

# **I. Executive Summary**

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In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this section of this Draft Environmental Impact Report (EIR) contains a brief summary of the 8th, Grand and Hope Project (Project) and its potential environmental effects. More detailed information regarding the Project and its potential environmental effects is provided in the following sections of this Draft EIR. Also included in this section of this Draft EIR is an overview of the purpose and focus of this Draft EIR, a general description of the Project and proposed entitlements, a description of the organization of this Draft EIR, an overview of the Project, a general description of areas of controversy, a description of the public review process for this Draft EIR, and a summary of the alternatives to the Project evaluated in this Draft EIR, including identification of the environmentally superior alternative.

## **1. Purpose of this Draft EIR**

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

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

## **2. Draft EIR Focus and Effects Found Not To Be Significant**

In accordance with Section 15128 of the CEQA Guidelines, an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were

determined not to be significant and not discussed in detail in the Draft EIR. An Initial Study was prepared for the Project and a Notice of Preparation (NOP) was distributed for public comment to the State Clearinghouse, Governor's Office of Planning and Research, responsible agencies, and other interested parties on May 10, 2019, for a 30-day review period. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City determined through the Initial Study the potential for significant impacts in the following environmental issue areas:

- Air Quality
- Energy
- Greenhouse Gas (GHG) Emissions
- Land Use
- Noise
- Public Services (including fire protection; police protection; and libraries)
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems (including water supply and infrastructure; energy infrastructure)

The City determined through the Initial Study that the Project would not have the potential to cause significant impacts related to: aesthetics; agricultural and forest resources; objectionable odors; biological resources; cultural resources; geology and soils; hazards and hazardous materials; hydrology and water quality; physical division of an established community; mineral resources; airport and airstrip noise; population and housing; school; parks and recreation; wastewater; stormwater drainage facilities; telecommunications; solid waste; and wildfire. Therefore, these areas were not analyzed separately in this Draft EIR. The Initial Study demonstrating that no significant impacts would occur for these issue areas is included in Appendix A of this Draft EIR and a summary of these less than significant impacts is provided in Section VI, Other CEQA Considerations, of this Draft EIR.

### **3. Draft EIR Organization**

This Draft EIR is comprised of the following sections:

- I. Executive Summary.** This section describes the purpose of this Draft EIR, Draft EIR focus and effects found not to be significant, Draft EIR organization, Project summary, areas of controversy and issues to be resolved, public review process, summary of alternatives, and a summary of environmental impacts and mitigation measures.
- II. Project Description.** This section describes the Project location, existing conditions, Project objectives, and characteristics of the Project.
- III. Environmental Setting.** This section contains a description of the existing physical and built environment and a list of related projects anticipated to be built within the Project vicinity.
- IV. Environmental Impact Analysis.** This section contains the environmental setting, project and cumulative impact analyses, mitigation measures (where necessary), and conclusions regarding the level of significance after mitigation for each of the following environmental issues: air quality; energy; GHG emissions; land use; noise; public services (fire protection; police protection; and libraries); transportation; tribal cultural resources; and utilities and service systems (water supply and infrastructure; energy infrastructure).
- V. Alternatives.** This section provides an analysis of a reasonable range of alternatives to the Project including: No Project/No Build Alternative; Hotel with Ground Floor Commercial Alternative; Development in Accordance with Existing Base FAR (Reduced Residential) Alternative; and Development in Accordance with the DTLA 2040 Plan Alternative.
- VI. Other CEQA Considerations.** This section provides a discussion of significant unavoidable impacts that would result from the Project and the reasons why the Project is being proposed notwithstanding the significant unavoidable impacts. An analysis of the significant irreversible changes in the environment and potential secondary effects that would result from the Project is also presented here. This section also analyzes potential growth-inducing impacts of the Project and potential secondary effects caused by the implementation of the mitigation measures for the Project. Lastly, a summary of the environmental impacts that were determined not to be significant within the Initial Study is provided.
- VII. References.** This section lists the references and sources used in the preparation of this Draft EIR.
- VIII. Acronyms and Abbreviations.** This section provides a list of acronyms and abbreviations used in this Draft EIR.

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

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

- Appendix A—Initial Study, NOP, and NOP Comment Letters
  - Appendix A.1—Initial Study
  - Appendix A.2—Notice of Preparation (NOP)
  - Appendix A.3—NOP Comment Letters
- Appendix B—Air Quality and Greenhouse Gas Emissions
  - Appendix B.1—Air Quality and Greenhouse Gas Emissions Methodology
  - Appendix B.2—Air Quality Worksheet and Modeling Output Files
  - Appendix B.3—Greenhouse Gas Worksheets and Modeling Output Files
- Appendix C—Energy
- Appendix D—Land Use Tables
- Appendix E—Noise
  - Appendix E.1—Noise Calculations Worksheets
  - Appendix E.2—Traffic Data for Noise
- Appendix F—Public Services Response Letters
  - Appendix F.1—Los Angeles Fire Department Response Letter
  - Appendix F.2—Los Angeles Police Department Response Letter
  - Appendix F.3—Los Angeles Public Library Response Letter
- Appendix G—Transportation
  - Appendix G.1—Transportation Memorandum of Understanding
  - Appendix G.2—Transportation Assessment

- Appendix G.3—Los Angeles Department of Transportation Letter of Approval for Transportation Assessment
- Appendix G.4—Copy of Email correspondence from LADOT (Wes Pringle) to Department of City Planning (Polonia Majas), February 11, 2020
- Appendix G.5—Supplemental Analysis Memorandum
- Appendix G.6—Los Angeles Department of Transportation Letter of Approval of Supplemental Analysis Memorandum
- Appendix H—Tribal Cultural Resources
  - Appendix H.1—Tribal Cultural Resources Report
  - Appendix H.2—AB 52 Notification Letter and Delivery Confirmations
  - Appendix H.3—AB 52 Comment Letter
- Appendix I—Utilities and Service Systems—Water Supply and Infrastructure
  - Appendix I.1—Water Supply Assessment
  - Appendix I.2—Los Angeles Department of Water and Power and Department of City Planning Communication
  - Appendix I.3—Water Utility Infrastructure Technical Report
- Appendix J—Technical References for Alternatives
  - Appendix J.1—Noise Analysis for Alternatives
  - Appendix J.2—Transportation: VMT and Freeway Off-Ramp Analysis for Alternatives
  - Appendix J.3—Alternative 2 Air Quality, GHG, and Energy Analysis
- Appendix K—Los Angeles Bureau of Sanitation Correspondence
- Appendix L—Archaeological Resources Assessment

