

V. Alternatives

V. Alternatives

1. Introduction

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

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

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

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

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

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

2. Overview of Alternatives to the Project

As indicated above, the intent of the alternatives is to avoid or substantially lessen any of the significant effects of a project while still feasibly obtaining most of the basic project objectives. Based on the analyses provided in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant and unavoidable impacts for the following: Project and cumulative construction noise impacts from on-site noise sources; cumulative noise impacts from off-site construction traffic; Project vibration impacts associated with human annoyance from on-site construction; and Project and cumulative vibration impacts associated with human annoyance from off-site construction traffic.

Based on the significant environmental impacts of the Project, the basic objectives established for the Project (refer to Section II, Project Description, of this Draft EIR), and the feasibility of the alternatives considered, the alternatives to the Project listed below were selected for evaluation. Table V-1 on page V-3 compares the amount of development proposed under the Project and the alternatives.

- **Alternative 1—No Project/No Build Alternative:** This alternative assumes that no new development would occur within the Project Site. The existing surface parking lot and four-story parking structure on the Project Site would remain. The existing conditions would be unchanged by Alternative 1.
- **Alternative 2—Hotel with Ground Floor Commercial Alternative:** This alternative would include a high-rise 22-story building with a maximum height of 292 feet and two subterranean levels. Alternative 2 would include 375 hotel rooms and 10,499 square feet of ground floor commercial/retail/restaurant uses. Overall, the new building under Alternative 2 would comprise 312,111 square feet of floor area of which 104,037 square feet of floor area would be requested through a Transfer of Floor Area. As such, Alternative 2 would provide a total

**Table V-1
Development Table for Alternatives**

Land Use	Proposed Project^a	Alternative 1: No Project/ No Build Alternative	Alternative 2: Hotel with Ground Floor Commercial Alternative	Alternative 3: Development in Accordance with Existing Base FAR (Reduced Residential) Alternative	Alternative 4: Development in Accordance with DTLA 2040 Plan Alternative
Residential	547,428 sf (580 du)	—	0 sf (0 du)	200,575 sf (228 du)	247,738 sf (290 du)
Commercial/Retail/ Restaurant	7,499 sf	—	10,499 sf	7,499 sf	7,499 sf
Hotel	0 sf (0 rm)	—	301,612 sf (375 rm)	0 sf (0 rm)	0 sf (0 rm)
Above-Grade Parking ^b	0 sf	—	0 sf	0 sf	56,874 sf ^b
Total Floor Area^c	554,927 sf	—	312,111 sf	208,074 sf	312,111 sf
FAR	9.25:1 ^a	—	9:1 ^d	6:1 ^d	9:1 ^{b,d}
Vehicle Parking ^e	636 spc	—	274 spc	285 spc	338 spc
Bicycle Parking	251 spc	—	84 spc	153 spc	172 spc
Open Space	65,193 sf ^a	—	47,087 sf	25,080 sf	28,958 sf
Number of Stories	50 sto	—	22 sto	23 sto	29 sto
Number of Above- Grade Parking Levels	8 lvl	—	2 lvl	3 lvl	3 lvl
Number of Subterranean Levels	3 lvl	—	2 lvl	2 lvl	3 lvl
<p><i>du = dwelling units sf = square feet</i> <i>FAR = floor-area ratio spc = spaces</i> <i>lvl = levels sto = stories</i> <i>rm = rooms</i></p> <p>^a For the Project, FAR is based on the lot area of 60,022 square feet to the center line of the street per LAMC Section 14.5.3 (which provides that for the purposes of computing the maximum Floor Area Rights available through the approval of a Transfer of Floor Area Rights Plan for a Transit Area Mixed Use Project, the buildable area shall include the lot area plus the area between the exterior lot lines and the centerline of any abutting public right-of-way.) In addition, pursuant to LAMC Section 12.21-A,2, the Applicant requests a Zoning Administrator's Interpretation to clarify that 1) covered exterior open space areas can be credited to the common open space requirement for the Project and 2) that at the same time, the covered open space areas provided within the building cut-outs of the Project are not considered "floor area" as defined by the LAMC.</p> <p>^b For Alternative 4, per the draft DTLA 2040 Plan as of the date of circulation of the Plan's Draft EIR, above-grade parking is counted towards the development's FAR. For the Project, as the draft DTLA 2040 Plan has not been adopted and the Project includes a Vesting Tentative Tract Map, the current adopted Central City Community Plan is the local adopted community plan that is evaluated for the Project. Currently, under the LAMC, parking, including above-grade parking, is not counted as floor area.</p> <p>^c Floor area as defined by LAMC Section 12.03.</p> <p>^d For Alternatives 2, 3, and 4, FAR is based on the lot area of 34,679 square feet.</p> <p>^e Includes required vehicle parking spaces within the Project Site for the 611 West 6th Street building pursuant to covenanted and recorded parking agreements (PKG-4743, PKG-5261, PKG-5248).</p> <p>Source: Gensler; Eyestone Environmental, 2021.</p>					

FAR of 9:1.¹ To accommodate Alternative 2, the existing surface parking and four-story parking structure would be demolished.

- **Alternative 3—Development in Accordance with Existing Base FAR (Reduced Residential) Alternative:** This alternative would include a reduced density project developed pursuant to the existing zoning designations, height limits, and base 6:1 FAR without requesting approval of a TFAR. Alternative 3 would involve the development of a high-rise 23-story mixed-use building with a maximum height of 288 feet and two subterranean levels. The building would consist of 228 residential units and 7,499 square feet of ground floor commercial/retail/restaurant uses. Overall, the new building would comprise 208,074 square feet of floor area, which would correspond to the maximum area allowed on-site.² To accommodate Alternative 3, the existing surface parking and four-story parking structure would be demolished.
- **Alternative 4—Development in Accordance with DTLA 2040 Plan Alternative:** This alternative would develop the same types of uses as the Project but would comply with the proposed draft zoning for the Project Site under the DTLA 2040 Community Plan Update.³ Under the DTLA 2040 Plan, the Project Site is currently proposed to be designated as part of the Transit Core, which would allow a maximum FAR of between 9:1 and 13:1, with general uses that include multi-family residential, regional retail and services, office, hotel, and entertainment uses.⁴ Per the DTLA 2040 Plan, above-grade parking is counted towards the development's FAR. Alternative 4 would develop a high-rise 29-story building with a maximum height of 372 feet and three subterranean levels. The building would consist of 290 residential units, up to 7,499 square

¹ The Alternative 2 FAR is based on the lot area of 34,679 square feet. The Project FAR is based on the lot area of 60,022 square feet to the center line of the street per LAMC Section 14.5.3 (which provides that for the purposes of computing the maximum Floor Area Rights available through the approval of a Transfer of Floor Area Rights Plan for a Transit Area Mixed Use Project, the buildable area shall include the lot area plus the area between the exterior lot lines and the centerline of any abutting public right-of-way.)

² The Alternative 3 FAR is based on the lot area of 34,679 square feet and a maximum FAR of 6:1 allowed for the Project Site, as restricted by the "D" Limitation in the zoning prefix. The Project FAR is based on the lot area of 60,022 square feet to the center line of the street.

³ The City of Los Angeles Department of City Planning is currently updating the Central City Community Plan and the Central City North Community Plan, whose areas together make up Downtown Los Angeles (DTLA), in a combined planning process referred to as the DTLA 2040 Plan. The DTLA 2040 Plan Draft Environmental Impact Report was published in 2020 and was followed by a public comment period. Subsequently, a virtual public hearing was held on December 8, 2020. A meeting with the City Planning Commission (CPC) was held on June 17, 2021, at which CPC voted to reconvene a second meeting. During its September 23, 2021, meeting, CPC recommended approval of the June 2021 draft of the DTLA 2040 Plan. The DTLA 2040 Plan has not yet been adopted and therefore is subject to change. As a result, Alternative 4 is based on conformance with the provisions of the draft DTLA 2040 as of the date of circulation of the Plan's Draft EIR.

⁴ Los Angeles Department of City Planning, Downtown Community Plan Update, Fall 2020 Draft.

feet of ground floor commercial/retail/restaurant uses, and 56,874 square feet of above-grade parking that would be counted towards the FAR. Overall, Alternative 4 would comprise 312,111 square feet of floor area. As such, based on a lot area of 36,178 square feet, Alternative 4 would result in a total FAR of 9:1 and would comply with the base FAR allowed by the DTLA 2040 Plan.⁵ To accommodate Alternative 4, the existing surface parking and four-story parking structure would be demolished.

3. Alternatives Considered and Rejected

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

- **Alternative Project Site:** The Project Applicant already owns the Project Site, and its location is conducive to the development of an infill mixed-use project. The Project Site is located in downtown Los Angeles within two blocks of the Metro 7th Street/Metro Center Station, which is a regional-serving transit hub. In addition, the Project Site is located in an urbanized area dominated by mixed-use development consisting of residential units above ground floor commercial uses and high-rise developments. These uses make the Project Site particularly suitable for development of a mixed-use development that provides new market rate multi-family housing and neighborhood-serving commercial/retail/restaurant uses that serve the community and provide opportunities for walkability due to the Project Sites proximity to existing commercial uses and various modes of public transportation. Furthermore, it is not expected that the Project Applicant can 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. If an alternative site in the downtown Los Angeles area that could accommodate the Project could be found, it would be expected that the significant and unavoidable impacts associated with on-site construction noise and on- and off-site vibration (associated with human annoyance) due to short-term construction activities would also occur. Specifically, since a potential alternative site would also likely be an infill site with nearby sensitive receptors and since noise levels during maximum daily activity days are used for measuring impacts, noise levels associated with on- and off-site construction activities would be similar to those of the Project. Furthermore, since

⁵ The Alternative 4 FAR is based on the lot area of 34,679 square feet.

construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment, vibration levels associated with on- and off-site construction activities would be similar to the Project. Thus, in accordance with Section 15126.6(f) of the State CEQA Guidelines, this alternative was rejected from further consideration.

- **Alternatives to Eliminate Significant Noise and Vibration Impacts During Construction:** As summarized above and discussed in detail in Section IV.E, Noise, of this Draft EIR, the Project would result in short-term significant unavoidable construction-related noise and vibration (associated with human annoyance) impacts. Specifically, Project construction activities would result in significant unavoidable construction-related noise impacts related to on-site construction activities, and significant unavoidable vibration (associated with human annoyance) impacts related to on-site construction off-site construction traffic. In addition, the Project would result in cumulative noise impacts from on-site construction and off-site construction traffic; and cumulative vibration impacts associated with human annoyance from off-site construction traffic. The following approaches were considered to substantially reduce or avoid these impacts:
 - Approach (a)—Extended Construction Duration with reduced construction equipment: This approach would use less construction equipment each day, which would extend the construction period, as compared to the Project. 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). With respect to on-site construction, a reduction in the number of pieces of on-site construction equipment would reduce the construction noise, depending on the number and type of equipment. Specifically, prior to implementation of mitigation measures, reducing the on-site construction equipment during the site demolition phase from seven pieces to four pieces of equipment (43 percent reduction) would reduce the construction noise at the off-site receptors by 2.3 dBA L_{eq} at receptor location R1, 2.4 dBA L_{eq} at receptor location R5, 2.5 dBA L_{eq} at receptor locations R6 and R8, 2.7 dBA L_{eq} at receptor locations R2, R4, R7 and R9, and 2.8 dBA L_{eq} at receptor location R3 (as compared to the Project noise levels, which ranged from 62.8 dBA at receptor location R9 to 83.0 dBA at receptor location R5).⁶ The estimated construction noise levels with a 43 percent reduction in the number of pieces of construction equipment would still exceed the significance threshold by up to 8.4 dBA L_{eq} at receptor location R1, 8.3 dBA L_{eq} at receptor location R5, and 2.7 dBA L_{eq}

⁶ Detailed noise analysis for demolition phase was performed as it generates the highest noise levels, which would result in highest noise impacts. Calculations are provided in the alternatives noise worksheets in Appendix J.

at receptor location R6 during the site demolition phase prior to mitigation. As described in detail in detail in Section IV.E. Noise of this Draft EIR, even with implementation of mitigation, the Project would continue to result in significant noise impacts at the upper levels of five of the receptor locations. Under this approach, significant impacts at the upper levels of three of the off-site sensitive receptors would remain. Therefore, on-site construction noise levels under this approach would be less than the Project (depending on the amount of reduction) but would still exceed the significance threshold. In addition, the reduction would be less than 3.0 dBA, which is the level where noise is perceptible. This approach would also be inefficient and would increase the number of days that sensitive receptors would be significantly impacted by construction activities. Furthermore, due to the close proximity of the off-site noise sensitive receptors (e.g., receptor locations R1 and R5 that are located across the street from the Project Site), it would not be feasible to reduce the on-site construction noise levels to below the significance threshold as a single piece of equipment would result in noise levels above the significance threshold. The estimated noise from a single piece of construction equipment would exceed the significance threshold by 6.9 dBA L_{eq} at receptor location R1 and 6.8 dBA L_{eq} at receptor location R5. As analyzed in Section IV.E Noise, cumulative off-site construction noise impacts would occur if the total truck trips per hour along 8th Street, James M. Wood Boulevard/9th Street, and Olive Street would add up to 52, 35, and 45 truck trips per hour, respectively. Related Project No. 10 would generate up to 50 truck trips per hour along 8th Street and 9th Street. Therefore, even when reducing the number of haul trips by half (from 19 to 10 truck trips per hour), the Project would continue to contribute to a potential cumulative impact associated with off-site construction noise. Additionally, reducing the construction truck trips per hour would extend the demolition period since there will be fewer trucks removing on-site demolition debris. The longer demolition period would extend the duration of the human annoyance from off-site construction traffic significant noise threshold. As such, the on-site noise impacts under this approach would not be substantially less than the Project and would remain significant and unavoidable for the on-site construction activities and the cumulative off-site construction noise levels.

- Off-site construction vibration impacts (associated with human annoyance) are based the peak levels generated by the individual heavy trucks traveling by sensitive receptors. Although the number of truck trips per day would be reduced, the peak vibration levels would be the same as for the Project. Therefore, vibration impacts associated with human annoyance would also continue to be significant and unavoidable, similar to the Project and for a longer duration.
- Approach (b)—Central Location of Development: An approach where proposed development is moved closer to the center of the Project Site, thus

pulling back the proposed development and associated construction activities from the off-site sensitive receptors, was reviewed and rejected for the following reasons:

- Construction noise levels can be reduced by providing an additional buffer zone between the receptor and the construction equipment. Noise levels from construction equipment would attenuate approximately 6 dBA per doubling of distance. The construction noise levels associated with the building phases for the proposed building placed closer to the center of the Project Site would be lower than the Project. However, the noise level reduction, depending upon the setback from the property line, would be limited due to the size of the Project Site (approximately 111 feet by 342 feet). Specifically, moving the building footprint an additional 30 feet toward the center of the Project Site would reduce the noise construction levels at receptors locations R1 and R5 by approximately 2.3 and 2.4 dBA L_{eq} , respectively, which would still exceed the significance thresholds at the upper levels of the buildings even with mitigation measures. The estimated noise reduction at receptor locations R6 and R7 would be 1.8 and 1.4 dBA L_{eq} , respectively, and the noise level at receptor location R6 would still exceed the significance threshold even with implementation of mitigation measures. The estimated noise reduction at receptor locations R2, R3, R4, R7 and R9 would be less than 1 dBA L_{eq} . In addition, noise levels during site demolition, site preparation and grading would be similar to the Project, as construction activities for these phases would be up to the property line, and noise impacts at receptor locations R1, R2, R4, R5 and R6 would remain significant and similar to the Project. As such, the on-site construction noise impacts under this approach would remain significant and unavoidable as with the Project. In addition, as with the central location of development described above, if development were to be limited to the surface parking area (i.e., the existing parking structure would be retained), significant and unavoidable impacts would remain given the continued close proximity of construction activities to adjacent sensitive receptors.⁷
- The number of trucks would be similar to the Project. Therefore, the off-site construction vibration impacts (associated with human annoyance) of this option due to heavy trucks traveling by sensitive receptors would be significant and unavoidable since heavy trucks would still have to travel by the same routes.
- Approach (c)—Reduced Development: This approach would reduce the amount of development that would occur under the Project to the extent

⁷ Note that the Project could not feasibly be developed if the existing parking structure were to be retained as the development footprint would be reduced by approximately one-half.

that the significant construction-related noise and vibration impacts of the Project would be avoided or substantially reduced. However, similar to the Approach (a), reducing the number of construction equipment (even by up to 43 percent) would not reduce construction noise to a less-than-significant level. Furthermore, as discussed under Approach (b), due to the close proximity of the sensitive receptors and a constrained Project Site that does not have the space to create a meaningful buffer zone, it would not be feasible to mitigate the on-site construction noise impacts of the Project, especially at receptor locations R1 and R5 (across from the Project Site). In addition, noise levels during site demolition, site preparation and grading would be similar to the Project, as construction activities for these phases would be up to the property line, and noise impacts at receptor locations R1, R2, R4, R5 and R6 would remain significant similar to the Project. Furthermore, off-site construction vibration impacts (associated with human annoyance), due to heavy trucks traveling by sensitive receptors, would also be significant and unavoidable, similar to the Project, as vibration impacts are based on the peak levels generated by individual heavy truck traveling by sensitive receptors.

Based on the above, none of the above approaches would substantially reduce or avoid the significant unavoidable construction-related on-site and cumulative off-site noise and off-site vibration (associated with human annoyance) impacts of the Project. This is because the significant unavoidable construction-related noise and vibration impacts of the Project, which is an infill development in an urban area, 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 or duration of Project construction activities. While the duration of impact does not change the measurement of noise or vibration impact level, extending the duration of construction would result in significant impacts to sensitive receptors for a longer a period of time. 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.

4. Alternatives Analysis Format

In accordance with CEQA Guidelines Section 15126.6(d), each Alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the Project, as measured against the baseline (existing conditions). Furthermore, each Alternative is evaluated to determine whether the Project objectives identified in Section II, Project Description, of this

Draft EIR would be substantially attained by the Alternative.⁸ The evaluation of each of the Alternatives follows the process described below:

- a. The net environmental impacts of the Alternative are determined for each environmental issue area analyzed in Section IV, Environmental Impact Analysis, of this Draft EIR assuming that the Alternative would implement the same project design features and mitigation measures identified in Section IV, Environmental Impact Analysis, of this Draft EIR.
- b. Post-mitigation significant and non-significant environmental impacts of the Alternative and the Project are compared for each environmental issue area as follows:
 - Less: Where the net impact of the Alternative would be clearly less adverse or more beneficial than the impact of the Project, the comparative impact is said to be “less.”
 - Greater: Where the Alternative’s net impact would be clearly more adverse or less beneficial than the impact of the Project, the comparative impact is said to be “greater.”
 - Similar: Where the impacts of the Alternative and the Project would be roughly equivalent, the comparative impact is said to be “similar.”
- c. The comparative analysis of the impacts is followed by a general discussion of whether the underlying purpose and basic Project objectives would be substantially attained by the Alternative.

Table V-2 on page V-11 provides a summary matrix that compares the impacts associated with the Project with the impacts of each of the analyzed Alternatives.

As evaluated in the Initial Study prepared for the Project included in Appendix A of this Draft EIR, the Project would not result in significant impacts related to aesthetics, agriculture and forest resources, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, mineral resources, population and housing, schools, parks and recreation, wastewater, solid waste, and wildfire. Therefore, no further analysis of these topics in this Draft EIR is required or provided and these topics are not considered with respect to any of the alternatives considered as the same analytic conclusions are anticipated.

⁸ CEQA Guidelines Section 15126.6(c).

**Table V-2
Comparison of Impacts Associated with the Project and Impacts of the Alternatives**

Environmental Issue	Project Impact	Alternative 1 No Project/No Build Alternative	Alternative 2 Hotel with Ground Floor Commercial Alternative	Alternative 3 Development in Accordance with Existing Base FAR (Reduced Residential) Alternative	Alternative 4 Development in Accordance with DTLA 2040 Plan Alternative
A. AIR QUALITY					
<i>Construction</i>					
<i>Regional Emissions</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Localized Emissions</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Toxic Air Contaminants</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>					
<i>Regional Emissions</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Localized Emissions</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Toxic Air Contaminants</i>	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
B. ENERGY					
<i>Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)

Table V-2 (Continued)

Comparison of Impacts Associated with the Project and Impacts of the Alternatives

Environmental Issue	Project Impact	Alternative 1 No Project/No Build Alternative	Alternative 2 Hotel with Ground Floor Commercial Alternative	Alternative 3 Development in Accordance with Existing Base FAR (Reduced Residential) Alternative	Alternative 4 Development in Accordance with DTLA 2040 Plan Alternative
<i>Conflict with Plans for Renewable Energy or Energy Efficiency</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
C. GREENHOUSE GAS EMISSIONS					
Greenhouse Gas Emissions	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
D. LAND USE					
<i>Physical Division of a Community</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Conflict with Land Use Plans</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
E. NOISE					
<i>Construction</i>					
<i>On-Site Noise</i>	Significant and Unavoidable⁹	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
<i>Off-Site Noise</i>	Less Than Significant ¹⁰	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)

⁹ As discussed in Section IV.E, Noise, of this Draft EIR, cumulative noise impacts from on-site construction would be significant and unavoidable.

