V. ALTERNATIVES

1. Introduction

The purpose of this section is to assess a reasonable range of alternatives to the Project that would feasibly attain most of the basic Project objectives and avoid or substantially lessen any of the potential significant effects of the Project and to evaluate the comparative merits of the alternatives (CEQA Guidelines Section 15126.6).[1] The CEQA Guidelines state that the selection of alternatives should be governed by a "rule of reason." CEQA also states that, "[t]he EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project." Generally, significant effects of an alternative shall be discussed, but in less detail than the project, and should provide decision-makers perspective as well as a reasoned choice.

The following provides a summary of the alternatives analyzed in detail in this section:

- Alternative 1 is the No Project Alternative, which assumes that the Project would not be implemented, and the existing building would not be demolished. However, in March 2018, the City of Los Angeles issued the Applicant an Order to Comply with the City's Soft Story Retrofit Program. Since compliance with the City's Soft Story Ordinance must occur in the foreseeable future if the proposed project were not approved, Alternative 1 includes the seismic retrofit work required to comply with the City's Soft Story Ordinance. As Alternative 1 involves the retention of the existing building, it would avoid the significant impacts related to historical resources and land use. However, while Alternative 1 would comply with the requirements of the City's Soft Story Retrofit Program, the building would still present a seismic risk and safety hazard and could not be occupied. This is because the structural retrofit required by the Soft Story Ordinance only addresses the structural deficiencies in the south wing, and does not address the east, north, or west wing structural deficiencies.

- Alternative 2, the Preservation Alternative, involves the voluntary seismic retrofit and ADA, building code, and energy efficiency upgrades of the existing building, after which the building would be re-occupied by approximately 12,800 square feet of retail uses. Per Los Angeles Municipal Code (LAMC) Section 12.21 A.4 (x)(2), parking for the rehabilitated Barry Building may, in the City's discretion, remain the same as the parking currently existing on the parcel where the Barry Building is located. As Alternative 2 involves the preservation of the existing building, Alternative 2 would avoid the Project's significant and

[1] This section does not analyze the economic feasibility of the Project Alternatives to achieve the Project objectives.

unavoidable impacts with respect to historical resources and land use. However, as Alternative 2 includes an operational component (the re-occupancy of the building), Alternative 2 would result in greater impacts than the Project with respect to air quality, greenhouse gas emissions, noise, and traffic.

- Alternative 3, the Partial Preservation with New Construction Alternative, involves the partial preservation of the existing building with new construction on the remaining portion of the Project Site. Specifically, Alternative 3 would preserve the south, east, and west wings of the building, the courtyard, and the south façade of the north wing, and would include the voluntary seismic retrofit, and ADA, building code, and energy efficiency upgrades to the preserved portion of the existing building. In addition, Alternative 3 would include the construction of a new building behind (north of) the existing building. In total, Alternative 3 would include approximately 19,771 square feet of office and retail uses. Per LAMC Section 12.21 A.4 (x)(2), parking for the rehabilitated Barry Building may, in the City's discretion, remain the same as the parking currently existing on the parcel where the Barry Building is located. However, that LAMC section may not apply to the parking required for the new building constructed behind the Barry Building. Therefore, the impact analyses assumed that Alternative 3 would potentially require a parking variance from the City to provide additional parking for the new floor area. As Alternative 3 involves the preservation of the existing building, Alternative 3 would avoid the Project's significant and unavoidable impacts with respect to historical resources and land use. However, Alternative 3 would include greater impacts during construction with respect to air quality, greenhouse gas emissions, and noise based on the construction of the new building. Further, as Alternative 3 includes an operational component, Alternative 3 would result in greater impacts than the Project with respect to air quality, greenhouse gas emissions, noise, and traffic.

- Alternative 4, the Relocation Alternative, involves the dismantling of the Barry Building into multiple small building portions to facilitate its relocation to a new site, which has yet to be identified. At the new location, the Barry Building would be reconstructed, which would incorporate additional preservation measures relating to seismic retrofitting, ADA updates, building code updates, and energy efficiency upgrades. Once the building has been moved and rehabilitated, it would be occupied by 12,800 square feet of retail uses. As Alternative 4 involves the preservation of the existing building, Alternative 4 would avoid the Project's significant and unavoidable impacts with respect to historical resources and land use, with mitigation measures for historical resources. However, as Alternative 4 includes an operational component, Alternative 4 would result in greater impacts than the Project with respect to air quality, greenhouse gas emissions, noise, and traffic.

2. Analysis Format

To develop Project alternatives, the Lead Agency considered the Project objectives and reviewed the significant impacts identified in Section IV of this EIR, considered whether those significant impacts could be substantially avoided or reduced through a range of reasonable Project

alternatives, and evaluated the comparative merits of the alternatives. The potential environmental impacts associated with the selected Alternatives are described below and are compared to the environmental impacts associated with the Project (also refer to Table V-33 at the end of this section).

(1) Project Objectives

The objectives of the Project are as follows:

1. Comply with the City's Soft Story Retrofit Program (LAMC Section 91.9300 et seq., Ordinance entitled Mandatory Earthquake Hazard Reduction in Existing Wood Frame Buildings with Soft, Weak or Open Front Walls), which includes complying with the requirements under LAMC Section 91.9305.2.

2. Abate the fire, loitering, vandalism, and other public safety hazards associated with structural defects and current vacancy of the Barry Building.

(2) Significant Project Impacts

The Project would result in the following significant and unavoidable impacts:

- Historical Resources
- Land Use

3. Overview of Alternatives to the Project

The following alternatives to the Project have been selected for evaluation based on the significant environmental impact of the Project, the objectives established for the Project, and the feasibility of the alternatives considered.

Alternative 1: No Project Alternative

Alternative 2: Preservation Alternative

Alternative 3: Partial Preservation with New Construction Alternative

Alternative 4: Relocation Alternative

A more detailed discussion of these alternatives and impacts that would occur under the alternatives is included below.

4. 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 Section 15126.6(c), 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. In considering ways to substantially reduce or avoid the significant impacts identified for the Project (i.e., to historic resources and land use) one alternative was considered but rejected for further review due to the infeasibility of the alternative and/or the inability of the alternative to meet most of the basic Project's objectives, or substantially reduce or avoid the Project's significant impacts after mitigation. The alternative to the Project that has been considered and rejected is described below:

Mothballing Alternative

One alternative that was considered was mothballing the Barry Building in accordance with *Preservation Brief 31: Mothballing Historic Buildings*, prepared by the National Park Service. Preservation Brief 31 outlines the steps required to close up and temporarily protect an historic building for an extended period of time while planning its future use. Historic Resources Group prepared a memo that outlines the steps to properly mothball a building (see Appendix H-1 for this memo). However, mothballing is not a long-term solution that can achieve the project objectives, including compliance with the Soft Story Ordinance and therefore, this alternative was rejected.

5. Analysis of Selected Alternatives

a) Alternative 1: No Project Alternative

(1) Description of the Alternative

CEQA requires the alternatives analysis to include a "no project" alternative, which is the circumstance under which the Project does not proceed. The purpose of analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project (CEQA Guidelines Section 15126.6[e][1]). Pursuant to CEQA Guidelines Section 15126.6(e)(2), requirements of the analysis of the "no project" alternative are as follows:

> *The "no project" analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the proposed project were not approved, based on current plans, and consistent with available infrastructure and community services.*

The No Project Alternative (Alternative 1) assumes that the Project would not be implemented, and the existing building would not be demolished. However, in March 2018, the City of Los Angeles issued the Applicant an Order to Comply with the City's Soft Story Retrofit Program. Specifically, the Order to Comply orders the applicant to comply with the following requirements as set forth in LAMC Section 91.9305.2:

1. Within 730 days (2 years) of the effective date of the Order to Comply, submit one of the following: (1) a structural analysis and plans that show that the building, as is, complies with the minimum seismic retrofit requirements set forth in LAMC Section 91.9309; or (2) a structural analysis and plans to seismically retrofit the building to comply with the minimum requirements set forth at LAMC Section 91.9309; or (3) plans for demolition of the building.

2. Within 1,278 days (3.5 years) of the effective date of the Order to Comply, obtain all necessary permits for retrofit or demolition.

3. Within 2,555 days (7 years) of the effective date of the Order to Comply, complete construction or demolition work under all necessary permits.

As the Applicant received an Order to Comply, it must comply with the City's Soft Story Retrofit Program. One way to comply would be to demolish the existing building, which is what the Project proposes. See LAMC § 91.9305.2, subd. (1)(c), (2), and (3). However, in order avoid the significant and unavoidable impacts related to historical resources and land use which would result from the demolition of the existing building, Alternative 1 assumes completion of the seismic retrofit work required to rehabilitate the existing building to comply with the Soft Story Ordinance.[2] See LAMC § 91.9305.2, subd. (2) and (3). Englekirk Structural Engineers prepared a technical report dated May 26, 2021 (included in Appendix H-2 of this Draft EIR) that included a structural analysis to repair the existing building to conform to the City's Soft Story Ordinance (see "Phase I" discussion in Appendix H-2). According to the Englekirk report, the south wing of the building that faces San Vicente Boulevard utilizes a pass-through at the ground floor that accesses the interior courtyard. As a result, there are no bearing walls that extend to the foundation and instead the second floor is supported on a series of isolated steel columns.

To comply with the City's Soft Story Retrofit Program, Englekirk developed a seismic retrofit scheme that consists of steel moment frame structures that are located within the building and are supported on new concrete footings. These steel moment frame structures provide lateral bracing for the south wing. In addition, there are some new wood shear walls that are placed to minimize the architectural impact on the building. New footings would be added, and the first floor, second floor, and roof diaphragms would be added and strengthened. Plans depicting the work to be performed under Alternative 1 are provided in Figures V-1 through V-3, which are provided at the end of this section.

According to Englekirk (see memorandum contained in Appendix H-3 of this Draft EIR), this structural retrofit only addresses the structural deficiencies in the south wing. The Soft Story Ordinance is limited to this portion of the building because there is no ascertainable lateral system (commonly referred to as the "soft story") and the second and roof levels are supported on the ground level by isolated steel columns. The Soft Story Ordinance does not apply to, and therefore

[2] No assumption is being made as to the economic feasibility of performing the seismic retrofit work required to comply with the Soft Story Ordinance.

does not address, the east, north, or west wing structural deficiencies identified in Englekirk's Seismic Assessment for the building (see Appendix G of this Draft EIR). Therefore, if the remaining building wings are not structurally retrofitted, the work to the south wing of the building would not be sufficient to protect building occupants if the building was subject to a moderate to severe seismic event. In addition, the south wing alone, which is on the second story of the building, could not be occupied as occupants would need to take one of two stairways and travel along other wings of the building that have not been retrofitted in order to reach the south wing. As such, the building could not be safely occupied under Alternative 1.

(2) Environmental Impacts

(a) Air Quality

(i) Construction

Alternative 1 consists solely of the work necessary to comply with the City's Soft Story Retrofit Program, and no future development of the Project Site is proposed and/or considered as part of Alternative 1. The work necessary to comply with the City's Soft Story Retrofit Program includes new steel moment frame structures to provide lateral bracing for the south wing. In addition, there are some new wood shear walls that are placed to minimize the architectural impact on the building. New footings would be added, and the first floor, second floor, and roof diaphragms would be added and strengthened. The construction work required for this Alternative would be less than the work required to complete the full demolition proposed for the Project. As such, the construction-related emissions from implementation of Alternative 1 would be reduced when compared to the Project. Like the Project, the impact would be less than significant, but would be less that of the Project.