## 4. Existing Project Site Conditions

The Project would be located at 754 S. Hope Street and 609 and 625 W. 8th Street in the City of Los Angeles (Project Site). Rectangular in shape, the Project Site is comprised of two tax assessor parcels (APNs: 5144-011-009 and 5144-011-016), encompassing a total of approximately 34,679 square feet of lot area (0.83 acre). The Project Site is currently developed with a low-rise four-story parking structure and a surface parking lot that is

entirely paved and devoid of landscaping. The existing parking structure and surface parking lot currently provide 324 parking spaces, which are used for commercial parking by businesses in the area. Vehicular access for the existing commercial parking structure and surface parking lot is currently provided from four existing driveways with four existing curb cuts: one curb cut along Grand Avenue, two curb cuts along 8th Street, and one curb cut along Hope Street. A chain-link fence lines portions of two sides of the existing surface parking lot along 8th Street and Grand Avenue. One street tree is situated along Hope Street, and six street trees line the sidewalk along 8th Street. None of the existing street trees are considered protected per the City of Los Angeles Native Protected Tree Ordinance.<sup>1</sup>

The Project Site is located within the planning boundary of the Central City Community Plan (Community Plan) area and, more specifically, is located within its Financial Core. Under the Community Plan, which was last updated in January 2003, the Project Site has a General Plan land use designation of Regional Center Commercial. The Regional Center Commercial land use designation has corresponding zones of CR, C1.5, C2, C4, C5, R3, R4, R5, RAS3, and RAS4 and corresponds to Height District 3D and 4D, which limit the FAR to 6:1, except for transfer of floor area of up to 13:1. The Project Site's C2-4D zoning is consistent with the Regional Center Commercial land use designation and the 4D Height District.

The entire Project Site is zoned by the Los Angeles Municipal Code (LAMC) as C2-4D (Commercial, Height District No. 4). The Commercial zones permit a wide array of land uses, such as retail stores, offices, hotels, schools, parks, and theaters. The C2 zone also permits any land uses permitted in the R4 (Multiple Residential) zone, which includes one-family dwellings, two-family dwellings, apartment houses, multiple dwellings, and home occupations. Height District No. 4 within the C2 zone does not impose any height limit with an allowable maximum FAR of 13:1. 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. With a gross lot size and buildable area of 34,679 square feet, the Project Site's maximum base FAR is 208,074 square feet. Per LAMC Section 14.5.3, for the purposes of computing the maximum Floor Area Rights available through the approval of a Transfer 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. Therefore, the Project's FAR is calculated on buildable area measured to the center line of the street, which is approximately 60,022 square feet.

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<sup>1</sup> *The Tree Resource, Native Tree Protection Report for the Project Site. See Appendix IS-2 of the Initial Study, which is included as Appendix A of this Draft EIR.*

## 5. Description of the Proposed Project

### a. Project Overview

As shown in Table I-1 on page I-8, the Project proposes to develop a mixed-use project consisting of 580 residential units and up to 7,499 square feet of ground level commercial/retail/restaurant uses on a 0.83-acre site.<sup>2</sup> As such, a maximum of 554,927 square feet of floor area would be developed with a total FAR of 9.25:1. To accommodate the Project, the existing four-story parking structure and surface parking lot would be demolished.

The Project would involve the development of a 50-story, high-rise, mixed-use building with three below-grade parking levels. The maximum depth of the subterranean levels would be approximately 63 feet below ground level. The building would include Levels 1 through 50 with a maximum height of 592 feet above grade to the top of the parapet. The building would be 568 feet above grade to the highest roof surface. Rooftop mechanical equipment and stair/elevator penthouses would extend above to a maximum height of 592 feet above grade and would be screened from public view by a parapet. The proposed building would be comprised of four above-ground tiers with varying stepbacks from Hope Street.

The ground floor of the new building would be occupied by a residential lobby on 8th Street, as well as commercial/retail/restaurant uses, which would be located at the corner of Hope Street and 8th Street and at the corner of Grand Avenue and 8th Street. These commercial/retail/restaurant uses would provide up to a total of 94 outdoor seats. In addition, a ground floor porte cochère/outdoor lobby and four parking spaces would be located internally on-site.

Residential units would be located on Levels 3 through 49, while 636 vehicle parking spaces would be located in three subterranean levels and above grade on Levels 2 through 9 and four vehicle parking spaces would be located on the ground floor. In addition, indoor and outdoor residential amenities would be located on Levels 10, 11, 21, 22, 35, and 36. The Project would also provide a dog run and pet amenity area on Level 3 that would not be counted toward open space.

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<sup>2</sup> As described above, the gross lot area of the Project Site to the centerline of the adjacent public rights-of-way is 60,022 square feet (1.38 acres).