Table V-2 (Continued)

Comparison of Impacts Associated with the Project and Impacts of the Alternatives

Environmental Issue	Project Impact	Alternative 1 No Project/No Build Alternative	Alternative 2 Hotel with Ground Floor Commercial Alternative	Alternative 3 Development in Accordance with Existing Base FAR (Reduced Residential) Alternative	Alternative 4 Development in Accordance with DTLA 2040 Plan Alternative
<i>On-Site Vibration (Building Damage)</i>	Less Than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
<i>On-Site Vibration (Human Annoyance)</i>	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
<i>Off-Site Vibration (Building Damage)</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Off-Site Vibration (Human Annoyance)</i>	Significant and Unavoidable¹¹	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
<i>Operation</i>					
<i>On-Site Noise</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Off-Site Noise</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Vibration</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)

¹⁰ As discussed in Section IV.E, Noise, of this Draft EIR, cumulative noise impacts from off-site construction traffic would be significant and unavoidable.

¹¹ As discussed in Section IV.E, Noise, of this Draft EIR, cumulative vibration impacts from off-site construction traffic (with respect to human annoyance) would be significant and unavoidable.

Table V-2 (Continued)

Comparison of Impacts Associated with the Project and Impacts of the Alternatives

Environmental Issue	Project Impact	Alternative 1 No Project/No Build Alternative	Alternative 2 Hotel with Ground Floor Commercial Alternative	Alternative 3 Development in Accordance with Existing Base FAR (Reduced Residential) Alternative	Alternative 4 Development in Accordance with DTLA 2040 Plan Alternative
F. PUBLIC SERVICES					
<i>Fire Protection</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Police Protection</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Libraries					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
G. TRANSPORTATION					
<i>Conflict with Programs, Plans, and Policies</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Vehicle Miles Traveled</i>	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Geometric Design Features</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)

Table V-2 (Continued)

Comparison of Impacts Associated with the Project and Impacts of the Alternatives

Environmental Issue	Project Impact	Alternative 1 No Project/No Build Alternative	Alternative 2 Hotel with Ground Floor Commercial Alternative	Alternative 3 Development in Accordance with Existing Base FAR (Reduced Residential) Alternative	Alternative 4 Development in Accordance with DTLA 2040 Plan Alternative
<i>Emergency Access</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
H. TRIBAL CULTURAL RESOURCES					
<i>Tribal Cultural Resources</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
I. UTILITIES AND SERVICE SYSTEMS					
<i>Water Supply and Infrastructure</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Energy Infrastructure</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Source: Eyestone Environmental, 2021.</i>					

5. Overview of Proposed Project and Objectives

The Project proposes to construct a 50-story mixed-use development comprised of 580 residential units and up to 7,499 square feet of ground floor commercial/retail/restaurant space on a 36,178-square-foot site.¹² The Project would provide 636 vehicle parking spaces within three subterranean levels and eight above-grade levels and four vehicle parking spaces on the ground floor. To accommodate the Project, an existing surface parking lot and four-story parking structure would be demolished. Upon completion, the total building floor area would be 554,927 square feet with a maximum height of 592 feet and a Floor Area Ratio (FAR) of approximately 9.25:1.

The underlying purpose of the Project is to develop a parcel with a high-quality mixed-use development that provides new multi-family housing and neighborhood-serving commercial/retail/restaurant uses that serves the community and promotes walkability. In accordance with the CEQA Guidelines, the Project's basic and fundamental objectives are included in Section II, Project Description of this Draft EIR and are provided below.

- To maximize new housing units on a site currently used for automobile parking to help address the demand for new housing in the region, the City of Los Angeles, and the Central City Community Plan area.
- To provide a contemporary architectural design that is compatible with existing high-rise development along 8th Street, Grand Avenue, and the vicinity.
- To create a pedestrian-oriented environment by promoting walkability and by creating a safe, inviting street-level identity for the Project Site through the introduction of a ground floor, street-fronting, neighborhood-serving, storefront commercial/retail/restaurant uses.
- To construct a high-density, mixed-use development consistent with the principles of smart growth¹³ features, such as sustainable design, mixed use,

¹² *The 8th, Grand and Hope Initial Study (May 2019), included as Appendix A of this Draft EIR, had proposed two options for the Project, one of which included the development of a school. Following the publication of the Initial Study, the school option was removed. As such, this Draft EIR refers to the Project as including 580 residential units and up to 7,499 square feet of commercial/retail/restaurant space.*

¹³ *Smart growth is an approach to development that encourages a mix of building types and uses, diverse housing and transportation options, development within existing neighborhoods, and community engagement. Smart growth includes the following ten principles: mix land uses; take advantage of compact building design; create a range of housing opportunities and choices; create walkable neighborhoods; foster distinctive, attractive communities with a strong sense of place; preserve open space, farmland, natural beauty, and critical environmental areas; strengthen and direct development towards existing communities; provide a variety of transportation choices; make development decisions predictable, fair, and cost effective; and encourage community and stakeholder collaboration in*
(Footnote continued on next page)

infill development, proximity to transit, walkability, and bicycle connections (“complete” streets).¹⁴

- To reduce vehicular trips and promote regional and local mobility objectives by locating high-density residential and retail uses in downtown Los Angeles, a high-density employment base, and within two blocks of a regional-serving transit hub (7th Street/Metro Center Station) and commercial services.
- To contribute to economic investment in the Central City Community Plan area through the provision of construction jobs and high-density residential uses with ground floor commercial uses.

development decisions. Source: U.S. Environmental Protection Agency and the International City/County Management Association, This is Smart Growth, 2014; Smart Growth America, What is smart growth?, <https://smartgrowthamerica.org/our-vision/what-is-smart-growth/>, accessed July 9, 2020.

¹⁴ *As outlined in California’s Complete Streets Act of 2008 (AB 1358), the goal of Complete Streets is to ensure that the safety, accessibility, and convenience of all transportation users—pedestrians, bicyclists, transit riders, and motorists—is accommodated. Refer to City of Los Angeles Complete Streets Design Guide for additional information.*

V. Alternatives

A. Alternative 1: No Project/No Build Alternative

1. Description of Alternative 1

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. Section 15126.6(e)(3)(B) of the CEQA Guidelines 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, the No Project/No Build Alternative (Alternative 1) 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 surface parking lot would remain and continue to operate on the Project Site, and no new construction would occur.

2. Environmental Impact Analysis

a. Air Quality

(1) Construction

(a) Regional Emissions

Alternative 1 would not remove the existing uses or require any construction activities on the Project Site. Therefore, Alternative 1 would not result in any construction emissions associated with construction worker and construction truck traffic, fugitive dust from demolition and excavation, or the use of heavy-duty construction equipment. Therefore, no construction-related regional air quality impacts would occur under Alternative 1, and impacts related to regional air quality emissions during construction would be less when compared to the less-than-significant impacts of the Project.

(b) Localized Emissions

Alternative 1 would not result in any construction emissions associated with construction worker and construction truck traffic, fugitive dust from demolition and excavation, or the use of heavy-duty construction equipment. Therefore, no construction-

related localized air quality impacts would occur under Alternative 1, and impacts related to localized air quality emissions during construction would be less when compared to the less-than-significant impacts of the Project.

(c) Toxic Air Contaminants

Since construction activities would not occur on the Project Site, Alternative 1 would not result in any diesel particulate emissions during construction that could generate substantial toxic air contaminants (TACs). Therefore, no impacts associated with the release of TACs would occur under Alternative 1, and TAC impacts during construction would be less when compared to the less-than-significant impacts of the Project.

(2) Operation

(a) Regional 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 existing uses. Therefore, no operational air quality impacts associated with regional emissions would occur under Alternative 1, and impacts related to regional air quality emissions during operation would be less when compared to the less-than-significant impacts of the Project.

(b) Localized 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 existing uses. Therefore, no operational air quality impacts associated with localized emissions would occur under Alternative 1, and impacts related to localized emissions during operation would be less when compared to the less-than-significant impacts of the Project.

(c) Toxic Air Contaminants

As discussed in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include diesel particulate matter (DPM) from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets) and, to a lesser extent, facility operations (e.g., natural gas fired boilers). Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, petroleum refinery). Since Alternative 1 would not result in new development on the Project Site, no increase in any potential sources of TAC emissions would occur. Therefore, no operational impacts associated with

TACs would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

b. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

(a) Construction

As no construction activities would occur, Alternative 1 would not generate a short-term demand for energy during construction, which could result in the wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, no construction-related impacts to energy would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 would not alter the existing land uses or operations on the Project Site. As such, Alternative 1 would not increase the long-term energy demand on the Project Site or result in the wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, no operations-related energy impacts would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Conflict with Plans for Renewable Energy or Energy Efficiency

Alternative 1 would not alter the existing land uses or operations on the Project Site. As such, Alternative 1 would not have the potential to conflict with plans for renewable energy or energy efficiency. Therefore, no impacts related to renewable energy or energy efficiency plans would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

c. Greenhouse Gas Emissions

As Alternative 1 would not develop any new uses on the Project Site, no new greenhouse gas (GHG) emissions would occur. Therefore, no impacts associated with GHG emissions would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

d. Land Use

Under Alternative 1, there would be no changes to the physical or operational characteristics of the existing Project Site. Therefore, no impacts associated with conflicts with land use plans or regulations would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

e. Noise

(1) Noise

(a) Construction

No new construction activities would occur under Alternative 1. As such, no construction-related noise would be generated on- or off-site, and no construction noise impacts would occur. Therefore, Alternative 1 would eliminate the significant and unavoidable Project-level and cumulative impacts from on-site noise sources during construction as well as the significant and unavoidable cumulative noise impacts from off-site construction traffic that would occur under the Project.

(b) Operation

Alternative 1 would not alter existing site operations or develop any new uses on the Project Site. As such, no new stationary or mobile noise sources (e.g., traffic) would be introduced on or within the vicinity of the Project Site under this alternative. Therefore, no impacts associated with operation noise would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

No new construction activities would occur under Alternative 1. As such, no construction-related vibration would be generated on- or off-site, and no construction vibration impacts would occur. Therefore, Alternative 1 would eliminate the need for any mitigation measure to reduce vibration impacts associated with building damage from on-site construction to a less-than-significant level as is the case under the Project. Furthermore, Alternative 1 would eliminate the following significant and unavoidable impacts under the Project: Project-level vibration impacts associated with on-site construction activities; Project-level and cumulative vibration impacts associated with human annoyance from off-site construction traffic.

(b) Operation

Alternative 1 would not alter existing site operations or develop new uses on the Project Site. As such, no new stationary or mobile noise sources (e.g., traffic) would be introduced on or within the vicinity of the Project Site under Alternative 1, and no vibration impacts associated with operation would occur. Therefore, under Alternative 1, operational vibration impacts would be less when compared to the less-than-significant impacts of the Project.

f. Public Services**(1) Fire Protection***(a) Construction*

Alternative 1 would not require any construction activities. As such, Alternative 1 would not result in construction-related demand for Los Angeles Fire Department (LAFD) fire protection facilities or services, construction traffic that could potentially slow emergency response times, or the potential for construction-related obstruction of emergency access that would require new or physically altered facilities, the construction of which could cause significant environmental impacts. Therefore, Alternative 1 would not result in any fire protection impacts due to construction, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

As Alternative 1 would not alter the existing land uses or operations, Alternative 1 would not result in operations-related demand for LAFD fire protection facilities or services, traffic that could potentially slow emergency response times, the potential for obstruction of emergency access, or a demand for fire flow that would require new or physically altered facilities, the construction of which could cause significant environmental impacts. Therefore, Alternative 1 would not result in any fire protection impacts during operation, and impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Police Protection*(a) Construction*

Alternative 1 would not require any construction activities. As such, Alternative 1 would not have the potential for construction to create sources of nuisances and hazards or potentially impact police response from the Los Angeles Police Department (LAPD) in the vicinity of the Project Site that would require new or physically altered facilities, the

construction of which could cause significant environmental impacts. Therefore, Alternative 1 would not result in any police protection impacts due to construction, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 would not alter the existing land uses or operations. As such, there would be no potential to increase the service population on-site or have the potential to increase calls for police protection services that would require new or physically altered facilities, the construction of which could cause significant environmental impacts. Therefore, Alternative 1 would not result in any police protection impacts during operation, and impacts would be less when compared to the less-than-significant impacts of the Project.

(3) Libraries

(a) Construction

Alternative 1 would not require any construction activities. As such, Alternative 1 would not have the potential for construction employment to result in a notable increase in the resident population or corresponding demand for libraries in the vicinity of the Project Site that would require new or physically altered facilities, the construction of which could cause significant environmental impacts. Therefore, no construction-related library impacts would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

As Alternative 1 would not alter the existing land uses or operations, there would be no potential to generate additional demand for libraries in the Project vicinity that would require new or physically altered facilities, the construction of which could cause significant environmental impacts. Therefore, no operation-related library impacts would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

g. Transportation

Alternative 1 would not develop new or additional land uses on the Project Site. As such, Alternative 1 would not generate any additional vehicle trips or alter existing access or circulation within the Project Site during construction or operation. Therefore, no impacts would occur with respect to transportation, including conflicts with programs, plans, ordinances, or policies addressing the circulation system; vehicle miles traveled (VMT); hazardous design features; emergency access; and freeway off-ramp safety. Overall,

Alternative 1 would not result in any transportation impacts, and impacts would be less when compared to the Project's less-than-significant impacts.

h. Tribal Cultural Resources

Under Alternative 1, no grading or earthwork activities would occur. As such, there would be no potential for Alternative 1 to uncover or adversely impact subsurface tribal cultural resources. Therefore, no impacts related to tribal cultural resources would occur under Alternative 1, and impacts would be less when compared to the Project's less-than-significant impacts.

i. Utilities and Service Systems

(1) Water Supply and Infrastructure

The No Project/No Build Alternative would not alter the existing site or result in new construction. Therefore, Alternative 1 would not increase the Project Site's water consumption. Thus, no construction-related or operational impacts to water supply and infrastructure under Alternative 1 would occur, and impacts would be less when compared to the Project's less-than-significant impacts.

(2) Energy Infrastructure

The No Project/No Build Alternative would not alter the existing site or result in new construction. Therefore, Alternative 1 would not increase the Project Site's electricity, natural gas, or petroleum-based fuel usage. Thus, no construction-related or operational impacts to energy infrastructure would occur under Alternative 1, and impacts would be less when compared to the Project's less-than-significant impacts.

3. Comparison of Impacts

As summarized in Table V-2 on page V-11, Alternative 1 would avoid all of the Project's significant and unavoidable environmental impacts, including those related to: Project-level and cumulative construction noise impacts from on-site noise sources; cumulative noise impacts from off-site construction traffic; Project-level vibration impacts associated with human annoyance from on-site construction; and Project-level and cumulative vibration impacts associated with human annoyance from off-site construction traffic. Impacts under Alternative 1 would be less when compared to all of the Project's remaining less-than-significant and less-than-significant with mitigation impacts as no changes to the existing conditions would occur.

4. Relationship of the Alternative to Project Objectives

Under Alternative 1, the existing parking structure and surface parking lot would remain on the Project Site, and no new development would occur. As such, Alternative 1 would not meet the underlying purpose of the Project to develop a parcel with a high-quality mixed-use development that provides new multi-family housing and neighborhood-serving commercial/retail/restaurant uses that serves the community and promotes walkability. In addition, Alternative 1 would not achieve any of the Project objectives:

- To maximize new housing units on a site currently used for automobile parking to help address the demand for new housing in the region, the City of Los Angeles, and the Central City Community Plan area.
- To provide a contemporary architectural design that is compatible with existing high-rise development along 8th Street, Grand Avenue, and the vicinity.
- To create a pedestrian-oriented environment by promoting walkability and by creating a safe, inviting street-level identity for the Project Site through the introduction of a ground floor, street-fronting, neighborhood-serving, storefront commercial/retail/restaurant uses.
- To construct a high-density, mixed-use development consistent with the principles of smart growth¹⁵ features, such as sustainable design, mixed use, infill development, proximity to transit, walkability, and bicycle connections (“complete” streets¹⁶).
- To reduce vehicular trips and promote regional and local mobility objectives by locating high-density residential and retail uses in downtown Los Angeles, a

¹⁵ *Smart growth is an approach to development that encourages a mix of building types and uses, diverse housing and transportation options, development within existing neighborhoods, and community engagement. Smart growth includes the following ten principles: mix land uses; take advantage of compact building design; create a range of housing opportunities and choices; create walkable neighborhoods; foster distinctive, attractive communities with a strong sense of place; preserve open space, farmland, natural beauty, and critical environmental areas; strengthen and direct development towards existing communities; provide a variety of transportation choices; make development decisions predictable, fair, and cost effective; and encourage community and stakeholder collaboration in development decisions. Source: U.S. Environmental Protection Agency and the International City/County Management Association, This is Smart Growth, 2014; Smart Growth America, What is smart growth?, <https://smartgrowthamerica.org/our-vision/what-is-smart-growth/>, accessed July 9, 2020.*

¹⁶ *As outlined in California’s Complete Streets Act of 2008 (AB 1358), the goal of Complete Streets is to ensure that the safety, accessibility, and convenience of all transportation users—pedestrians, bicyclists, transit riders, and motorists—is accommodated. Refer to City of Los Angeles Complete Streets Design Guide for additional information.*

high-density employment base, and within two blocks of a regional-serving transit hub (7th Street/Metro Center Station) and commercial services.

- To contribute to economic investment in the Central City Community Plan area through the provision of construction jobs and high-density residential uses with ground floor commercial uses.

V. Alternatives

B. Alternative 2: Hotel with Ground Floor Commercial Alternative

1. Description of Alternative 2

The Hotel with Ground Floor Commercial Alternative (Alternative 2) would include a reduced development comprised of a high-rise 22-story building with a maximum height of 292 feet. Alternative 2 would include 375 hotel rooms and 10,499 square feet of ground floor commercial/retail/restaurant uses. Table V-3 on page V-28 compares the uses and total square footage under Alternative 2 with the uses and square footage proposed by the Project. Alternative 2 would include 274 vehicle parking spaces on four levels, including two subterranean levels (Levels B1 and B2) and two above-ground levels (Levels 2 and 3). Of the 274 vehicle parking spaces, 34 spaces would be provided per covenanted and recorded parking agreements (PKG-4743, PKG-5261, PKG-5248) for an off-site use. Alternative 2 would also include 84 bicycle parking spaces (42 short-term and 42 long-term bicycle parking spaces). Overall, the new building under Alternative 2 would comprise 312,111 square feet of floor area, of which 104,037 square feet of floor area would be requested through a Transfer of Floor Area. As such, Alternative 2 would provide a total FAR of 9:1.¹⁷ To accommodate Alternative 2, the existing surface parking and four-story parking structure would be demolished.

The ground floor (Level 1) of Alternative 2 would include the hotel lobby and 7,499 square feet of commercial/retail/restaurant uses. Similar to the Project, Alternative 2 would include driveways along Hope Street and Grand Avenue. Levels 2 and 3 would provide space for vehicular parking. Level 4 would include hotel amenities and back-of-house uses. Level 5 would provide indoor and outdoor recreational amenities for hotel guests including a landscaped amenity deck. Levels 6 through 21 would include hotel rooms, and Level 22 would include additional indoor hotel amenities and 3,000 square feet of restaurant uses. Level 23 would support mechanical equipment necessary for the operation of Alternative 2. Alternative 2 would implement a similar overall building design,

¹⁷ *The Alternative 2 FAR is based on the lot area of 34,679 square feet. The Project FAR is based on the lot area of 60,022 square feet to the center line of the street per LAMC Section 14.5.3 (which provides that for the purposes of computing the maximum Floor Area Rights available through the approval of a Transfer of Floor Area Rights Plan for a Transit Area Mixed Use Project, the buildable area shall include the lot area plus the area between the exterior lot lines and the centerline of any abutting public right-of-way.)*

**Table V-3
Summary of Alternative 2 (Hotel with Ground Floor Commercial Alternative) Uses and
Comparison to the Project**

Land Use	Alternative 2	Project	Difference
Residential ^a	0 sf (0 du)	547,428 sf (580 du)	-547,428 sf (-580 du)
Hotel	301,612 sf (375 rm)	0 sf (0 rm)	+301,612 sf (375 rm)
Commercial/Retail/Restaurant	10,499 sf	7,499 sf	+3,000 sf
Total Proposed Floor Area^b	312,111 sf	554,927 sf^c	-242,816 sf

sf = square feet
du = dwelling unit
rm = hotel room

^a Includes amenities, circulation, and operations spaces.

^b Except where otherwise noted, square footage is calculated pursuant to the LAMC definition of floor area for the purpose of calculating FAR. In accordance with LAMC Section 12.03, floor area is defined as: “[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas.”

^c As discussed in Section II, Project Description, of this Draft EIR, for the Project, pursuant to LAMC Section 12.21-A,2, the Applicant requests a Zoning Administrator’s Interpretation to clarify that 1) covered exterior open space areas can be credited to the common open space requirement for the Project and 2) that at the same time, the covered open space areas provided within the building cut-outs of the Project are not considered “floor area” as defined by the LAMC.