(ii) Operation

Alternative 1 consists solely of the work necessary to comply with the City's Soft Story Retrofit Program, and no future development of the Project Site is proposed or considered as part of Alternative 1. As discussed above, while the existing building would remain on-site under this alternative, it would still present a seismic risk and therefore could not be occupied. This is because the structural retrofit (see memorandum contained in Appendix H-3 of this Draft EIR) only addresses the structural deficiencies in the south wing. The Soft Story Ordinance is limited to this portion of the building because there is no ascertainable lateral system (commonly referred to as the "soft story") and the second and roof levels are supported on the ground level by isolated steel columns. The Soft Story Ordinance does not apply to, and therefore does not address, the east, north, or west wing structural deficiencies identified in Englekirk's Seismic Assessment for the building (see Appendix G of this Draft EIR). Therefore, if the remaining building wings are not structurally retrofitted, the work to the south wing of the building would not be sufficient to protect building occupants if the building was subject to a moderate to severe seismic event. Therefore, there would be no uses that would result in particulate matter (PM) emissions and Alternative 1 would not result in any operational impacts with respect to a cumulatively considerable net increase of any criteria pollutants for which the region is in non-attainment under an applicable

federal or state ambient air quality standard. This impact would be less than significant and the same as the Project's less than significant impact.

(b) Cultural Resources

As discussed in Section IV.B (Cultural Resources) of this Draft EIR, the existing building is designated as Historic-Cultural Monument (HCM) No. LA-887. While the Project proposes to demolish the existing building, the existing building would remain on the Project Site under Alternative 1. As described above, Alternative 1 includes work necessary to comply with the City's Soft Story Retrofit Program. Historic Resources Group prepared a memorandum to address the potential impacts of this retrofit work with respect to the historic significance of the existing building (memorandum included in Appendix H-4 of this Draft EIR). As discussed in this memorandum, the work necessary to comply with the City's Soft Story Retrofit Program would meet the Secretary of the Interior's Standards for Rehabilitation and would not impact the historic significance of the existing building. Therefore, the implementation of Alternative 1 would result in a less than significant impact with respect to historical resources, which is less than the Project's significant and unavoidable impact with respect to historical resources.

(c) Greenhouse Gas Emissions

(i) GHG Emissions

Alternative 1 consists solely of the work necessary to comply with the City's Soft Story Retrofit Program, and no future development of the Project Site is proposed and/or considered as part of Alternative 1. The construction work necessary to comply with the City's Soft Story Retrofit Program under Alternative 1 would be less than the work required to complete the full demolition proposed for the Project. As such, the GHG emissions from Alternative 1's construction activities would be reduced when compared to the Project, and like the Project, the impact would be less than significant.

(ii) Plan Consistency

Alternative 1 consists solely of the work necessary to comply with the City's Soft Story Retrofit Program, and no future development of the Project Site is proposed and/or considered as part of Alternative 1. As discussed above, while the existing building would remain on-site under this alternative, it would still present a seismic risk and therefore could not be occupied. As no new development is proposed, and as the applicable GHG-reduction plans are directed at the operational activities associated with development (e.g., on-going traffic trips, energy and water consumption, waste generation, etc.) and do not address construction activities, there would be no potential to conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Therefore, Alternative 1's impacts related to GHG emissions would be less than significant, and would be reduced when compared to the Project.

(d) Land Use and Planning

(i) SCAG 2020-2045 RTP/SCS

Like the Project, Alternative 1 does not involve any new development of the Project Site. As no new development is proposed, the strategies and policies contained in the 2020-2045 RTP/SCS would not be applicable to Alternative 1.

(ii) City of Los Angeles General Plan

Alternative 1's consistency with the applicable objective and policy of the General Plan is discussed below in Table V-1.

Table V-1
Alternative 1 Consistency with Applicable Policies of the General Plan

Objectives and Policies	Alternative 1 Consistency
Conservation Element	
Cultural and historical objective and policy: Objective: protect important cultural and historical sites and resources for historical, cultural, research, and community education purposes. Policy: continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities.	**No Conflict.** Whereas the Project involves the demolition of the Barry Building, which the City of Los Angeles designated as Historic-Cultural Monument No. LA-887 in 2007, Alternative 1 would retain the existing building on the Project Site. Further, as discussed above under "Cultural Resources," the work needed to comply with the City's Soft Story Retrofit Program would not impact the historic significance of the existing building. Therefore, Alternative 1 would not conflict with this objective and policy.
Source: City of Los Angeles General Plan, Conservation Element.	

As provided above, Alternative 1 would be substantially consistent with the applicable objective and policy of the General Plan Conservation Element and therefore, Alternative 1's impacts would be less than significant.

(iii) Brentwood – Pacific Palisades Community Plan

Alternative 1's consistency with applicable goal, objectives, and policies contained in the Brentwood – Pacific Palisades Community Plan is provided below in Table V-2.

Table V-2
Alternative 1 Consistency with Applicable Goals, Objectives, and Policies of the Brentwood-Pacific Palisades Community Plan

Policy	Alternative 1 Consistency
Objective 1-4: To preserve and enhance neighborhoods with a distinctive historic character. **Policy 1-4.1:** Protect and encourage reuse of the area's historic resources. **Policy 1-4.2:** Preserve architecturally or historically significant features and incorporate such features as an integral part of new development when appropriate.	**No Conflict.** Unlike the Project, Alternative 1 involves the retention of the existing building, which is City HCM No. LA-887. Further, as discussed above under "Cultural Resources," the work needed to comply with the City's Soft Story Retrofit Program would not impact the historic significance of the existing building. Therefore, Alternative 1 would not conflict with this objective and these policies calling for historic preservation.
Goal 17: A community which preserves and restores the monuments, cultural resources, neighborhoods, and landmarks which have historic and/or cultural significance. **Objective 17-1:** To ensure that the Plan Area's significant cultural and historic resources are protected, preserved, and/or enhanced. **Policy 17-1.1:** Identify all designated City of Los Angeles Historic and Cultural Monuments in order to foster public appreciation of the City of Los Angeles' valuable historic resources and to promote education of the public.	**No Conflict.** Unlike the Project, Alternative 1 involves the retention of the existing building, which is City HCM No. LA-887. Further, as discussed above under "Cultural Resources," the work needed to comply with the City's Soft Story Retrofit Program would not impact the historic significance of the existing building. Therefore, Alternative 1 would not conflict with the goal, objective, and policy calling for historic preservation.
Policy 17-1.2: Protect and preserve archaeological sites of Native Americans.	**No Conflict.** As discussed in Section IV.G, Tribal Cultural Resources, of this Draft EIR, in response to a sacred lands file search conducted with the Native American Heritage Commission (NAHC), the NAHC indicated that no sacred lands or sites are documented within the Project area. In addition, any excavation required for the retrofit of the building would be minimal and would only disturb soils that have been previously disturbed by past development activities.
Source: City of Los Angeles, Brentwood-Pacific Palisades Community Plan, adopted June 1998.	

As shown above, Alternative 1 would be substantially consistent with the applicable goal, objectives, and policies of the Brentwood – Pacific Palisades Community Plan.

(iv) San Vicente Scenic Corridor Specific Plan

Alternative 1's consistency with the applicable policy contained in the San Vicente Scenic Corridor Specific Plan is provided below in Table V-3. As shown, Alternative 1 would be consistent with this policy, and Alternative 1's land use impacts related to consistency with the San Vicente Scenic Corridor Specific Plan would be less than significant.

Table V-3
Alternative 1 Consistency with Applicable Provisions of the San Vicente Scenic Corridor Specific Plan

Provision	Alternative 1 Consistency
9.A.1: Sidewalks abutting San Vicente Boulevard shall be at least 12 feet in width and maintain a minimum unobstructed width of 10 feet for pedestrian access.	**No Conflict.** The existing sidewalk is at least 12 feet in width, with a minimum unobstructed width of 10 feet for pedestrian access. The existing sidewalk would not be altered as part of Alternative 1.
13.B: Temporary construction fences required by the Los Angeles Municipal Code shall be painted a single earth tone color.	**No Conflict.** The construction fence placed around the Project Site would be painted a single earth tone color.
Source: San Vicente Scenic Corridor Specific Plan.	

(v) Los Angeles Municipal Code

The Project Site is zoned C4-1VL (Commercial Zone, Height District 1VL). The Commercial Zone permits a range of commercial uses including retail and office uses. Within Height District 1VL, the C4 zone allows for a building height maximum of up to 45 feet and establishes an FAR of 1.5:1. As Alternative 1 consists solely of the work needed to comply with the City's Soft Story Retrofit Program, and no future development of the Project Site is proposed and/or considered as part of Alternative 1, Alternative 1 would not conflict with the existing zoning, and no impact would occur.

(vi) Conclusion

As described above, Alternative 1 would be substantially consistent with the applicable plans and policies adopted for the purpose of avoiding or mitigating an environmental effect, and Alternative 1 would not result in any changes to the General Plan land use designation and zoning regulations applicable to the Project Site. Further, Alternative 1 would not conflict with these policies as Alternative 1 involves the retention of the existing building and would not affect the historic significance of this building. Therefore, Alternative 1's impacts with respect to land use and planning would be less than significant, and less than the Project's significant and unavoidable land use impact.

(e) Noise

(i) Construction Noise and Vibration

Alternative 1 consists solely of the work necessary to comply with the City's Soft Story Retrofit Program, and no future development of the Project Site is proposed and/or considered as part of Alternative 1. The work described above that would be necessary to comply with the City's Soft Story Retrofit Program under Alternative 1 would therefore be reduced when compared to the full demolition proposed for the Project and less heavy-duty construction equipment would be required. Therefore, construction noise and vibration from Alternative 1 would be reduced when compared to the Project, and like the Project, the impacts would be less than significant.

(ii) Operation

Alternative 1 consists solely of the work necessary to comply with the City's Soft Story Retrofit Program, and no future development of the Project Site is proposed and/or considered as part of Alternative 1. As discussed above, while the existing building would remain on-site under this alternative, it would still present a seismic risk and therefore could not be occupied. Therefore, Alternative 1 would not have the potential to generate a substantial temporary or permanent increase in ambient noise levels or vibration beyond the construction activities. This impact would be less than significant and the same as the Project.

(f) Transportation

(i) Plan Consistency

Alternative 1 consists solely of the work necessary to comply with the City's Soft Story Retrofit Program although the building would not be occupied upon completion of this work. In addition, no future development of the Project Site is proposed and/or considered as part of Alternative 1, and therefore, Alternative 1 would not trigger the requirement for additional review pursuant to the City of Los Angeles Transportation Assessment Guidelines screening criteria for the following reasons. First, no discretionary actions would be required to implement Alternative 1. Second, because no future development is proposed and/or considered as part of Alternative 1, Alternative 1 would not generate any traffic and would not conflict with any transportation plan, policy, or program adopted to support multi modal transportation options or public safety. Third, because no future development is proposed and/or considered as part of Alternative 1, Alternative 1 would not be required to make any modifications to the public right-of-way, nor is Alternative 1 proposing any modifications to the public right-of-way. Therefore, no impacts would occur from implementation of Alternative 1, same as the Project.

(ii) Vehicle Miles Traveled

Alternative 1 consists solely of the work necessary to comply with the City's Soft Story Retrofit Program although the building would not be occupied upon completion of this work. In addition, no future development is proposed and/or considered as part of Alternative 1. Therefore, Alternative 1 would not result in any daily vehicle trips or a net increase in daily VMT, and no impact would occur, same as the Project.