**Table I-1  
Summary of Proposed Floor Area<sup>a</sup>**

<b>Land Use</b>	<b>Floor Area (sf)</b>
Residential	547,428 square feet (580 dwelling units)
Commercial/Retail/Restaurant	7,499 square feet
<b>Total</b>	<b>554,927 square feet</b>
<p><sup>a</sup> <i>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.” In addition, as discussed further below, 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: Eyestone Environmental, 2020.</i></p>	

## b. Building Design

The Project would be designed in a contemporary architectural style. Building materials that are proposed to be used include different types of glass, concrete, aluminum, stone, and ceramic. These varied surface materials would provide articulated features and design elements with window treatments, architectural design features, and building articulations to enhance the pedestrian space. The 50-story, high-rise, mixed-use building would be designed using glass and aluminum frame window wall with concrete, metal panel, and stone cladding.<sup>3</sup> The proposed building would be comprised of four above-ground tiers with varying stepbacks from Hope Street. Landscaped terraces would be located on the upper level of each tier. Through the stepped tower massing, the urban street wall would be articulated by the mass of the first tier of the building. Continuous balconies situated at 25 feet above grade would activate the street and sidewalk with usable outdoor space and would introduce a human scale element and visual interest to pedestrians, visitors, and occupants.

<sup>3</sup> *The 8th, Grand and Hope Initial Study (May 2019), included as Appendix A of this Draft EIR, had proposed a 45-story building with a maximum height of 592 feet above grade to the top of the mechanical parapet. Following the publication of the Initial Study, the Project now includes Levels 1 through 50 with a maximum height of 592 feet above grade to the top of the parapet. The Project would be 568 feet to the highest roof surface. Rooftop mechanical equipment and stair/elevator penthouses would be screened from public view and extend above to a maximum height of 592 feet to the top of the parapet.*

## c. Open Space and Landscaping

LAMC Section 12.21-G requires open space for new developments with six or more dwelling units. The Greater Downtown Housing Incentive Area, LAMC Section 12.22-C,3(d), permits any percentage of the required open space to be provided as either private or common open space. Per LAMC Section 12.21-G, there shall be 100 square feet of open space provided for each residential unit having less than three habitable rooms; 125 square feet of open space provided for each residential unit containing three habitable rooms; and 175 square feet of open space provided for each residential unit containing more than three habitable rooms. Based on the number and types of units proposed, the Project is required to provide 63,600 square feet of open space. Due to the design used as a way of protecting the residents within the open space area from exposure to sun and rain elements, the Applicant is requesting a Zoning Administrator's Interpretation (ZAI) to determine that building cut-outs (covered open space) functioning as outdoor open space for the Project would: (1) not count toward the floor area calculation as defined in LAMC Section 12.03; and (2) shall count as open space as defined in LAMC Section 12.21-G,2(a).

The Project would provide 65,193 square feet of total open space. Specifically, the Project would provide a number of indoor and outdoor common open space areas and recreational amenities, including 13,140 square feet of indoor open space, 15,358 square feet of outdoor open space, and 8,596 square feet of outdoor covered open space. The common open space elements of the Project would be provided in a tiered terrace arrangement throughout the vertical levels of the building. These would include an indoor and outdoor common open space area with a pool, gym, spa, yoga and fitness areas, juice bar, barbeque and dining areas, seating, event lawn, and lounge on Level 10; an indoor fitness/recreation area on Level 11; common indoor and outdoor open space featuring a board room, co-working spaces, kitchen, barbeque and dining areas, and fire pit and seating on Level 21; indoor amenities on Level 22; common indoor and outdoor open space featuring a spa, fire pit and seating, dining areas, bar, and lounges on Level 35; and indoor fitness and wellness amenities on Level 36. The Project would also provide a dog run and pet amenity area on Level 3 that would not be counted toward open space. In addition, although the Greater Downtown Housing Incentive Area eliminates required percentage allocation for common and private open space, 562 of the Project's 580 residential units would each include 50 square feet of private balcony space, which totals 28,100 square feet throughout the residential portion of the Project.

LAMC Section 12.21-G also requires the planting of one 24-inch box tree for every four residential units as part of the Project's open space requirements. Therefore, the Project would be required to provide a total of 145 trees on-site, based on 580 residential units. The Project can only accommodate 79 of the 145 tree plantings on-site. Pursuant to LAMC Section 62.177, the Applicant has requested to pay a Development Tree Planting

Requirement In-Lieu Fee for the 66 required residential trees otherwise required to be planted pursuant to LAMC Section 12.21-G,2.(a)(3).

As part of the Project, seven non-protected existing street trees would be removed, and replacement street trees would be planted along 8th Street, Hope Street, and Grand Avenue. Street tree removal would require the approval of the Board of Public Works, and street trees would be replaced per the replacement requirements of the Urban Forestry Division, which typically require replacement at a 2:1 ratio. New street trees would be selected in coordination with the Urban Forestry Division. Due to physical constraints, the Project would be able to accommodate the planting of 10 of the 14 required street tree replacements in the public right-of-way. Pursuant to LAMC Section 62.177, the Applicant has requested to pay a Public Works Tree Planting Requirement In-Lieu Fee (pursuant to Board of Public Works approval) for the four replacement street trees that cannot be feasibly planted in the public right-of-way, otherwise required to be planted pursuant to the Board of Public Works replacement policy.

In addition, the Project would provide bicycle racks along Hope Street and Grand Avenue and outdoor seating, which will both be in compliance with Department of Public Works BOE standards, for which the Project will obtain necessary permits and approvals, as applicable.

#### **d. Access and Circulation**

The Project Site is close to several bus transit lines, rail lines, and local shuttle service. Specifically, the Project Site is located approximately one block away from the Los Angeles County Metropolitan Transportation Authority's (Metro's) 7th/Metro Center Metro Rail station, which contains the Metro Red, Purple, Blue, and Expo Lines and is considered a hub of the regional rail network, connecting passengers to Pasadena, East Los Angeles, Long Beach, Culver City, Santa Monica, Hollywood, Koreatown, and North Hollywood. Metro bus lines, including local and rapid lines, as well as Los Angeles Department of Transportation's (LADOT's) Commuter Express lines, run south along Grand Avenue, with the nearest stop midblock on Grand Avenue between 7th Street and 8th Street. Metro Lines 66 and 81, as well as LADOT's Commuter Express Lines 419, 431, 437 and 534 and Antelope Valley Transit Authority's (AVTA) Commuter Line 785, run west on 8th Street. LADOT's DASH Lines have stops within one block north on 7th Street and within one block west on Flower Street. Also within two to three blocks of the Project Site are Silver Lines 910 and 950; Foothill Transit Lines SS, 493, 495, 497, 498, 499 and 699; Santa Monica's Big Blue Bus Line R10; Torrance Transit Line 4X; and Montebello Bus Lines 40 and 50. These bus lines connect passengers to the Project Site from various locations across the City and throughout Los Angeles County. Additionally, the Project Site is within walking distance of various employment opportunities in the Downtown area.