Source: Gensler; Eyestone Environmental, 2021.

signage, lighting, vehicular and pedestrian access, setbacks, and sustainability features as those proposed for the Project.

With regard to construction activities and schedule, it is anticipated that the overall duration of construction would be reduced compared to the Project based on the proposed development under Alternative 2 (e.g., smaller project, shorter tower, and less excavation with one less subterranean level). As with the Project, Alternative 2 would implement a Construction Management Plan and Worksite Traffic Control Plan during construction to minimize potential conflicts between construction activity, through traffic, and emergency access. As with the Project, the Construction Management Plan and Worksite Traffic Control Plan would be subject to LADOT review and approval.

2. Environmental Impact Analysis

a. Air Quality

(1) Construction

(a) Regional Emissions

As with the Project, construction of Alternative 2 has the potential to generate construction-related regional air emissions through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, mobile source emissions, primarily NO_x, would result from the use of construction equipment, such as dozers, loaders, and cranes. During the finishing phase of the Project, paving and the application of architectural coatings (e.g., paints) would potentially release VOCs. The assessment of construction air quality impacts considers each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and, for dust, the prevailing weather conditions.

Under Alternative 2, construction activities would be reduced in comparison to the Project due to the elimination of one subterranean level, the reduced height, and the overall reduced square footage. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, regional impacts on these days would be similar to those of the Project. Therefore, the construction-related regional emissions under Alternative 2 would be less than significant and similar when compared to the less-than-significant impacts of the Project.

(b) Localized Emissions

On-site construction activities associated with Alternative 2 would be located at similar distances from sensitive receptors as the Project. Although Alternative 2 would result in a reduction in the amount of proposed development compared to the Project, the intensity of construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, localized impacts on these days would be similar to the less than significant impacts of the Project. Therefore, as with the Project, localized impacts under Alternative 2 would be less than significant and similar when compared to the less-than-significant impacts of the Project.

(c) *Toxic Air Contaminants*

As with the Project, construction of Alternative 2 would generate diesel particulate emissions associated with heavy equipment operations. However, Alternative 2 would reduce the Project's proposed excavation activities and associated diesel particulate emissions associated with the construction of subterranean parking. Overall construction TAC emissions generated by Alternative 2 would be reduced compared to those of the Project since excavation activities required during construction of Alternative 2 would be reduced. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(2) Operation

(a) *Regional Emissions*

As discussed above, Alternative 2 proposes to develop 375 hotel rooms and 10,499 square feet of retail/restaurant uses. Alternative 2 would generate a total of 1,539 daily vehicle trips and 11,406 daily VMT, which would be greater than the Project's 1,500 daily vehicle trips and 8,617 daily VMT. As vehicular emissions depend on the number of trips, vehicular sources under Alternative 2 would result in a greater increase in air emissions compared to the Project. However, because the overall square footage would be substantially reduced when compared to the Project, the demand for electricity and natural gas would be less than the Project. Furthermore, as shown in Table V-4 on page V-31, the operational regional emissions of Alternative 2 would be below the SCAQMD's regional significance thresholds. Therefore, the operational regional air pollutant emissions of Alternative 2 would be less than significant and similar when compared to the less-than-significant impacts of the Project.¹⁸

(b) *Localized Emissions*

Localized operational impacts are determined primarily by peak-hour intersection traffic volumes. Alternative 2 would generate a total of 1,539 daily vehicle trips and 11,406 daily VMT, which would be greater than the Project's 1,500 daily vehicle trips and 8,617 daily VMT. As such, total peak-hour vehicular emissions would be greater under Alternative 2 compared to the Project. With the development of less floor area under Alternative 2 than the Project, area and stationary sources would generate less on-site operational air emissions compared to the Project. Furthermore, as with the Project, Alternative 2 would not introduce any major new sources of air pollution within the Project Site. Therefore, localized impacts under Alternative 2 would also be less than significant

¹⁸ Refer to Appendix J of this Draft EIR for Alternative 2 CalEEMod model outputs.

Table V-4
Estimate of Maximum Regional Alternative 2 Daily Operational Emissions—At Buildout (2025)^a

Emission Source	Pollutant Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Alternative 2 Regional Emissions						
Area ^b	7	<1	<1	<1	<1	<1
Energy (Natural Gas) ^c	<1	2	2	<1	<1	<1
Mobile	3	12	27	<1	9	2
Stationary	<1	1	1	<1	<1	<1
Total Alternative 2 Emissions	11	16	30	<1	9	3
SCAQMD Significance Threshold	55	55	550	150	150	55
Over/(Under)	(44)	(39)	(520)	(150)	(141)	(52)
Exceed Threshold?	No	No	No	No	No	No
Project Regional Emissions						
Alternative 2 vs. Project	(6)	2	(42)	<1	2	1
Alternative 2 Localized Emissions						
SCAQMD Significance Threshold ^d		74	680		2	1
Over/(Under)		(70)	(677)		(2)	(1)
Exceed Threshold?		No	No		No	No
Project Localized Emissions						
Alternative 2 vs. Project		<1	(47)		<1	<1
<p>Numbers may not add up exactly due to rounding.</p> <p>^a The CalEEMod model printout sheets and/or calculation worksheets are presented in Appendix B (CalEEMod Output) of this Draft EIR. The table reflects net emissions (i.e., Project emissions less existing emissions).</p> <p>^b Area source emissions accounts for a reduction in emissions (e.g., 94 percent reduction in NO_x emissions) with implementation of AIR-PDF-2 (prohibit installation of fireplaces within residential units).</p> <p>^c Subsequent to release of the most current version of CalEEMod (Version 2016.3.2), the 2019 Title 24 standards went into effect January 1, 2020. CalEEMod is currently based on 2016 Title 24 standards. The analysis conservatively includes a 10-percent reduction in the CalEEMod calculated energy use to account for compliance with 2019 Title 24 standards.</p> <p>^d The SCAQMD Daily Significance Thresholds are based on the 1-acre Project Site. The closest sensitive receptors are residential uses southwest of the Project Site. The localized threshold is based on a 25 meter receptor distance which is the closest receptor distance on the SCAQMD mass rate LST look-up table. Calculations of the localized thresholds are provided in Appendix B of this Draft EIR.</p> <p>Source: Eyestone Environmental, 2021.</p>						

And similar when compared to the less-than-significant impacts of the Project as shown in Table V-4 on page V-31.¹⁹

© *Toxic Air Contaminants*

As set forth in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential TACs associated with Project operations would include diesel particulate emissions from delivery trucks. Under Alternative 2, the overall increase in the number of deliveries and associated diesel particulate matter emissions would be increased compared to the Project due to the increase in the number of trips generated. While Alternative 2 would generate greater truck trips than the Project, hotel land uses under this Alternative are not considered substantial sources of diesel truck trips (e.g., truck stops and warehouse facilities that generate more than 100 truck trips per day).²⁰ Therefore, the number of delivery trucks under Alternative 2 would not result in a substantial increase in TAC emissions compared to the Project. Additionally, the types of uses proposed with both the Project and Alternative 2 are not considered land uses that generate substantial TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not proposed by the Project or Alternative 2. Similar to the Project, Alternative 2 would not release substantial amounts of TACs and would be consistent with California Air Resources Board (CARB) and South Coast Air Quality Management District (SCAQMD) guidelines regarding TAC sources in proximity to existing sensitive land uses. Thus, as with the Project, potential TAC impacts under Alternative 2 would be less than significant, and greater when compared to the less-than-significant impacts of the Project due to the slight increase in truck trips under Alternative 2.

b. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

(a) Construction

Similar to the Project, construction activities associated with Alternative 2 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. Like the Project, construction activities associated with Alternative 2 would not involve the consumption of natural gas. As with the Project,

¹⁹ Refer to Appendix J of this Draft EIR for Alternative 2 CalEEMod model outputs.

²⁰ California Air Resources Board. *Air Quality and Land Use Handbook: A Community Health Perspective*. April 2005.

Alternative 2 would generate a demand for transportation energy associated with on- and off-road vehicles. However, the energy consumed during construction of Alternative 2 would be reduced compared to the Project due to the reduction in construction activities and duration. As with the Project, the electricity demand during construction of Alternative 2 would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Construction equipment used during construction of Alternative 2 would also comply with Title 24 requirements where applicable, similar to the Project. With regard to transportation fuels, trucks and equipment used during construction of Alternative 2 would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. Therefore, as with the Project, construction activities would result in energy usage that is not wasteful, inefficient, or unnecessary. Overall, impacts under Alternative 2 regarding energy use associated with short-term construction activities would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 2 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions. As previously discussed, Alternative 2 would result in an increased number of daily trips when compared to the Project. Specifically, as provided in Appendix J of this Draft EIR, Alternative 2 would generate a total of 1,539 daily vehicle trips and 11,406 daily VMT, which would be greater than the Project's 1,500 daily vehicle trips and 8,617 daily VMT. As shown in Table V-5 on page V-34, land uses under this Alternative would also consume more electricity and natural gas compared to the Project. As such, the consumption of electricity, natural gas, and petroleum-based fuels would be greater under Alternative 2.²¹ However, similar to the Project, Alternative 2 would implement design features to reduce energy usage such as Energy Star-labeled products and light-emitting diode lighting. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 2 would not be wasteful, inefficient, or unnecessary. Overall, impacts related to energy use during operation of Alternative 2 would be less than significant but greater when compared to the less-than-significant impacts of the Project based on the increased energy consumption.

²¹ Refer to Appendix J of this Draft EIR for Alternative 2 CalEEMod model outputs.

**Table V-5
Summary of Annual Net New Energy Use Under Alternative 2^a**

Source	Estimated Energy Demand	
	Project	Alternative 2
Electricity		
Building	2,895,390 kWh	3,247,276 kWh
Water ^b	528,877 kWh	122,692 kWh
EV Chargers ^c	103,418 kWh	103,418 kWh
Total Electricity^d	3,527,684 kWh	3,473,385 kWh
Natural Gas		
Building	4,859,882 cf	8,580,438 cf
Total Natural Gas^d	4,859,882 cf	8,580,438 cf
Transportation (On-Road Vehicles and Off-Road Equipment)		
Gasoline	102,531 gal	135,778 gal
Diesel	20,179 gal	26,722 gal
Total Transportation^e	122,710 gal	162,499 gal
<p><i>cf = cubic feet</i> <i>gal = gallons</i> <i>kWH = kilowatt-hours</i></p> <p>^a Detailed calculations are provided in Appendix C of this Draft EIR. Totals may not add up due to rounding. Project energy demand is all net new. Existing site is currently occupied by a surface parking lot and a four-story parking structure, as such to provide a conservative analysis of the Project's impacts, existing energy usage is presumed to be de minimis.</p> <p>^b Calculations assume compliance with Project Design Feature GHG-PDF-1 provided in Section IV.C, Greenhouse Gas Emissions, of this Draft EIR and Project Design Feature WAT-PDF-1 provided in Section IV.I.1, Utilities and Service System-Water Supply and Infrastructure.</p> <p>^c Consistent with City Code, the Project would provide at least 30 percent of Code-required parking spaces with the capability of supporting electric vehicle supply equipment (EVSE) and that a minimum of 10 percent of Code-required parking spaces would be further equipped with EV charging stations.</p> <p>^d Electricity and natural gas estimates assume compliance with applicable 2019 CALGreen requirements and implementation of GHG-PDF-1, in Section IV.C, Greenhouse Gas Emissions, of this Draft EIR.</p> <p>^e Transportation fuel estimates include project characteristics consistent with the LADOT VMT Calculator. Fuel estimates conservatively do not include reductions in fuel usage associated with implementation of EV charging stations.</p> <p>Source: Eyestone Environmental, 2021.</p>		

(2) Conflict with Plans for Renewable Energy or Energy Efficiency

As discussed in Section IV.C, Energy, of this Draft EIR, the current City of LA Green Building Code requires compliance with CalGreen and California's Building Energy Efficiency Standards (Title 24). Like the Project, Alternative 2 would comply with the City's Green Building Code and would be capable of achieving LEED® Certified or equivalent

green building standards. In addition, like the Project, Alternative 2 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2019 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code. Furthermore, as with the Project, Alternative 2 would incorporate certain measures such as use of LED lighting that are beyond current State and City energy conservation requirements.

With regard to transportation related energy usage, Alternative 2 would also comply with goals of the SCAG's 2020–2045 RTP/SCS which incorporate VMT targets established by SB 375. As with the Project, the proximity of Alternative 2's hotel and commercial/retail/restaurant uses to public transportation would serve to reduce VMT and associated transportation fuel usage within the region. In addition, vehicle trips generated during operation of Alternative 2 would comply with CAFE fuel economy standards. During construction of Alternative 2, activities would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations.

Based on the above, Alternative 2, like the Project, would not conflict with plans for renewable energy or energy efficiency. Therefore, impacts of Alternative 2 would be less than significant and similar when compared to the less-than-significant impacts of the Project

c. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily trips generated and associated VMT, as well as energy consumption from proposed land uses. As previously discussed, the number of daily trips and daily VMT under Alternative 2 would be greater when compared to the Project. Energy consumption from proposed land uses would be greater compared to the Project due to the type of land uses proposed for Alternative 2. The amount of GHG emissions generated by Alternative 2 would be greater than the amount generated by the Project due to the increase in the number of trips and daily VMT generated when compared to the Project.²² As with the Project, Alternative 2 would be designed to comply with the requirements of the CALGreen Code and the Los Angeles Green Building Code. Alternative 2 would also incorporate design features, as also incorporated into the Project, to reduce GHG emissions and would be designed to comply with the City's Green Building Ordinance, as applicable. With compliance with the CALGreen Code and the Los Angeles Green Building Code, and with the implementation of comparable sustainability features as the Project, Alternative 2 would

²² Refer to Appendix J of this Draft EIR for Alternative 2 CalEEMod model outputs.

be consistent with the GHG reduction goals and objectives included in adopted State, regional, and local regulatory plans. As with the Project, this Alternative would be serviced by the LADWP which will comply with SB 100 and SB 350 requirements for renewable energy, consistent with the CARB Scoping Plan. Vehicle trips and VMT under this Alternative would not conflict with the 2020–2045 RTP/SCS and SB 375 GHG reduction policies. Water efficiency and solid waste reduction measures under this Alternative would also comply with State and City requirements. Thus, impacts related to GHG emissions under Alternative 2 would be less than significant but greater when compared to the less-than-significant impacts of the Project due to the increase in GHG emissions.

d. Land Use

(1) Physical Division of a Community

The proposed hotel and retail/restaurant uses of Alternative 2 are consistent with types of land uses already present or under construction in the surrounding area, which consist of mixed-use developments, new residential, hotel, office, and commercial/retail uses. In addition, all proposed development would occur within the boundaries of the Project Site as it currently exists. Therefore, Alternative 2 would not physically divide an established community. Impacts would be less than significant under Alternative 2 and similar when compared to the less-than-significant impacts of the Project.

(2) Conflict with Land Use Plans, Policies, and Regulations

Alternative 2 proposes hotel and retail/restaurant uses that are consistent with the uses permitted by the Project Site's C2-4D zoning. However, while Height District No. 4 permits an FAR of 13:1, the maximum permitted floor area of the Project Site is restricted by the "D" limitation, which restricts the FAR to 6:1 without a Transfer of Floor Area Rights (TFAR), pursuant to Ordinance No. 164,307. As such, similar to the Project, Alternative 2 would request approval of a TFAR. While the Project would request a total transfer of 346,853 square feet of floor area, Alternative 2 would request a reduced transfer to 104,037 square feet of floor area to provide a total of 312,111 square feet of floor area, resulting in a FAR of 9:1.²³ With the TFAR, the FAR of Alternative 2 would be higher than the base FAR of 6:1 but less than the maximum 13:1 FAR allowed by the Community Plan in Height District No. 4.

In addition, Alternative 2 would require fewer discretionary approvals than the Project. While Alternative 2 would request the Specific Plan Project Permit Adjustment to deviate from the provisions of the 2017 Downtown Design Guide to provide less than

²³ $312,111 \text{ sf} \div 34,679 \text{ sf} = 9:1 \text{ FAR}$

75 percent active uses along 8th Street, Grand Avenue, and Hope Street, Alternative 2 would not require the Project's requests for zone variances regarding drive aisles and parking, a Zoning Administrator's Interpretation regarding parking, the Specific Plan Project Permit Adjustment regarding balcony projections, the Zoning Administrator's Interpretation regarding open space and floor area, or payment of in-lieu fees for tree planting.

With approval of the necessary discretionary approvals as well as the implementation of project design features similar to those of the Project, Alternative 2 would not conflict with the applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect, including those set forth in the General Plan, Mobility Plan 2035, Central City Community Plan, LAMC, Downtown Design Guide, Citywide Design Guidelines, and SCAG's RTP/SCS. Therefore, impacts related to land use consistency under Alternative 2 would be less than significant and similar when compared to the less-than-significant impacts of the Project.

e. Noise

(1) Noise

(a) Construction

The types of construction activities under Alternative 2 would be similar to the Project, although the amount of construction activities and duration of construction would be reduced due to the reduction in total floor area (approximately 41 percent less floor area) and elimination of one subterranean level. As with the Project, construction of Alternative 2 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. However, the maximum or peak day of construction activity, which serves as the basis of the construction noise analysis, would be similar between Alternative 2 and the Project. This is because: (1) Alternative 2 would include a similar site plan and subterranean parking, albeit one less level; (2) both Alternative 2 and the Project would be developed on the same site, with similar building footprints,²⁴ and within the same distances to off-site sensitive receptors; (3) given that both Alternative 2 and the Project would include high-rise mixed-use development, it is anticipated that they would require the same mix of construction equipment; (4) both Alternative 2 and the Project would implement the same construction-related project noise design features, including Project Design Feature NOI-PDF-1 (using construction equipment equipped with state-of-the-art noise shielding and muffling devices) and Project Design Feature NOI-PDF-3 (prohibition on the use of impact driven pile systems); and

²⁴ Although the total floor area for Alternative 2 would be approximately 41 percent less due to the height than the Project, the building footprint would be similar, due to the building layout and lot coverage.

(5) both Alternative 2 and the Project would implement Mitigation Measure NOI-MM-1 (temporary impermeable sound barrier, along the eastern, southern, and western property lines, during the construction period). That is, the estimated noise levels during Alternative 2 construction would be similar to the Project (as provided in Table IV.E-11 of Section IV.E, Noise, of this Draft EIR), which would exceed the significance criteria at off-site receptor locations, R1, R2, R4, R5 and R6 by 10.7 dBA, 2.1 dBA, 1.8 dBA, 10.5 dBA and 5.2 dBA, respectively. Implementation of Mitigation Measure NOI-MM-1 would reduce the noise impacts at the ground level. However, the temporary sound barriers would not be effective in reducing the construction-related noise levels at these receptor locations due to the height of the residential buildings (ranging from seven stories to 33 stories). Thus, like the Project, Alternative 2 would result in significant unavoidable on-site construction noise impacts (both project-level and cumulative), less-than-significant off-site construction traffic noise (project-level), and significant unavoidable off-site construction traffic noise (cumulative). As impacts are based on peak construction days, impacts would be similar to those of the Project.

(b) Operation

As discussed in Section IV.E, Noise, of this Draft EIR, sources of operational noise under the Project include: (a) on-site stationary noise sources, including mechanical equipment, activities within the proposed outdoor spaces, parking facilities, loading dock and trash compactors; and (b) off-site mobile (roadway traffic) noise sources. Alternative 2 would introduce noise from similar on-site and off-site noise sources as the Project. However, it is anticipated that with the overall reduction in total floor area and uses, the noise levels from building mechanical equipment and outdoor spaces, would be reduced. In addition, similar to the Project, Alternative 2 would implement Project Design Feature NOI-PDF-2 to screen all outdoor mounted mechanical equipment from off-site noise-sensitive receptors as well as Project Design Feature NOI-PDF-4 to ensure that outdoor amplified sound systems, if any, will be designed so as not to exceed the maximum noise level of 80 dBA (L_{eq-1hr}) at a distance of 25 feet from the amplified speaker sound systems with proof of compliance from a qualified noise consultant. Alternative 2 would also comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. Since Alternative 2 would include less above-grade parking levels than the Project (two versus eight above grade parking spaces for the Project), noise levels associated with parking operation would be lower. Thus, operational on-site noise impacts would be less than significant and less when compared to the less-than-significant impacts of the Project due to reduction in total floor area and uses proposed.

With regard to off-site noise sources, Alternative 2 would result in an increase in the daily trips, 1,539 daily vehicle trips versus 1,500 daily vehicle trips under the Project

(2.6 percent increase). Typically, a doubling of traffic volumes would result in an increase of 3 dBA. The 2.6 percent increase in the daily trips under Alternative 2 would have no measurable changes in noise as compared to the Project. Therefore, impacts from off-site noise during operation of Alternative 2 would be less than significant and similar when compared to the less-than-significant impacts of the Project. In addition, like the Project, composite noise level impacts due to operation of Alternative 2 would be less than significant. However, impacts would be reduced as Alternative 2 would result in a reduction in mechanical equipment, outdoor spaces and parking levels. Cumulative operational on-site noise impacts under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project, due to the reduction in the overall floor area and proposed uses.