(iii) Design Feature Hazards

Alternative 1 consists solely of the work necessary to comply with the City's Soft Story Retrofit Program, and no future development of the Project Site is proposed and/or considered as part of Alternative 1. The roadways adjacent to the Project Site are part of the existing roadway network and contain no sharp curves or dangerous intersections. In addition, implementation of Alternative 1 would not result in roadway improvements, and no safety hazards would be introduced to the existing roadway network. Further, no new driveways are proposed. Thus, Alternative 1 would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or

dangerous intersections) or incompatible uses (e.g., farm equipment), and no impact would occur, same as the Project.

(iv) Emergency Access

Like the Project, Alternative 1 would implement PDF-TRA-1 (Construction Management Plan) during the construction activities necessary to comply with the City's Soft Story Retrofit Program. With implementation of PDF-TRA-1, these construction activities would not create hazards for roadway travelers, bus riders, or parkers, as procedures and other measures (e.g., to address temporary traffic control, lane closures, sidewalk closures, etc.) would be incorporated into the Construction Management Plan. As discussed below, construction-related impacts associated with access (including emergency access) to other businesses and transit would be less than significant.

Construction activities would primarily be contained within the Project Site boundaries. All construction equipment would be staged entirely on-site or delivered on an as-needed basis. However, temporary closures of the sidewalks adjacent to the Project Site could be required. Temporary traffic controls (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths, and/or providing overhead covering) would be provided to direct pedestrians safely around any closures and maintain safe pedestrian access along San Vicente Boulevard, as required in the Construction Management Plan (PDF-TRA-1). The temporary traffic controls would be provided to maintain a safe pedestrian route to the nearby Brentwood Science Magnet School. Construction activities would not result in bicycle lane or vehicular travel lanes closures along San Vicente Boulevard. Thus, bicycle and vehicular operations along San Vicente Boulevard adjacent to the Project Site would be maintained. In addition, emergency access in the vicinity would not be affected by Alternative 1's construction activities, and Alternative 1's impacts with respect to emergency access would be less than significant, and this impact would be similar to the Project's less than significant impact.

(g) Tribal Cultural Resources

The Project Site is located in an urbanized area of the City and has been disturbed by past development activities. Alternative 1 consists solely of the work necessary to comply with the City's Soft Story Retrofit Program, and no future development of the Project Site is proposed and/or considered as part of Alternative 1. Any excavation required for the retrofit of the existing building, such as for new foundations for the moment frames and shear walls, would be minimal and would only disturb soils that have been previously disturbed by past development activities. Specifically, new footings would be dug 6' x 6' x 30" deep under all steel moment frames. New and strengthened walls would include footings to a minimum of 4' wide and 30" deep. In addition, as discussed in Section IV.G (Tribal Cultural Resources) of this Draft EIR, there are no known tribal cultural resources present or within the Project Site. Therefore, the potential to encounter tribal cultural resources as part of Alternative 1's construction activities is low and impacts would be less than significant. In addition, while no tribal cultural resources are anticipated to be affected by Alternative 1, the City has established a standard condition of approval to address the inadvertent discovery of tribal cultural resources. The condition requires that in the event a potential tribal cultural resource

is discovered in the Project Site during ground-disturbing activities, all ground-disturbing activities temporarily cease until it is determined whether the discovery is a tribal cultural resource and appropriate treatment is determined through consultation with a California Native American tribe on the City's AB 52 list and with a qualified archaeologist. This impact would be less than significant, and similar to the Project's less than significant impact.

(3) Summary of Impacts

As demonstrated above, all of Alternative 1's impacts would be less than significant, including with respect to historical resources and land use. The Project would result in a significant and unavoidable impact with respect to historical resources and land use, as the Project would demolish the existing building, which is City HCM No. LA-887. As Alternative 1 involves the retention of the existing building, Alternative 1 would avoid the Project's significant and unavoidable impacts with respect to historical resources and land use.

(4) Relationship of Alternative 1 to the Project Objectives

As Alternative 1 includes the necessary work to comply with the City's Soft Story Retrofit Program, Alternative 1 would meet the following Project objective:

1. Comply with the City's Soft Story Retrofit Program (LAMC Section 91.9300 et seq., Ordinance entitled Mandatory Earthquake Hazard Reduction in Existing Wood Frame Buildings with Soft, Weak or Open Front Walls), which includes complying with the requirements under LAMC Section 91.9305.2.

However, as described above and in the memorandum contained in Appendix H-3 of this Draft EIR, even after compliance with the requirements of the City's Soft Story Retrofit Program, the building would still present a seismic risk and safety hazard and could not be occupied. This is because the structural retrofit (see memorandum contained in Appendix H-3 of this Draft EIR) only addresses the structural deficiencies in the south wing. The Soft Story Ordinance is limited to this portion of the building because there is no ascertainable lateral system (commonly referred to as the "soft story") and the second and roof levels are supported on the ground level by isolated steel columns. The Soft Story Ordinance does not apply to, and therefore does not address, the east, north, or west wing structural deficiencies identified in Englekirk's Seismic Assessment for the building (see Appendix G of this Draft EIR). Therefore, if the remaining building wings are not structurally retrofitted, the work to the south wing of the building would not be sufficient to protect building occupants if the building was subject to a moderate to severe seismic event. Given that the building would remain unoccupied, the property would remain fenced and the building would remain boarded up to prevent vandalism, loitering, and other public safety hazards. Therefore, Alternative 1 would not meet the following Project objective:

2. Abate fire, loitering, vandalism, and other public safety hazards associated with structural defects and current vacancy of the Barry Building.

b) Alternative 2: Preservation Alternative

(1) Description of the Alternative

The Preservation Alternative (Alternative 2) involves the work required to comply with the City's Soft Story Ordinance (described above for Alternative 1), as well as a voluntary seismic retrofit, and Americans with Disabilities Act (ADA), building code, and energy efficiency upgrades of the existing building, which is City HCM No. LA-887. The voluntary seismic retrofit program proposed by Englekirk Structural Engineers (see "Phase II" discussion in the technical report contained in Appendix H-2 of this Draft EIR) would include strengthening existing walls, adding new two-story shear walls, adding new floor and roof diaphragm sheathing, and adding new steel moment frames. Figures V-4 through V-6 at the end of this section for plans depicting the work to be performed as part of the voluntary seismic retrofit. Specifically, this alternative would include the following:

- Strengthening the existing shear walls would include adding new plywood sheathing and nailing to existing framing; adding new hold-down anchors at each end of each wall and new floor-to-wall connections; and enhancing existing footings or adding new footings. These include exterior and interior walls of the north, east, and west wings.

- Construction of new two-story shear walls would include new 2x stud framing with new plywood sheathing and nailing, new hold-down anchors at each end of each wall, and new footings. These would be located on the perimeter and courtyard walls of the north, east, and west wings. Each wall would have a minimum length of five feet. Actual locations of the new shear walls have yet to be determined.

- New floor and roof diaphragm sheathing would include the addition of new ¾-inch plywood sheathing over the entirety of the existing floor and roof sheathing.

- New two-story steel moment resisting frames would be constructed at the south wing. The frames would consist of wide flange steel columns and beams, and new concrete footings. These would be installed in two L-shaped plan configurations within the two ground-floor tenant spaces of the south wing.

In addition, various physical aspects of the building are not in compliance with the ADA and California Building Code provisions related to access to buildings and properties for people with disabilities (Title 24, Part 2, Vol. 2, Chapter 11B). These issues are detailed in the ADA Upgrade Report prepared by Gruen Associates, included in Appendix H-5 of this Draft EIR. Accordingly, in addition to the voluntary seismic retrofit described above, Alternative 2 would also include an ADA upgrade, which would include upgrades related to an accessible path of travel, plumbing, stairs and balcony railing, vertical transportation, and tenant space improvements. Specifically, in order to bring this building into compliance, this alternative would include the following:

- Accessible path of travel improvements would include new compliant parking paving on the portion of the parking lot that is on the Project Site (APN 4404-025-008), layout, stalls,

and signage; widening the sidewalk along the east façade;[3] modification or replacement of exterior doors on the east façade; addition of a floor-mounted handrail on the courtyard steps; addition of a curb to the courtyard ramp; addition of a rail or landscape element as a barrier to the underside of the stairs; and the addition of handrails for the ramp leading to the CMU addition.

- Plumbing improvements would include upgrading the first-floor men's room second-floor women's room to compliance; addition of single unisex restrooms on both floors; code-compliant signage; and installation of an ADA-compliant drinking fountain.

- Stair and balcony railing improvements would include the addition of solid or perforated panels to the floating stair risers; contrasting stripes at each tread; replacement of existing stair handrails and balcony guardrails with new handrails at code-compliant height; and addition of wall-mounted handrails at each of the four stairs between the second-floor levels.

- Vertical transportation improvements would include the addition of elevators and/or lifts to provide access to the second floor; and the addition of two exterior areas of assisted rescue on the second-floor balcony.

- Tenant space improvements would include widening all tenant doorways; modifying interior doors, landings, and steps; providing code-compliant entry signage; replacement of all door hardware with lever-type hardware; relocation of hardware mounted outside the required range; modification of nine-inch bottom rales on glazed doors; removal and infill of mail slots in doors; relocation of all switches and outlets mounted outside the required range; and modification or replacement of at least one window in each unit with operating parts within the required range.

Finally, certain aspects of the building do not meet California Building Code requirements. Therefore, Alternative 2 includes the following work to bring the building into compliance with the Code and other energy efficiency requirements. This work would include the following:[4]

- Structural / Life Safety – Building Code Compliance

    - Abatement: Remove all lead paint; remove all asbestos floor tile – adhesives – drywall topping; remove PCBs including switch gear; remove all light fixtures and HVAC controls; remove black mold from wall-ceiling floors; remove electrical wire, asbestos insulation electrical wire, and asbestos insulation.

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[3] It appears that there is only a two-foot wide sidewalk between the building and the driveway. However, it is unlikely that the sidewalk can be widened into the driveway, as the driveway is only 16.5 feet wide and is already too narrow.

[4] This list is taken from page 9 of the cost estimate report prepared by Hill International on May 7, 2019.

- Structural upgrades:

    - Roof Diaphragm - Remove and replace roofing; remove existing structural roof deck where water damage has occurred; replace roof drains and connect to storm drain system; place new diaphragm plywood; install new roof access per code.

    - Second Floor Repairs / Diaphragm – Remove floor finishes; remove non-load bearing partitions; remove exterior wall finishes at building perimeter; remove ceilings; remove electrical distribution and lighting; repair second floor decking; remove plumbing system supply and sewer; remove ductwork - soffits – ceilings; remove exterior windows; remove entry doors to mechanical rooms & replace with fire rated doors; remove second floor railings; remove HVAC mechanical equipment.

    - Reconstruction - Place new diaphragm plywood; install new water sprinkler system and fire main/riser/sewer line; establish electrical room for power and low voltage; install new electrical gear and distribution to electrical rooms; install new LED lighting; realign restroom to meet ADA; reconstruct restrooms including entry doors to meet ADA; repair water damage at window openings; repair damage to bottom plate and studs (termites/water); replace windows with low e – dual glazed windows; provide four openable windows per elevation for emergency evacuation; install new entry doors; reconstruct mechanical rooms (walls – ceiling – floor to meet fire code); install new HVAC units; install distribution HVAC ductwork; repartition space ready for tenant improvements; insulate exterior walls; replace drywall at perimeter walls; reinstall ceiling; install balcony ramps and railing to meet ADA.

    - Second Story Steel Moment Frame – Demolition of exterior structure/plaster; shoring support during construction; demolition of existing slab on-grade (new foundation).

