximately 193 feet tall under the Project.

A residential lobby would be provided at the northwestern portion of the Hotel/Residential Tower on the ground floor, which would be accessed from a covered driveway entry from Hope Street and underground parking would be across the entire Project Site, including under the Morrison Hotel. Residential amenity areas would be located on level 6, and the remaining residential uses would be located on levels 7 through 29 of the Hotel/Residential Tower. A rooftop pool, covered and uncovered terraces, gym, and lounges for residents would be located on level 29. The Hotel/Residential Tower would be 29 stories and approximately 360 feet tall compared to 25 stories and approximately 325 feet tall under the Project.

Lighting, signage, landscaping, security, sustainability features, and off-site improvements would be the same as under the Project. As no subterranean levels would be developed under this alternative, the excavation phase would be substantially decreased to foundation and utility work; however, the building construction phase would be increased due to the approximately 14 percent increase in total floor area, which includes four additional building stories compared to the Project, resulting in an overall construction schedule that would be similar to the 36 months estimated for the Project.

2. Comparative Analysis

Alternative 5 assumes the development of the Related Projects listed in **Section III, Environmental Setting**, of this Draft EIR. The potential environmental impacts associated with Alternative 5 are described below and are compared to the environmental impacts that would result from the implementation of the Project as described in **Section IV, Environmental Impact Analysis**, of this Draft EIR.

a) Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

As detailed in **Section IV.A, Air Quality**, of this Draft EIR, construction of the Project would result in less-than-significant impacts with regard to regional and localized air quality emissions. Alternative 5 would involve the same amount of demolition as the Project; however, the overall amount of building construction would be greater than what is proposed under the Project due to the increase in total floor area and the increase of four aboveground levels. Therefore, as Alternative 5 would eliminate the subterranean levels proposed under the Project, the overall amount of construction activities and duration under Alternative 5 would be similar to that of the Project. The intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days when maximum construction activities occur. Because maximum daily conditions are used for measuring impact significance, regional and localized impacts on these days would be similar to those of the Project. Furthermore, Alternative 5 would

be located at similar distances from sensitive receptors as the Project. **Therefore, impacts associated with regional and localized construction emissions under Alternative 5 would be less than significant and similar to the less-than-significant impacts of the Project.**

(b) *Toxic Air Contaminants*

As detailed in **Section IV.A, Air Quality**, of this Draft EIR, construction of the Project would result in less-than-significant toxic air contaminants (TACs) impacts. 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 and, accordingly, because Alternative 5 would require less grading and excavation than the Project due to the elimination of the subterranean parking levels proposed under the Project, construction emissions of TACs generated by Alternative 5 would be less than those of the Project. **Therefore, TAC impacts would be less than significant under Alternative 5 and less than the less-than-significant TAC impacts of the Project.**

(2) Operation

(a) *Regional and Localized Air Quality Impacts*

As detailed in **Section IV.A, Air Quality**, of this Draft EIR, operation of the Project would result in less-than-significant impacts with regard to regional and localized air quality emissions. As discussed below in **Section VI.F.k.2**, Alternative 5 would result in a greater number of daily trips and an increase in the total daily VMT as compared to the Project. Since the amount of vehicular emissions is based on the number of trips generated, the vehicular emissions generated by Alternative 5 would be greater than the emissions generated by the Project. While the overall size of hotel and residential uses would be greater under Alternative 5, no subterranean parking levels with elevator would be constructed under this alternative, which are also factored in the energy consumption calculations. As such, the energy consumption from electricity and natural gas would be similar. As with the Project, Alternative 5 would include energy efficiency features, such as reductions in building energy and resource consumption with energy efficient appliances and reduced building energy usage sufficient to meet the applicable Title 24 standard. Furthermore, based on the Project's regional air quality emissions presented in **Section IV.A, Air Quality** the 14 percent increase in development at the Project Site proposed under Alternative 5 as compared to the Project would not be expected to result in emissions that would exceed SCAQMD thresholds as shown on **Table VI-3, Potential Regional Operational Pollutant Emissions for Alternative 5**. **Therefore, regional air quality impacts under Alternative 5 would be less than significant, and similar to the less-than-significant impacts of the Project.**

**Table VI-3
Potential Regional Operational Pollutant Emissions for Alt 5**

	Pollutant Emissions (pounds/day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Total Maximum Emissions with 14% increase	19.81	41.96	114.97	0.41	32.09	9.17
SCAQMD Thresholds	55	55	550	150	150	55

Table VI-3
Potential Regional Operational Pollutant Emissions for Alt 5

	Pollutant Emissions (pounds/day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Exceeds Threshold?	No	No	No	No	No	No
<i>Source: EcoTierra Consulting, 2021.</i>						

With regard to on-site localized emissions, as with the Project, Alternative 5 would not introduce any new major source of air pollution within the Project Site. As discussed above, the number of daily vehicle trips and the total daily VMT generated by Alternative 5 would be greater than the vehicle trips generated by the Project. However, based on the Project's localized air quality emissions presented in **Section IV.A**, the 14 percent increase in development at the Project Site proposed under Alternative 5 as compared to the Project would not be expected to result in emissions that would exceed SCAQMD thresholds. **As such, localized impacts under Alternative 5 would be less than significant, but greater than the less-than-significant impacts of the Project.**