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 2 would be similar to the Project, although the amount and duration of construction activities would be reduced. As with the Project, construction of Alternative 2 would generate vibration from the use of heavy-duty construction equipment as well as from truck trips. While the overall amount of construction would be reduced, on- and off-site construction activities and the associated construction vibration levels would be expected to be similar to those of the Project, as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment. As such, peak vibration levels generated by the construction equipment would be similar to those of the Project. That is, similar to the Project, the maximum vibration levels associated with Alternative 2 on-site construction activities would be up to 0.523 PPV at the parking structures adjacent to the Project Site to the north, which would exceed the 0.5 PPV building damage criteria. Alternative 2 would implement Mitigation Measure NOI-MM-2 (vibration monitoring), which would reduce the on-site construction vibration impacts associated with building damage to a less-than-significant level. Like the Project, the estimated ground-borne vibration levels would be up to 72.2 VdB at the receptor location R5 due on-site construction equipment (as provided in Table IV.E-23 of Section IV.E, Noise, of this Draft EIR) and at the sensitive receptors along the anticipated haul routes (8th Street, James M. Wood Boulevard/9th Street, and Olive Street) due to off-site construction trucks, which would result in a significant impact as related to human annoyance. Like the Project, there are no feasible mitigation measures to reduce the vibration human annoyance impacts for Alternative 2. As such, project and cumulative vibration impacts associated with human annoyance from construction would be significant and unavoidable. Overall, vibration impacts under Alternative 2 would be similar to the impacts of the Project.

(b) Operation

Similar to the Project, sources of vibration related to operation of Alternative 2 would include vehicle circulation, delivery trucks, and building mechanical equipment. Vehicular-induced vibration, including vehicle circulation within the parking structure, would not generate perceptible vibration levels at off-site sensitive uses. Building mechanical equipment installed as part of the 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 so vibration would not be perceptible at the off-site sensitive receptors. Therefore, operation of Alternative 2 would not result in the generation of excessive ground-borne vibration levels that would be perceptible in the vicinity of the Project Site. As such, vibration impacts during operation of Alternative 2 would be less than significant and similar when compared to the less-than-significant impacts of the Project.

f. Public Services

(1) Fire Protection

(a) Construction

As previously described, while the types of construction activities required for Alternative 2 would be similar to that of the Project, the overall duration of construction would be shorter due to the Alternative 2's reduced development. As with the Project, construction activities under Alternative 2 would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous waste (e.g., OSHA, LAFD requirements, etc.). Construction would also occur in compliance with all applicable federal, State, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, similar to the Project, compliance with regulatory requirements under Alternative 2 would effectively reduce the potential for construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Additionally, while construction activities would primarily be contained within the boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by temporary lane closures, roadway/access improvements, and the construction of utility line connections. Similar to the Project, it is likely that Alternative 2 would require the following: closure of the right turn lane and bike lane adjacent to the Project Site along Grand Avenue; closure of up to eight feet of the curb lane, relocation of two bus stops along 8th Street, removal of one on-street parking space, and closure of the sidewalk and right-turn lane along 8th Street; and closure of up to eight feet of the curb lane on Hope Street on occasion as needed, which would require the temporary removal of two on-street parking spaces on Hope Street. Therefore, as with the Project's implementation of Project Design Feature TR-PDF-1, Alternative 2 would prepare a

Construction Traffic Management Plan and Worksite Traffic Control Plan for approval by LADOT, prior to the issuance of any demolition or building permits and would specify the details of any sidewalk or lane closures, including the potential temporary lane and/or sidewalk closures on Hope Street, Grand Avenue and 8th Street, as identified above, and off-site construction staging procedures. Plan details would also be coordinated with emergency services.

Therefore, construction of Alternative 2 would not require construction of new fire facilities, construction of which would cause significant environmental impacts. As such, construction-related impacts related to fire protection services under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in construction activities and duration.

(b) Operation

As previously discussed, Alternative 2 would eliminate the residential uses proposed by the Project, which would generate 1,398 residents; therefore, Alternative 2 would not generate a permanent residential population. However, Alternative 2 would generate a hotel guest and employee population on the Project Site that would contribute to an increase in demand for LAFD fire protection and emergency medical services. Alternative 2 would generate approximately 229 employees²⁵ compared to the Project's 30 employees. Occupants of the 375 hotel rooms may also generate a demand for fire protection services. However, with the reduction in the total floor area and elimination of residential uses, the overall increased demand for LAFD fire protection and emergency medical services would be reduced compared to that of the Project. Furthermore, as with the Project, Alternative 2 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, automatic fire sprinklers, etc. As discussed in Section IV.F.1, Public Services—Fire Protection, of this Draft EIR, and the *Utility Infrastructure Technical Report: Water* included as Appendix I of this Draft EIR, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for the Project. Thus, LADWP would be able to satisfy fire suppression needs for the reduced tower proposed by Alternative 2. Alternative 2 also would not include the installation of barriers that could impede emergency vehicle access. As such, emergency access to the Project Site and surrounding area would be maintained. Compliance with applicable City Building Code and Fire Code requirements would be confirmed as part of LAFD's fire/life safety plan review and fire/life safety inspection for new

²⁵ Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the rate 0.5 employee per room for "Hotel" land use is applied to the proposed 375 hotel rooms, and the rate 0.004 employee per square feet is applied to the 10,499 square feet of retail and restaurant uses.

construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit.

Therefore, similar to the Project, Alternative 2 would not necessitate the construction of new fire protection facilities or expansion of existing facilities in order to maintain service. Operation of Alternative 2 would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities (fire protection), the construction of which would cause significant environmental impacts, in order to maintain acceptable fire protection services. Overall impacts with regard to LAFD fire protection during operation of Alternative 2 would be less than significant. Such impacts would be less when compared to the less-than-significant impacts of the Project due to the reduction in total floor area and uses and associated service population.

Furthermore, in *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection and emergency medical services, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.²⁶

(2) Police Protection

(a) Construction

As with the Project, Alternative 2 would include construction activities and generate construction traffic that would create a demand for LAPD police protection services, potentially obstruct emergency access, and potentially slow emergency response times during the construction period. However, as previously discussed, the duration and amount of construction activities would be reduced compared to the Project due to the reduction in development. Furthermore, similar to the Project, Alternative 2 would be required to implement Project Design Feature POL-PDF-1, which includes temporary security measures such as security fencing, lighting, and locked entry to secure the Project Site during construction, thereby reducing the demand for police protection services.

In addition, as detailed above and similar to the Project, Alternative 2 would prepare a Construction Traffic Management Plan and Worksite Traffic Control Plan for approval by LADOT, prior to the issuance of any demolition or building permits and would specify the details of any sidewalk or lane closures, including the potential temporary lane and/or sidewalk closures on Hope Street, Grand Avenue and 8th Street, as identified above, and

²⁶ *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, 843, 847.

off-site construction staging procedures. Plan details would also be coordinated with emergency services. Therefore, construction of Alternative 2 would not require construction of new police facilities, construction of which would cause significant environmental impacts. Overall, construction-related impacts to police protection services under Alternative 2 would be less than significant, and less when compared to the less-than-significant impacts of the Project due to the reduction in construction activities and duration.

(b) Operation

As indicated in Section IV.F.2, Public Services—Police Protection, of this Draft EIR, LAPD considers the residential population within their service area to evaluate service capacity. As previously discussed, while the residential uses proposed by the Project would generate 1,398 residents, Alternative 2 would not develop residential uses and generate an on-site residential population that would generate a demand for police protection services. However, Alternative 2 would generate a higher employee population (i.e., 229 employees) on the Project Site than the Project (i.e., 30 employees). Nonetheless, the overall increased demand in police protection services would not cause any change to the current officer-to-resident ratio as no residential units are proposed. In addition, like the Project, Alternative 2 would implement the same Project Design Features POL-PDF-2 through POL-PDF-6, as provided in Section IV.F.2, Public Services—Police Protection, of this Draft EIR. Specifically, as set forth in Project Design Feature POL-PDF-2, the Project would include private on-site security, a closed circuit security camera system, and keycard entry for residential areas. In addition, the Project would provide lighting of building entries and walkways to provide for pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into buildings, as set forth by Project Design Feature POL-PDF-3. Project Design Feature POL-PDF-4 would provide for sufficient lighting of parking areas, elevators, and lobbies to maximize visibility and reduce areas of concealment. Furthermore, Project Design Feature POL-PDF-5 would require the Project to design entrances to and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites. As specified in Project Design Feature POL-PDF-6, prior to the issuance of a building permit, the Project Applicant would submit a diagram of the Project Site to the LAPD Central Area Commanding Officer that includes access routes and any additional information that might facilitate police response. Furthermore, pursuant to Project Design Feature POL-PDF-7, the Project Applicant would consult with the LAPD Community Outreach and Development Division regarding the incorporation of crime prevention features appropriate for the Project. As such, the design features would provide security for the hotel and commercial/retail/restaurant uses and would help offset the increase in demand from current conditions for police protection services generated by Alternative 2.

Therefore, similar to the Project, this alternative would not necessitate the construction of new police protection facilities or expansion of existing facilities in order to maintain service. As such, impacts on police protection services would be less than significant under Alternative 2, and less when compared to the less-than-significant impacts of the Project due to the elimination of a permanent residential service population.

Furthermore, in *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including police protection, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.²⁷

(3) Libraries

(a) Construction

Similar to the Project, Alternative 2 would result in a temporary increase of construction workers on the Project Site. However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities. Therefore, construction employment generated by Alternative 2 would not result in a notable increase in the resident population or a corresponding demand for library services in the vicinity of the Project Site. As such, construction of Alternative 2 would not require construction of new library facilities, construction of which would cause significant environmental impacts. Impacts to library facilities during construction of Alternative 2 would be less than significant and similar when compared to the less-than-significant impacts of the Project.

(b) Operation

Residents are considered the primary users of library facilities. As such, the LAPL bases its needs for libraries using population data as set forth in its letter dated August 30, 2019, regarding the Project included as Appendix F. As Alternative 2 would not generate a new residential population on the Project Site, implementation of Alternative 2 would not result in a direct increase in the number of residents within the service population of the libraries in the vicinity, as compared to the Project, which would generate 1,398 residents. Although there is potential for hotel guests to utilize local libraries during their stay at the Project Site, based on the temporary nature of hotel stays, the demand for library services

²⁷ *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, 843, 847.

is expected to be negligible. As previously discussed, Alternative 2 would generate an estimated 229 employees for the hotel and retail/restaurant uses, which would be greater than the estimated 30 employees generated by Project. However, employees would be more likely to use library facilities near their homes during non-work hours. In addition, it is anticipated that some of the employment opportunities generated by Alternative 2 would be filled by people already residing in the vicinity of the Project Site. Furthermore, employees at the Project Site would have internet access, which provides information and research capabilities and reduces the demand at physical library locations. Therefore, any indirect or direct demand for library services generated by the employees of Alternative 2 would be unlikely to necessitate the construction of a new or expanded library. Operation of Alternative 2 would not exceed the capacity of local libraries to adequately serve the existing residential population based on target service populations or as defined by the LAPL, or substantially increase the demand for library services. As such, impacts under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the absence of a permanent residential population.

g. Transportation

Alternative 2 would provide a circulation system similar to that of Project, including driveways along Hope Street and Grand Avenue as well as an internal porte cochere on the ground floor. Like the Project, Alternative 2 would ensure that vehicular loading and drop-off would occur within the building's parking structure, and the site planning would provide a safe and comfortable walking component which would enhance the existing pedestrian environment. Alternative 2 would also include the same sidewalks, street trees, and pedestrian lighting as the Project, and would include short-term and long-term bicycle parking in accordance with the LAMC. In addition, Alternative 2 would provide 240 vehicle parking spaces for hotel and commercial/retail/restaurant uses as well as 34 vehicle parking spaces per covenanted and recorded parking agreements (PKG-4743, PKG-5261, PKG-5248 for an off-site use. As such, Alternative 2 would comply with programs and policies addressing the circulation system that are set forth in the Mobility Plan 2035; Plan for a Healthy Los Angeles; Central City Community Plan, LAMC; Vision Zero; Citywide Design Guidelines; Downtown Design Guide; and LADOT Manual of Policies and Procedures, Section 321 to the same extent as the Project. Therefore, overall, Alternative 2 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be less than significant and similar when compared to the less-than-significant impacts of the Project.

As provided in Appendix J of this Draft EIR, Alternative 2 would result in a total of 1,539 daily vehicle trips and 11,406 daily VMT as compared to the Project's 1,500 daily vehicle trips and 8,617 daily VMT. Alternative 2 would result in a 5.9 work VMT per

employee, which would not exceed the threshold of 7.6.²⁸ The Project would result in a 3.4 household VMT per capita, which would not exceed the threshold of 6.0. Therefore, similar to the Project, Alternative 2 would be consistent with CEQA Guidelines Section 15064.3, which establishes VMT as the most appropriate measure of transportation impacts. As such, impacts related to VMT under Alternative 2 would be less than significant and greater when compared to the less-than-significant impacts of the Project.

Alternative 2 would provide the same geometric design and circulation features as the Project. Alternative 2 would design the internal porte cochere and proposed driveways on Grand Avenue and Hope Street exactly as the Project and in accordance with LADOT standards. In addition, Alternative 2 would not require further freeway off-ramp analysis.²⁹ Therefore, Alternative 2 would not result in a substantial increase in hazards due to a geometric design feature or incompatible use. Such impacts under Alternative 2 would be less than significant and similar when compared to the less-than-significant impacts of the Project.

Like the Project, while construction activities would primarily be contained within the boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by temporary lane closures, roadway/access improvements, and the construction of utility line connections. Therefore, as with the Project's implementation of Project Design Feature TR-PDF-1, Alternative 2 would prepare a Construction Traffic Management Plan and Worksite Traffic Control Plan for approval by LADOT, prior to the issuance of any demolition or building permits and would specify the details of any sidewalk or lane closures, including the potential temporary lane and/or sidewalk closures on Hope Street, Grand Avenue and 8th Street, and off-site construction staging procedures. Plan details would also be coordinated with emergency services. With regard to operation of Alternative 2, the driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. Similar to the Project, Alternative 2 would not include the installation of barriers that could impede emergency vehicle access. Also, upon completion of Alternative 2 and prior to the issuance of a building permit, the Applicant would also submit a diagram of the Project Site to the LAPD's Central Area Commanding

²⁸ *The Mobility Group, VMT Calculator Results for 8th, Grand and Hope Project Alternative 2. See Appendix J of this Draft EIR.*

²⁹ *The Mobility Group, Alternatives Analysis—Freeway Screening Check for 8th, Grand and Hope Project. See Appendix J of this Draft EIR.*

Officer that includes access routes and any additional information that might facilitate police response, as provided in Project Design Feature POL-PDF-6 included in Section IV.F.2, Public Services—Police Protection, of this Draft EIR. As such, emergency access to the Project Site and surrounding area would be adequate and maintained under Alternative 2. Impacts would be less than significant and similar when compared to the less-than-significant impacts of the Project.

h. Tribal Cultural Resources

Alternative 2 would construct one less subterranean level than the Project. Therefore, the potential for Alternative 2 to uncover subsurface tribal cultural resources would be reduced when compared to that of the Project. As discussed in Section IV.H, Tribal Cultural Resources, of this Draft EIR, and in the Tribal Cultural Resources Report included as Appendix H of this Draft EIR, the results of the records searches (i.e., SCCIC and NAHC) conducted for the Project Site and the independent analysis of correspondence and materials relative to potential tribal cultural resources on the Project Site (included in the TCR Report) demonstrate that there is no record or evidence of tribal cultural resources on the Project Site or in its immediate vicinity. Furthermore, given the nature of the existing and previous on-site development, which would have required excavation of soils in excess of those with potential to support cultural resources and TCRs (generally less than 10 feet below the surface in this area), subsurface soils within the Project Site are of low suitability to support the presence of tribal cultural resources. Based on this information, the City, in its discretion and supported by substantial evidence, finds that the Project Site does not contain any resources determined to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. Accordingly, Alternative 2 would not cause a substantial adverse change in the significance of a tribal cultural resource, and impacts related to tribal cultural resources would be less than significant. Nonetheless, as with the Project, Alternative 2 would comply with the City's established standard condition of approval to address inadvertent discovery of tribal cultural resources. Therefore, impacts under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduced depth of excavation.

i. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities for Alternative 2 would result in a temporary demand for water associated with soil compaction and earthwork, dust control, mixing and placement of concrete, equipment and site cleanup, irrigation for plant and landscaping establishment, testing of water connections and flushing, and other short-term related activities. This demand would be reduced compared to that of the

Project since Alternative 2 would result in a reduction in construction activities and duration. The amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed. However, given the temporary nature of construction activities, water use during construction of Alternative 2 would be short-term and intermittent. As with the Project, the existing water infrastructure would meet the limited and temporary water demand associated with construction activities for Alternative 2.

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

(b) Operation

As with the Project, operation of Alternative 2 would generate an increased water demand relative to existing conditions. Based on rates provided by LASAN, the hotel and commercial uses of Alternative 2 would result in a base water demand of approximately 57,599 gpd,³⁰ which would be less than the base water demand of 84,358 gpd³¹ for the residential and commercial uses of the Project.³² Furthermore, as Alternative 2 would provide less covered parking and less open space and recreational amenities than the Project, Alternative 2 would have an overall reduced water demand when compared to the Project. Nonetheless, Alternative 2 would implement the same water conservation

³⁰ Per LASAN Sewage Generation Factors, effective April 6, 2012, a rate of 120 gpd per hotel room was applied to the 375 hotel rooms, and a rate of 30 gpd per seat was applied to the 10,499 square feet of retail/restaurant uses with the assumption that 1 seat = 25 square feet. $(375 \text{ rm} \times 120 \text{ gpd/rm}) + (10,499 \text{ sf} \times 1 \text{ seat}/25\text{sf} \times 30 \text{ gpd/seat}) = \text{approximately } 57,599 \text{ gpd}.$

³¹ As provided in Section IV.I.1, Utilities and Service Systems—Water Supply and Infrastructure, Table IV.I.1-5, the Project would generate a base demand of 85,478 gpd for the residential units and commercial retail/restaurant uses. $(108 \text{ du} \times 75 \text{ gpd/du}) + (258 \text{ du} \times 110 \text{ gpd/du}) + (66 \text{ du} \times 150 \text{ gpd/du}) + (143 \text{ du} \times 150 \text{ gpd/du}) + (5 \text{ du} \times 190 \text{ gpd/du}) + (7,698 \text{ residential base demand adjustment}) + (7,499 \text{ sf} \times 1 \text{ seat}/25\text{sf} \times 30 \text{ gpd/seat}) = \text{approximately } 84,358 \text{ gpd}.$

³² The base water demand refers to just the demand from proposed land uses and does not account for the open space, landscaping, covered parking, cooling tower, etc. As such, the comparative analysis first quantitatively compares Alternative 2's hotel and commercial demand and the Project's residential and commercial demand, In addition a qualitative comparison is provided for open space, landscaping, covered parking.

commitment measures as the Project. As discussed in Section IV.I.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project would not exceed the available capacity of the existing water distribution infrastructure that would serve the Project Site, and LADWP would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Therefore, as with the Project, operational impacts related to water supply and infrastructure would be less than significant under Alternative 2 and less when compared to less-than-significant impacts of the Project due to the reduced water demand.

(2) Energy Infrastructure

(a) Construction

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

(b) Operation

As with the Project, operation of Alternative 2 would generate an increased consumption of electricity and natural gas relative to existing conditions. Although Alternative 2 would result in less floor area, the proposed hotel uses in lieu of the residential units proposed by the Project, as well as the increase in commercial/retail/restaurant uses would result in an increased natural gas consumption and slightly decreased electricity consumption when compared to that of the Project.³³ As shown in Table V-5 on page V-34, electricity consumption under Alternative 2 would be 3,473,385 kWh per year compared to 3,527,684 kWh per year for the Project. Natural gas usage under Alternative 2 would be 8,580,438 cf/year compared to 4,859,882 cf per year for the Project. As such, the corresponding impact on energy infrastructure would be greater than that of the Project as the infrastructure would need to supply increased electricity and natural gas in comparison to the Project. However, like the Project, Alternative 2 would be required to coordinate with LADWP and SoCalGas to ensure adequate electricity and natural gas infrastructure would be available to serve the Project Site. Therefore, operational impacts to energy infrastructure under Alternative 2 would be

³³ Refer to Appendix J, Pages J.3-1, J.3-13 and J.3-14 of this Draft EIR for Alternative 2 CalEEMod model outputs.

less than significant and similar when compared to the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above and summarized in Table V-2 on page V-11, Alternative 2 would not eliminate the Project's significant and unavoidable environmental impacts, including those related to: Project-level and cumulative construction noise impacts from on-site noise sources; cumulative noise impacts from off-site construction traffic; Project-level vibration impacts associated with human annoyance from on-site construction; and Project-level and cumulative vibration impacts associated with human annoyance from off-site construction traffic.