    - Second Story Shear Wall – Install new moment frame foundation; install new moment frame; reconstruction building exterior including roof structure; reconstruct interior – ready for tenant improvement; incorporate vertical elevator shaft into moment frame design.

    - Upgrades to steel stairs and railings: Building Access – Improve landings non-slip risers; add backing to risers; replace railing (all locations) with code compliant railing; install vertical means of access to second floor.

- Site Improvements: Divert rain water from roof to storm drain, upgrade the portion of the parking lot on the Project Site (APN 4404-025-008) with catch basins piping to

storm drain; widen east side sidewalk to five feet in width[5] – new walk and curb; upgrade the portion of the parking lot on the Project Site to meet ADA; resurface the portion of the parking lot on the Project Site; install new sewer line.

Upon completion of the voluntary seismic retrofit, and ADA, building code, and energy efficiency upgrades, the building would be re-occupied by approximately 12,800 square feet of retail uses. Per LAMC Section 12.21 A.4 (x)(2), parking for the rehabilitated Barry Building may, in the City's discretion, remain the same as the parking currently existing on the parcel where the Barry Building is located. While an adjacent parcel (APN 4404-025-016) has been used for parking in the past, there is no covenant or lot tie as a matter of record for parcels 4404-025-008 and 4404-025-016, and parcel 4404-025-016 is not part of the HCM designation for the Barry Building. Therefore, this parcel could not be used for parking.

In the analysis provided below, asbestos abatement activities, which would take place prior to all other work, are anticipated to last two weeks. Performing the additional preservation measures is estimated to take approximately six months. Finishing activities, such as paving and applying new architectural coatings to the Barry Building, would take approximately one week each.

(3) Environmental Impacts

(a) Air Quality

(i) Construction

Alternative 2 involves the work to comply with the City's Soft Story Ordinance, as well as a voluntary seismic retrofit, ADA, building code, and energy efficiency upgrades of the Barry Building. This work would occur after asbestos abatement activities have occurred for the Barry Building.

Regional emissions were quantified for Alternative 2's construction activities using CalEEMod and compared to SCAQMD regional daily emissions thresholds. As shown in Table V-4, below, Alternative 2's construction activities would not produce VOC, NO_X, CO, SO_X, $PM_{10,}$ or $PM_{2.5}$ emissions that exceed SCAQMD regional daily thresholds for these pollutants. The regional emission levels shown in Table V-4 represent the highest daily emissions projected to occur during Alternative 2's construction activities. Because Alternative 2's construction emissions would not exceed SCAQMD's regional daily thresholds for project-specific impacts, Alternative 2 also would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment (i.e., ozone, PM_{10}, $PM_{2.5}$). This is because the SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed utilizing the same significance criteria as those for project-specific impacts. In short, because Alternative 2

[5] It appears that there is only a two-foot wide sidewalk between the building and the driveway. However, it is unlikely that the sidewalk can be widened into the driveway, as the driveway is only 16.5 feet wide and is already too narrow.

would not generate regional daily construction emissions in excess of SCAQMD thresholds, Alternative 2's project-specific and cumulative impact on regional air quality would be considered less than significant.

Localized (on-site) emissions were also quantified for Alternative 2's construction activities. Maximum on-site daily construction emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ were calculated using CalEEMod and compared to the applicable SCAQMD localized significance thresholds (LSTs) for the Northwest Coastal LA source receptor area (SRA) No. 2 based on construction site acreage that is less than or equal to one acre. Potential impacts were evaluated at a distance of 25 meters (approximately 82 feet), which is the shortest distance utilized in SCAQMD LST guidance documents. As shown in Table V-4, emissions generated during Alternative 2's construction activities would not exceed the localized thresholds for NO_2, CO, $PM_{10,}$ and/or $PM_{2.5}$ emissions. Therefore, impacts on localized air quality as a result of Alternative 2 are considered less than significant.

Neither the Project's construction emissions nor Alternative 2's construction emissions would have a significant impact on regional or localized air quality. However, Alternative 2 would result in greater maximum daily regional construction emissions of VOC than the Project. Maximum daily regional construction emissions of NO_X, CO, PM_{10}, and $PM_{2.5}$ would be lower than the Project. SO_X emissions would be similarly negligible under both the Project and Alternative 2. Alternative 2 would also result in greater maximum daily localized construction emissions of VOC, NO_X, and CO than the Project. Maximum daily localized construction emissions of PM_{10} and $PM_{2.5}$ would be lower than the Project. SO_X emissions would be similarly negligible under both the Project and Alternative 2. Alternative 2 would also generate construction emissions over a much longer period than the Project. Whereas the Project would take an estimated 37 days to complete, Alternative 2 would require approximately six months.

Table V-4
Alternative 2 - Estimated Daily Construction Emissions (Unmitigated)

Construction Phase[A]	Daily Emissions (Pounds Per Day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Regional Emissions						
Asbestos Abatement	0.6	5.0	6.9	<0.1	0.4	0.3
Preservation Work[B]	0.9	8.2	7.6	<0.1	0.4	0.3
Paving	1.3	5.5	7.7	<0.1	0.3	0.3
Architectural Coatings	26.8	1.3	2.0	<0.1	0.1	0.1
Maximum Regional Emissions	26.8	8.2	7.7	<0.1	0.4	0.5
Regional Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
Asbestos Abatement	0.6	4.5	6.1	<0.1	0.3	0.2
Preservation Work[B]	0.9	8.1	7.2	<0.1	0.4	0.3
Paving	0.8	5.5	7.0	<0.1	0.3	0.2
Architectural Coatings	26.8	1.3	1.8	<0.1	0.1	0.1
Maximum Localized Emissions	26.8	8.1	7.2	<0.1	0.4	0.3
Localized Significance Threshold[C]	N/A	103	562	N/A	4	3
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Table V-4
Alternative 2 - Estimated Daily Construction Emissions (Unmitigated)

[A] A January 2023 starting date was chosen to estimate Alternative 2's construction activities, but Alternative 2 does not have a pre-determined starting date as of the time of this analysis. A different starting date would have a nominal effect on emissions projections.

[B] "Preservation Work" would consist of seismic, ADA, building code, and energy efficiency upgrades.

[C] Localized Significance Thresholds based on one-acre site with 25-meter distance to nearest sensitive receptors in the Northwest Coastal LA County monitoring area.

Source: Noah Tanski Environmental Consulting, 2023, based on CalEEMod 2020.4.0 model runs (included in Appendix H-6 of this Draft EIR).

(ii) Operation

Localized and regional emissions were also estimated for Alternative 2's operations. As shown below in Table V-5, the operations of the building as leasable space for retail tenants would not introduce any new major sources of air pollution; emissions would not exceed SCAQMD regional significance thresholds for VOC, NO_X, CO, PM_{10}, and $PM_{2.5}$, nor would they exceed SCAQMD LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$. As a result, Alternative 2's operational impacts on regional and localized air quality would be considered less than significant. Note that the emissions shown in Table V-5 are not "net" emissions that have been quantified by calculating the change in emissions between the building's previous uses and its potential future uses. The building's previous uses, and what their operational emissions might have been, have not been considered in this analysis.

Neither the Project's operational emissions nor Alternative 2's operational emissions would have a significant impact on regional or localized air quality. However, Alternative 2 would result in greater daily operational emissions than the Project, both regionally and locally.

Table V-5
Alternative 2 - Estimated Daily Operational Emissions (Unmitigated)

Emissions Source	Daily Emissions (Pounds Per Day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area	0.3	<0.1	<0.1	<0.1	<0.1	<0.1
Energy	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Mobile Sources	1.4	1.3	11.8	<0.1	2.5	0.7
Project Regional Emissions	1.7	1.3	11.8	<0.1	2.5	0.7
Regional Daily Thresholds	55	55	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Project Localized Emissions	0.3	<0.1	<0.1	<0.1	<0.1	<0.1
Localized Significance Thresholds[A]	N/A	103	562	N/A	1	1
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

[A] Localized Significance Thresholds based on one-acre site with 25-meter distance to nearest receptors in the Northwest Coastal LA County monitoring area (SRA No. 2).

Source: Noah Tanski Environmental Consulting, 2023, based on CalEEMod 2020.4.0 model runs (included in Appendix H-6 of this Draft EIR).

(iii) Sensitive Receptors

As demonstrated in Tables V-4 and V-5, above, Alternative 2's construction and operational emissions would not exceed SCAQMD's applicable regional thresholds and LSTs. These SCAQMD thresholds represent the maximum emissions that would not be expected to cause or materially contribute to an exceedance of National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS), which themselves represent the maximum concentrations of pollutants that can be present in outdoor air without any harmful effects on people or the environment. Therefore, neither Alternative 2's construction nor its operational emissions would be expected to cause or measurably contribute to adverse air quality related health impacts at any nearby receptors, and Alternative 2's construction and operational emissions impacts to local and regional receptors would be considered less than significant.

As noted earlier, neither the Project's emissions nor Alternative 2's emissions would have a significant impact on regional air quality or localized air quality at nearby sensitive receptors within 25 meters (82 feet) of the Project Site. However, as discussed, Alternative 2 would result in greater construction and operational emissions than the Project.

(b) Cultural Resources

As discussed in Section IV.B (Cultural Resources) of this Draft EIR, the existing building is designated as City HCM No. LA-887. While the Project proposes to demolish the existing building, the existing building would remain on the Project Site under Alternative 2. Alternative 2 involves the work necessary to comply with the City's Soft Story Ordinance, as well as the voluntary seismic retrofit and ADA, building code, and energy efficiency upgrades of the existing building.

Historic Resources Group prepared a memorandum (included in Appendix H-7 of this Draft EIR) to determine whether the proposed seismic retrofit and ADA upgrades would comply with the Secretary of the Interior's Standards for Rehabilitation (the Standards) and whether the existing building would continue to retain its historic significance. The Standards provide guidance for reviewing projects that may affect historic resources. The intent of the Standards is to assist the long-term preservation of a property's significance through the preservation, rehabilitation, and maintenance of historic materials and features. The Standards pertain to historic buildings of all materials, construction types, sizes, and occupancy and encompass the exterior and interior of the buildings. The Standards also encompass related landscape features and the building's site and environment, as well as attached, adjacent, or related new construction.

The treatment "rehabilitation" assumes that at least some repair or alteration of the historic building will be needed in order to provide for an efficient contemporary use; however, these repairs and alterations must not damage or destroy materials, features or finishes that are important in defining the building's historic character. From a practical perspective, the Standards have guided agencies in carrying out their historic preservation responsibilities including State and local officials when reviewing projects that may impact historic resources. The Standards are a useful analytic tool for understanding and describing the potential impacts of substantial changes to historic resources. The Standards have also been adopted by state and local jurisdictions across the country, including the City of Los Angeles.

Historic Resources Group (in their memo included in Appendix H-7 of this Draft EIR) provided the following design alterations of the proposed ADA upgrade, which would bring Alternative 2 into compliance with the Standards:

- If egress and entrance are not required on the east façade, retain the existing doors in place and fix them in the closed position to avoid modifying or replacing them. If egress and entrance are required, modify or replace the minimum number of doors required to provide the necessary egress and leave the remaining doors intact and in place.

- If feasible, avoid closing the risers of the floating stairs in the courtyard by utilizing the California Historical Building Code (CHBC). If it is determined by the building official that the open risers present a hazard and must be closed, utilize a fine wire mesh or clear Plexiglass, rather than solid panels, to maintain the open appearance.

- If feasible, avoid replacing or altering the existing stair handrails and balcony guardrails by utilizing the CHBC. If it is determined by the building official that the existing handrails and guardrails present a hazard, retain the existing railings in place and add new, differentiated rails or clear Plexiglass panels to achieve the required height and spacing.