(b) Toxic Air Contaminants

As detailed in **Section IV.A, Air Quality**, of this Draft EIR, operation of the Project would result in less-than-significant TAC impacts. Due to the increase in daily trips that would occur under Alternative 5, mobile source emissions generated by Alternative 5 would be correspondingly increased compared to the mobile source emissions generated by the Project. However, as with the Project, Alternative 5 would be required to comply with SCAQMD Rule 1138 (Control of Emissions from Restaurant Operations), which requires the installation of emissions controls on charbroilers, and SCAQMD Rule 1113 (Architectural Coatings), which limits VOC content of architectural coatings. Furthermore, as with the Project, proposed land uses under Alternative 5 would not include installation of industrial-sized paint booths or require extensive use of commercial or household cleaning products, and would not be expected to generate substantial amounts of TACs. **Therefore, TAC impacts would be less than significant under Alternative 5 but greater than the less-than-significant TAC impacts of the Project.**

b) Cultural Resources

(1) Historical Resources

(a) Direct Impacts

As detailed in **Section IV.B, Cultural Resources**, of this Draft EIR, following implementation of mitigation measure MM CUL-1, direct impacts to the Morrison Hotel (an historical resource) would remain significant and unavoidable due to the loss of all the interior historic fabric of the building, including all of the public circulation, lobby, stairs, corridors, floors, ceilings, and roof structure causes material impairment under CEQA. Similar to the Project, Alternative 5 would adaptively reuse and expand the on-site Morrison Hotel, which would alter the interior fabric of the building

and require mitigation measure MM CUL-1. As under the Project, despite retaining, rehabilitating, restoring, and reconstructing certain physical characteristics and the most visually recognizable features, the Morrison Hotel would no longer be able to convey its historic significance for eligibility to be listed in the National Register, California Register, and as an HCM as an early twentieth century Beaux-Arts tourist hotel. **Thus, direct impacts to historical resources under Alternative 5 would remain significant and unavoidable after implementation of MM CUL-1, similar to the Project.**

(b) Indirect Impacts

As detailed in **Section IV.B, Cultural Resources**, of this Draft EIR, indirect impacts to nearby historical resources from construction and operation of the Project would be less than significant. As with the Project, Alternative 5 would alter the immediate surroundings of off-site historical resources in the vicinity by constructing a new building on the Project Site and increasing the density of the Project Site. Such off-site resources include 1200 S. Hope Street, 1223-1225 S. Hope Street, 1201 S. Grand Avenue, and 1221-1225 S. Grand Avenue. The design of the proposed building under Alternative 5 would be similar to that of the Project in terms of architectural style, building materials and colors, but would be taller in maximum height by four levels. Accordingly, Alternative 5 would appear larger in views of and from nearby historical resources as compared to the Project. However, as described in **Section IV.B**, in the dense urban setting of the Downtown area, mid- to high-rise new construction located across the street from and within the same block as historical resources like these is not uncommon, and new development has already occurred in close proximity to these buildings. Therefore, as with the Project, Alternative 5 would merely introduce new visual elements to the area that is characterized by a variety of building types, heights, designs, and setbacks. **Thus, indirect impacts to historical resources under Alternative 5 would be less than significant but, due to the increased height, greater than the less-than-significant impacts of the Project.**

(2) Archaeological Resources

As detailed in **Section IV.B, Cultural Resources**, of this Draft EIR, impacts to archaeological resources from construction and operation of the Project would be less than significant with implementation of mitigation measures MM CUL-2 and MM CUL-3. Alternative 5 would eliminate the subterranean parking levels proposed under the Project. Therefore, the potential for Alternative 5 to uncover subsurface archaeological resources would be reduced compared to that of the Project. However, because Alternative 5 would still require minor amounts of excavation into subsurface soils, the potential still exists that construction would encounter unanticipated archaeological resources and mitigation measures MM CUL-2 and MM CUL-3 would also be required. **Accordingly, impacts to archaeological resources under Alternative 5 would be less-than-significant-with-mitigation, and less than the less-than-significant-with-mitigation impacts of the Project.**

c) Energy Conservation

(1) Construction

As detailed in **Section IV.C, Energy**, of this Draft EIR, construction of the Project would have a less-than-significant impact with regard to energy consumption. Due to the increase in total floor area, the building construction phase length and overall intensity of activities would be increased compared to the Project; however, no subterranean parking levels would be constructed, which would significantly reduce the excavation phase such that the overall construction period would be similar to the Project. Therefore, the amount of electricity and petroleum-based fuel required for construction of Alternative 5 would be correspondingly similar compared to the Project. As with the Project, Alternative 5 would also be subject to State and federal regulations that reduce the inefficient, wasteful, and unnecessary consumption of energy. **Therefore, impacts on energy resources associated with short-term construction activities would be less than significant under Alternative 5 and similar to the less-than-significant impacts of the Project.**

(2) Operation

(a) *Energy Consumption*

As detailed in **Section IV.C, Energy**, of this Draft EIR, operation of the Project would have a less-than-significant impact with regard to energy consumption. While the alternative would result in a 57,368-square-foot increase in total development as compared to the Project, electricity, and natural gas consumption for Alternative 5 would be correspondingly similar compared to the Project as the alternative would not include the subterranean parking levels with elevator, which are also accounted for in the energy consumption calculations. In addition, as discussed below in **Section VI.F.k.2**, Alternative 5 would generate more daily trips and an increase in the total daily VMT as compared to the Project. Accordingly, the associated consumption of petroleum-based fuels under Alternative 5 would also be correspondingly increased. Similar to the Project, Alternative 5 would implement the Title 24 energy conservation standards, 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. **Therefore, impacts related to the consumption of energy resources under Alternative 5 would be less than significant but greater than the less-than-significant impacts of the Project from the increased daily trips' consumption of petroleum-based fuels.**