The following impacts under Alternative 2 would be less than significant but greater when compared to the less-than-significant impacts of the Project: potential toxic air contaminants impacts during operation; energy use during operation, GHG emissions, and VMT.

All other impacts would be less than significant or less than significant with mitigation, and less than or similar when compared to the impacts of the Project.

4. Relationship of the Alternative to Project Objectives

With the provision of hotel uses and elimination of the proposed residential uses, Alternative 2 would not fully meet the underlying purpose of the Project to develop a parcel with a high-quality mixed-use development that provides new multi-family housing and neighborhood-serving commercial/retail/restaurant uses that serves the community and promotes walkability. In addition, Alternative 2 would not achieve the following objective of the Project:

- To maximize new housing units on a site currently used for automobile parking to help address the demand for new housing in the region, the City of Los Angeles, and the Central City Community Plan area.

Alternative 2 would only partially meet the following objectives of the Project:

- To reduce vehicular trips and promote regional and local mobility objectives by locating high-density residential and retail uses in downtown Los Angeles, a high-density employment base, and within two blocks of a regional-serving transit hub (7th Street/Metro Center Station) and commercial services.

- To contribute to economic investment in the Central City Community Plan area through the provision of construction jobs and high-density residential uses with ground floor commercial uses.
- To construct a high-density, mixed-use development consistent with the principles of smart growth features, such as sustainable design, mixed use, infill development, proximity to transit, walkability, and bicycle connections (“complete” streets).³⁴

However, Alternative 2 would meet the following remaining objectives of the Project:

- To provide a contemporary architectural design that is compatible with existing high-rise development along 8th Street, Grand Avenue, and the vicinity.
- To create a pedestrian-oriented environment by promoting walkability and by creating a safe, inviting street-level identity for the Project Site through the introduction of a ground floor, street-fronting, neighborhood-serving, storefront commercial/retail/restaurant uses.

³⁴ *As outlined in California’s Complete Streets Act of 2008 (AB 1358), the goal of Complete Streets is to ensure that the safety, accessibility, and convenience of all transportation users—pedestrians, bicyclists, transit riders, and motorists—is accommodated. Refer to City of Los Angeles Complete Streets Design Guide for additional information.*

V. Alternatives

C. Alternative 3: Development in Accordance with Existing Base FAR (Reduced Residential) Alternative

1. Description of Alternative 3

The Development in Accordance with Existing Base FAR (Reduced Residential) Alternative (Alternative 3), would include a reduced density project developed pursuant to the existing zoning designations, height limits, and base 6:1 floor area ratio (FAR) without requesting approval of a TFAR to accommodate an increase in the total floor area within the Project Site. Table V-6 on page V-53 compares the proposed uses and total square footage under Alternative 3 with the uses and total square footage proposed by the Project.

Alternative 3 would involve the development of a high-rise 23-story mixed-use building with a maximum height of 288 feet. The new building would consist of 228 residential units and 7,499 square feet of ground floor commercial/retail/restaurant uses. Alternative 3 would provide 285 vehicle parking spaces on five levels, including two subterranean levels (Levels B1 and B2) (one fewer than the Project) and three above-ground levels (Levels 2 through 4). Of the 285 vehicle parking spaces, 34 spaces would be provided per covenanted and recorded parking agreements (PKG-4743, PKG-5261, PKG-5248). Alternative 3 would also provide 153 bicycle parking spaces (17 short-term and 136 long-term bicycle parking spaces) in accordance with LAMC requirements. Overall, the new building would comprise 208,074 square feet of floor area, which would correspond to the maximum area (208,074 square feet) allowed on-site.³⁵ To accommodate Alternative 3, the existing surface parking and four-story parking structure would be demolished.

Alternative 3 would provide the same ground floor plan and design as the Project, including the commercial/retail/restaurant uses and residential lobby, internal porte cochere, and driveways along Hope Street and Grand Avenue. Levels 2 through 4 and the two subterranean levels (Levels B1 and B2) would provide space for vehicular parking. Level 5 would consist of indoor and outdoor open space and recreational amenities for

³⁵ *The Alternative 3 FAR is based on the lot area of 34,679 square feet and a maximum FAR of 6:1 allowed for the Project Site, as restricted by the "D" Limitation in the zoning prefix.*

**Table V-6
Summary of Alternative 3 (Reduced Residential Alternative) Uses and Comparison to the Project**

Land Use	Alternative 3	Project	Difference
Residential ^a	200,575 sf (228 du)	547,428 sf (580 du)	-346,853 sf (-352 du)
Commercial/Retail/Restaurant	7,499 sf	7,499 sf	0 sf
Total Proposed Floor Area^b	208,074 sf	554,927 sf^c	-346,853 sf
<p><i>sf = square feet</i> <i>du = dwelling unit</i></p> <p>^a <i>Includes amenities, circulation, and operations spaces.</i></p> <p>^b <i>Except where otherwise noted, square footage is calculated pursuant to the LAMC definition of floor area for the purpose of calculating FAR. In accordance with LAMC Section 12.03, floor area is defined as: “[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas.”</i></p> <p>^c <i>As discussed in Section II, Project Description, of this Draft EIR, for the Project, pursuant to LAMC Section 12.21-A,2, the Applicant requests a Zoning Administrator’s Interpretation to clarify that 1) covered exterior open space areas can be credited to the common open space requirement for the Project and 2) that at the same time, the covered open space areas provided within the building cut-outs of the Project are not considered “floor area” as defined by the LAMC.</i></p> <p><i>Source: Gensler, Eyestone Environmental, 2021.</i></p>			

residents, including a landscaped amenity deck. Levels 5 through 23 would include residential units. Level 24 would support mechanical equipment necessary for the operation of the Project. Alternative 3 would implement the same above-grade parking design, signage, lighting, vehicular and pedestrian access, setbacks, and sustainability features as those proposed for the Project.

With regard to construction activities and schedule, it is anticipated that the overall duration of construction would be reduced compared to the Project based on the proposed development under Alternative 3 (e.g., smaller project, shorter tower, and less excavation with one less subterranean level). As with the Project, Alternative 3 would implement a Construction Management Plan and Worksite Traffic Control Plan during construction to minimize potential conflicts between construction activity, through traffic, and emergency access. As with the Project, the Construction Management Plan and Worksite Traffic Control Plan would be subject to LADOT review and approval.

2. Environmental Impact Analysis

a. Air Quality

(1) Construction

(a) Regional Emissions

As with the Project, construction of Alternative 3 has the potential to generate construction-related regional air emissions through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, mobile source emissions, primarily NO_x, would result from the use of construction equipment, such as dozers, loaders, and cranes. During the finishing phase of the Project, paving and the application of architectural coatings (e.g., paints) would potentially release VOCs. The assessment of construction air quality impacts considers each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and, for dust, the prevailing weather conditions.

Under Alternative 3, construction activities would be reduced in comparison to the Project due to the reduction in subterranean levels and overall square footage. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, regional impacts on these days would be similar to those of the Project. Therefore, the construction-related regional emissions under Alternative 3 would be less than significant and similar when compared to the less-than-significant impacts of the Project.

(b) Localized Emissions

On-site construction activities associated with Alternative 3 would be located at similar distances from sensitive receptors as the Project. Although Alternative 3 would result in a reduction in the amount of proposed development compared to the Project, the intensity of construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, localized impacts on these days would be similar to the less than significant impacts of the Project. Therefore, as with the Project, localized impacts under Alternative 3 would be less than significant, and similar to the less-than-significant impacts of the Project.

(c) *Toxic Air Contaminants*

As with the Project, construction of Alternative 3 would generate diesel particulate emissions associated with heavy equipment operations. However, Alternative 3 would reduce the Project's proposed excavation activities and associated diesel particulate emissions associated with the construction of subterranean parking. Overall construction TAC emissions generated by Alternative 3 would be reduced compared to those of the Project since excavation activities required during construction of Alternative 3 would be reduced. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(2) Operation

(a) *Regional Emissions*

As previously discussed, Alternative 3 would result in a reduced development of the Project. As such, the number of new daily operational vehicle trips generated by Alternative 3 would be less than the number of new daily trips generated by the Project. Specifically, as provided in Appendix J of this Draft EIR, Alternative 3 would result in a total of 783 daily vehicle trips and 4,854 daily VMT as compared to the Project's 1,500 daily vehicle trips and 8,617 daily VMT. Because operational regional air pollutant emissions associated with Alternative 3 would be generated by vehicle trips and VMT, which are the largest contributors to operational air pollutant emissions, and to a lesser extent by the reduction in square footage and consumption of electricity and natural gas, the operational regional emissions of Alternative 3 would be less than those of the Project. As the Project's impacts are less than significant, Alternative 3 represents a further reduction in vehicle trips, VMT and square footage of the same land uses in comparison to the Project, the operational regional emissions of Alternative 3 would be below the SCAQMD's regional significance thresholds. Therefore, the operational regional air pollutant emissions of Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) *Localized Emissions*

Localized operational impacts are determined primarily by peak-hour intersection traffic volumes. As provided in Appendix J of this Draft EIR, Alternative 3 would generate 783 daily vehicle trips and 4,854 daily VMT, which would be less than the Project's 1,500 daily vehicle trips and 8,617 daily VMT. As such, total operational vehicular emissions under Alternative 3 would be less than those of the Project. In addition, with the development of less floor area under Alternative 3 than the Project, area and stationary sources would also generate less on-site operational air emissions compared to the Project. Furthermore, as with the Project, Alternative 3 would not introduce any major new

sources of air pollution within the Project Site. Therefore, localized impacts under Alternative 3 would also be less than significant and less when compared to the less-than-significant impacts of the Project.

(c) Toxic Air Contaminants

As set forth in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential TACs associated with Project operations would include diesel particulate emissions from delivery trucks. Under Alternative 3, the overall increase in the number of deliveries and associated diesel particulate emissions would be less than the Project due to reduction in development. Similar to the Project, the land uses proposed under Alternative 3 are not considered land uses that generate substantial TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not proposed by the Project or Alternative 3. Similar to the Project, Alternative 3 would not release substantial amounts of TACs and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Therefore, as with the Project, Alternative 3 would not release substantial amounts of TACs and impacts would be less than significant. Such impacts would be less when compared to the less-than-significant impacts of the Project.

b. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

(a) Construction

Similar to the Project, construction activities associated with Alternative 3 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. Like the Project, construction activities associated with Alternative 3 would not involve the consumption of natural gas. As with the Project, Alternative 3 would generate a demand for transportation energy associated with on- and off-road vehicles. However, the energy consumed during construction of Alternative 3 would be reduced compared to the Project due to the reduction in construction activities and duration. As with the Project, the electricity demand during construction of Alternative 3 would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Construction equipment used during construction of Alternative 3 would also comply with Title 24 requirements where applicable, similar to the Project. With regard to transportation fuels, trucks and equipment used during construction of Alternative 3 would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets

regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. Therefore, as with the Project, Alternative 3 construction activities would result in energy usage that is not wasteful, inefficient, or unnecessary. Overall, impacts under Alternative 3 regarding energy use associated with short-term construction activities would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 3 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions. However, as previously discussed, Alternative 3 would provide a reduced development of the Project and would result in a reduced number of daily trips when compared to the Project. Specifically, as provided in Appendix J of this Draft EIR, Alternative 3 would generate 783 daily vehicle trips and 4,854 daily VMT, which would be comparatively less than the Project's 1,500 daily vehicle trips and 8,617 daily VMT. The total residential units and square footage under this Alternative would be reduced and consume less electricity and natural gas compared to the Project. As such, the consumption of electricity, natural gas, and petroleum-based fuels would be reduced under Alternative 3. In addition, similar to the Project, Alternative 3 would implement design features to reduce energy usage. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 3 would not be wasteful, inefficient, or unnecessary. Overall, impacts related to energy use during operation of Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in vehicle trips, VMT, reduced residential units and floor area in comparison to the Project.

(2) Conflict with Plans for Renewable Energy or Energy Efficiency

As discussed in Section IV.C, Energy, of this Draft EIR, the current City of LA Green Building Code requires compliance with the Los Angeles Green Building Code, CalGreen and California's Building Energy Efficiency Standards (Title 24). Like the Project, Alternative 3 would comply with the City's Green Building Code and would be capable of achieving LEED® Certified or equivalent green building standards. In addition, like the Project, Alternative 3 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2019 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code. Furthermore, as with the Project, Alternative 3 would incorporate certain measures such as use of LED lighting that are beyond current State and City energy conservation requirements.

With regard to transportation related energy usage, Alternative 3 would also comply with goals of the 2020–2045 SCAG’s RTP/SCS which incorporate VMT targets established by SB 375. As with the Project, the proximity of Alternative 3’s residential and commercial/retail/restaurant uses to major job centers and public transportation would serve to reduce VMT and associated transportation fuel usage within the region. In addition, vehicle trips generated during operation of Alternative 3 would comply with CAFE fuel economy standards. During construction of Alternative 3, activities would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations.

Based on the above, Alternative 3, like the Project, would not conflict with plans for renewable energy or energy efficiency. Therefore, impacts of Alternative 3 would be less than significant and similar when compared to the less-than-significant impacts of the Project.

c. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily trips generated and associated VMT, as well as energy consumption from proposed land uses. As previously discussed, the number of daily trips and daily VMT under Alternative 3 would be reduced when compared to the Project. Additionally, energy and water consumption from proposed land uses would be reduced compared to the Project due to the reduction in development. Thus, the amount of GHG emissions generated by Alternative 3 would be less than the amount generated by the Project due to the reduction in the number of trips and daily VMT generated when compared to the Project and the reduction in total development. As with the Project, Alternative 3 would be designed to comply with the requirements of the CALGreen Code and the Los Angeles Green Building Code. Alternative 3 would also incorporate design features, as would be incorporated into the Project, to reduce GHG emissions and would be designed to comply with the City’s Green Building Ordinance, as applicable. As with the Project, this Alternative would be serviced by the LADWP which will comply with SB 100 and SB 350 requirements for renewable energy, consistent with the CARB Scoping Plan. Vehicle trips and VMT under this Alternative would also be consistent with the 2020–2045 RTP/SCS and SB 375 policies to reduce VMT and associated GHG emissions. Water efficiency and solid waste reduction measures under this Alternative would also comply with State or City requirements. With compliance with the CALGreen Code and the Los Angeles Green Building Code, and with the implementation of comparable sustainability features as the Project, Alternative 3 would not conflict with the GHG reduction goals and objectives included in adopted State, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in GHG emissions.

d. Land Use

(1) Physical Division of a Community

Alternative 3 would propose the same types of uses as those proposed by the Project. As discussed in Section IV.D, Land Use, of this Draft EIR, and as determined in the Initial Study included as Appendix A of this Draft EIR, the Project's uses would not physically divide an established community, and implementation of the Project would result in further infill of an already developed community with similar and compatible land uses, and Project impacts would be less than significant. Therefore, impacts related to the physical division of an established community would also be less than significant under Alternative 3 and similar when compared to the less-than-significant impacts of the Project.

(2) Conflict with Land Use Plans, Policies, and Regulations

As previously described, Alternative 3 would propose similar uses as the Project but with 352 fewer residential dwelling units and 337,859 less square feet of overall floor area when compared to the Project. Alternative 3 would require discretionary approvals (e.g., Site Plan Review, haul route permit, and construction permits) similar to the Project but would not require the TFAR proposed by the Project as density would be developed in accordance with the allowed FAR of 6:1. With approval of the required discretionary approvals and the implementation of project design features, as further discussed with respect to the Project in Section IV.D, Land Use, of this Draft EIR, Alternative 3 would not conflict with the applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect, including those set forth in the General Plan, Mobility Plan 2035, Central City Community Plan, LAMC, Downtown Design Guide, Citywide Design Guidelines, and SCAG RTP/SCS. Therefore, impacts related to land use consistency under Alternative 3 would be less than significant and similar when compared to the less-than-significant impacts of the Project.

e. Noise

(1) Noise

(a) Construction

The types of construction activities under Alternative 3 would be similar to the Project, although the amount of construction activities and duration of construction would be reduced due to the reduction in total floor area (approximately 61 percent less floor area). As with the Project, construction of Alternative 3 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. However, the maximum or peak day of construction activity, which serves as the basis of the construction noise analysis, would be similar between Alternative 3 and the

Project. This is because: (1) Alternative 3 would include a similar footprint and subterranean parking levels; (2) both Alternative 3 and the Project would be developed on the same site, and within the same distances to off-site sensitive receptors; (3) given that both Alternative 3 and the Project would include high-rise mixed-use development, it is anticipated that they would require the same mix of construction equipment; (4) both Alternative 3 and the Project would implement the same construction-related project noise design features, including NOI-PDF-1 (using construction equipment equipped with state-of-the-art noise shielding and muffling devices) and NOI-PDF-3 (prohibition on the use of impact driven pile systems); and (5) both Alternative 3 and the Project would implement Mitigation Measure NOI-MM-1 (temporary impermeable sound barrier, along the eastern, southern and western property lines, during the construction period). That is, the estimated noise levels during Alternative 2 construction would be similar to the Project (as provided in Table IV.E-11 of Section IV.E, Noise, of this Draft EIR), which would exceed the significance criteria at off-site receptor locations, R1, R2, R4, R5 and R6 by 10.7 dBA, 2.1 dBA, 1.8 dBA, 10.5 dBA and 5.2 dBA, respectively. Implementation of Mitigation Measure NOI-MM-1 would reduce the noise impacts at the ground level. However, the temporary sound barriers would not be effective in reducing the construction-related noise levels at these receptor locations due to the height of the residential buildings (ranging from seven stories to 33 stories). Thus, like the Project, Alternative 3 would result in significant unavoidable on-site construction noise (both project-level and cumulative), less than significant off-site construction traffic noise (project-level), and significant unavoidable off-site construction traffic noise (cumulative). As impacts are based on peak construction days, impacts would be similar to those of the Project.

(b) Operation

As discussed in Section IV.E, Noise, of this Draft EIR, sources of operational noise under the Project include: (a) on-site stationary noise sources, including mechanical equipment, activities within the proposed outdoor spaces, parking facilities, loading dock and trash compactors; and (b) off-site mobile (roadway traffic) noise sources. Alternative 3 would introduce noise from similar on-site and off-site noise sources as the Project. However, it is anticipated that with the overall reduction in total floor area and uses under Alternative 3, the noise levels from building mechanical equipment, outdoor spaces, and parking facilities would be reduced. In addition, similar to the Project, Alternative 3 would implement Project Design Feature NOI-PDF-2 to screen all outdoor mounted mechanical equipment from off-site noise-sensitive receptors as well as Project Design Feature NOI-PDF-4 to ensure that outdoor amplified sound systems, if any, will be designed so as not to exceed the maximum noise level of 80 dBA (L_{eq-1hr}) at a distance of 25 feet from the amplified speaker sound systems with proof of compliance from a qualified noise consultant. Alternative 3 would also comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than five dBA. Since Alternative 3 would include less above

grade parking levels than the Project (three versus eight above grade parking levels for the Project), noise levels associated with parking operations would be lower. Thus, operational on-site noise impacts would be less than significant and less when compared to the less-than-significant impacts of the Project due to reduction in total floor area and uses proposed.

With regard to off-site noise sources, when compared to the Project, Alternative 3 would result in 717 fewer daily vehicle trips. The reduction in vehicle trips would result in a decrease in off-site traffic-related noise levels under Alternative 3. Therefore, as with the Project, off-site noise impacts under Alternative 3 would be less than significant. Such impacts would be less when compared to the less-than-significant impacts of the Project due to the reduction in vehicle trips under Alternative 3. In addition, the cumulative operational on- and off-site noise impacts would be less than significant and less when compared to the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 3 would be similar to the Project, although the amount and duration of construction activities would be reduced. As with the Project, construction of Alternative 3 would generate vibration from the use of heavy-duty construction equipment as well as from truck trips. While the overall amount of construction would be reduced, on- and off-site construction activities and the associated construction vibration levels would be expected to be similar to those of the Project, as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment. As such, peak vibration levels generated by the construction equipment would be similar to those of the Project. That is, similar to the Project, the maximum vibration levels associated with Alternative 3 on-site construction activities would be up to 0.523 PPV at the parking structures adjacent to the Project Site to the north, which would exceed the 0.5 PPV building damage criteria. Alternative 3 would implement Mitigation Measure NOI-MM-2 (vibration monitoring), which would reduce the on-site construction vibration impacts associated with building damage to a less-than-significant level. Like the Project, the estimated ground-borne vibration levels would be up to 72.2 VdB at the receptor location R5 due on-site construction equipment (as provided in Table IV.E-23 of Section IV.E, Noise, of this Draft EIR) and at the sensitive receptors along the anticipated haul routes (8th Street, James M. Wood Boulevard/ 9th Street, and Olive Street) due to off-site construction trucks, which would result in a significant impact as related to human annoyance. Like the Project, there are no feasible mitigation measures to reduce the vibration human annoyance impacts. As such, vibration impacts associated with human annoyance from construction would be significant and unavoidable. Overall, vibration impacts under Alternative 3 would be similar to the impacts of the Project.