- If feasible, avoid widening all tenant doorways and replacing all hardware by utilizing the CHBC. Modify only the minimum required number of doors and hardware, leaving the remainder intact and in place.

- If possible, avoid modifying the bottom rails of glazed doors by utilizing the CHBC. If it is determined by the building official that the existing condition presents a hazard, add panels that can be removed in the future to preserve the original doors in place.

- Do not remove or infill mail slots; retain in place and fix in the closed position.

- Avoid replacing windows. If possible, modify a minimum number of existing windows with new interior ADA compliant hardware. If some window replacement is unavoidable, avoid replacing windows on the primary (south) façade or the courtyard façades.

- Avoid adding elevators and ramps, especially within the historic courtyard. The preferred option is the use of two Limited Use Limited Application (LULA) elevators that would make two stops on each floor to account for the varying floor levels. The LULA elevators shall be installed within the existing building envelope, in locations that will minimize material and visual impacts to the historic primary façade and courtyard.

These alterations would be incorporated as part of the design of Alternative 2. Therefore, both the voluntary seismic retrofit of the existing building and the ADA upgrade would meet the Secretary of the Interior's Standards for Rehabilitation, as required by the City. Further, the building code and energy efficiency upgrades would be similar in scope to the seismic retrofit and ADA upgrades described above. Therefore, these upgrades would also meet the Secretary of the Interior's Standards for Rehabilitation.

The following analysis evaluates the proposed seismic retrofit and ADA upgrades for compliance with the Standards for Rehabilitation if the design alterations proposed by Historic Resources Group, listed above, are not approved.

Standard 1: A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.

Alternative 2 does not propose to change the building's use. Therefore, Alternative 2 would meet Standard 1.

Standard 2: The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.

The proposed seismic retrofit would minimize potential impacts by adding new plywood shear paneling to the interior face of the walls, to avoid removal of the existing plaster; locating new shear walls to avoid closing existing window or door openings; and locating the new moment frames at the building interior, which is not character-defining. The exterior materials and configuration of the building would remain unaltered. The seismic upgrade would therefore meet Standard 2.

The ADA upgrade as proposed would potentially remove distinctive materials and alter features that characterize the property by modifying or replacing exterior doors on the east façade; adding panels to the floating stair risers; replacing existing stair handrails and balcony guardrails; widening all tenant doorways and replacing hardware; modifying the bottom rails of glazed doors; removing or infilling mail slots; and replacing some windows. The cumulative effect of these alterations would negatively impact the building's historic integrity and significance and would not meet Standard 2.

Standard 3: Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.

Alternative 2 does not propose to add conjectural features or elements from other historic properties. It would therefore meet Standard 3.

Standard 4: Changes to a property that have acquired significance in their own right will be retained and preserved.

Alternative 2 does not propose to alter or remove any changes to the property that have acquired significance in their own right. Therefore, Alternative 2 would meet Standard 4.

Standard 5: Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.

As noted under Standard 2 above, the proposed seismic retrofit would be accomplished without altering or eliminating distinctive materials, features, finishes, and construction techniques that characterize the building, and therefore would meet Standard 5. The recommended ADA upgrade, however, would modify or replace exterior doors on the east façade; add panels to the floating stair risers; replace existing stair handrails and balcony guardrails; widen all tenant doorways and replace hardware; modify the bottom rails of glazed doors; remove or infill mail slots; and replace some windows. Therefore, the ADA upgrade as proposed would not meet Standard 5.

Standard 6: Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

Alternative 2 does not propose to replace historic features of the existing building that would not be directly affected by the seismic retrofit or the ADA upgrade. Alternative 2 would therefore meet Standard 6.

Standard 7: Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

Alternative 2 does not propose chemical or physical treatments to historic materials that are not directly affected by the seismic retrofit or the ADA upgrade. Alternative 2 would therefore meet Standard 7.

Standard 8: Archaeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

If the owner identifies, protects, preserves, and/or documents potential archaeological resources that may be uncovered on the Project Site as recommended by a qualified archaeologist, Alternative 2 would meet Standard 8.

Standard 9: New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

As noted in the discussion of Standards 2 and 5 above, the proposed seismic retrofit project would not destroy historic materials and features that characterize the property and would meet Standard 9. The recommended ADA upgrade would modify or replace exterior doors on the east façade; add panels to the floating stair risers; replace existing stair handrails and balcony guardrails; widen all tenant doorways and replace hardware; modify the bottom rails of glazed doors; remove or infill mail slots; and replace some windows. The proposed addition of elevators could alter the building's profile by adding height and bulk that did not exist historically, in the form of elevator penthouses. The ADA upgrade as proposed would therefore not meet Standard 9.

Standard 10: New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

The proposed seismic retrofit would be undertaken in such a manner that only the building's interior, which is not character-defining, would be affected. The essential form and integrity of the building would be unimpaired. The seismic retrofit therefore meets Standard 10.

The recommended ADA upgrade, however, would permanently alter the essential form and integrity of the building by modifying or replacing exterior doors on the east façade; adding panels to the floating stair risers; replacing existing stair handrails and balcony guardrails; widening all tenant doorways and replacing hardware; removing or infilling mail slots; replacing some windows; and potentially altering the building's profile and massing by adding height and bulk in the form of elevator penthouses. The ADA upgrade as proposed would therefore not meet Standard 10, although the building would still be eligible for designation as an HCM.

With the design alterations proposed by Historic Resources Group, both the voluntary seismic retrofit of the existing building and the ADA upgrade would meet the Secretary of the Interior's Standards for Rehabilitation, as required by the City. Further, the building code and energy efficiency upgrades would be similar in scope to the seismic retrofit and ADA upgrades described

above. Therefore, these upgrades would also meet the Secretary of the Interior's Standards for Rehabilitation, and Alternative 2's impacts with respect to historic resources would be less than significant, and less than the Project's significant and unavoidable impact with respect to historic resources.

Further, with respect to the required ADA upgrade, under the California Historical Building Code (CHBC), the code for access for people with disabilities (Title 24, Part 2, Vol. 2, Chapter 11B), must be applied to qualified historical buildings or properties unless strict compliance with the regular code will threaten or destroy the historical significance or character-defining features of the building or property. *See* CHBC section 8-602.1. As detailed above, the required upgrades to bring the building into strict compliance with the code would not comply with the Standards and would therefore threaten or destroy the historical significance or character-defining features of the building. However, the CHBC allows alternative provisions for access when the historical significance or character-defining features of a qualified historical building are threatened. *See* CHBC section 8-602.2. These alternative provisions for access may be applied provided that (1) the alternative provisions are only applied on an item-by-item or a case-by-case basis, and (2) documentation is provided to the enforcing agency, including meeting minutes or letters, stating the reasons for the application of the alternative provisions. CHBC section 8-602.2.

It is too speculative to determine whether the enforcing agency would allow the applicant to apply alternative provisions for access to character-defining features of the building that would be impacted by the ADA upgrade. However, for purposes of this analysis, the City assumes that the enforcing agency would allow the applicant to apply alternative provisions for access on an item-by-item basis to character-defining features of the building that would be impacted by the ADA upgrade. With application of the alternative provisions for access provided for under the CHBC, the ADA upgrade would not destroy the historical significance or character-defining features of the building.

(c) Greenhouse Gas Emissions

(1) GHG Emissions Calculation

Alternative 2's construction activities described above are estimated to take approximately six months to complete. During this time, GHG emissions would be generated (refer to Table V-6) as a result of equipment used on-site as well as off-site activities, such as truck trips. As recommended by the SCAQMD, the total GHG construction emissions should be amortized over a 30-year lifetime of a project (i.e., total construction GHG emissions should be divided by 30 to determine an annual construction emissions estimate that can be added to the operational emissions) to determine a project's annual GHG emissions inventory.

Alternative 2 would also result in direct and indirect GHG emissions generated by the building's operations and its related vehicle trips. The emissions shown in Table V-6 are not "net" emissions that have been quantified by calculating the change in GHG emissions between the building's previous uses and its potential future uses. The emissions shown in Table V-6 are disclosed for informational purposes only.

Table V-6
Alternative 2 – Estimated GHG Emissions

Source	Metric Tons of CO_2e[a]
Construction	
2023	76.6
Total Construction Emissions	76.6
Amortized Over 30 Years	2.6
Operations (annual)	
Area Source(s)	<0.1
Energy Source(s)	58.6
Mobile Sources	365.6
Solid Waste	7.4
Water/Wastewater	7.9
Construction (from above)	2.6
Total Annual Emissions	442.1

[a] CO_2e was calculated using the CalEEMod 2020.4.0 model. Some figures may not add up properly due to rounding.

Source: Noah Tanski Environmental Consulting, 2023. Refer to Appendix H-6 of this Draft EIR.

(2) Plan Consistency

The Barry Building has been vacant since 2017. The Barry Building, as preserved via Alternative 2, would not be substantially different than what was vacated approximately five years ago, and the proposed seismic and ADA-related upgrades, such as the addition of elevators and plumbing improvements, would not introduce any new major direct or indirect sources of GHG emissions. Given the age of the Barry Building and its improvements, updates to its plumbing, electrical, glazing, and other systems/features would be made in accordance with the latest CALGreen and LA Green Building Code requirements, which would provide some measure of GHG emissions reductions via energy and water conservation. Nonresidential buildings built to the latest 2019 Title 24 Building Energy Efficiency Standards are expected to use about 30 percent less energy than nonresidential buildings built to the previous 2016 standards. Considering the age of the Barry Building, it is reasonable to anticipate that the upgrades and renovations proposed by Alternative 2 would improve its energy efficiency by greater than 30 percent.

Updating the Barry Building's lighting, glazing, plumbing, insulation, and other features to the latest CALGreen and LA Green Building Code Standards is one way that Alternative 2 would be consistent with the Climate Change Scoping Plan's actions and strategies to improve lighting efficiencies, reduce statewide electrical energy consumption, and reduce water consumption. The preservation and renewed operations of the Barry Building would also be consistent with the Scoping Plan's actions and strategies related to SB 375, as well as the GHG-reducing plans and strategies developed pursuant to SB 375. SCAG's 2020-2045 RTP/SCS, "Connect SoCal," is the latest plan to achieve CARB's GHG emissions reduction targets for the region, per SB 375. The land use pattern emphasized by the 2020-2045 RTP/SCS involves concentrating new housing,

employment, and other development in infill locations and high-quality transit areas (HQTAs) in an effort to reduce regional GHG emissions by facilitating alternative transportation modes and reducing VMT. The Project Site is located in a HQTA (as defined by the 2020-2045 RTP/SCS) and a "Pedestrian Enhanced District" (as defined by the City's Mobility Plan 2035). By enabling the renewed operations of the Barry Building, Alternative 2 would contribute to growth in a walkable community with ready access to transit infrastructure and would thus be consistent with the 2020-2045 RTP/SCS's land use pattern and smart growth policies. The Barry Building's location would provide the opportunity for employees and other users to utilize transit infrastructure to reduce vehicle trips and VMT. Further, the RTP/SCS encourages growth in low-intensity infill locations. Given that the Barry Building is currently vacant and inoperable, Alternative 2 would not merely add growth to a low-intensity infill location, but it would add growth to a no-intensity infill location. This could reduce demand for growth in urbanizing areas that likely possess fewer alternative transportation options and that may contribute to sprawl. For similar reasons, Alternative 2 would also be consistent with aspects of LA's Green New Deal that relate to development and mobility, such as targets to reduce VMT per capita and to increase the number of trips made by walking, biking, or transit.