(b) *Conflicts with Energy Efficiency Plans*

As detailed in **Section IV.C, Energy**, of this Draft EIR, operation of the Project would have a less-than-significant impact with regard to conflicts with energy efficiency plans. As discussed below in **Section VI.C.k.2**, Alternative 5 would generate more daily trips and result in an increase in the total daily VMT as compared to the Project. A higher per capita VMT indicates that Alternative 5 would not be as energy efficient as the Project and would, therefore, not be as compatible with energy efficiency plans. However, as with the Project, Alternative 5's design would comply with

existing energy standards and incorporate features to reduce energy consumption and would, accordingly, not conflict with energy efficiency plans. **Therefore, the impact related to conflicts with energy efficiency plans under Alternative 5 would be less than significant but greater than the Project's less-than-significant impact.**

d) Geology and Soils

(1) Geology and Soils

As detailed in **Section IV.D, Geology and Soils**, of this Draft EIR, impacts related to geology and soils from construction and operation of the Project would be less than significant. Under Alternative 5 impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, liquefaction, seismically induced settlement, soil stability, and subsidence would be similar to those under the Project because such impacts are a function of the Project Site's underlying geologic conditions rather than the type or amount of land use proposed. As such, although Alternative 5 would increase total development and the number of aboveground levels as compared to the Project, the potential for encountering unstable soils would be substantially similar. Alternative 5 would comply with the same regulatory requirements as the Project to ensure that the soils underlying the Project Site can adequately support the proposed development. As with the Project, Alternative 5 would be designed and constructed to conform to the current seismic design provisions of the California Building Code and the Los Angeles Building Code. Alternative 5 would also be required to provide a final design-level geotechnical report, subject to LADBS review and approval, prior to the issuance of grading permits, to identify and minimize seismic risks. **Therefore, under Alternative 5, impacts related to geology and soils would be less than significant and similar to those of the Project.**

(2) Paleontological Resources

As detailed in **Section IV.D, Geology and Soils**, of this Draft EIR, impacts related paleontological resources would be less than significant with implementation of mitigation measure MM GEO-1. Alternative 5 would eliminate the subterranean parking levels proposed under the Project. Therefore, the potential for Alternative 5 to uncover subsurface paleontological resources would be reduced compared to that of the Project. However, because Alternative 5 would also require a minor amount of excavation into moderate paleontological sensitivity sediments, mitigation measure MM GEO-1 would also be required. **As such, impacts to paleontological resources under Alternative 5 would be less than significant with mitigation and less than the less-than-significant-with-mitigation impacts of the Project.**

e) Greenhouse Gas Emissions

As detailed in **Section IV.E, Greenhouse Gas Emissions**, of this Draft EIR, the impacts of combined construction and operational GHG emissions of the Project would be less than significant. 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. Alternative 5 would result in 57,368 square feet more development compared to the Project. Furthermore, as

detailed below under **Section VI.F.k.2**, Alternative 5 would generate more daily trips and an increase in total daily VMT than the Project. Therefore, under Alternative 5, the trip generation and energy and water consumption from proposed land uses would be higher compared to the Project due to the increase of the proposed building and uses. As such, the amount of GHG emissions generated by Alternative 5 would be greater than the amount generated by the Project. However, as with the Project, Alternative 5 would be designed to comply with CalGreen and the City's Green Building Ordinance, as applicable. Accordingly, similar to the Project, Alternative 5 would be consistent with the GHG reduction goals and objectives included in adopted State, regional, and local regulatory plans. **Therefore, impacts related to GHG emissions under Alternative 5 would be less than significant but greater than the less-than-significant impacts of the Project.**

f) Hydrology and Water Quality – Groundwater

As detailed in **Section IV.F, Hydrology and Water Quality**, of this Draft EIR, neither construction nor operation of the Project would encounter groundwater or conflict with groundwater management plans and impacts would be less than significant. Alternative 5 would also not encounter groundwater, as Alternative 5 would eliminate the subterranean levels proposed under the Project. Furthermore, as with the Project, Alternative 5 would receive its water from LADWP, which along with the California Department of Water Resources, has protection programs in place to prevent the overdrafting of groundwater. As with the Project, Alternative 5 would be required to implement water conservation measures consistent with Title 24 and the City's Green Building Code and would not conflict with sustainable groundwater management. **Therefore, impacts to hydrology and water quality under Alternative 5 would be less than significant and similar to the Project's less-than-significant impacts.**

g) Land Use and Planning

As detailed in **Section IV.G, Land Use and Planning**, of this Draft EIR, impacts related to land use would be less than significant under the Project. The draft Central City Community Plan Update/DTLA 2040 has not yet been formally adopted. As such, the 8.75:1 FAR permitted at the Project Site under the draft Central City Community Plan Update/DTLA 2040 is not currently permitted at the Project Site without additional entitlements, either a Transfer of Floor Area or a Zone Change to modify the D Limitations. The applicant has not submitted an application for either of these entitlements. Additionally, Alternative 5 would require approval by the City Council in addition to the same discretionary actions as the Project: a Vesting Tentative Tract; a Master Conditional Use; a Conditional Use; and a Zone Variance. As with the Project, with approval of these requests, Alternative 5 would be in conformance with applicable provisions of the LAMC and the Central City Community Plan Update/DTLA 2040, would revitalize an infill site by locating residential and commercial uses at a site targeted for high density in close proximity to transit, and would enhance the pedestrian environment and promote alternative forms of transportation to reduce VMT. As such, Alternative 5 would also not conflict with local and regional land use plans applicable to the Project Site. **Therefore, land use impacts under Alternative 5 would be less than significant and similar to the land use impacts of the Project.**