(b) Operation

Similar to the Project, sources of vibration related to operation of Alternative 3 would include vehicle circulation, delivery trucks, and building mechanical equipment. Vehicular-induced vibration, including vehicle circulation within the parking structure, would not generate perceptible vibration levels at off-site sensitive uses. 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 so vibration would not be perceptible at the off-site sensitive receptors. Therefore, operation of Alternative 3 would not result in the generation of excessive ground-borne vibration levels that would be perceptible in the vicinity of the Project Site. As such, vibration impacts during operation of Alternative 3 would be less than significant and similar when compared to the less-than-significant impacts of the Project.

f. Public Services

(1) Fire Protection

(a) Construction

As previously described, while the types of construction activities required for Alternative 3 would be similar to that of the Project, the overall duration of construction would be shorter due to the reduction in development. As with the Project, construction activities under Alternative 3 would occur in compliance with all applicable federal, State, and local requirements concerning the handling, disposal, use, storage, and management of hazardous waste (e.g., OSHA, LAFD requirements, etc.). Construction would also occur in compliance with all applicable federal, State, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, similar to the Project, compliance with regulatory requirements under Alternative 3 would effectively reduce the potential for construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Additionally, while construction activities would primarily be contained within the boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by temporary lane closures, roadway/access improvements, and the construction of utility line connections. Similar to the Project, it is likely that Alternative 3 would require the following: closure of the right turn lane and bike lane adjacent to the Project Site along Grand Avenue; closure of up to eight feet of the curb lane, relocation of two bus stops along 8th Street, removal of one on-street parking space, and closure of the sidewalk and right-turn lane along 8th Street; and closure of up to eight feet of the curb lane on Hope Street on occasion as needed, which would require the temporary removal of two on-street parking spaces on Hope Street. Therefore, as with the Project's

implementation of Project Design Feature TR-PDF-1, Alternative 3 would prepare a Construction Traffic Management Plan and Worksite Traffic Control Plan for approval by LADOT, prior to the issuance of any demolition or building permits and would specify the details of any sidewalk or lane closures, including the potential temporary lane and/or sidewalk closures on Hope Street, Grand Avenue and 8th Street, as identified above, and off-site construction staging procedures. Plan details would also be coordinated with emergency services.

Therefore, construction of Alternative 3 would not require construction of new fire facilities, construction of which would cause significant environmental impacts. As such, construction-related impacts related to fire protection services under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in construction activities and duration.

(b) Operation

As previously discussed, Alternative 3 would provide the same residential and commercial/retail/restaurant land uses as the Project but would reduce the number of residents from the Project's 1,398 residents generated from 580 residential units to Alternative 3's 550 residents generated from 228 residential units.³⁶ As such, while the development of Alternative 3 would increase the demand for LAFD fire protection services on-site when compared to existing conditions, Alternative 3 would generate a reduced service population when compared to the Project. As with the Project, Alternative 3 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, automatic fire sprinklers, etc. As discussed in Section IV.F.1, Public Services—Fire Protection, of this Draft EIR, and the *Utility Infrastructure Technical Report: Water* included as Appendix I of this Draft EIR, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for the Project. Thus, LADWP would be able to satisfy fire suppression needs for the reduced development proposed by Alternative 3. In addition, Alternative 3 would not include the installation of barriers that could impede emergency vehicle access. As such, emergency access to the Project Site and surrounding area would be maintained. Compliance with applicable City Building Code and Fire Code requirements would be

³⁶ Based on a 2.41 persons per household rate for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020. As a note, the Initial Study for the 8th, Grand and Hope Project (Appendix A of this Draft EIR) applied an estimated rate of 2.43 persons per multi-family unit, which was the available rate provided by the City of Los Angeles at the time of publication of the Initial Study. This Draft EIR now utilizes the updated rate of 2.41 persons per multi-family unit provided by the City of Los Angeles.

confirmed as part of LAFD's fire/life safety plan review and fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit.

Therefore, similar to the Project, Alternative 3 would not necessitate the construction of new fire protection facilities or expansion of existing facilities in order to maintain service. Operation of Alternative 3 would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities (fire protection), the construction of which would cause significant environmental impacts, in order to maintain acceptable fire protection services. Overall impacts with regard to LAFD fire protection during operation of Alternative 3 would be less than significant. Such impacts would be less when compared to the less-than-significant impacts of the Project due to the reduction in total floor area, uses, and associated service population.

Furthermore, in *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection and emergency medical services, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.³⁷

(2) Police Protection

(a) Construction

As with the Project, Alternative 3 would include construction activities and generate construction traffic that would create a demand for LAPD police protection services, potentially obstruct emergency access, and potentially slow emergency response times during the construction period. However, as previously discussed, the duration and amount of construction activities for Alternative 3 would be reduced compared to the Project due to the reduction in development. Furthermore, similar to the Project, Alternative 3 would be required to implement Project Design Feature POL-PDF-1, which includes temporary security measures such as security fencing, lighting, locked entry to secure the Project Site during construction, thereby reducing the demand for police protection services.

In addition, as detailed above and similar to the Project, Alternative 3 would prepare a Construction Traffic Management Plan and Worksite Traffic Control Plan for approval by LADOT, prior to the issuance of any demolition or building permits and would specify the

³⁷ *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, 843, 847.

details of any sidewalk or lane closures, including the potential temporary lane and/or sidewalk closures on Hope Street, Grand Avenue and 8th Street, as identified above, and off-site construction staging procedures. Plan details would also be coordinated with emergency services. Therefore, construction of Alternative 3 would not require construction of new police facilities, construction of which would cause significant environmental impacts. Overall, construction-related impacts to police protection services under Alternative 3 would be less than significant, and less when compared to the less-than-significant impacts of the Project due to the reduction in construction activities and duration.

(b) Operation

As indicated in Section IV.F.2, Public Services—Police Protection, of this Draft EIR, LAPD considers the residential population within their service area to evaluate service capacity. As previously discussed, Alternative 3 would provide the same residential and commercial/retail/restaurant land uses as the Project but would reduce the number of residential units from the Project's 580 residential units to 228 residential units. As such, Alternative 3 would result in a reduced police service population when compared to the Project. Similar to the Project, Alternative 3 would implement the same Project Design Features POL-PDF-2 through POL-PDF-6, as provided in Section IV.F.2, Public Services—Police Protection, of this Draft EIR. Specifically, as set forth in Project Design Feature POL-PDF-2, the Project would include private on-site security, a closed circuit security camera system, and keycard entry for residential areas. In addition, the Project would provide lighting of building entries and walkways to provide for pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into buildings, as set forth by Project Design Feature POL-PDF-3. Project Design Feature POL-PDF-4 would provide for sufficient lighting of parking areas, elevators, and lobbies to maximize visibility and reduce areas of concealment. Furthermore, Project Design Feature POL-PDF-5 would require the Project to design entrances to and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites. As specified in Project Design Feature POL-PDF-6, prior to the issuance of a building permit, the Project Applicant would submit a diagram of the Project Site to the LAPD Central Area Commanding Officer that includes access routes and any additional information that might facilitate police response. Furthermore, pursuant to Project Design Feature POL-PDF-7, the Project Applicant would consult with the LAPD Community Outreach and Development Division regarding the incorporation of crime prevention features appropriate for the Project. The design features would help offset the increase in demand for police protection services generated by Alternative 3.

Therefore, similar to the Project, Alternative 3 would not necessitate the construction of new police protection facilities or expansion of existing facilities in order to maintain service. As such, impacts on police protection services would be less than significant

under Alternative 3, and less when compared to the less-than-significant impacts of the Project due to the reduced service population on-site.

Furthermore, in *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including police protection, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.³⁸

(3) Libraries

(a) Construction

Similar to the Project, Alternative 3 would result in a temporary increase of construction workers on the Project Site. However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities. Therefore, construction employment generated by Alternative 3 would not result in a notable increase in the resident population or a corresponding demand for library services in the vicinity of the Project Site. As such, construction of Alternative 3 would not require construction of new library facilities, construction of which would cause significant environmental impacts. Impacts to library facilities during construction of Alternative 3 would be less than significant and similar when compared to the less-than-significant impacts of the Project.

(b) Operation

Residents are considered the primary users of library facilities. As such, the LAPL bases its needs for libraries using population data as set forth in its letter dated August 30, 2019, regarding the Project included as Appendix I. As Alternative 3 would reduce the proposed residential units from 580 to 228 units, Alternative 3 would generate a reduced residential population when compared to the Project. In addition, the Project's residential units would be equipped to receive individual internet service, which provides information and research capabilities and reduces demand at physical library locations. Thus, as with the Project, operation of Alternative 3 would not exceed the capacity of local libraries to adequately serve the existing residential population based on target service populations or as defined by the LAPL, or substantially increase the demand for library services, such that would result in the need for new or altered library facilities. Therefore, impacts on library

³⁸ *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, 843, 847.

services under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in the permanent on-site residential population.

g. Transportation

Alternative 3 would provide a circulation system similar to that of Project, including driveways along Hope Street and Grand Avenue as well as an internal porte cochere on the ground floor. Like the Project, Alternative 3 would ensure that vehicular loading and drop-off would occur within the building's parking structure, and the site planning would provide a safe and comfortable walking component which would enhance the existing pedestrian environment. Alternative 3 would also include the same sidewalks, street trees, and pedestrian lighting as the Project, and would include short-term and long-term bicycle parking in accordance with the LAMC. In addition, Alternative 3 would provide the 34 vehicle parking spaces per covenanted and recorded parking agreements (PKG-4743, PKG-5261, PKG-5248 for an off-site use. As such, Alternative 3 would comply with programs and policies addressing the circulation system that are set forth in the Mobility Plan 2035; Plan for a Healthy Los Angeles; Central City Community Plan, LAMC; Vision Zero; Citywide Design Guidelines; Downtown Design Guide; and LADOT Manual of Policies and Procedures, Section 321 to the same extent as the Project. Therefore, Alternative 3 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be less than significant and similar when compared to the less-than-significant impacts of the Project.

As previously discussed, Alternative 3 would result in a reduced development of the Project with 352 fewer residential units. As such, the number of new daily operational vehicle trips generated by Alternative 3 would be fewer than the number of new daily trips generated by the Project. Specifically, as provided in Appendix J of this Draft EIR, Alternative 3 would result in a total of 783 daily vehicle trips and 4,854 daily VMT as compared to the Project's 1,500 daily vehicle trips and 8,617 daily VMT. Alternative 3 would result in a household VMT per capita of 3.5, which would not exceed the threshold of 6.0.³⁹ The Project would result in a 3.4 household VMT per capita, which would not exceed the threshold of 6.0. Therefore, similar to the Project, Alternative 3 would be consistent with CEQA Guidelines Section 15064.3, which establishes VMT as the most appropriate measure of transportation impacts. As such, impacts related to VMT under Alternative 3 would be less than significant and similar when compared to the less-than-significant impacts of the Project.

³⁹ *The Mobility Group, VMT Calculator Results for 8th, Grand and Hope Project Alternative 3. See Appendix J of this Draft EIR.*

Alternative 3 would provide the same geometric design and circulation features as the Project. Alternative 3 would design the internal porte cochere and proposed driveways on Grand Avenue and Hope Street the same as the Project and in accordance with LADOT standards. In addition, Alternative 3 would not require further freeway off-ramp analysis.⁴⁰ Therefore, Alternative 3 would not result in a substantial increase in hazards due to a geometric design feature or incompatible use. Such impacts under Alternative 3 would be less than significant and similar when compared to the less-than-significant impacts of the Project.

Like the Project, while construction activities would primarily be contained within the boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by temporary lane closures, roadway/access improvements, and the construction of utility line connections. Therefore, as with the Project's implementation of Project Design Feature TR-PDF-1, Alternative 3 would prepare a Construction Traffic Management Plan and Worksite Traffic Control Plan for approval by LADOT, prior to the issuance of any demolition or building permits and would specify the details of any sidewalk or lane closures, including the potential temporary lane and/or sidewalk closures on Hope Street, Grand Avenue and 8th Street, and off-site construction staging procedures. Plan details would also be coordinated with emergency services. With regard to operation of Alternative 3, the driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. Similar to the Project, Alternative 3 would not include the installation of barriers that could impede emergency vehicle access. Also, upon completion of Alternative 3 and prior to the issuance of a building permit, the Applicant would also submit a diagram of the Project Site to the LAPD's Central Area Commanding Officer that includes access routes and any additional information that might facilitate police response, as provided in Project Design Feature POL-PDF-6 included in Section IV.F.2, Public Services—Police Protection, of this Draft EIR. As such, emergency access to the Project Site and surrounding area would be adequate and maintained under Alternative 3. Therefore, Alternative 3 impacts to emergency access would be less than significant and similar when compared to the less-than-significant impacts of the Project.

⁴⁰ *The Mobility Group, Alternatives Analysis—Freeway Screening Check for 8th, Grand and Hope Project. See Appendix J of this Draft EIR.*

h. Tribal Cultural Resources

Alternative 3 would construct one less subterranean level than the Project. Therefore, the potential for Alternative 3 to uncover subsurface tribal cultural resources would be reduced when compared to that of the Project. As discussed in Section IV.H, Tribal Cultural Resources, of this Draft EIR, and in the Tribal Cultural Resources Report included as Appendix H of this Draft EIR, the results of the records searches (i.e., SCCIC and NAHC) conducted for the Project Site and the independent analysis of correspondence and materials relative to potential tribal cultural resources on the Project Site (included in the TCR Report) demonstrate that there is no record or evidence of tribal cultural resources on the Project Site or in its immediate vicinity. Furthermore, given the nature of the existing and previous on-site development, which would have required excavation of soils in excess of those with potential to support cultural resources and TCRs (generally less than 10 feet below the surface in this area), subsurface soils within the Project Site are of low suitability to support the presence of tribal cultural resources. Based on this information, the City, in its discretion and supported by substantial evidence, finds that the Project Site does not contain any resources determined to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. Accordingly, Alternative 3 would not cause a substantial adverse change in the significance of a tribal cultural resource, and impacts related to tribal cultural resources would be less than significant. Nonetheless, as with the Project, Alternative 3 would comply with the City's established standard condition of approval to address inadvertent discovery of tribal cultural resources. Therefore, impacts under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduced depth of excavation.

i. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities for Alternative 3 would result in a temporary demand for water associated with soil compaction and earthwork, dust control, mixing and placement of concrete, equipment and site cleanup, irrigation for plant and landscaping establishment, testing of water connections and flushing, and other short-term related activities. This demand would be reduced compared to that of the Project since Alternative 3 would result in a reduction in construction activities and duration. The amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed. However, given the temporary nature of construction activities, water use during construction of Alternative 3 would be short-term and intermittent. As with the Project, the existing water infrastructure would meet the limited and temporary water demand associated with construction activities for Alternative 3.

As discussed above, Alternative 3 would reduce the total amount of development on the Project Site by 337,859 square feet. Thus, the water demand generated by construction activities for Alternative 3 would be less than the net water consumption of the Project during construction. Overall, similar to the Project, construction activities associated with Alternative 3 would not require or result in the construction of new water facilities or expansion of existing facilities that could have a significant impact on the environment. Therefore, construction-related impacts on water demand and infrastructure under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in development.

(b) Operation

As with the Project, operation of Alternative 3 would generate an increased demand for water relative to existing conditions. However, based on the reduction in total development and proposed residential units, water demand for Alternative 3 would be less than that for the Project. Alternative 3 would also include the same water conservation commitment measures as the Project. As discussed in Section IV.I.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project would not exceed the available capacity of the existing water distribution infrastructure that would serve the Project Site, and LADWP would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Therefore, as with the Project, operational impacts related to water supply and infrastructure would be less than significant under Alternative 3 and less when compared to the less-than-significant impacts of the Project due to the reduction in development.

(2) Energy Infrastructure

(a) Construction

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

(b) Operation

As with the Project, operation of Alternative 3 would generate an increased consumption of electricity and natural gas relative to existing conditions. However, the proposed uses of Alternative 3 would result in less electricity and natural gas consumption

when compared to the uses proposed by the Project. While both Alternative 3 and the Project would both propose up to 7,499 square feet of commercial/retail/restaurant uses, Alternative 3 would develop 228 residential units in lieu of the Project's 580 residential units. As such, Alternative 3 would result in a reduced consumption of electricity and natural gas when compared to the Project, and the corresponding impact on energy infrastructure would be less than that of the Project. Therefore, operational impacts to energy infrastructure under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above and summarized in Table V-2 on page V-11, Alternative 3 would not eliminate the Project's significant and unavoidable environmental impacts, including those related to: Project-level and cumulative construction noise impacts from on-site noise sources; cumulative noise impacts from off-site construction traffic; Project-level vibration impacts associated with human annoyance from on-site construction; and Project-level and cumulative vibration impacts associated with human annoyance from off-site construction traffic.

All other impacts would be less than significant or less than significant with mitigation, and less than or similar when compared to the impacts of the Project.

4. Relationship of the Alternative to Project Objectives

Overall, the Alternative 3 would provide the same mix of uses as the Project but at a reduced scope and density. As such, Alternative 3 would meet the underlying purpose of the Project to develop a parcel with a high-quality mixed-use development that provides new multi-family housing and neighborhood-serving commercial/retail/restaurant uses that serves the community and promotes walkability. In addition, Alternative 3 would not fully achieve the Project objectives to the same extent as the Project. Specifically, with the reduction in residential units, Alternative 3 would not fully achieve the following objectives to the same extent as the Project:

- To maximize new housing units on a site currently used for automobile parking to help address the demand for new housing in the region, the City of Los Angeles, and the Central City Community Plan area.

- To construct a high-density, mixed-use development consistent with the principles of smart growth features, such as sustainable design, mixed use, infill development, proximity to transit, walkability, and bicycle connections (“complete” streets⁴¹).
- To reduce vehicular trips and promote regional and local mobility objectives by locating high-density residential and retail uses in downtown Los Angeles, a high-density employment base, and within two blocks of a regional-serving transit hub (7th Street/Metro Center Station) and commercial services.
- To contribute to economic investment in the Central City Community Plan area through the provision of construction jobs and high-density residential uses with ground floor commercial uses.

However, with development of similar, although reduced, uses as the Project, Alternative 3 would meet the following Project objectives:

- To provide a contemporary architectural design that is compatible with existing high-rise development along 8th Street, Grand Avenue, and the vicinity.
- To create a pedestrian-oriented environment by promoting walkability and by creating a safe, inviting street-level identity for the Project Site through the introduction of a ground floor, street-fronting, neighborhood-serving, storefront commercial/retail/restaurant uses.

⁴¹ *As outlined in California’s Complete Streets Act of 2008 (AB 1358), the goal of Complete Streets is to ensure that the safety, accessibility, and convenience of all transportation users—pedestrians, bicyclists, transit riders, and motorists—is accommodated. Refer to City of Los Angeles Complete Streets Design Guide for additional information.*

V. Alternatives

D. Alternative 4: Development in Accordance with DTLA 2040 Plan Alternative

1. Description of Alternative 4

The Development in Accordance with DTLA 2040 Plan Alternative (Alternative 4) would develop the same types of uses as the Project but would comply with the proposed draft zoning for the Project Site under the DTLA 2040 Community Plan Update (DTLA 2040 Plan).⁴² Under the DTLA 2040 Plan, the Project Site is currently proposed to be designated as part of the Transit Core, which would allow a maximum FAR of between 9:1 and 13:1, with general uses that include multi-family residential, regional retail and services, office, hotel, and entertainment uses.⁴³ Per the DTLA 2040 Plan presented as part of the Draft EIR for the Plan, above-grade parking is counted toward the development's FAR.