Vehicular access to the Project Site for residents would be provided on Hope Street and Grand Avenue. Service, delivery, and trash collecting vehicles would access the Project Site from Hope Street and would exit the Project Site to Grand Avenue. Project entry gates would be located at or beyond the LADOT-required distance from the property line for adequate entry queuing. Visitors, taxis, service vehicles and rideshare vehicles would enter the site from either Hope Street or Grand Avenue, access the internal porte cochère, and exit via Grand Avenue. The Grand Avenue driveway would provide access to the subterranean parking levels, and the Hope Street driveway would provide access to the above-grade parking levels.

## **e. Parking**

The Project would provide 636 vehicle parking spaces within three subterranean levels and eight above-grade, partially screened levels and four vehicle parking spaces on the ground floor. The Project would provide parking for its residential uses at the ratios required by the Central City Parking Exception (LAMC Section 12.21-A,4(p)). In addition, the Project would utilize a 5-percent bicycle parking reduction for a residential project located within 1,500 feet of a major transit stop (LAMC Section 12.21-A,4). Prior to the bike parking reduction, the Project would be required to provide 634 spaces for the 580 residential units; however, this would be reduced by 5 percent of the required parking spaces to 602 spaces through the bike parking replacement allowance for the residential component of the Project. Per the Central City Parking Exception District, no parking is required for the commercial/retail/restaurant component of the Project as the total square footage is less than 7,500 square feet. The Project would provide a total of 602 parking stalls to accommodate the Project's residential parking component, 34 spaces for an adjacent building located at 611 W. 6th Street per current parking agreements (as recorded covenants PKG-4743, PKG-5261, and PKG-5248), and four surplus parking spaces. Overall, the Project would provide 640 vehicle parking spaces.

In addition, the Project would be required to provide a total of 251 bicycle parking stalls to accommodate short- and long-term residential and commercial bicycle parking stalls. Overall, the Project would provide a total of 251 bicycle parking stalls, including 243 residential bicycle stalls and 8 bicycle stalls for the commercial/retail/restaurant uses. The Project would also provide parking in accordance with the 2017 Downtown Design Guide and the Department of City Planning Advisory Notice Relative to Above-Grade Parking dated October 24, 2019. As described above, the proposed parking spaces would be located within 12 levels. Three subterranean levels of the garage would be laid out primarily for tandem parking and would provide a minimum 8-foot 2-inch of clearance height to accommodate vehicle access per the Americans with Disabilities Act (ADA). The Applicant is requesting a Zone Variance, pursuant to LAMC Section 12.27, to permit reduced drive aisle widths of 24 feet in lieu of the required 27-foot 4-inch drive aisle for an 8-foot 6-inch-wide standard stall and 25-foot 4-inch drive aisle otherwise required for a

7-foot 6-inch-wide compact stall as outlined in LAMC Section 12.21-A,5(a). Most units would be provided a single stall and the Project parking would be in a tandem configuration, therefore, parking attendants would be responsible for moving cars. Residents would be able to drive to one of the below-grade or above-grade parking levels and leave their car with an attendant before using one of the tower elevators to reach the lobby or their respective unit. With regard to the proposed parking garage, pursuant to LAMC Section 12.21-A,2, the Applicant requests a Zoning Administrator's Interpretation (ZAI) to clarify that private parking garages can implement the use of a 24-hour parking attendant service, through recordation of a covenant and agreement, in order to attend to and serve residential parking provided in a tandem configuration within the private parking garage.

The Applicant is requesting a Zone Variance, pursuant to LAMC Section 12.27, to permit 60 percent of the required residential primary parking spaces as compact spaces, in lieu of the required minimum of one primary standard space for each residential unit otherwise required by LAMC Section 12.21-A,5(c) and to permit the parking of compact spaces in a tandem configuration. The Applicant is also requesting a Zone Variance, pursuant to LAMC Section 12.27, to permit relief from providing an additional 10-inch clear space to the parking stall widths when adjoined on their longer dimension by an obstruction, such as a fence, wall, column, post or similar obstruction, otherwise required by LAMC Section 12.21-A,5(a)(1)(ii).

The four parking spaces on the ground floor and the above-ground parking on Levels 2 through 9 would be obscured from view from adjacent streets by the Project's habitable spaces fronting Grand Avenue, screening elements, including partial-height opaque guardrails, that unify the building architecture fronting 8th Street and Hope Street. The eight above-ground parking levels would function similarly to the subterranean parking levels and would be laid out primarily for tandem parking.

## **f. Lighting and Signage**

Proposed signage would include mounted Project identity signage, building and commercial tenant signage, general ground-level and wayfinding pedestrian signage, and security markings in compliance with code requirements. Project identity signage would be visible from vehicular and pedestrian traffic and serve as an identifier for the Project. Commercial, retail, and restaurant signage would be designed to complement the building architecture. Wayfinding signs would be located at parking garage entrances, elevator lobby, vestibules, and residential corridors. No off-premises billboard advertising is proposed as part of the Project. All proposed signage would be designed in conformance to applicable LAMC requirements, sign ordinance, and the Downtown Design Guide.

Exterior lighting along the public areas would include pedestrian-scale fixtures and elements. Project lighting would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the site. As required by LAMC Section 93.0117(b), exterior light sources and building materials would be designed such that they would not cause more than 2 foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors on any property containing residential units; an elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses, such as recreation, barbecue or lawn areas, or any other property containing a residential unit or units. Project lighting would also follow the streetscape lighting standards as established by the Downtown Design Guide.