h) Noise

(1) Noise

(a) Construction

As detailed in **Section IV.H, Noise**, of this Draft EIR, on-site noise impacts from construction would be significant and unavoidable even after implementation of mitigation measure MM NOI-1. Alternative 5 would require less excavation and soil export than the Project and would, accordingly, result in the less noise associated with haul trucks. Due to the increase in the total floor area as compared to the Project, there would be an increase in the amount and the overall duration of construction and associated on-site noise under Alternative 5, however, on-site construction activities and the associated construction noise levels would be similar to the Project during maximum activity days since only the overall duration, and not the daily intensity of construction activities and associated equipment noise, would increase under Alternative 5 when compared to the Project, which would also result in a significant and unavoidable impact. Noise levels during maximum activity days, which are used for measuring impact significance, would therefore be similar to those of the Project and would require mitigation measure MM NOI-1. **As such, on-site construction noise impacts under Alternative 5 would be significant and unavoidable similar to the significant and unavoidable impacts of the Project.**

(b) Operation

As detailed in **Section IV.H, Noise**, of this Draft EIR, noise impacts from operation of the Project would be less than significant with implementation of mitigation measure MM NOI-2. As with the Project, the operational noise generated under Alternative 5 would be typical of residential and commercial land uses. Alternative 5 would also implement mitigation measure MM NOI-2 to reduce operational noise from amplified music to less-than-significant levels. Similar to the Project, new vehicle trips would be generated along study area roadways, however, as detailed below under **Section VI.F.k.2**, Alternative 5 would generate more daily trips than the Project. Thus, Alternative 5 would generate more traffic noise than the Project. However, under Alternative 5, on-site parking would be eliminated and no parking noise impacts to adjacent properties would occur. **Therefore, overall operational noise impacts under Alternative 5 would be less than significant with mitigation and similar to the Project's less-than-significant-with-mitigation impacts.**

(2) Vibration

(a) Construction

As detailed in **Section IV.H, Noise**, of this Draft EIR, off-site vibration impacts from construction haul trucks would be significant and unavoidable even with implementation of mitigation measures MM NOI-3 and MM NOI-4. Both Alternative 5 and the Project would generate on-site vibration from the use of heavy-duty excavation, grading and construction equipment and off-site vibration along the proposed construction haul route from construction trucks. As discussed previously, both Alternative 5 and the Project would also have roughly the same peak day construction activity

and be located the same distance from sensitive receptors, but Alternative 5 would require less soil export which would reduce the number of haul trucks. As with the Project, Alternative 5 would require mitigation measures MM NOI-3 and MM NOI-4 to reduce construction vibration impacts to people and buildings along the eastern property boundary. **Therefore, off-site construction vibration impacts from haul trucks under Alternative 5 would remain significant and unavoidable due to haul trucks causing human annoyance to sensitive uses along the route, but to a lesser degree than the significant and unavoidable Project impact.**

(b) Operation

As detailed in **Section IV.H, Noise**, of this Draft EIR, sources of vibration related to operation of the Project would include mechanical equipment and on-site vehicle circulation, including delivery trucks. As with the Project, building mechanical equipment installed as part of Alternative 5 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units mounted at the roof level that would include vibration-attenuation mounts to reduce vibration transmission, such that associated vibration would not be perceptible at the off-site sensitive receptors. As described in **Section IV.H**, delivery trucks rarely generate vibration that exceeds thresholds for damage or annoyance. Under Alternative 5, on-site parking would be eliminated and, accordingly, there would be no on-site parking noise impacts. **Therefore, operational vibration impacts (both building damage and human annoyance) would be less than significant under Alternative 5 and, due to the elimination of on-site parking, less than the less-than-significant impacts of the Project.**

i) Population and Housing

(1) Population Growth

As detailed in **Section IV.I, Population and Housing**, of this Draft EIR, indirect population growth impacts would be less than significant under the Project. As under the Project, Alternative 5 would not require the extension of roadways or infrastructure to an undeveloped area and would be supported by the existing infrastructure. **As such, indirect population growth impacts of Alternative 5 would be less than significant, similar to the Project.**

As detailed in **Section IV.I, Population and Housing**, of this Draft EIR, direct population growth impacts would be less than significant under the Project. Alternative 5 would develop 23 additional residential units and 74 additional hotel rooms, and would increase the overall size of the development at the Project Site by 57,368 square-feet. Accordingly, Alternative 5 would generate more residents and employees than the Project. However, as with the Project, Alternative 5's generation of residents and employees would represent a nominal percentage of SCAG's estimated growth for the City and its provision of housing and employment within an infill site in proximity to transit would be consistent with regional and local goals. **As such, direct population growth impacts of Alternative 5 would be less than significant but greater than the less-than-significant impacts of the Project.**