Alternative 4 would develop a high-rise 29-story building with a maximum height of 372 feet, consisting of 290 residential units, up to 7,499 square feet of ground floor commercial/retail/restaurant uses, and 56,874 square feet of above-grade parking that would be counted towards the FAR. Overall, Alternative 4 would comprise 312,111 square feet of floor area. As such, based on a lot area of 34,679 square feet, Alternative 4 would result in a total FAR of 9:1 and would comply with the base FAR allowed by the DTLA 2040 Plan.⁴⁴ Table V-7 on page V-74 compares the total proposed uses under Alternative 4 with

⁴² *The City of Los Angeles Department of City Planning is currently updating the Central City Community Plan and the Central City North Community Plan, whose areas together make up Downtown Los Angeles (sometimes known as DTLA), in a combined planning process referred to as the DTLA 2040 Plan. The DTLA 2040 Plan Draft Environmental Impact Report was published in 2020 and was followed by a public comment period. Subsequently, a virtual public hearing was held on December 8, 2020. A meeting with the City Planning Commission (CPC) was held on June 17, 2021, at which CPC voted to reconvene a second meeting. During its September 23, 2021, meeting, CPC recommended approval of the June 2021 draft of the DTLA 2040 Plan. The DTLA 2040 Plan has not yet been adopted and therefore is subject to change. As a result, Alternative 4 is based on conformance with the provisions of the draft DTLA 2040 as of the date of circulation of the Plan's Draft EIR.*

⁴³ *Los Angeles Department of City Planning, Downtown Community Plan Update, Fall 2020 Draft.*

⁴⁴ *The Alternative 4 FAR is based on the lot area of 34,679 square feet. The Project FAR is based on the lot area of 60,022 square feet to the center line of the street. (Per LAMC Section 14.5.3, for the purposes (Footnote continued on next page)*

**Table V-7
Summary of Alternative 4 (Development in Accordance with DTLA 2040 Plan Alternative) Uses
and Comparison to the Project**

Land Use	Alternative 4	Project	Difference
Residential ^a	247,738 sf (290 du)	547,428 sf (580 du)	-299,690 sf (-290 du)
Commercial/Retail/Restaurant	7,499 sf	7,499 sf	0 sf
Above-grade Parking ^b	56,874 sf	N/A	56,874 sf
Total Proposed Floor Area^c	312,111 sf	554,927 sf^d	-242,816 sf
<p><i>sf = square feet</i> <i>du = dwelling unit</i> <i>N/A = not applicable</i></p> <p>^a <i>Includes amenities, circulation, and operations spaces.</i></p> <p>^b <i>For Alternative 4, per the draft DTLA 2040 Plan, above-grade parking is counted towards the development's FAR. For the Project, as the draft DTLA 2040 Plan has not been adopted and the Project includes a Vesting Tentative Tract Map, the current adopted Central City Community Plan is the local adopted community plan that is evaluated for the Project.</i></p> <p>^c <i>Except where otherwise noted, square footage is calculated pursuant to the LAMC definition of floor area for the purpose of calculating FAR. In accordance with LAMC Section 12.03, floor area is defined as: "[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas."</i></p> <p>^d <i>As discussed in Section II, Project Description, of this Draft EIR, for the Project, pursuant to LAMC Section 12.21-A,2, the Applicant requests a Zoning Administrator's Interpretation to clarify that 1) covered exterior open space areas can be credited to the common open space requirement for the Project and 2) that at the same time, the covered open space areas provided within the building cut-outs of the Project are not considered "floor area" as defined by the LAMC.</i></p> <p><i>Source: Gensler; Eyestone Environmental, 2021.</i></p>			

the uses proposed by the Project. Similar to the Project, to accommodate Alternative 4, the existing surface parking and four-story parking structure would be demolished.

While the DTLA 2040 Plan does not include minimum vehicle parking requirements, Alternative 4 would include 304 vehicle parking spaces for tenants, employees, and visitors. In addition, Alternative 4 would provide 34 vehicle parking spaces per covenanted and recorded parking agreements (PKG-4743, PKG-5261, PKG-5248) for an off-site use. Alternative 4 would provide the vehicle parking on six parking levels, including three

of computing the maximum Floor Area Rights available through the approval of a Transfer of Floor Area Rights Plan for a Transit Area Mixed Use Project, the buildable area shall include the lot area plus the area between the exterior lot lines and the centerline of any abutting public right-of-way.)

subterranean levels (Levels B1 through B3) and three above-ground levels (Levels 2 through 4). In accordance with LAMC requirements, Alternative 4 would provide 172 bicycle parking spaces (20 short-term and 152 long-term bicycle parking spaces).

Alternative 4 would provide the same ground floor plan and design as the Project, including the commercial/retail/restaurant uses and residential lobby, internal porte cochere, and driveways along Hope Street and Grand Avenue. Levels 2 through 4 would include residential units and above-grade parking. Levels 5 through 29 would include the remaining residential units. Similar to the Project, Alternative 4 would include four above-ground tiers with varying setbacks from Hope Street, and amenity decks would be located on the upper level of each tier. Open space would be provided in accordance with the DTLA 2040 Plan within the amenity decks located on Levels 5, 13, and 21. Level 30 would support mechanical equipment necessary for the operation of Alternative 4. Alternative 4 would implement the same signage, lighting, vehicular and pedestrian access, setbacks, and sustainability features as those proposed for the Project.

With regard to construction activities and schedule, it is anticipated that the overall duration of construction would be reduced compared to that of Project based on the proposed development under Alternative 4 (e.g., smaller project, shorter tower, but with the same amount of excavation with the same number of subterranean levels). As with the Project, Alternative 4 would implement a Construction Management Plan and Worksite Traffic Control Plan during construction to minimize potential conflicts between construction activity, through traffic, and emergency access. As with the Project, the Construction Management Plan and Worksite Traffic Control Plan would be subject to LADOT review and approval.

2. Environmental Impact Analysis

a. Air Quality

(1) Construction

(a) Regional Emissions

As with the Project, construction of Alternative 4 has the potential to generate construction-related regional air emissions through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, mobile source emissions, primarily NO_x, would result from the use of construction equipment, such as dozers, loaders, and cranes. During the finishing phase of the Project, paving and the application of architectural coatings (e.g., paints) would potentially release VOCs. The

assessment of construction air quality impacts considers each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and, for dust, the prevailing weather conditions.

Under Alternative 4, construction activities would be reduced in comparison to the Project due to the overall reduced development. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, regional impacts on these days would be similar to those of the Project. Therefore, the construction-related regional emissions under Alternative 4 would be less than significant and similar when compared to the less-than-significant impacts of the Project.

(b) Localized Emissions

On-site construction activities associated with Alternative 4 would be located at similar distances from sensitive receptors as the Project. Although Alternative 4 would result in a reduction in the amount of proposed development compared to the Project, the intensity of construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, localized impacts on these days would be similar to the less than significant impacts of the Project. Therefore, as with the Project, localized impacts under Alternative 4 would be less than significant, and similar to the less-than-significant impacts of the Project.

(c) Toxic Air Contaminants

As with the Project, construction of Alternative 4 would generate diesel particulate emissions associated with heavy equipment operations. As Alternative 4 would require the same extent of excavation activities as the Project, the associated diesel particulate emissions associated with the construction of subterranean parking would also be similar. Therefore, impacts due to TAC emissions and the corresponding individual cancer risk would be less than significant under Alternative 4 and similar when compared to the less-than-significant impacts of the Project.

(2) Operation

(a) Regional Emissions

As previously discussed, Alternative 4 would result in a reduced development of the Project. As such, the number of new daily operational vehicle trips generated by Alternative 4 would be less than the number of new daily trips generated by the Project. Specifically, as provided in Appendix J of this Draft EIR, Alternative 4 would result in a total of 908 daily vehicle trips and 5,505 daily VMT as compared to the Project's 1,500 daily

vehicle trips and 8,617 daily VMT. Because operational regional air pollutant emissions associated with Alternative 4 would be generated by vehicle trips and VMT, which are the largest contributors to operational air pollutant emissions, and to a lesser extent by the reduction in square footage and consumption of electricity and natural gas, the operational regional emissions of Alternative 4 would be less than those of the Project. As the Project's impacts are less than significant, Alternative 4 represents a further reduction in vehicle trips, VMT and square footage while maintaining the same land uses in comparison to the Project, the operational regional emissions of Alternative 4 would be below the SCAQMD's regional significance thresholds. Therefore, the operational regional air pollutant emissions of Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Localized Emissions

Localized operational impacts are determined primarily by peak-hour intersection traffic volumes. As provided in Appendix J of this Draft EIR, Alternative 4 would generate 908 daily vehicle trips and 5,505 daily VMT, which would be less than the Project's 1,500 daily vehicle trips and 8,617 daily VMT. As such, total operational vehicular emissions under Alternative 4 would be less than those of the Project. In addition, with the development of less floor area under Alternative 4 than the Project, area and stationary sources would also generate less on-site operational air emissions compared to the Project. Furthermore, as with the Project, Alternative 4 would not introduce any major new sources of air pollution within the Project Site. Therefore, localized impacts under Alternative 4 would also be less than significant and less when compared to the less-than-significant impacts of the Project.

(c) Toxic Air Contaminants

As set forth in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential TACs associated with Project operations would include diesel particulate emissions from delivery trucks. Under Alternative 4, the overall increase in the number of deliveries and associated diesel particulate emissions would be less than that of the Project due to the reduction in development. Similar to the Project, the land uses proposed under Alternative 4 are not considered land uses that generate substantial TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not proposed by the Project or Alternative 4. Similar to the Project, Alternative 4 would not release substantial amounts of TACs and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Therefore, as with the Project, Alternative 4 would not release substantial amounts of TACs and impacts would be less than significant. Such impacts would be less when compared to the less-than-significant impacts of the Project.

b. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

(a) Construction

Similar to the Project, construction activities associated with Alternative 4 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. Like the Project, construction activities associated with Alternative 4 would not involve the consumption of natural gas. As with the Project, Alternative 4 would generate a demand for transportation energy associated with on- and off-road vehicles. However, the energy consumed during construction of Alternative 4 would be reduced compared to the Project due to the reduction in construction activities and duration. As with the Project, the electricity demand during construction of Alternative 4 would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Construction equipment used during construction of Alternative 4 would also comply with Title 24 requirements where applicable, similar to the Project. With regard to transportation fuels, trucks and equipment used during construction of Alternative 4 would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. Therefore, as with the Project, construction activities would result in energy usage that is not wasteful, inefficient, or unnecessary. Overall, impacts under Alternative 4 regarding energy use associated with short-term construction activities would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 4 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions. However, as previously discussed, Alternative 4 would provide a reduced development of the Project and would result in a reduced number of daily trips when compared to the Project. Specifically, as provided in Appendix J of this Draft EIR, Alternative 4 would generate 908 daily vehicle trips and 5,505 daily VMT, which would be comparatively less than the Project's 1,500 daily vehicle trips and 8,617 daily VMT. The square footage under this Alternative would be reduced and consume less electricity and natural gas compared to the Project. As such, the consumption of electricity, natural gas, and petroleum-based fuels would be reduced under Alternative 4. In addition, similar to the

Project, Alternative 4 would implement design features to reduce energy usage. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 4 would not be wasteful, inefficient, or unnecessary. Overall, impacts related to energy use during operation of Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in vehicle trips, VMT and floor area in comparison to the Project.

(2) Conflict with Plans for Renewable Energy or Energy Efficiency

As discussed in Section IV.C, Energy, of this Draft EIR, the Project would comply with the City of LA Green Building Code, CalGreen and California's Building Energy Efficiency Standards (Title 24). Like the Project, Alternative 4 would comply with the City's Green Building Code and would be capable of achieving LEED® Certified or equivalent green building standards. In addition, like the Project, Alternative 4 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2019 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code. Furthermore, as with the Project, Alternative 4 would incorporate certain measures such as use of LED lighting that are beyond current State and City energy conservation requirements.

With regard to transportation related energy usage, Alternative 4 would also comply with goals of the 2020–2045 SCAG's RTP/SCS which incorporate VMT targets established by SB 375. As with the Project, the proximity of Alternative 4's residential and commercial/retail/restaurant uses to major job centers and public transportation would serve to reduce VMT and associated transportation fuel usage within the region. In addition, vehicle trips generated during operation of Alternative 4 would comply with CAFE fuel economy standards. During construction of Alternative 4, activities would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations.

Based on the above, Alternative 4, like the Project, would not conflict with plans for renewable energy or energy efficiency. Therefore, impacts of Alternative 4 would be less than significant and similar when compared to the less-than-significant impacts of the Project.

c. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily trips generated and associated VMT, as well as energy consumption from proposed land uses. As previously discussed, the number of daily trips and daily VMT under Alternative 4 would be reduced when compared to the Project. Additionally, energy and water consumption from proposed land uses would be reduced compared to the

Project due to the reduction in development. Thus, the amount of GHG emissions generated by Alternative 4 would be less than the amount generated by the Project due to the reduction in the number of trips and daily VMT generated when compared to the Project and the reduction in total development. As with the Project, Alternative 4 would be designed to comply with the requirements of the CALGreen Code and the Los Angeles Green Building Code. Alternative 4 would incorporate design features, as also proposed by the Project, to reduce GHG emissions and would be designed to comply with the City's Green Building Ordinance, as applicable. As with the Project, this Alternative would be serviced by the LADWP which will comply with SB 100 and SB 350 requirements for renewable energy, consistent with the CARB Scoping Plan. Vehicle trips and VMT under this Alternative would also be consistent with the 2020–2045 RTP/SCS and SB 375 policies to reduce VMT and associated GHG emissions. Water efficiency and solid waste reduction measures under this Alternative would also comply with State and City requirements. With compliance with the CALGreen Code and the Los Angeles Green Building Code, and with the implementation of comparable sustainability features as the Project, Alternative 4 would not conflict with the GHG reduction goals and objectives included in adopted State, regional, and local regulatory plans.

Thus, impacts related to GHG emissions under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in GHG emissions.

d. Land Use

(1) Physical Division of a Community

Alternative 4 would propose the same types of uses as those proposed by the Project. As discussed in Section IV.D, Land Use, of this Draft EIR, and as determined in the Initial Study included as Appendix A of this Draft EIR, the Project's uses would not physically divide an established community, and implementation of the Project would result in further infill of an already developed community with similar and compatible land uses, and Project impacts would be less than significant. Therefore, impacts related to the physical division of an established community would also be less than significant under Alternative 4 and similar when compared to the less-than-significant impacts of the Project.

(2) Conflict with Land Use Plans, Policies, and Regulations

The DTLA 2040 Community Plan is in draft form and has not yet been adopted, and is therefore subject to change. Under the DTLA 2040 Plan, the Project Site is currently proposed to be designated as part of the Transit Core, which would allow a maximum FAR

of between 9:1 and 13:1, with general uses that include multi-family residential, regional retail and services, office, hotel, and entertainment uses.⁴⁵ As discussed above, like the Project, Alternative 4 would develop residential and commercial/retail/restaurant uses. Specifically, Alternative 4 would provide 247,738 square feet of residential uses and 7,499 square feet of retail/restaurant uses. Per the DTLA 2040 Plan, above-grade parking is counted towards the development's FAR. As such, the 56,874 square feet of above-grade parking within Levels 2 through 4 are counted toward the FAR. Therefore, Alternative 4 would comply with the current unadopted draft DTLA 2040 Community Plan base FAR of 9:1 by providing 312,111 square feet of floor area on a 34,679-square-foot site.

Alternative 4 would require discretionary approvals (e.g., Site Plan Review, haul route permit, and construction permits) similar to the Project.⁴⁶ With approval of the required discretionary approvals and the implementation of project design features, as further discussed with respect to the Project in Section IV.D, Land Use, of this Draft EIR, Alternative 4 would not conflict with the applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect, including those set forth in the General Plan, Mobility Plan 2035, Central City Community Plan, LAMC, Downtown Design Guide, Citywide Design Guidelines, and SCAG's RTP/SCS. Therefore, impacts related to land use consistency under Alternative 4 would be less than significant and similar when compared to the less-than-significant impacts of the Project.

e. Noise

(1) Noise

(a) Construction

The types of construction activities under Alternative 4 would be similar to the Project, although the amount of construction activities and duration of construction would be reduced due to the reduction in total floor area (approximately 41 percent less floor area). As with the Project, construction of Alternative 4 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. However, the maximum or peak day of construction activity, which serves as the basis of the construction noise analysis, would be similar between Alternative 4 and the Project. This is because: (1) Alternative 4 would include a similar site plan and subterranean parking levels as the Project; (2) both Alternative 4 and the Project would be developed on the same site, with similar building footprints, and within the same distances

⁴⁵ Los Angeles Department of City Planning, *Downtown Community Plan Update, Fall 2020 Draft*.

⁴⁶ Under current zoning regulations, TFAR would be utilized to achieve the maximum FAR.

to off-site sensitive receptors; (3) given that both Alternative 4 and the Project would include high-rise mixed-use development, it is anticipated that they would require the same mix of construction equipment; (4) both Alternative 4 and the Project would implement the same construction-related project noise design features, including NOI-PDF-1 (using construction equipment equipped with state-of-the-art noise shielding and muffling devices) and NOI-PDF-3 (prohibition on the use of impact driven pile systems); and (5) both projects would implement Mitigation Measure NOI-MM-1 (temporary impermeable sound barrier, along the eastern, southern and western property lines, during the construction period). That is, the estimated noise levels during Alternative 4 construction would be similar to the Project (as provided in Table IV.E-11 of this Draft EIR), which would exceed the significance criteria at off-site receptor locations, R1, R2, R4, R5 and R6 by 10.7 dBA, 2.1 dBA, 1.8 dBA, 10.5 dBA and 5.2 dBA, respectively. Implementation of Mitigation Measure NOI-MM-1 would reduce the noise impacts at the ground level. However, the temporary sound barriers would not be effective in reducing the construction-related noise levels at these receptor locations due to the height of the residential buildings (ranging from seven stories to 33 stories). Thus, like the Project, Alternative 4 would result in significant unavoidable on-site construction noise (both project-level and cumulative), less than significant off-site construction traffic noise (project-level), and significant unavoidable off-site construction traffic noise (cumulative). As impacts are based on peak construction days, impacts under Alternative 4 would be similar to those of the Project.

(b) Operation

As discussed in Section IV.E, Noise, of this Draft EIR, sources of operational noise under the Project include: (a) on-site stationary noise sources, including mechanical equipment, activities within the proposed outdoor spaces, parking facilities, loading dock and trash collection areas; and (b) off-site mobile (roadway traffic) noise sources. Alternative 4 would introduce noise from similar on-site and off-site noise sources as the Project. However, it is anticipated that with the overall reduction in total floor area and uses under Alternative 4, the noise levels from building mechanical equipment, outdoor spaces, and parking facilities would be reduced. In addition, similar to the Project, Alternative 4 would implement Project Design Feature NOI-PDF-2 to screen all outdoor mounted mechanical equipment from off-site noise-sensitive receptors as well as Project Design Feature NOI-PDF-4 to ensure that outdoor amplified sound systems, if any, will be designed so as not to exceed the maximum noise level of 80 dBA (L_{eq-1hr}) at a distance of 25 feet from the amplified speaker sound systems with proof of compliance from a qualified noise consultant. Alternative 4 would also comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. Thus, operational on-site noise impacts would be less than significant and less when compared to the less-than-significant impacts of the Project due to reduction in total floor area and uses proposed.

With regard to off-site noise sources, when compared to the Project, Alternative 4 would result in 592 fewer daily vehicle trips. The reduction in vehicle trips would result in a decrease in off-site traffic-related noise levels under Alternative 4. Therefore, as with the Project, off-site noise impacts under Alternative 4 would be less than significant during operation. Such impacts would be less when compared to the less-than-significant impacts of the Project due to the reduction in vehicle trips under Alternative 4. In addition, the cumulative operational on- and off-site noise impacts would be less than significant and less than the less-than-significant impact of the Project.

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 4 would be similar to the Project, although the amount and duration of construction activities would be reduced. As with the Project, construction of Alternative 4 would generate vibration from the use of heavy-duty construction equipment as well as from truck trips. While the overall amount of construction would be reduced, on- and off-site construction activities and the associated construction vibration levels would be expected to be similar to those of the Project, as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment. As such, peak vibration levels generated by the construction equipment would be similar to those of the Project. That is, similar to the Project, the maximum vibration levels associated with Alternative 4 on-site construction activities would be up to 0.523 PPV at the parking structures adjacent to the Project Site to the north, which would exceed the 0.5 PPV building damage criteria. Alternative 4 would implement Mitigation Measure NOI-MM-2 (vibration monitoring), which would reduce the on-site construction vibration impacts associated with building damage to a less-than-significant level. Like the Project, vibration impacts associated with building damage due to off-site construction activities under Alternative 4 would be similar and less than significant prior to mitigation. The estimated ground-borne vibration levels would be up to 72 VdB at the receptor location R5 due on-site construction equipment (as provided in Table IV.E-23 of Section IV.E, Noise, of this Draft EIR) and at the sensitive receptors along the anticipated haul routes (8th Street, James M. Wood Boulevard/9th Street, and Olive Street) due to off-site construction trucks, which would result in a significant impact as related to human annoyance. Like the Project, there are no feasible mitigation measures to reduce the vibration human annoyance impacts. As such, vibration impacts associated with human annoyance from off-site construction would be significant and unavoidable. Overall, vibration impacts under Alternative 4 would be similar to the impacts of the Project.