All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations, including the Downtown Design Guide, and would be subject to approval by the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways, while minimizing light and glare on adjacent properties.

### **g. Density, FAR, and Setbacks**

While the Project Site's Height District No. 4 designation permits a FAR of up to 13 times the buildable area of the lot, the maximum permitted floor area of the Project Site is restricted by the "D" limitation, which restricts the FAR to 6 times the buildable area of the lot without a transfer of floor area (TFAR). With a gross lot size and buildable area of 34,679 square feet, the Project Site's maximum FAR is 208,074 square feet. Per LAMC Section 14.5.3, for the purposes of computing the maximum Floor Area Rights available through the approval of a Transfer 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. The Project Site's buildable area measured to the center line of the street is 60,022 square feet. With a maximum FAR of up to 13:1 through the TFAR, the Project Site would be permitted to request a total floor area of up to 780,286 square feet. The Applicant is requesting approval of a TFAR to the Project Site (Receiver Site) from a Donor Site which, in this case, is the City-owned Los Angeles Convention Center at 1201 South Figueroa Street. The Project is requesting a total transfer of 346,853 square feet of floor area, which would result in a total floor area of 554,927 and an overall Project FAR of 9.25:1. With the TFAR, the Project's FAR would be higher than the base FAR but less than the maximum 13:1 FAR allowed by the Community Plan in Height District No. 4.

The Project Site is zoned C2-4D. Per LAMC Section 12.14-C, no setbacks are required in the front yard. Although LAMC Section 12.14-C requires all portions of

buildings erected and used for residential purposes to provide side and rear yards conforming to the requirements of the R4 Zone on the floor level of the first story used in whole or in part for residential purposes, LAMC Section 12.22-A,18(c)(3) provides exceptions for developments combining residential and commercial uses, and states that no yard requirements shall apply to the residential portions of buildings located on lots in the C2 zone, if such portions are used exclusively for residential uses, abut a street, private street or alley, and the first floor of such buildings at ground level is used for commercial uses or for access to the residential portions of such buildings. In addition, as the Project is within the Greater Downtown Housing Incentive Area (ZI 2385) and zoned C2-4D, no yard requirements apply to the Project as an incentive to produce housing within the Greater Downtown Housing Incentive Area. However, the Project is subject to the Downtown Design Guide, which requires that retail streets in the Financial Core, such as the portions of Hope Street and Grand Avenue adjacent to the Project Site, include setbacks of 0 to 3 feet. As such, the Project would comply with such requirement.

## **h. Sustainability Features**

The Project would be designed and constructed to incorporate features to support and promote environmental sustainability. “Green” principles are incorporated throughout the Project to comply with the City of Los Angeles Green Building Code, which also incorporates various provisions of the California Green Building Standards Code (CALGreen), and the sustainability intent of the U.S. Green Building Council’s Leadership in Energy and Environmental Design (LEED®) program in order to meet LEED certified or equivalent building standards. These include energy conservation, water conservation, waste reduction features, and a pedestrian-friendly site design with large double door glass entrances. The Project would also utilize sustainable planning and building strategies and incorporate the use of environmentally-friendly materials, such as non-toxic paints and recycled finish materials, whenever feasible. The sustainability features to be incorporated into the Project would include, but would not be limited to, high-efficiency/low-flow plumbing fixtures and drip/subsurface irrigation systems to promote a reduction of indoor and outdoor water use, and Energy Star–labeled products and appliances. The Project would also include energy-efficient lighting technologies and fenestration designed for solar orientation. The proposed use of continuous balconies along portions of the building would also provide passive shading for indoor spaces, reducing energy consumption and allowing for increased natural daylighting and natural ventilation via fully-operable balcony doors and windows. In addition, the Project would include bicycle-friendly site design which would locate short-term bicycle parking near entrances to the commercial/retail/restaurant uses along the sidewalks of Hope Street and Grand Avenue.

In addition, the Project would meet the City of Los Angeles Green Building Code Requirements for parking facilities capable of supporting future electric vehicle supply equipment (EVSE), as well as parking spaces equipped with electric vehicle (EV) charging

stations. Pursuant to City of Los Angeles Ordinance 186,485 and Ordinance 186,488, 30 percent of the parking spaces in the Project would be capable of supporting future electric vehicle supply equipment (EVSE), and 10 percent of spaces would include EV charging stations.

## 6. Project Construction and Scheduling

Construction of the Project would commence with site clearance and demolition of the existing parking structure and parking lot, which would result in approximately 15,000 cubic yards of demolition debris, followed by grading and excavation for the subterranean levels. Building foundations would then be laid, followed by building construction, paving/concrete installation, and installation of landscaping and amenities. The Project would install new utility connections from existing public infrastructure to serve the Project. Project construction is anticipated to occur over a 36-month period and be completed in 2025. The estimated depth of excavation for the subterranean parking and building foundations would be approximately 63 feet below grade. Approximately 89,750 cubic yards of soil would be exported and hauled from the Project Site during the excavation phase. As part of the Project, a Construction Traffic Management Plan and Truck Haul Route Program would be implemented during construction to minimize potential conflicts between construction activity and through traffic. The Construction Traffic Management Plan and Truck Haul Route Program would be subject to LADOT review and approval.

## 7. Necessary Approvals

The City of Los Angeles has the principal responsibility for approving the Project. Discretionary Entitlement Approvals required for development of the Project may include, but not be limited to, the following:

- Pursuant to **LAMC Section 14.5.6**, the Applicant requests approval of a Transfer of Floor Area Rights (TFAR) from one Donor Site to the Project Site (Receiver Site). The Donor Site, the Los Angeles Convention Center, located at 1201 S. Figueroa Street, a City-owned property, would transfer 346,853 square feet to the Project Site (Receiver Site).
- Pursuant to **LAMC Section 16.05**, the Applicant requests that Site Plan Review Findings be made for a project that results in net increase of 50 or more dwelling units.
- Pursuant to **LAMC Section 12.27**, the Applicant requests a Zone Variance to permit 60 percent of the required residential primary parking spaces as compact spaces, in lieu of the required minimum of one primary standard space for each

residential unit otherwise required by **LAMC Section 12.21-A,5(c)** and to permit the parking of compact spaces in a tandem configuration.