(2) Displacement

As detailed in **Section IV.I, Population and Housing**, of this Draft EIR, the displacement impacts of the Project would be less than significant. As with the Project, Alternative 5 would adaptively reuse and expand the Morrison Hotel, which currently contains 111 vacant SRO units. However, as detailed in **Section IV.I**, these units have been approved for replacement at 407-413 East 5th Street and/or at a qualified alternative site by the City Planning Commission and, as with the Project, the displacement of these units would not represent a substantial number of housing. **Therefore, displacement impacts under Alternative 5 would be less than significant and similar to those of the Project.**

j) Public Services

(1) Fire Protection

(a) Construction

As detailed in **Section IV.J.1, Public Services – Fire Protection**, of this Draft EIR, under the Project, impacts to fire protection services during construction would be less than significant. The types of construction activities that would be required for Alternative 5 and associated fire risks would be similar to those of the Project. Similar to the Project, implementation of “good housekeeping” procedures by the construction contractors and the work crews would minimize these risks. Emergency access to the Project Site and surrounding vicinity could be impacted by construction activities, however, construction impacts are temporary in nature and would not cause lasting access effects to emergency services. In addition, construction work and haul truck trips would occur outside of typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related impacts. Furthermore, construction-related traffic would not significantly impact LAFD emergency response within the vicinity as emergency vehicles normally have a variety of options for avoiding traffic. As with the Project, a Construction Staging and Traffic Management Plan (PDF TR-1) would be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. As under the Project, Alternative 5 would not result in the need for new or altered government facilities (i.e., fire stations). **Therefore, construction-related impacts related to fire protection services under Alternative 5 would be less than significant but, due to the increased construction period, greater than the less-than-significant impacts of the Project.**

(b) Operation

As detailed in **Section IV.J.1, Public Services – Fire Protection**, of this Draft EIR, under the Project, impacts to fire protection services during operation would be less than significant. Alternative 5 proposes 23 additional residential units and would increase the overall size of the development at the Project Site by 57,368 square-feet than the Project. Therefore, the demand for services from the LAFD would be correspondingly increased under Alternative 5 due to more people on the Project Site, the larger size of building requiring fire suppression, and increased square footage of uses requiring the need for fire and emergency service. However, similar to the

Project, Alternative 5 would implement all applicable City Building Code and Fire Code requirements. **Therefore, Alternative 5's demand for fire protection services would be less than significant but greater than the Project's less-than-significant impact.**

(2) Police Protection

(a) Construction

As detailed in **Section IV.J.2, Public Services – Police Protection**, of this Draft EIR, under the Project, impacts to police protection services during construction would be less than significant. The types of construction activities that would be required for Alternative 5 would be similar to those of the Project. As with the Project, Alternative 5 would implement PDF POL-1 and PDF POL-3 to reduce the demand for police protection services during construction. Emergency access to the Project Site and surrounding vicinity could be impacted by construction activities. However, construction impacts are temporary in nature and would not cause lasting access effects to emergency services. In addition, construction work and haul truck trips would occur outside of typical weekday commuter morning and afternoon peak periods and emergency vehicles normally have a variety of options for avoiding traffic. As with the Project, Construction Staging and Traffic Management Plan, project design feature PDF TR-1 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 to police protection services under Alternative 5 would be less than significant but, due to the increased construction period, would be greater than the less-than-significant impacts of the Project.**

(b) Operation

As detailed in **Section IV.J.2, Public Services – Police Protection**, of this Draft EIR, under the Project, impacts to police protection services during operation would be less than significant. Alternative 5 proposes 23 additional residential units and would increase the overall size of the development at the Project Site by 57,368 square-feet than the Project. Therefore, the demand for services from the LAPD would be correspondingly increased due to more people on the Project Site and the increased square footage of uses requiring the need for police services. As with the Project, Alternative 5 would implement PDF POL-2 and PDF POL-3 to improve safety through Project Site design and preparation of an Emergency Procedures Plan. **Therefore, impacts to police protection under Alternative 5 would be less than significant but greater than the Project's less-than-significant impacts.**

(3) Libraries

(a) Construction

As detailed in **Section IV.J.3, Public Services – Libraries**, of this Draft EIR, under the Project, impacts to library services during construction would be less than significant. Similar to the Project, Alternative 5 would result in a temporary increase of construction workers on the Project Site. However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, construction workers are not likely to

relocate their households as a consequence of the construction job opportunities. Therefore, construction employment generated by Alternative 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. **As such, impacts to library facilities during construction of Alternative 5 would be less than significant and similar to the less-than-significant impacts of the Project.**

(b) *Operation*

As detailed in **Section IV.J.3, Public Services – Libraries**, of this Draft EIR, under the Project, impacts to library services during operation would be less than significant. Residents are considered the primary users of library facilities. Alternative 5 proposes 23 additional residential units than the Project. Therefore, the potential demand for library services would be increased in comparison to the Project. Alternative 5 would also generate revenues to the City’s General Fund (in the form of property taxes, sales tax, business tax, etc.) that could potentially be applied toward the provision of new library facilities and related staffing in the Downtown Community, as deemed appropriate. **Accordingly, impacts to library facilities under Alternative 5 would be less than significant but, due to the increase in number of residents, would be greater than the Project’s less-than-significant impacts.**

k) Transportation

(1) Plan Consistency

As detailed in **Section IV.K, Transportation**, of this Draft EIR, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant. Similar to the Project, Alternative 5 would provide pedestrian enhancements along S. Hope Street and W. Pico Boulevard, bicycle facilities, and electric vehicle chargers; as well as improve the walkability in the area. Therefore, as with the Project, Alternative 5 would be compatible with circulation system plans. **As such, the impact of Alternative 5 with regard to compatibility with plan, ordinance or policy addressing circulation system, including transit, roadway, bicycle and pedestrian facilities would be less than significant and similar to the less-than-significant impacts of the Project.**