In summary, Alternative 2 would not conflict with the Climate Change Scoping Plan and its updates, the 2020-2045 RTP/SCS, or LA's Green New Deal, which represent the GHG-reduction plans and policies that are most relevant to Alternative 2. Furthermore, renewed operations of the Barry Building would benefit from items such as SB 100's requirement for LADWP and other energy providers to supply 100 percent of electricity from renewable resources by 2045 and Corporate Average Fuel Economy ("CAFE") standards that establish increasing fuel efficiency standards for on-road vehicles. Given these considerations, Alternative 2's impacts with regard to climate change would be less than significant.

Compared to the Project, Alternative 2 would emit more GHG emissions on an ongoing basis because it proposes the renewed operations of the Barry Building. However, both the Project and Alternative 2 would be consistent with relevant GHG-reduction plans and policies and result in a less than significant impact with regard to climate change.

(d) Land Use and Planning

(i) SCAG 2020-2045 RTP/SCS

Like the Project, Alternative 2 does not involve the construction of any new uses at the Project Site. Instead, Alternative 2 involves the seismic retrofit, ADA, building code, and energy efficiency upgrades to the existing building, and re-occupancy of the existing building with retail uses. The land use pattern emphasized by the 2020-2045 RTP/SCS involves concentrating new housing, employment, and other development in infill locations and HQTAs in an effort to reduce regional GHG emissions by facilitating alternative transportation modes and reducing VMT. The Project Site is located in a HQTA (as defined by the 2020-2045 RTP/SCS) and a "Pedestrian Enhanced District" (as defined by the City's Mobility Plan 2035). By enabling the renewed operations of the Barry Building, Alternative 2 would contribute to growth in a walkable community with ready access to transit infrastructure and would thus be consistent with the 2020-2045 RTP/SCS's land

use pattern and smart growth policies. The Barry Building's location would provide the opportunity for employees and other users to utilize transit infrastructure to reduce vehicle trips and VMT. Therefore, Alternative 2 would be consistent with the 2020-2045 RTP/SCS and this impact would be less than significant.

(ii) City of Los Angeles General Plan

Alternative 2's consistency with the applicable objectives and policies of the General Plan is discussed below in Table V-7.

Table V-7
Alternative 2 Consistency with Applicable Policies of the General Plan

Objectives and Policies	Alternative 2 Consistency
Framework Element	
3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	**No Conflict.** Alternative 2 includes the preservation of the Barry Building, including the central courtyard, which would promote pedestrian and bicycle access into the Project Site,
3.8.1: Accommodate the development of neighborhood-serving uses in areas designated as "neighborhood district." The range and densities of uses permitted in any area shall be identified in the community plans.	**No Conflict.** Alternative 2 includes the re-occupation of the Barry Building with 12,800 square feet of retail uses that would serve the surrounding neighborhood, on a site with a land use designation of Neighborhood Office Commercial.
3.8.2: Encourage the retention of existing and development of new commercial uses that primarily are oriented to the residents of adjacent neighborhoods and promote the inclusion of community services (e.g., child care and community meeting rooms).	**No Conflict.** Alternative 2 includes the retention of the Barry Building, including the re-occupation of the building with 12,800 square feet of new retail uses. While the tenants that could occupy the building under Alternative 2 are unknown, it is likely that they would be uses that would serve the residents of the adjacent neighborhoods.
Conservation Element	
Cultural and historical objective and policy: Objective: protect important cultural and historical sites and resources for historical, cultural, research, and community education purposes. Policy: continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities.	**No Conflict.** Whereas the Project involves the demolition of the Barry Building, which the City of Los Angeles designated as HCM No. LA-887 in 2007, Alternative 2 involves the preservation of the existing building. Further, as discussed above under "Cultural Resources," the work performed on the building under Alternative 2 would not impact the historic significance of the existing building, as long as Alternative 2 includes the recommendations provided by Historic Resources Group (in the memo contained in Appendix H-7 of this Draft EIR). Therefore, Alternative 2 would not conflict with this objective.
Air Quality Element	
4.2.2: Improve accessibility for the City's residents to places of employment, shopping centers, and other establishments.	**No Conflict.** Alternative 2 includes the re-occupation of the Barry Building with 12,800 square feet of retail uses, which would provide residents of surrounding areas with places of employment and places to shop.
Source: City of Los Angeles General Plan.	

As provided above, Alternative 2 would be substantially consistent with the applicable policies of the General Plan and therefore, Alternative 2's impacts would be less than significant.

(iii) Brentwood – Pacific Palisades Community Plan

Alternative 2's consistency with applicable policies contained in the Brentwood – Pacific Palisades Community Plan is provided below in Table V-8.

Table V-8
Alternative 2 Consistency with Applicable Goals, Objectives, and Policies of the Brentwood-Pacific Palisades Community Plan

Policy	Alternative 2 Consistency
Objective 1-4: To preserve and enhance neighborhoods with a distinctive historic character. **Policy 1-4.1:** Protect and encourage reuse of the area's historic resources. **Policy 1-4.2:** Preserve architecturally or historically significant features and incorporate such features as an integral part of new development when appropriate.	**No Conflict.** Unlike the Project, Alternative 2 involves the preservation of the existing building, which is City HCM No. LA-887. Further, as discussed above under "Cultural Resources," the work performed on the building under Alternative 2 would not impact the historic significance of the existing building, as long as Alternative 2 includes the recommendations provided by Historic Resources Group (in the memo contained in Appendix H-7 of this Draft EIR). Therefore, Alternative 2 would not conflict with the objective and policies calling for historic preservation.
Policy 2-1.1: New commercial uses shall be located in existing established commercial areas or shopping centers.	**No Conflict.** Alternative 2 includes the re-occupation of the Barry Building with 12,800 square feet of new commercial (retail) uses, located along an established commercial area on San Vicente Boulevard.
Policy 2-3.5: Require that the first-floor street frontage of structures, including mixed-use projects and parking structures located in pedestrian oriented districts, incorporate commercial uses directed at pedestrian traffic.	**No Conflict.** Alternative 2 includes the re-occupation of the Barry Building with 12,800 square feet of retail uses. Therefore, the ground floor uses that front San Vicente Boulevard would be directed at pedestrian traffic.
Policy 2-4.2: Preserve community character, scale, and architectural diversity.	**No Conflict.** Alternative 2 involves the preservation of the existing building, which is City HCM No. LA-887. Therefore, Alternative 2 would preserve community character and architectural diversity.
Policy 2-4.4: Landscape corridors should be created and enhanced and maintained through the planting of street trees.	**No Conflict.** While Alternative 2 would not result in the planting of new street trees, the two existing street trees located adjacent to the Project Site along San Vicente Boulevard would be retained.
Goal 17: A community which preserves and restores the monuments, cultural resources, neighborhoods, and landmarks which have historic and/or cultural significance. **Objective 17-1:** To ensure that the Plan Area's significant cultural and historic resources are protected, preserved, and/or enhanced. **Policy 17-1.1:** Identify all designated City of Los Angeles Historic and Cultural Monuments in order to foster public appreciation of the City of Los	**No Conflict.** Unlike the Project, Alternative 2 involves the preservation of the existing building, which is City HCM No. LA-887. Further, as discussed above under "Cultural Resources," the work performed under Alternative 2 would not impact the historic significance of the existing building, as long as Alternative 2 includes the recommendations provided by Historic Resources Group (in the memo contained in Appendix H-7 of this Draft EIR). Therefore, Alternative 2 would not conflict with this goal, objective, and policy calling for historic preservation.

Table V-8
Alternative 2 Consistency with Applicable Goals, Objectives, and Policies of the Brentwood-Pacific Palisades Community Plan

Policy	Alternative 2 Consistency
Angeles' valuable historic resources and to promote education of the public.	
Policy 17-1.2: Protect and preserve archaeological sites of Native Americans.	**No Conflict.** As discussed in Section IV.G, Tribal Cultural Resources, of this Draft EIR, in response to a sacred lands file search conducted with the NAHC, the NAHC indicated that no sacred lands or sites are documented within the Project area. In addition, the Tribal Cultural Resources Report prepared for the Project concluded that the Project Site has a low sensitivity for containing unknown tribal cultural resources. Like the Project, Alternative 2 would comply with the City's standard condition of approval for the inadvertent discovery of tribal cultural resources. Therefore, Alternative 2 would not conflict with this policy.
Source: City of Los Angeles, Brentwood-Pacific Palisades Community Plan, adopted June 1998.	

As shown above, Alternative 2 would be substantially consistent with the applicable policies of the Brentwood – Pacific Palisades Community Plan. Alternative 2 would be consistent with these policies as Alternative 2 includes the preservation of the existing building and the re-occupation of the building with retail uses. Further, the work proposed for Alternative 2 (voluntary seismic retrofit and ADA, building code, and energy efficiency upgrades) would not impact the historic significance of the existing building with the recommendations provided by Historic Resources Group (in the memo contained in Appendix H-7 of this Draft EIR). Overall, Alternative 2's land use impacts related to consistency with the Brentwood – Pacific Palisades Community Plan would be less than significant.

(iv) San Vicente Scenic Corridor Specific Plan

Alternative 2's consistency with applicable policies contained in the San Vicente Scenic Corridor Specific Plan is provided below in Table V-9.

Table V-9
Alternative 2 Consistency with Applicable Provisions of the San Vicente Scenic Corridor Specific Plan

Provision	Alternative 2 Consistency
5.D.: Ground Floor Frontage Uses 1. On lots located on streets specified in Subsection D4 of this Section, at least 80% of the Ground Floor Frontage shall contain the following uses: a. Retail Sales. b. Personal Services. c. Restaurants and Bars. d. Signs. e. Parks and Plazas. f. Driveways, when no other means of access to parking exists or for the purpose of providing access to parking for a supermarket which contains a gross floor area exceeding 10,000 square feet. g. Pedestrian Entrances, which are not more than 15 linear feet in width or 15% of the linear frontage of the structure, whichever is greater. h. Schools. i. Libraries.	**No Conflict.** The Project Site is located on the north side of San Vicente Boulevard, which is one of the streets specified in Subsection D4. As part of Alternative 2, the existing building would be re-occupied entirely with retail uses. Therefore, the entire ground floor frontage would contain retail uses and Alternative 2 would be consistent with this provision.
9.A.1: Sidewalks abutting San Vicente Boulevard shall be at least 12 feet in width and maintain a minimum unobstructed width of 10 feet for pedestrian access.	**No Conflict.** The existing sidewalk along San Vicente Boulevard is at least 12 feet in width, with a minimum unobstructed width of 10 feet for pedestrian access. The existing sidewalk abutting San Vicente Boulevard would not be altered as part of Alternative 2.
9.B.1: Open Space Uses The required open space shall contain one or more of the following amenities: a. Plaza b. Seating c. Landscaping d. Bicycle Racks e. Outdoor café f. Tables for outdoor eating g. Other uses similar to a-f above	**No Conflict.** Alternative 2 includes the preservation of the existing building, including the landscaped central courtyard, which would be similar to a plaza. Therefore, Alternative 2 would be consistent with this provision.
12.A.4: Parking A garage or off-street parking area shall be provided in connection with and at the time of erection of each new commercial structure or at the time any existing commercial structure is enlarged or increased in floor area or seating capacity, or when any building is converted from a more restrictive use to a commercial uses. The following minimum parking requirements shall apply to new structures, conversions and to the net additional floor area added to an existing structure: 4. For buildings or premises occupied by any other commercial use, one space shall be required for each 300 square feet of gross floor area.	**No Conflict.** Per LAMC Section 12.21 A.4 (x)(2), parking for the rehabilitated Barry Building may, in the City's discretion, remain the same as the parking currently existing on the parcel where the Barry Building is located.