- Pursuant to **LAMC Section 12.27**, the Applicant requests a Zone Variance to permit relief from providing an additional 10-inch clear space to the parking stall widths when adjoined on their longer dimension by an obstruction, such as a fence, wall, column, post or similar obstruction, otherwise required by **LAMC Section 12.21-A,5(a)(1)(ii)**.
- Pursuant to **LAMC Section 12.27**, the Applicant requests a Zone Variance to allow reduced drive aisle widths of 24 feet in lieu of the required 27-foot 4-inch drive aisle for a 8-foot 6-inch wide standard stall and 25-foot 4-inch drive aisle otherwise required for a 7-foot 6-inch wide compact stall as outlined in **LAMC Section 12.21-A,5(a)**.
- Pursuant to **LAMC Section 17.15**, the Applicant requests approval of Vesting Tentative Tract Map (VTTM) No. 74876, to: i) merge three (3) existing lots and portions of the public right-of-way, including 8 feet along the west side of 8th Street and the corner cut on the west side of 8th Street; ii) a limited-in-height dedication of 3 feet along Hope Street; iii) re-subdivide the land into one ground lot and nine airspace lots; and iv) to waive the 2-foot and 10-foot street dedications along the west side and east side of 8th Street, respectively, in order to maintain the 23-foot half-roadway and provide for the 12-foot required sidewalk.
- Pursuant to **LAMC Section 12.22-A,30(e)**, the Applicant requests a Specific Plan Project Permit Adjustment to deviate from the provisions of the 2017 Downtown Design Guide, to allow for balcony projections in the right-of-way to begin at a vertical height of 25 feet above-grade in lieu of a minimum vertical height of 40 feet above the sidewalk, as recommended by the Downtown Design Guide.
- Pursuant to **LAMC Section 12.22-A,30(e)**, the Applicant requests a Specific Plan Project Permit Adjustment to deviate from the provisions of the 2017 Downtown Design Guide, to provide less than 75 percent active uses along the retail streets of Hope Street and Grand Avenue and the non-retail 8th Street as required by the Downtown Design Guide.
- A Director's Decision under LAMC Section 12.21-G,3 may determine that a site cannot feasibly accommodate a required tree and allow an in-lieu fee to be used to satisfy a Development Tree Planting Requirement. Pursuant to **LAMC Section 62.177**, the Applicant requests to pay a Development Tree Planting Requirement In-Lieu Fee for a total of 66 trees otherwise required to be planted within the Project pursuant to **LAMC Section 12.21-G,2.(a)(3)**.
- Pursuant to **LAMC Section 12.21-A,2**, the Applicant requests a Zoning Administrator's Interpretation to clarify that private parking garages can

implement the use of a 24-hour parking attendant service, through recordation of a covenant and agreement, in order to attend to and serve residential parking provided in a tandem configuration within the private parking garage.

- 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.
- The Applicant requests approval of a haul route permit.
- The Applicant requests approval for the removal of seven (7) existing street trees and the planting of 10 replacement street trees within the public right-of-way from the Urban Forestry Division of the City Department of Public Works. Pursuant to **LAMC Section 62.177**, the Applicant requests approval from the Board of Public Works to pay a Public Works Tree Planting Requirement In-Lieu Fee for a total of four street trees that cannot be feasibly planted within the public right-of-way.
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, revocable permits, grading permits, excavation permits, foundation permits, building permits and sign permits from various municipal agencies related to the construction and operation of the Project including, but not limited to, the following: excavation, shoring, grading, foundation, removal of existing street trees, haul route, building and tenant improvements.

## 8. Areas of Controversy

Potential areas of controversy and issues to be resolved by the City's decision-makers may include those environmental issue areas where the potential for a significant unavoidable impact has been identified. These areas include Project 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 and cumulative vibration impacts associated with human annoyance from off-site construction traffic. There were also several comments related to other environmental issues provided to the City in response to the NOP. Based on the NOP comment letters provided in Appendix A of this Draft EIR, issues known to be of concern included, but were not limited to, Project impacts on aesthetics; air quality; GHG emissions; hazards; public services; access and transportation; and utilities and service systems. Refer to Appendix A of this Draft EIR for copies of the NOP comment letters.

## **9. Public Review Process**

The City prepared an Initial Study and circulated an NOP for public comment to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties on May 10, 2019, for a 30-day review period. In addition, a public scoping meeting was held on May 29, 2019. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR.

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

## **10. Summary of Environmental Impacts**

Table I-2 on page I-19 provides a summary of the environmental impacts of the Project. These impacts are summarized as follows:

**Table I-2  
Summary of Impacts Under the Project**

Environmental Issue	Proposed Project Impact
<b>A. AIR QUALITY</b>	
Construction	
<i>Regional Emissions</i>	Less Than Significant
<i>Localized Emissions</i>	Less Than Significant
<i>Toxic Air Contaminants</i>	Less Than Significant
Operation	
<i>Regional Emissions</i>	Less Than Significant
<i>Localized Emissions</i>	Less Than Significant
<i>Toxic Air Contaminants</i>	Less Than Significant
<b>B. ENERGY</b>	
Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Conflict with Plans for Renewable Energy or Energy Efficiency	Less Than Significant
<b>C. GREENHOUSE GAS EMISSIONS</b>	
	Less Than Significant
<b>D. LAND USE</b>	
Physical Division of a Community	Less Than Significant
Conflict with Land Use Plans	Less Than Significant
<b>E. NOISE</b>	
Construction	
<i>On-Site Noise</i>	<b>Significant and Unavoidable<sup>4</sup></b>
<i>Off-Site Noise</i>	Less Than Significant <sup>5</sup>
<i>On-Site Vibration (Building Damage)</i>	Less Than Significant with Mitigation
<i>On-Site Vibration (Human Annoyance)</i>	<b>Significant and Unavoidable</b>
<i>Off-Site Vibration (Building Damage)</i>	Less Than Significant
<i>Off-Site Vibration (Human Annoyance)</i>	<b>Significant and Unavoidable<sup>6</sup></b>
Operation	
<i>On-Site Noise</i>	Less Than Significant
<i>Off-Site Noise</i>	Less Than Significant
<i>Vibration</i>	Less Than Significant

<sup>4</sup> As discussed in Section IV.E, Noise, of this Draft EIR, cumulative noise impacts from on-site construction would be significant and unavoidable.