(2) VMT Analysis

As detailed in **Section IV.K, Transportation**, of this Draft EIR, the Project would result in an estimated total daily VMT of 22,722. The Project would result in 3.5 daily household VMT per capita, which is below than the Central APC significance threshold of 6.0 VMT per capita, and an estimated 6.7 daily work VMT per employee, which is less than the Central APC significance threshold of 7.6 VMT per employee. Alternative 5 would result in an estimated total daily VMT of 27,044;¹⁴ an increase of 4,322 total daily VMT as compared to the Project. Alternative 5 would result in a 4.1 daily household VMT per capita, which is below the Central APC significance

¹⁴ *Overland Traffic Consultants, Inc., Morrison Mixed-Use Alternatives Project Summary, November 11, 2020.*

threshold of 6.0 VMT per capita, but greater than the Project's daily household VMT per capita of 3.5. In addition, Alternative 5 would result in an estimated 7.6 daily work VMT per employee, which is equal to the Central APC significance threshold of 7.6 VMT per employee and greater than the Project's daily work VMT per employee of 6.7. **As such, the impact of Alternative 5 with regard to daily household VMT per capita and work VMT per employee would be less than significant but greater than the Project's less-than-significant impact.**

(3) Emergency Access

As discussed in **Section IV.K, Transportation**, of this Draft EIR, impacts related to emergency access during construction and operation of the Project would be less than significant. In addition, the Project would implement project design feature PDF TR-1, which requires a Construction Staging and Traffic Management Plan to ensure that emergency access is maintained, establish safety procedures and re-routing for temporary lane closures, and prevent worker and haul trips from prohibiting emergency vehicle access to the Site and surrounding area. As with the Project, Alternative 5 would maintain emergency access during construction and implement PDF TR-1 to address traffic and access control during construction. Furthermore, construction impacts are temporary in nature and would not cause lasting access effects to emergency services. During operation, all circulation improvements that are proposed for the Project Site would comply with the Fire Code, including any additional access requirements of the LAFD. In addition, emergency vehicles normally have a variety of options for avoiding traffic. **As such, impacts to emergency access during construction and operation of Alternative 5 would be less than significant and similar to the less-than-significant impacts of the Project.**

I) Tribal Cultural Resources

As detailed in **Section IV.L, Tribal Cultural Resources**, of this Draft EIR, under the Project, impacts to tribal cultural resources would be less than significant. Alternative 5 would eliminate the subterranean levels proposed by the Project. Therefore, the potential for Alternative 5 to uncover subsurface tribal cultural resources would be reduced compared to that of the Project. Moreover, the City has established a standard condition of approval to address inadvertent discovery of tribal cultural resources and reduce any potential impacts to less than significant. As with the Project, this standard condition of approval would be applied to Alternative 5. **Accordingly, impacts to tribal cultural resources under Alternative 5 would be less than significant and less than the less-than-significant impacts of the Project.**

m) Utility and Service Systems

(1) Water

(a) Construction

As detailed in **Section IV.M.1, Utility and Service Systems – Water**, of this Draft EIR, impacts to water supply and infrastructure during construction of the Project would be less than significant. As with the Project, the demand for water during construction activities associated with Alternative

5 would be short-term and it is anticipated that the temporary and intermittent demand for water during construction under Alternative 5 would also be met by the City's available water supplies. Similarly, it is expected that 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 regulations and standards. **Therefore, impacts on water supply and infrastructure associated with short-term construction activities under Alternative 5 would be less than significant and less than the Project's less-than-significant impacts.**

(b) Operation

As detailed in **Section IV.M.1, Utility and Service Systems – Water**, of this Draft EIR, impacts to water supply and infrastructure during operation of the Project would be less than significant. Alternative 5 would develop 23 additional residential units and 74 additional hotel rooms, and would increase the overall size of the development at the Project Site by 57,368 square-feet as compared to the Project; an increase of approximately 14 percent. Accordingly, Alternative 5 would have an approximately 14 percent increased water demand as compared to the Project. As detailed in **Section IV.M.1**, the Project's operational water demand would represent a nominal percentage of projected water supplies for normal, single-dry, and multi-dry years through the year 2040. Alternative 5's increased water demand over that of the Project's by 14 percent would not be expected to significantly impact the projected water supplies over that of the Project. Therefore, as with the Project, the estimated water demand for Alternative 14 would be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040. In addition, it is expected that the existing water distribution infrastructure would also be adequate to serve Alternative 5 and, similar to the Project, Alternative 5 would be required to construct the necessary on-site water infrastructure and off-site connections to the LADWP system pursuant to applicable City requirements to accommodate the new building. **Therefore, Alternative 5's impacts to water would be less than significant but greater than the Project's less-than-significant impacts.**

(2) Wastewater

(a) Construction

As detailed in **Section IV.M.2, Utility and Service Systems – Wastewater**, of this Draft EIR, impacts to wastewater infrastructure during construction of the Project would be less than significant. Under Alternative 5, similar to the Project, temporary facilities such as portable restrooms 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 not cause an increase in wastewater flows to the municipal sewer system. Therefore, construction of Alternative 5 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 5 may include construction activities associated with the installation of new or relocated sewer connections. 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 sewer lines in the streets adjacent to the Project Site. Similar to the Project, a Construction Staging and Traffic Management Plan, project design feature PDF TR-1, 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 Project's less than significant impacts.**