Table V-9
Alternative 2 Consistency with Applicable Provisions of the San Vicente Scenic Corridor Specific Plan

Provision	Alternative 2 Consistency
13.B: Temporary construction fences required by the Los Angeles Municipal Code shall be painted a single earth tone color.	**No Conflict.** The construction fence placed around the Project Site would be painted a single earth tone color.
Source: San Vicente Scenic Corridor Specific Plan.	

As provided above, Alternative 2 would be substantially consistent with the applicable policies of the San Vicente Scenic Corridor Specific Plan and therefore, Alternative 2's impacts would be less than significant.

(v) Los Angeles Municipal Code

The Project Site is zoned C4-1VL (Commercial Zone, Height District 1VL). The Commercial Zone permits a range of commercial uses including retail and office uses. Within Height District 1VL, the C4 zone allows for a building height maximum of up to 45 feet and establishes an FAR of 1.5:1. Alternative 2 does not involve the construction of any new uses at the Project Site, and only the re-occupancy of the existing building with retail uses, which would be consistent with the existing zoning for the Project Site. Therefore, Alternative 2 would not conflict with the existing zoning, and no impact would occur.

(vi) Conclusion

As described above, Alternative 2 would be substantially consistent with the applicable plans and policies adopted for the purpose of avoiding or mitigating an environmental effect, and Alternative 2 would not result in any changes to the General Plan land use designation and zoning regulations applicable to the Project Site. Further, Alternative 2 would not conflict with policies related to historic preservation, as Alternative 2 involves the preservation of the existing building and would not affect the historic significance of this building with the recommendations provided by Historic Resources Group (in the memo contained in Appendix H-7 of this Draft EIR). Therefore, Alternative 2's impacts with respect to land use and planning would be less than significant, and less than the Project's significant and unavoidable land use impact.

(e) Noise

(i) Construction Noise

Noise would be generated during Alternative 2's approximate six months of construction activities. Noise-generating activities could occur at the Project Site between 7:00 A.M. and 9:00 P.M. Monday through Friday, in accordance with LAMC Section 41.40(a). On Saturdays, construction would be permitted to occur between 8:00 A.M. and 6:00 P.M. No construction is permitted on Sundays. Because Alternative 2's construction activities would last more than ten days in a three-

month period, the applicable threshold of significance for noise impacts is an increase of 5 dBA over existing ambient noise levels.

Alternative 2 would involve a range of construction activities. Prior to all other work, asbestos abatement would be required. This would involve the removal of asbestos-containing building materials from the Barry Building and hauling it to an off-site landfill that accepts friable asbestos waste. Asbestos abatement would require the onsite use of powered hand tools and other electric or pneumatic equipment, but no heavy-duty off-road construction vehicles. After asbestos abatement, the preservation, seismic, ADA, building code, and energy efficiency upgrades would be performed. This activity would require a variety of construction equipment such as truck-mounted cranes, forklifts, welding tools, and powered hand tools. Finishing activities would require paving equipment to pave surfaces and air compressors to apply architectural coatings. None of these activities would require the types of heavy-duty off-road demolition vehicles that are required (and analyzed) under the Project scenario. Further, equipment for these activities would be utilized on an intermittent to sporadic basis and would not have the potential to result in exceedances of the LAMC Section 112.05 75 dBA at 50 feet noise threshold or the City's 5 dBA significance threshold as measured over the course of any construction workday. Nevertheless, to minimize Alternative 2's construction-related noise increases at 11900 Saltair Terrace and other sensitive receptors, the following mitigation measure is recommended:

ALT2 MM-1 Sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along the following boundaries:

- The east and west parking area boundaries (both the Project Site's east and west parking area boundaries and the east and west boundaries of the parcel immediately to the north of the Project Site (APN 4404-025-016)). (While the parcel to the north of the Project Site is not part of either the Project or Alternative 2, that parcel would be used for construction staging.)

- The northern property line of the parcel to the north of the Project Site (APN 4404-025-016) that separates this parcel from the residential uses to the north. Sound barriers along this property line shall be connected to the sound barriers described for the east and west property lines, so that all of Alternative 2's construction areas are fully enclosed by sound barriers.

The sound barriers shall be tall enough to shield line of sight paths from operating construction equipment to the 2nd stories of nearby residential uses. The prescribed sound barriers shall be installed for the duration of Alternative 2's construction activities.

The sound attenuation (i.e., the performance standard) of ALT2 MM-1 would equal the sound attenuation achieved by mitigation required for the Project. Alternative 2 and the Project would therefore both result in less than significant construction noise impacts. Because Alternative 2 would result in reduced daily noise levels as compared to the Project based on the different profile of construction equipment, and because its noise impacts would be mitigated to the same extent

as the Project's noise impacts, Alternative 2 would result in lower daily noise impacts at 11900 Saltair Terrace and other sensitive receptors than the Project, which itself is estimated to result in a maximum 1.1 dBA impact. However, the difference between noise increases under Alternative 2 or the Project are unlikely to be noticeable, because any difference would be below the 3 dBA threshold of perception for humans. It should be noted that while the Project would last an estimated 37 days, Alternative 2 is anticipated to last approximately six months. Thus, Alternative 2 would expose sensitive receptors to construction noises for a far greater duration than the Project.

Concerning off-site construction noise sources, trucks and other construction-related vehicles would access the Project Site over the course of all construction phases. However, no phase would be anticipated to generate more than five construction truck trips per hour. The addition of a maximum of five construction truck trips per hour to San Vicente Boulevard would not have a discernible effect on roadside ambient noise levels, much less a 5 dBA L_{eq} increase over the course of a workday. As explained in the Project analysis (contained in Section IV.E. of this Draft EIR), an approximate doubling of traffic volumes is required to increase traffic noise levels by 3 dBA. Because construction trucks emit more noise than passenger vehicles, a 19.1 passenger car equivalency (PCE) is used to convert construction truck trips to a passenger car equivalent. In this way, five construction truck trips per hour would be similar in noise to approximately 96 passenger car trips per hour. Because San Vicente Boulevard is a major arterial roadway that carries more than a thousand vehicles per hour during the daytime hours in which Alternative's 2 construction activities would take place, the maximum 96 PCE trips per hour generated by Alternative 2's construction trucks would not be capable of doubling traffic on San Vicente Boulevard and causing noise increases in excess of 3 dBA, let alone increases in excess of the 5 dBA threshold of significance. Therefore, Alternative 2's impact from off-site construction noise sources would be less than significant.

Neither the Project nor Alternative 2 would generate substantial noise increases due to off-site noise sources such as construction trucks. Alternative 2 would generate a greater number of off-site construction trips than the Project and would presumably result in greater off-site noise impacts than the Project as a result. However, it is unlikely that any difference in impact would be noticeable because the threshold of perception for humans is a 3 dBA difference. The difference in noise impacts would be far less than this 3 dBA threshold.

(ii) Construction Vibration

Alternative 2 would not require heavy-duty construction vehicles or impact equipment (e.g., pile drivers, hydraulic breakers, etc.) capable of generating substantial ground-borne vibration levels. The types of forklifts, hand tools, and other on-site construction equipment required by Alternative 2 are not identified by the FTA as being substantial sources of ground-borne vibration with the potential to result in architectural damage at nearby structures or substantial human annoyance. As a result, the on-site operations of this equipment would not cause architectural damage to structures near the Project Site or substantial annoyance to residential occupants in the vicinity

of the Project Site, and Alternative 2's vibration impacts as generated by on-site construction activities would be less than significant.

Neither the Project nor Alternative 2 would generate potentially damaging or substantially annoying levels of construction-related ground-borne vibration at nearby structures and residences. However, ground-borne vibration generated by Alternative 2 would be less than the Project, as Alternative 2 would not utilize heavy-duty off-road demolition vehicles.

As discussed earlier, Alternative 2 would generate a maximum of five construction truck trips per hour to and from the Project Site. Buildings situated along the truck route could be exposed to ground-borne vibrations from these vehicles. Based on FTA data, the vibration generated by a typical heavy-duty truck would be approximately 0.076 inches per second PPV at a distance of 25 feet from the truck. This is below the FTA's most stringent 0.12 inches per second PPV threshold for buildings that are extremely susceptible to vibration. As a result, Alternative 2's construction trucks and other on-road construction vehicles would not expose any roadside building to potentially damaging levels of ground-borne vibration.

Regarding human annoyance, both the FTA and Caltrans note that vehicles, even buses and trucks, are rarely a source of perceptible ground-borne vibrations. The analysis for the Project (included in Section IV.E. of this Draft EIR) details why haul trucks and other construction vehicles traveling off-site on local roadways would not be expected to expose roadside land uses to ground-borne vibrations of such an intensity and frequency that substantial human annoyance may result. Given these considerations, Alternative 2's human annoyance-related ground-borne vibration impact from off-site sources would be less than significant.

Neither the Project nor Alternative 2 would expose roadside land uses to substantial ground-borne vibration levels associated with architectural damage and substantial human annoyance. Impacts would be similar under either scenario.

(iii) Operational Noise

On-site operational sources of noise associated with Alternative 2 would mainly consist of mechanical systems and auto-related activities. Given the Barry Building's distances to sensitive residential receptors, elevated surrounding ambient noise levels, and the relatively quiet operation of modern HVAC systems, it is unlikely that any new rooftop-mounted HVAC equipment installed per Alternative 2 would be capable of increasing off-site noise levels by a discernable degree. Furthermore, many surrounding land uses, both commercial and residential, also contain rooftop-mounted HVAC equipment. Regarding auto-related noises (e.g., doors slamming, engines starting, etc.), these intermittent noises would not contribute to substantial noise increases. According to FTA equations for the prediction of parking facility noise impacts, a facility with an hourly activity of 43 vehicles would be expected to result in a noise level of just 43 dBA L_{eq}. As noise levels at the nearest and most-sensitive residential receptors are approximately 55 dBA L_{eq} or greater, the addition of auto-related noise from Alternative 2's parking facilities would have a nominal effect on surrounding ambient noise levels; noise increases at sensitive receptors would be far less than 1 dBA. The off-site effect of Alternative 2's auto-related noises due to trip

generation would be even less. Generally, a minimum 3 dBA CNEL increase in roadside noise levels requires an approximate doubling of traffic volumes. Reasonably, the renewed operations of the Barry Building would not cause traffic volumes to double on San Vicente Boulevard or any other nearby roadway that employees and users may utilize when accessing the site. Operations would add well-below 100 trips per hour to roadways with hundreds to thousands of existing trips per hour. Measurable noise increases, if any, would be just fractions of a decibel.

Overall, the Barry Building as preserved by Alternative 2 would be located in an urbanized area with a mix of land uses that include numerous other multi-story commercial uses fronting San Vicente Boulevard. The renewed operations of the Barry Building would not alter the noise environment of its surroundings by a substantial degree – far below the minimum 3 dBA CNEL increase criteria that may represent a significant impact. As a result, Alternative 2's impact from operational noise sources would be less than significant.

Neither the Project nor Alternative 2 would cause substantial noise increases due to operations. However, because Alternative 2 proposes the renewed operations of the Barry Building, it would naturally result in a greater operational noise impact than the Project, which proposes to demolish the Barry Building.

(iv) Operational Vibration

Renewed operations of the existing building would not involve the use of heavy equipment or industrial operations capable of generating substantial groundborne vibrations. Related vehicle travel would not be considered a significant source of vibration because vehicle travel rarely generates perceptible groundborne vibrations. As a result, Alternative 2's potential to generate excessive groundborne vibration levels due to its operations would be considered less than significant.