<sup>5</sup> As discussed in Section IV.E, Noise, of this Draft EIR, cumulative noise impacts from off-site construction traffic would be significant and unavoidable.

<sup>6</sup> 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 I-2 (Continued)**  
**Summary of Impacts Under the Project**

Environmental Issue	Proposed Project Impact
<b>F. PUBLIC SERVICES</b>	
Fire Protection	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Police Protection	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Libraries	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<b>G. TRANSPORTATION</b>	
Conflict with Programs, Plans, and Policies	Less Than Significant
Vehicle Miles Traveled	Less Than Significant
Geometric Design Features	Less Than Significant
Emergency Access	Less Than Significant
<b>H. TRIBAL CULTURAL RESOURCES</b>	
	Less Than Significant
<b>I. UTILITIES AND SERVICE SYSTEMS</b>	
Water Supply and Infrastructure	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Energy Infrastructure	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<hr/> <i>Source: Eyestone Environmental, 2021.</i>	

## 11. Project Design Features

The following project design features are applicable to the Project:

### a. Air Quality

**Project Design Feature AIR-PDF-1:** Where power poles are available, electricity from power poles and/or solar powered generators rather than temporary diesel or gasoline generators will be used during construction.

**Project Design Feature AIR-PDF-2:** The Project will not include the use of natural gas-fueled fireplaces in the proposed residential units.

## b. Greenhouse Gas Emissions

**Project Design Feature GHG-PDF-1:** The design of the new buildings shall incorporate features of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) program to be capable of meeting the standards of LEED Certified or equivalent green building standards. The design of the new buildings will incorporate the following sustainability features:

- a. Use of Energy Star-labeled products and appliances.
- b. Use of light-emitting diode (LED) lighting or other energy-efficient lighting technologies, such as occupancy sensors or daylight harvesting and dimming controls, where appropriate, to reduce electricity use.
- c. Water-efficient plantings with drought-tolerant species;
- d. Fenestration designed for solar orientation; and
- e. Pedestrian- and bicycle-friendly design with short-term and long-term bicycle parking.

## c. Noise

**Project Design Feature NOI-PDF-1:** Power construction equipment (including combustion engines), fixed or mobile, will be equipped with state-of-the-art noise shielding and muffling devices (consistent with manufacturers' standards). All equipment will be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.

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

**Project Design Feature NOI-PDF-3:** Project construction will not include the use of driven (impact) pile systems.

**Project Design Feature NOI-PDF-4:** 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.<sup>7</sup> A qualified noise consultant will provide written

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<sup>7</sup> The specified noise level limit was established to ensure the noise levels from the amplified sound system at the nearest noise sensitive receptor would not increase the ambient noise level by more than 5 dBA, per LAMC Section 112.01.

documentation that the design of the system complies with this maximum noise levels.

## d. Public Services—Police Protection

**Project Design Feature POL-PDF-1:** During construction, the Project applicant will implement appropriate temporary security measures, including security fencing (e.g., chain-link fencing), low-level security lighting, and locked entry (e.g., padlocked gates or guard-restricted access) to limit access by the general public. Regular security patrols during non-construction hours (e.g., nighttime hours, weekends, and holidays) will also be provided. During construction activities, the Contractor will document the security measures; and the documentation would be made available to the Construction Monitor).

**Project Design Feature POL-PDF-2:** During operation, the Project will include access controls in the forms of private on-site security, a closed circuit security camera system, and keycard entry for the residential building and the residential parking areas.

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

**Project Design Feature POL-PDF-4:** The Project will provide sufficient lighting of parking areas, elevators, and lobbies to maximize visibility and reduce areas of concealment.

**Project Design Feature POL-PDF-5:** The Project entrances to, and exits from, buildings, open spaces around buildings, and pedestrian walkways will be designed, to the extent practicable, to be open and in view of surrounding sites.

**Project Design Feature POL-PDF-6:** Prior to the issuance of a building permit, the Project Applicant will 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.

**Project Design Feature POL-PDF-7:** Prior to the issuance of a building permit, the Project Applicant will consult with the LAPD Community Outreach and Development Division regarding the incorporation of crime prevention features appropriate for the Project.

## e. Transportation

**Project Design Feature TR-PDF-1:** A detailed Construction Management Plan and Worksite Traffic Control Plan will be prepared and submitted to the City for review and approval prior to the issuance of any

demolition or building permits. These plans will include sidewalk/lane closure information, a detour plan, haul routes, and a staging plan to formalize how construction would be carried out and to identify specific actions that would be required to reduce effects on the surrounding community. The plans will also identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activities. The plan details will be coordinated with emergency services and affected transit providers that may need to temporarily close or relocate bus stops. The plans will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site.