(b) Operation

As detailed in **Section IV.M.2, Utility and Service Systems – Wastewater**, of this Draft EIR, impacts to wastewater infrastructure during construction of the Project would be less than significant. Alternative 5 would develop 23 additional residential units and 74 additional hotel rooms, and would increase the overall size of the development at the Project Site by 57,368 square-feet as compared to the Project; an increase of approximately 14 percent. Accordingly, Alternative 5 would generate approximately 14 percent more wastewater as compared to the Project. As detailed in **Section IV.M.2**, the Project's operational wastewater generation would represent a nominal percentage of the existing capacity of the HWRP. Alternative 5's increased wastewater generation over that of the Project's by 14 percent would not be expected to significantly impact the wastewater treatment capacity over that of the Project. Therefore, similar to the Project, the wastewater generated by Alternative 5 would be accommodated by the existing capacity of the HWRP, and Alternative 5 would not result in a determination by the wastewater treatment provider that it does not have adequate capacity to serve the increase in demand. In addition, it is expected that the existing sewer system would also have capacity to serve Alternative 5. All related sanitary sewer connections and on-site infrastructure under Alternative 5 would be designed and constructed in accordance with applicable Bureau of Sanitation regulations, standards, and policies. **As such, impacts with regard to wastewater generation and infrastructure capacity under Alternative 5 would be less than significant but greater than the less-than-significant impacts of the Project.**

(3) Solid Waste

(a) Construction

As detailed in **Section IV.M.3, Utility and Service Systems – Solid Waste**, of this Draft EIR, impacts to solid waste facilities during construction of the Project would be less than significant. Because Alternative 5 would demolish the same improvements on the Project Site, the amount of demolition debris generated by Alternative 5 would be the same as the Project, however, due to the increased development amount proposed under Alternative 5 compared to the Project, Alternative 5 would generate more total solid waste than the Project. However, as with the Project, Alternative 5 would be required to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris in accordance with the City's Green Building Code. Accordingly, like the Project, Alternative 5 would represent a very small percentage of the inert waste disposal capacity in the region. Therefore, Alternative 5 would not create a need for

additional solid waste disposal facilities to adequately handle the construction-generated inert waste. **As such, construction impacts related to solid waste under Alternative 5 would be less than significant but greater than the Project's less-than-significant impacts.**

(b) Operation

As detailed in **Section IV.M.3, Utility and Service Systems – Solid Waste**, of this Draft EIR, impacts to solid waste facilities during operation of the Project would be less than significant. Alternative 5 would develop 23 additional residential units and 74 additional hotel rooms, and would increase the overall size of the development at the Project Site by 57,368 square-feet as compared to the Project; an increase of approximately 14 percent. As a result, operation of Alternative 5 would generate approximately 14 percent more solid waste than operation of the Project. As detailed in **Section IV.M.3**, the Project's operational solid waste generation would represent a nominal percentage of the existing capacity of the landfill serving the Project Site. Alternative 5's increased solid waste generation over that of the Project's by 14 percent would not be expected to significantly impact the landfill capacity over that of the Project. Therefore, similar to the Project, the existing landfill serving the Project Site would also have the capacity to accommodate the disposal needs of Alternative 5. Therefore, Alternative 5 would not result in the need for an additional recycling or disposal facility. Similar to the Project, as Alternative 5 would be required to divert a minimum of 50 percent of solid waste from landfills in accordance with SB 939, it would therefore, comply with federal, State, and local management statutes and regulations. **Therefore, Alternative 5's operational impacts to solid waste would be less than significant but greater than the Project's less-than-significant impacts.**

(4) Dry Utilities

(a) Construction

As detailed in **Section IV.M.4, Utility and Service Systems – Dry Utilities**, of this Draft EIR, impacts to dry utilities during construction of the Project would be less than significant. Construction activities typically do not consume natural gas or require telecommunication services. 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 electricity consumed would be increased compared to the Project due to the increase in the overall amount of construction. However, as with the Project, before construction begins, the Project Applicant would coordinate with applicable regulatory agencies and telecommunication providers to identify the location of existing underground dry utilities and to implement orderly installation of new on-site and connection to existing off-site electrical, natural gas, and telecommunication facilities in order to prevent accidental encroachment or service interruptions. **Therefore, impacts on energy infrastructure associated with short-term construction activities would be less than significant under Alternative 5 but, due to the increased construction period, greater than the less-than-significant impacts of the Project.**

(b) *Operation*

As detailed in **Section IV.M.4, Utility and Service Systems – Dry Utilities**, of this Draft EIR, impacts to dry utilities during operation of the Project would be less than significant. As Alternative 5 proposes a development that would be approximately 14 percent larger than under the Project, electricity, and natural gas consumption for Alternative 5 would be approximately 14 percent greater than under the Project. However, similar to the Project, Alternative 5 would adhere to the Title 24 energy conservation standards, which would improve energy efficiency and reduce impacts on consumption of energy resources. Telecommunications services would be provided from existing suppliers through established service procedures. Therefore, Alternative 5 would not require the need for relocation or construction of new or expanded electric, natural gas, or telecommunication facilities. **Therefore, impacts to dry utilities during operation of Alternative 5 would be less than significant but greater than the less-than-significant impacts of the Project.**

3. Relationship to Project Objectives

Alternative 5 would include the same components as the Project. Like the Project, the existing four-story Morrison Hotel would be adaptively reused into a new hotel. The adaptive reuse of the hotel would include removal of an approximately 12,280-square-foot existing inner wing, the demolition of the majority of the north and full east elevations and light courts, partial rehabilitation and reconstruction of the existing Morrison Hotel as well as protection and shoring of the portions of the structure that will remain. No underground parking is contemplated as part of Alternative 5.