(b) Operation

Sources of vibration related to operation of Alternative 4 would include vehicle circulation, delivery trucks, and building mechanical equipment. Vehicular-induced

vibration, including vehicle circulation within the parking structure, would not generate perceptible vibration levels at off-site sensitive uses. 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 so vibration would not be perceptible at the off-site sensitive receptors. Therefore, operation of Alternative 4 would not result in the generation of excessive ground-borne vibration levels that would be perceptible in the vicinity of the Project Site. As such, vibration impacts during operation of Alternative 4 would be less than significant and similar when compared to the less-than-significant impacts of the Project.

f. Public Services

(1) Fire Protection

(a) Construction

As previously described, while the types of construction activities required for Alternative 4 would be similar to that of the Project, the overall duration of construction would be shorter due to the reduced development proposed by Alternative 4. As with the Project, construction activities under Alternative 4 would occur in compliance with all applicable federal, State, and local requirements concerning the handling, disposal, use, storage, and management of hazardous waste (e.g., OSHA, LAFD requirements, etc.). Construction would also occur in compliance with all applicable federal, State, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, similar to the Project, compliance with regulatory requirements under Alternative 4 would effectively reduce the potential for construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Additionally, while construction activities would primarily be contained within the boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by temporary lane closures, roadway/access improvements, and the construction of utility line connections. Similar to the Project, it is likely that Alternative 3 would require the following: closure of the right turn lane and bike lane adjacent to the Project Site along Grand Avenue; closure of up to eight feet of the curb lane, relocation of two bus stops along 8th Street, removal of one on-street parking space, and closure of the sidewalk and right-turn lane along 8th Street; and closure of up to eight feet of the curb lane on Hope Street on occasion as needed, which would require the temporary removal of two on-street parking space on Hope Street. Therefore, as with the Project's implementation of Project Design Feature TR-PDF-1, Alternative 4 would prepare a Construction Traffic Management Plan and Worksite Traffic Control Plan for approval by LADOT, prior to the issuance of any demolition or building permits and would specify the

details of any sidewalk or lane closures, including the potential temporary lane and/or sidewalk closures on Hope Street, Grand Avenue and 8th Street, as identified above, and off-site construction staging procedures. Plan details would also be coordinated with emergency services.

Therefore, construction of Alternative 4 would not require construction of new fire facilities, construction of which would cause significant environmental impacts. As such, construction-related impacts related to fire protection services under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in construction activities and duration.

(b) Operation

As previously discussed, Alternative 4 would provide the same residential and commercial/retail/restaurant land uses as the Project but would reduce the number of residents from the Project's 1,398 residents generated from 580 residential units to 699 residents generated from 290 residential units.⁴⁷ As such, while the development of Alternative 4 would increase the demand for LAFD fire protection services on-site when compared to existing conditions, Alternative 4 would generate a reduced service population when compared to the Project. As with the Project, Alternative 4 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, automatic fire sprinklers, etc. As discussed in Section IV.F.1, Public Services—Fire Protection, of this Draft EIR, and the *Utility Infrastructure Technical Report: Water* included as Appendix I of this Draft EIR, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for the Project. Thus, LADWP would be able to satisfy fire suppression needs for the reduced development tower proposed by Alternative 4. In addition, Alternative 4 would not include the installation of barriers that could impede emergency vehicle access. As such, emergency access to the Project Site and surrounding area would be maintained. Compliance with applicable City Building Code and Fire Code requirements would be confirmed as part of LAFD's fire/life safety plan review and fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit.

⁴⁷ Based on a 2.41 persons per household rate for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020. As a note, the Initial Study for the 8th, Grand and Hope Project (Appendix A of this Draft EIR) applied an estimated rate of 2.43 persons per multi-family unit, which was the available rate provided by the City of Los Angeles at the time of publication of the Initial Study. This Draft EIR now utilizes the updated rate of 2.41 persons per multi-family unit provided by the City of Los Angeles.

Therefore, similar to the Project, Alternative 4 would not necessitate the construction of new fire protection facilities or expansion of existing facilities in order to maintain service. Operation of Alternative 4 would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities (fire protection), the construction of which would cause significant environmental impacts, in order to maintain acceptable fire protection services. Overall impacts with regard to LAFD fire protection during operation of Alternative 4 would be less than significant. Such impacts would be less when compared to the less-than-significant impacts of the Project due to the reduction in development, residential units, and associated service population.

Furthermore, in *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection and emergency medical services, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.⁴⁸

(2) Police Protection

(a) Construction

As with the Project, Alternative 4 would include construction activities and generate construction traffic that would create a demand for LAPD police protection services, potentially obstruct emergency access, and potentially slow emergency response times during the construction period. However, as previously discussed, the duration and amount of construction activities for Alternative 4 would be reduced compared to the Project due to the reduction in development. Furthermore, similar to the Project, Alternative 4 would be required to implement Project Design Feature POL-PDF-1, which includes temporary security measures such as security fencing, lighting, locked entry to secure the Project Site during construction, thereby reducing the demand for police protection services.

In addition, as detailed above and similar to the Project, Alternative 4 would prepare a Construction Traffic Management Plan and Worksite Traffic Control Plan for approval by LADOT, prior to the issuance of any demolition or building permits and would specify the details of any sidewalk or lane closures, including the potential temporary lane and/or sidewalk closures on Hope Street, Grand Avenue and 8th Street, as identified above, and off-site construction staging procedures. Plan details would also be coordinated with emergency services. Therefore, construction of Alternative 4 would not require

⁴⁸ *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, 843, 847.

construction of new police facilities, construction of which would cause significant environmental impacts. Overall, construction-related impacts to police protection services under Alternative 4 would be less than significant, and less when compared to the less-than-significant impacts of the Project due to the reduction in construction activities and duration.

(b) Operation

As indicated in Section IV.F.2, Public Services—Police Protection, of this Draft EIR, LAPD considers the residential population within their service area to evaluate service capacity. As previously discussed, Alternative 4 would provide the same residential and commercial/retail/restaurant land uses as the Project but would reduce the number of residential units from the Project's 580 residential units to 290 residential units. As such, Alternative 4 would result in a reduced police service population when compared to the Project. Similar to the Project, Alternative 4 would implement the same Project Design Features POL-PDF-2 through POL-PDF-6, as provided in Section IV.F.2, Public Services—Police Protection, of this Draft EIR. Specifically, as set forth in Project Design Feature POL-PDF-2, the Project would include private on-site security, a closed circuit security camera system, and keycard entry for residential areas. In addition, the Project would provide lighting of building entries and walkways to provide for pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into buildings, as set forth by Project Design Feature POL-PDF-3. Project Design Feature POL-PDF-4 would provide for sufficient lighting of parking areas, elevators, and lobbies to maximize visibility and reduce areas of concealment. Furthermore, Project Design Feature POL-PDF-5 would require the Project to design entrances to and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites. As specified in Project Design Feature POL-PDF-6, prior to the issuance of a building permit, the Project Applicant would submit a diagram of the Project Site to the LAPD Central Area Commanding Officer that includes access routes and any additional information that might facilitate police response. Furthermore, pursuant to Project Design Feature POL-PDF-7, the Project Applicant would consult with the LAPD Community Outreach and Development Division regarding the incorporation of crime prevention features appropriate for the Project. The design features would help offset the increase in demand compared to existing conditions for police protection services generated by Alternative 4.

Therefore, similar to the Project, Alternative 4 would not necessitate the construction of new police protection facilities or expansion of existing facilities in order to maintain service. As such, impacts on police protection services would be less than significant under Alternative 4 and less when compared to the less-than-significant impacts of the Project due to the reduced service population on-site.

Furthermore, in *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including police protection, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.⁴⁹

(3) Libraries

(a) Construction

Similar to the Project, Alternative 4 would result in a temporary increase of construction workers on the Project Site. However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities. Therefore, construction employment generated by Alternative 4 would not result in a notable increase in the resident population or a corresponding demand for library services in the vicinity of the Project Site. As such, construction of Alternative 4 would not require construction of new library facilities, construction of which would cause significant environmental impacts. Impacts to library facilities during construction of Alternative 4 would be less than significant and similar when compared to the less-than-significant impacts of the Project.

(b) Operation

Residents are considered the primary users of library facilities. As such, the LAPL bases its needs for libraries using population data as set forth in its letter dated August 30, 2019, regarding the Project included as Appendix I. As Alternative 4 would reduce the proposed residential units from 580 to 290 units, Alternative 4 would generate a reduced residential population when compared to the Project. In addition, the Project's residential units would be equipped to receive individual internet service, which provides information and research capabilities and reduces demand at physical library locations. Thus, as with the Project, operation of Alternative 4 would not exceed the capacity of local libraries to adequately serve the existing residential population based on target service populations or as defined by the LAPL, or substantially increase the demand for library services, such that would result in the need for new or altered library facilities. Therefore, impacts on library services under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in the permanent on-site residential population.

⁴⁹ *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, 843, 847.

g. Transportation

Alternative 4 would provide a circulation system similar to that of Project, including driveways along Hope Street and Grand Avenue as well as an internal porte cochere on the ground floor. Like the Project, Alternative 4 would ensure that vehicular loading and drop-off would occur within the building's parking structure, and the site planning would provide a safe and comfortable walking component which would enhance the existing pedestrian environment. Alternative 4 would also include the same sidewalks, street trees, and pedestrian lighting as the Project, and would include short-term and long-term bicycle parking in accordance with the LAMC. In addition, Alternative 4 would include 338 vehicle parking spaces of which 34 would be provided per covenanted and recorded parking agreements (PKG-4743, PKG-5261, PKG-5248). As such, Alternative 4 would comply with the programs and policies addressing the circulation system that are set forth in the Mobility Plan 2035; Plan for a Healthy Los Angeles; Central City Community Plan, LAMC; Vision Zero; Citywide Design Guidelines; Downtown Design Guide; and LADOT Manual of Policies and Procedures, Section 321 to the same extent as the Project. Therefore, Alternative 4 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be less than significant and similar when compared to the less-than-significant impacts of the Project.

As previously discussed, Alternative 4 would result in a reduced development of the Project with 290 fewer residential units. As such, the number of new daily operational vehicle trips generated by Alternative 4 would be less than the number of new daily trips generated by the Project. Specifically, as provided in Appendix J of this Draft EIR, Alternative 4 would result in a total of 908 daily vehicle trips and 5,505 daily VMT as compared to the Project's 1,500 daily vehicle trips and 8,617 daily VMT. Alternative 4 would result in a household VMT per capita of 3.4, which would not exceed the threshold of 6.0.⁵⁰ The Project would result in a 3.4 household VMT per capita, which would not exceed the threshold of 6.0. Therefore, similar to the Project, Alternative 4 would be consistent with CEQA Guidelines Section 15064.3, which establishes VMT as the most appropriate measure of transportation impacts. As such, impacts related to VMT under Alternative 4 would be less than significant and similar when compared to the less-than-significant impacts of the Project.

Alternative 4 would provide the same geometric design and circulation features as the Project. Alternative 4 would design the internal porte cochere and proposed driveways on Grand Avenue and Hope Street the same as the Project and in accordance with LADOT standards. In addition, as Alternative 4 would result in less trips than the Project,

⁵⁰ *The Mobility Group, VMT Calculator Results for 8th, Grand and Hope Project Alternative 4. See Appendix J of this Draft EIR.*

Alternative 4 would not require further freeway off-ramp analysis.⁵¹ Therefore, Alternative 4 would not result in a substantial increase in hazards due to a geometric design feature or incompatible use. Such impacts under Alternative 4 would be less than significant and similar when compared to the less-than-significant impacts of the Project.

Like the Project, while construction activities would primarily be contained within the boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by temporary lane closures, roadway/access improvements, and the construction of utility line connections. Therefore, as with the Project's implementation of Project Design Feature TR-PDF-1, Alternative 4 would prepare a Construction Traffic Management Plan and Worksite Traffic Control Plan for approval by LADOT, prior to the issuance of any demolition or building permits and would specify the details of any sidewalk or lane closures, including the potential temporary lane and/or sidewalk closures on Hope Street, Grand Avenue and 8th Street, and off-site construction staging procedures. Plan details would also be coordinated with emergency services. With regard to operation of Alternative 4, the driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. Similar to the Project, Alternative 4 would not include the installation of barriers that could impede emergency vehicle access. Also, upon completion of Alternative 4 and prior to the issuance of a building permit, the Applicant would also submit a diagram of the Project Site to the LAPD's Central Area Commanding Officer that includes access routes and any additional information that might facilitate police response, as provided in Project Design Feature POL-PDF-6 included in Section IV.F.2, Public Services—Police Protection, of this Draft EIR. As such, emergency access to the Project Site and surrounding area would be adequate and maintained under Alternative 4. Therefore, Alternative 4 impacts related to emergency access would be less than significant and similar when compared to the less-than-significant impacts of the Project.

h. Tribal Cultural Resources

Alternative 4 would require the same amount of excavation as the Project in order to construct three subterranean levels. Therefore, the potential for Alternative 4 to uncover subsurface tribal cultural resources would be similar when compared to that of the Project. As discussed in Section IV.H, Tribal Cultural Resources, of this Draft EIR, and in the Tribal

⁵¹ *The Mobility Group, Alternatives Analysis—Freeway Screening Check for 8th, Grand and Hope Project. See Appendix J of this Draft EIR.*

Cultural Resources Report included as Appendix H of this Draft EIR, the results of the records searches (i.e., SCCIC and NAHC) conducted for the Project Site and the independent analysis of correspondence and materials relative to potential tribal cultural resources on the Project Site (included in the TCR Report) demonstrate that there is no record or evidence of tribal cultural resources on the Project Site or in its immediate vicinity. Furthermore, given the nature of the existing and previous on-site development, which would have required excavation of soils in excess of those with potential to support cultural resources and TCRs (generally less than 10 feet below the surface in this area), subsurface soils within the Project Site are of low suitability to support the presence of tribal cultural resources. Based on this information, the City, in its discretion and supported by substantial evidence, finds that the Project Site does not contain any resources determined to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. Accordingly, as with Project, Alternative 4 would not cause a substantial adverse change in the significance of a tribal cultural resource, and impacts related to tribal cultural resources would be less than significant. Nonetheless, as with the Project, Alternative 4 would comply with the City's established standard condition of approval to address inadvertent discovery of tribal cultural resources. Therefore, impacts under Alternative 4 would be similar when compared to the less-than-significant impacts of the Project.

i. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities for Alternative 4 would result in a temporary demand for water associated with soil compaction and earthwork, dust control, mixing and placement of concrete, equipment and site cleanup, irrigation for plant and landscaping establishment, testing of water connections and flushing, and other short-term related activities. This demand would be reduced compared to that of the Project since Alternative 4 would result in a reduction in construction activities and duration. The amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed. However, given the temporary nature of construction activities, water use during construction of Alternative 4 would be short-term and intermittent. As with the Project, the existing water infrastructure would meet the limited and temporary water demand associated with construction activities for Alternative 4.

As discussed above, while Alternative 4 would include the same depth of excavation as the Project, Alternative 4 would reduce the total amount of development on the Project Site with a shorter tower. Thus, the water demand generated by construction activities for Alternative 4 would be less than the net water consumption of the Project during construction. Overall, construction activities associated with Alternative 4 would not require

or result in the construction of new water facilities or expansion of existing facilities that could have a significant impact on the environment. Therefore, construction-related impacts on water demand and infrastructure under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in development.

(b) Operation

As with the Project, operation of Alternative 4 would generate an increased demand for water relative to existing conditions. However, based on the reduction in total development and proposed residential units, water demand for Alternative 4 would be less than that for the Project. Alternative 4 would also include the same water conservation commitment measures as the Project. As discussed in Section IV.I.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project would not exceed the available capacity of the existing water distribution infrastructure that would serve the Project Site, and LADWP would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Therefore, as with the Project, operational impacts related to water supply and infrastructure would be less than significant under Alternative 4 and less when compared to the less-than-significant impacts of the Project due to the reduced density development.

(2) Energy Infrastructure

(a) Construction

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

(b) Operation

As with the Project, operation of Alternative 4 would generate an increased consumption of electricity and natural gas relative to existing conditions. However, as Alternative 4 proposes a reduced development with less residential units, the proposed uses of Alternative 4 would result in less electricity and natural gas consumption when compared to the uses proposed by the Project. While both Alternative 4 and the Project would both propose up to 7,499 square feet of commercial/retail/restaurant uses, Alternative 4 would develop 290 residential units in lieu of the Project's 580 residential

units. As such, Alternative 4 would result in a reduced consumption of electricity and natural gas when compared to the Project, and the corresponding impact on energy infrastructure would be less than that of the Project. Therefore, operational impacts to energy infrastructure under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above and summarized in Table V-2 on page V-11, Alternative 4 would not eliminate the Project's significant and unavoidable environmental impacts, including those related to: Project-level and cumulative construction noise impacts from on-site noise sources; cumulative noise impacts from off-site construction traffic; Project-level vibration impacts associated with human annoyance from on-site construction; and Project-level and cumulative vibration impacts associated with human annoyance from off-site construction traffic.

All other impacts would be less than significant or less than significant with mitigation, and less than or similar when compared to the impacts of the Project.

4. Relationship of the Alternative to Project Objectives

Overall, Alternative 4 would provide the same mix of uses as the Project but at a reduced scope and density in accordance with the draft proposed DTLA 2040 Plan.⁵² As such, Alternative 4 would meet the underlying purpose of the Project to develop a parcel with a high-quality mixed-use development that provides new multi-family housing and neighborhood-serving commercial/retail/restaurant uses that serves the community and promotes walkability. Alternative 4 would not fully achieve the Project objectives to the same extent as the Project. Specifically, with the reduction in residential units, Alternative 4 would not fully achieve the following objectives to the same extent as the Project:

⁵² *The City of Los Angeles Department of City Planning is currently updating the Central City Community Plan and the Central City North Community Plan, whose areas together make up Downtown Los Angeles (sometimes known as DTLA), in a combined planning process referred to as the DTLA 2040 Plan. The DTLA 2040 Plan Draft Environmental Impact Report was published in 2020 and was followed by a public comment period. Subsequently, a virtual public hearing was held on December 8, 2020. A meeting with the City Planning Commission (CPC) was held on June 17, 2021, at which CPC voted to reconvene a second meeting. During its September 23, 2021, meeting, CPC recommended approval of the June 2021 draft of the DTLA 2040 Plan. The DTLA 2040 Plan has not yet been adopted and therefore is subject to change. As a result, Alternative 4 is based on conformance with the provisions of the draft DTLA 2040 as of the date of circulation of the Plan's Draft EIR.*

- To maximize new housing units on a site currently used for automobile parking to help address the demand for new housing in the region, the City of Los Angeles, and the Central City Community Plan area.
- To construct a high-density, mixed-use development consistent with the principles of smart growth features, such as sustainable design, mixed use, infill development, proximity to transit, walkability, and bicycle connections (“complete” streets⁵³).
- To reduce vehicular trips and promote regional and local mobility objectives by locating high-density residential and retail uses in downtown Los Angeles, a high-density employment base, and within two blocks of a regional-serving transit hub (7th Street/Metro Center Station) and commercial services.
- To contribute to economic investment in the Central City Community Plan area through the provision of construction jobs and high-density residential uses with ground floor commercial uses.

However, with development of similar, although reduced, uses as the Project, Alternative 4 would meet the following Project objectives:

- To provide a contemporary architectural design that is compatible with existing high-rise development along 8th Street, Grand Avenue, and the vicinity.
- To create a pedestrian-oriented environment by promoting walkability and by creating a safe, inviting street-level identity for the Project Site through the introduction of a ground floor, street-fronting, neighborhood-serving, storefront commercial/retail/restaurant uses.

⁵³ *As outlined in California’s Complete Streets Act of 2008 (AB 1358), the goal of Complete Streets is to ensure that the safety, accessibility, and convenience of all transportation users—pedestrians, bicyclists, transit riders, and motorists—is accommodated. Refer to City of Los Angeles Complete Streets Design Guide for additional information.*

V. Alternatives

E. Environmentally Superior Alternative

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

With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible alternatives includes the No Project/No Build Alternative; the Hotel with Ground Floor Commercial Alternative; the Development in Accordance with Existing Base FAR (Reduced Residential) Alternative; and the Development in Accordance with DTLA 2040 Plan Alternative. Table V-2 on page V-11 provides a summary matrix that compares the impacts associated with the Project with the impacts of each of the analyzed Alternatives. A more detailed description of the potential impacts associated with each Alternative is provided above. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the Alternatives to “avoid or substantially lessen one or more of the significant effects” of the Project.

Of the alternatives analyzed, Alternative 1, the No Project/No Build Alternative, would avoid all of the Project’s significant and unavoidable environmental impacts, including those related to: Project-level and cumulative construction noise impacts from on-site noise sources; cumulative noise impacts from off-site construction traffic; Project-level vibration impacts associated with human annoyance from on-site construction; and Project-level and cumulative vibration impacts associated with human annoyance from off-site construction traffic. However, Alternative 1 would not meet any of the Project objectives or the Project’s underlying purpose to develop a parcel with a high-quality mixed-use development that provides new multi-family housing and neighborhood-serving commercial/retail/restaurant uses that serves the community and promotes walkability.

As stated above, the CEQA Guidelines require the identification of an Environmentally Superior Alternative other than a No Project Alternative. Accordingly, in accordance with the CEQA Guidelines, a comparative evaluation of the remaining Alternatives indicates that Alternative 3, the Development in Accordance with Existing Base FAR (Reduced Residential) Alternative, is the Environmentally Superior Alternative. This Alternative represents a reduced density development that is in accordance with existing

zoning designation, height limit, and FAR allowed within the Project Site. Similar to Alternatives 2 and 4, Alternative 3 would not eliminate the Project's significant and unavoidable impacts. However, of the proposed Alternatives other than Alternative 1 (No Project/No Build), Alternative 3 would result in the greatest overall reduction in extent of impacts when compared to the Project's impacts. Overall, with the reduction in residential units, Alternative 3 would partially achieve the Project's objectives, and would not meet the underlying purpose of the Project or satisfy the Project objectives to the same extent as the Project.