## **f. Utilities and Service Systems—Water Supply and Infrastructure**

**Project Design Feature WAT-PDF-1:** In addition to regulatory requirements, the Project design will incorporate the following water conservation features to support water conservation in addition to those measures required by the City's current codes and ordinances:

- High-efficiency toilets with flush volume of 1.1 gallons of water per flush or less throughout, or less in amenity and community spaces.
- Showerheads with a flow rate of 1.5 gallons per minute, or less in amenity and community spaces.
- ENERGY STAR–Certified Residential Clothes Washers—Front Loading with Integrated Water Factor of 2.8 or less and capacity of 5.6 cubic feet or less, or Top Loading with Integrated Water Factor of 3.2 or less and capacity of 5.7 cubic feet or less.
- ENERGY STAR–Certified Residential Dishwashers—Standard 3.2 gallons per cycle or less, or Compact 1.96 gallons per cycle or less.
- Water-Saving Pool Filter.
- Pool/Spa recirculating filtration equipment.
- Pool splash troughs around the perimeter that drain back into the pool.
- Leak Detection System for swimming pools and Jacuzzi, including installation of a meter on the pool make-up line.
- Drip/Subsurface Irrigation (Micro-Irrigation) where appropriate.
- Proper Hydro-zoning/Zoned Irrigation (grouping plans with similar water requirements together).

## 12. Mitigation Measures

The following mitigation measures are applicable to the Project:

### a. Cultural Resources (Archaeological Resources)

**Mitigation Measure CUL-MM-1:** Prior to the start of ground-disturbing activities, the Applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (U.S. Department of the Interior 2008) to carry out the following measure. A qualified archaeologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the archaeologist and the City of Los Angeles Department of City Planning and shall depend on the rate of excavation and grading activities and the materials being excavated. If archaeological materials are encountered, the archaeologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The archaeologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological survey report shall be submitted to the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist.

### b. Geology and Soils (Paleontological Resources)

**Mitigation Measure GEO-MM-1:** A qualified paleontologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the paleontologist and shall depend on the rate of excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered. If paleontological materials are encountered, the paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Project Applicant shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum. Ground-disturbing

activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist

## c. Noise

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

- Along the eastern property line of the Project Site between the construction areas and the residential uses on the east side of Grand Avenue (receptor locations R1 and R2). The temporary sound barrier shall be designed to provide a minimum 11-dBA and 5-dBA noise reduction at the ground level of receptor locations R1 and R2, respectively.
- Along the southern property line of the Project Site between the construction areas and residential use across the Project Site to the south (receptor location R5) and the SP Lofts on the east side of Grand Avenue to the south (receptor location R4). The temporary sound barrier shall be designed to provide a minimum 11-dBA and 5-dBA noise reduction at the ground level of receptor locations R5 and R4, respectively.
- Along the western property line of the Project Site between the construction areas and residential uses at the southwest corner of 8th Street and Hope Street (receptor location R6). The temporary sound barrier shall be designed to provide a minimum 6-dBA noise reduction at the ground level of receptor location R6.

**Mitigation Measure NOI-MM-2:** Prior to start of construction, the Applicant shall retain the services of a structural engineer or qualified professional to visit the multi-story parking structures adjacent to the Project Site to the north to inspect and document the apparent physical condition of the structures' readily-visible features. The inspection survey shall be made to the extent feasible from the public right of way and within the Project Site's property line.

The Applicant shall retain the services of a qualified acoustical engineer to review proposed construction equipment and develop and implement a vibration monitoring program capable of documenting the construction-related ground vibration levels at property line of the parking structure adjacent to the Project Site to the north during demolition and grading/excavation phases. The vibration monitoring system shall continuously measure and store the peak particle velocity (PPV) in inch/second. The system shall also be programmed for two preset velocity levels: a warning level of 0.45 PPV and a regulatory level of 0.5 PPV. The system shall also

provide real-time alert when the vibration levels exceed the two preset levels.

In the event the warning level (0.45 PPV) is triggered, the contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level, including but not limited to halting/staggering concurrent activities and utilizing lower vibratory techniques.

In the event the regulatory level (0.5 PPV) is triggered, the contractor shall halt the construction activities in the vicinity of the parking structure and visually inspect the building for any damage. Results of the inspection must be logged, and repairs will be provided in the event any damage occurred. The contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level. Construction activities may then restart once the vibration level is measured and below the warning level.

## **13. Summary of Alternatives**

This Draft EIR examined four alternatives to the Project in detail, which include 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. A general description of these alternatives is provided below. Refer to Section V, Alternatives, of this Draft EIR for a more detailed description of these alternatives and a comparative analysis of the impacts of these alternatives with those of the Project.

### **a. Alternative 1: No Project/No Build Alternative**

Alternative 1, the No Project/No Build Alternative, assumes that the Project would not be approved and no new development would occur within the Project Site. Thus, the physical conditions of the Project Site would generally remain as they are today. The existing surface parking lot would remain and continue to operate on the Project Site, and no new construction would occur.

### **b. Alternative 2: Hotel with Ground Floor Commercial Alternative**

The Hotel with Ground Floor Commercial Alternative (Alternative 2) would include a reduced development project 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. 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.<sup>8</sup> 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, 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.

### **c. Alternative 3: Development in Accordance with Existing Base FAR (Reduced Residential) Alternative**

The Development in Accordance with Existing Base FAR (Reduced Residential) Alternative (Alternative 3), would include a reduced density project developed pursuant to

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<sup>8</sup> *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.)*

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.

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.<sup>9</sup> 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 cochère, 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 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.

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<sup>9</sup> *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.*

## d. Alternative 4: Development in Accordance with DTLA 2040 Plan Alternative

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).<sup>10</sup> 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.<sup>11</sup> Per the DTLA 2040 Plan presented as part of the Draft EIR for the 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, consisting 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.<sup>12</sup> 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

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<sup>10</sup> *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.*

<sup>11</sup> *Los Angeles Department of City Planning, Downtown Community Plan Update, Fall 2020 Draft.*

<sup>12</sup> *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 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 cochère, 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.

## **e. Environmentally Superior Alternative**

As discussed in Section V, Alternatives, of this Draft EIR, 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. 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; 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, as discussed in detail in Section V, Alternatives, of this Draft EIR, 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.