Alternative 5 would meet Objectives 2, 3, 4, and 7 to a greater extent than the Project. Alternative 5 would provide more residential units and hotel rooms than the Project, it would meet the Project Objectives to maximize residential density and floor area in Downtown within walking distance of jobs-rich centers to help meet the demand for new housing opportunities in proximity to public transit, including Metro's A Line and E Line, and to create a mixed-use hotel complex that maximizes the density of hotel rooms on an urban infill location in walking distance to the Convention Center and public transit to further smart growth land use planning practices aligned with policies to reduce greenhouse gas emissions and vehicle miles traveled, as well as the Mayor's goal of 8,000 hotel rooms by the Convention Center by 2020, to a greater degree than the Project would. Furthermore, the increased hotel and commercial floor area would also meet the Project Objective of providing construction and permanent jobs, attracting commercial tenants and hotel operators, and increasing hotel patrons that collectively increase City tax revenues directly and indirectly to a greater degree than the Project.

2. Adaptively reusing the long vacant SRO hotel as a high-density mixed-use project that further revitalizes the area adjacent to the Convention Center and maximizes the economic viability of the Site.
3. Create a mixed-use hotel complex that maximizes the density of hotel rooms on an urban infill location in walking distance to the Convention Center and public transit to further smart growth land use planning practices aligned with policies to reduce greenhouse gas

emissions and vehicle miles traveled, as well as the Mayor's goal of 8,000 hotel rooms by the Convention Center by 2020.

4. Maximize residential density and floor area in Downtown within walking distance of jobs-rich centers to help meet the demand for new housing opportunities in proximity to public transit, including Metro's A Line and E Line.
7. Expand the economic base of the City and provide employment opportunities and new sources of tax revenue 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.

Alternative 5 would meet Objectives 1, 5, and 6 to the same extent as the Project because the Morrison Hotel would be partially rehabilitated, demolished, and reconstructed to create more useable ground-floor commercial uses (including restaurant, gallery, and immersive museum) while preserving the major character-defining features of the existing hotel. Like the Project, Alternative 5 would also activate and improve the existing pedestrian experience at Hope Street and Pico Boulevard.

1. Preserve the existing Morrison Hotel by rehabilitating major character-defining features and incorporating a diversity of commercial uses to highlight the hotel's history, while making the building safe and habitable through a seismic retrofit and upgrading the building to meet current safety standards.
5. Create a cultural and arts destination with a range of commercial uses, including event spaces, gallery and museum space, and restaurants that support one of the Central City Community Plan's primary goals of creating a vibrant and active 24-hour downtown.
6. Enhance and further activate the pedestrian experience at the intersection of Hope Street and Pico Boulevard by providing street-oriented uses, such as restaurants, gallery and museum space, and creating a transparent ground floor with a landscaped courtyard and pedestrian connections.

Alternative 5 would meet the Project's underlying purpose to create a mixed-use development that complements the uses and market needs for the South Park neighborhood and greater Central City community by rehabilitating and reconstructing the long vacant Morrison Hotel and turning it into a safe and habitable hotel with a range of ground-floor commercial uses, which enhance the City's economic base. However, although Alternative 5 would reduce some construction-related impacts due to the elimination of the subterranean parking levels proposed under the Project, Alternative 5's impacts would generally be either similar to or greater than the Project's impacts and, as with the Project, would also require mitigation to reduce impacts related to historical, archaeological, and paleontological resources, and operation-related noise. Furthermore, Alternative 5 would not eliminate the Project's significant and unavoidable direct impact to historical resources or on-site construction noise to adjacent sensitive uses and off-site construction vibration from haul trucks and would also result in greater VMT impacts. Alternative 5 is not currently permitted under the LAMC without additional entitlements because the Central Community Plan Update/DTLA 2040 has not yet been adopted.

G. Environmentally Superior Alternative

In addition to the discussion and comparison of impacts of a proposed project and its alternatives, Section 15126.6 of the *State CEQA Guidelines* requires that an environmentally superior alternative be identified and the reasons for such a selection be disclosed. In general, the environmentally superior alternative is the alternative that would generate the least amount of adverse impacts. In this case, the No Project Alternative (Alternative 1) would result in fewer impacts on the existing environment.

However, Section 15126.6(e)(2) of the *State CEQA Guidelines* states that if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. Based on the above analysis and as shown in the impact comparison presented in **Table VI-2**, Alternative 2, the Reduced Density Alternative, would be environmentally superior to the Project. In most environmental areas, Alternative 2 would result in lesser degrees of Project impacts due to the overall reduction in construction and development. However, it should be noted that Alternative 2 would not eliminate the Project's significant and unavoidable direct impacts to historical resources or on-site construction noise to adjacent sensitives uses and off-site construction vibration from haul trucks, and would result in greater VMT impacts and operational energy compared to the Project. Furthermore, Alternative 2 would meet all the Project's objectives, including to maximize density on an infill site in proximity to transit consistent with smart growth polices to reduce GHG emissions and VMT, but to a lesser extent than the Project.

Alternative 3, the Morrison Hotel Preservation – Hotel Use and Alternative 4, the Morrison Hotel Preservation – Office Use are not considered the environmentally superior alternatives even though they would reduce the significant and unavoidable direct impacts to historical resources because impacts would be greater than the Project with respect to on-site construction noise and off-site construction vibration (and still significant and unavoidable) as well as greater (though still less than significant) with respect to TACs, construction energy, VMT impacts, tribal cultural resources, and water usage during construction. Additionally, the feasibility of rehabilitating the Morrison Hotel and implementing the comprehensive seismic retrofit program without completing a comprehensive materials assessment as recommended by Englekirk is uncertain.