Neither the Project nor Alternative 2 would cause generate substantial or perceptible ground-borne vibrations due to operations.

(f) Transportation

(i) Plan Consistency

Alternative 2 involves the voluntary seismic retrofit, and ADA, building code, and energy efficiency upgrades of the existing building and would therefore not trigger the requirement for additional review pursuant to the City of Los Angeles Transportation Assessment Guidelines screening criteria for the following reasons. First, Alternative 2 would not require the decision maker to find that it substantially conforms to the purpose, intent, and provisions of the General Plan. Second, Alternative 2 would not directly conflict with a transportation plan, policy, or program adopted to support multi-modal transportation options or public safety. Third, while Alternative 2 would widen the sidewalk along the eastern façade to five feet to meet ADA requirements, this would not conflict with a transportation plan, policy, or program adopted to support multi-modal

transportation options or public safety.[6] Therefore, a less than significant impact would occur as a result of Alternative 2, which would be greater than the Project's impact.

(ii) Vehicle Miles Traveled

Upon completion of the voluntary seismic retrofit, and ADA, building code, and energy efficiency upgrades, Alternative 2 would involve the re-occupancy of the existing building with approximately 12,800 square feet of retail uses. According to LADOT's Transportation Assessment Guidelines, small-scale or local serving retail uses are assumed to have less than significant VMT impacts.[7] As Alternative 2 only includes 12,800 square feet of retail uses, no further analysis with respect to VMT is required, and Alternative 2's impacts would be less than significant, but greater than the Project's impact based on the inclusion of an operational component for Alternative 2.

(iii) Design Feature Hazards

The roadways adjacent to the Project Site are part of the existing roadway network and contain no sharp curves or dangerous intersections. In addition, implementation of Alternative 2 would not result in roadway improvements, and no safety hazards would be introduced to the existing roadway network. Further, no new driveways are proposed. Thus, Alternative 2 would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment), and no impact would occur, similar to the Project.

(iv) Emergency Access

Like the Project, Alternative 2 would implement PDF-TRA-1 (Construction Management Plan) during the construction activities proposed as part of this alternative. With implementation of PDF-TRA-1, these construction activities would not create hazards for roadway travelers, bus riders, or parkers, as procedures and other measures (e.g., to address temporary traffic control, lane closures, sidewalk closures, etc.) would be incorporated into the Construction Management Plan. As discussed below, construction-related impacts associated with access (including emergency access) to other businesses and transit would be less than significant.

Construction activities would primarily be contained within the Project Site boundaries. All construction equipment would be staged entirely on-site or delivered on an as-needed basis. However, temporary closures of the sidewalks adjacent to the Project Site could be required. Temporary traffic controls (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths, and/or providing overhead covering) would be provided to direct

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6 It appears that there is only a two-foot wide sidewalk between the building and the driveway. However, it is unlikely that the sidewalk can be widened into the driveway, as the driveway is only 16.5 feet wide and is already too narrow.

7 According to LADOT's Transportation Assessment Guidelines, retail projects that fall under 50,000 square feet are considered local serving.

pedestrians safely around any closures and maintain safe pedestrian access along San Vicente Boulevard, as required in the Construction Management Plan (PDF-TRA-1). The temporary traffic controls would be provided to maintain a safe pedestrian route to the nearby Brentwood Science Magnet School. Construction activities would not result in bicycle lane or vehicular travel lanes closures along San Vicente Boulevard. Thus, bicycle and vehicular operations along San Vicente Boulevard adjacent to the Project Site would be maintained. In addition, emergency access in the vicinity would not be affected by Alternative 2's construction activities, and Alternative 2's impacts with respect to emergency access during construction would be less than significant.

During operation of Alternative 2, vehicular access to the Project Site would be maintained from the existing driveway at the eastern portion of the Project Site on San Vicente Boulevard. Alternative 2 would also not include the installation of barriers that could impede emergency vehicle access both during and post-construction. Drivers of emergency vehicles are also trained to utilize center turn lanes, or travel in opposing through lanes (on two-way streets) to pass through crowded intersections or streets. Accordingly, the respect entitled to emergency vehicles and driver training allows emergency vehicles to negotiate typical street conditions in urban areas. As such, emergency access to the Project Site and surrounding area would be maintained both during and post-construction. Therefore, Alternative 2 would not result in inadequate emergency access during construction or operation, and, as such, impacts to emergency access as a result of Alternative 2 would be less than significant, but greater than the Project due to the inclusion of an operational component of Alternative 2.

(f) Tribal Cultural Resources

The Project Site is located in an urbanized area of the City and has been disturbed by past development activities. Alternative 2 involves the work required to comply with the City's Soft Story Ordinance, as well as the voluntary seismic retrofit and ADA, building code, and energy efficiency upgrades of the existing building as described above.

As discussed in Section IV.G (Tribal Cultural Resources) of this Draft EIR, there are no known tribal cultural resources within the Project Site. Like the Project, Alternative 2 would only disturb soils that have been previously disturbed by past development activities. The City has established a standard condition of approval to address the inadvertent discovery of tribal cultural resources. The condition requires that in the event a potential tribal cultural resource is discovered in the Project Site during ground-disturbing activities, all ground-disturbing activities temporarily cease until it is determined whether the discovery is a tribal cultural resource and appropriate treatment is determined through consultation with a California Native American tribe on the City's AB 52 list and with a qualified archaeologist. Therefore, Alternative 2's impacts with respect to tribal cultural resources would be less than significant.

(3) Summary of Impacts

As demonstrated above, all of Alternative 2's impacts would be less than significant, including with respect to historical resources and land use. The Project would result in significant and unavoidable impacts with respect to historical resources and land use, as the Project would

demolish the existing building, which is City HCM No. LA-887. As Alternative 2 involves the preservation of the existing building, Alternative 2 would avoid the Project's significant and unavoidable impacts with respect to historical resources and land use. However, as Alternative 2 includes an operational component (the re-occupancy of the building with commercial uses), Alternative 2 would result in greater operational impacts than the Project with respect to air quality, greenhouse gas emissions, noise, and traffic, although these impacts would still be less than significant.

(4) Relationship of Alternative 2 to the Project Objectives

As demonstrated in the analysis provided above, Alternative 2 would meet both of the Project objectives:[8]

1. Comply with the City's Soft Story Retrofit Program (LAMC Section 91.9300 et seq., Ordinance entitled Mandatory Earthquake Hazard Reduction in Existing Wood Frame Buildings with Soft, Weak or Open Front Walls), which includes complying with the requirements under LAMC Section 91.9305.2.
2. Abate fire, loitering, vandalism, and other public safety hazards associated with structural defects and current vacancy of the Barry Building.

c) Alternative 3: Partial Preservation with New Construction Alternative

(1) Description of the Alternative

Alternative 3 includes the partial preservation of the existing building with new construction on the remaining portion of the Project Site. Specifically, Alternative 3 would preserve the south, east, and west wings of the building, the courtyard, and the south façade of the north wing. However, Alternative 3 would involve demolition of the building volume behind the south façade of the north wing. Alternative 3 would also include the work required to comply with the City's Soft Story Ordinance, as well as the voluntary seismic retrofit (see Appendix H-2 of this Draft EIR for a discussion of the work required to comply with the Soft Story Ordinance and the voluntary seismic retrofit), and ADA (see Appendix H-5 of this Draft EIR for a discussion of work need to comply with ADA requirements),[9] building code, and energy efficiency upgrades, as described above for Alternative 2, to the preserved portion of the existing building. In addition, Alternative 3 would include the construction of a new building behind (north of) the existing building. The new building would be approximately 10,815 square feet in three stories (approximately 3,605 square feet per level). In total, Alternative 3 would include approximately 19,771 square feet of office and retail uses, consisting of 8,956 square feet of retail uses in the existing building and 10,815 square feet of office uses in the new building. Per LAMC Section 12.21 A.4 (x)(2), parking for the rehabilitated

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[8] The EIR is not analyzing the economic feasibility of Alternative 2.

[9] It appears that there is only a two-foot wide sidewalk between the building and the driveway. However, it is unlikely that the sidewalk can be widened into the driveway, as the driveway is only 16.5 feet wide and is already too narrow.

Barry Building may, in the City's discretion, remain the same as the parking currently existing on the parcel where the Barry Building is located. However, that LAMC section may not apply to the parking required for the new floor area constructed behind the Barry Building. The San Vicente Scenic Corridor Specific Plan requires one parking space per 300 square feet of commercial space. Therefore, the new building would require approximately 36 parking spaces. However, there would only be room for approximately 15 parking spaces on the Project Site (APN 4404-025-008) under Alternative 3. Therefore, to be conservative, the following impact analyses assumed that the City may need to grant a parking variance in case additional parking is required. While an adjacent parcel (APN 4404-025-016) has been used for parking in the past, there is no covenant or lot tie as a matter of record for parcels 4404-025-008 and 4404-025-016, and parcel 4404-025-016 is not part of the HCM designation for the Barry Building. Therefore, this parcel could not be used for parking. Figure V-7 at the end of this section provides a conceptual site plan for Alternative.

This work would be performed over an approximate seven-month period. Asbestos abatement activities, which would take place prior to all other work, are anticipated to last two weeks. Performing the additional preservation measures, as well as constructing the new office building, is estimated to take approximately seven months. Finishing activities, such as paving and application of architectural coatings, would take approximately one week each.

(2) Environmental Impacts

(a) Air Quality

(i) Construction

Alternative 3 involves the partial preservation of the Barry Building (including the voluntary seismic retrofit, and ADA, building code, and energy efficiency upgrades) and the construction of a new, approximately 10,815 square foot office building behind (north of) the Barry Building.

Regional emissions were quantified for Alternative 3's construction activities using CalEEMod and then compared to SCAQMD regional daily emissions thresholds. As shown in Table V-10, below, Alternative 3's construction activities would not produce VOC, NO_X, CO, SO_X, PM_{10} and $PM_{2.5}$ emissions that exceed SCAQMD regional daily thresholds for these pollutants. The regional emission levels shown in Table V-10 represent the highest daily emissions projected to occur during Alternative 3's construction activities. Because Alternative 3's construction emissions would not exceed SCAQMD's regional daily thresholds for project-specific impacts, Alternative 3 also would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment (i.e., ozone, PM_{10}, $PM_{2.5}$). This is because the SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed utilizing the same significance criteria as those for project-specific impacts. In short, because Alternative 3 would not generate regional daily construction emissions in excess of SCAQMD thresholds, Alternative 3's project-specific and cumulative impact on regional air quality would be considered less than significant.

Localized (on-site) emissions were also quantified for Alternative 3's construction activities. Maximum on-site daily construction emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ were calculated using CalEEMod and compared to the applicable SCAQMD LSTs for the Northwest Coastal LA SRA No. 2 based on construction site acreage that is less than or equal to one acre. Potential impacts were evaluated at a distance of 25 meters, which is the shortest distance utilized in SCAQMD LST guidance documents. As shown in Table V-10, emissions generated during Alternative 3's construction activities would not exceed the localized thresholds for NO_2, CO, $PM_{10,}$ and/or $PM_{2.5}$ emissions. Therefore, impacts on localized air quality as a result of Alternative 3 are considered less than significant.

Neither the Project's construction emissions nor Alternative 3's construction emissions would have a significant impact on regional or localized air quality. However, Alternative 3 would result in greater maximum daily construction emissions than the Project, both regionally and locally. Alternative 3 would also generate construction emissions over a much longer period than the Project. Whereas the Project would take an estimated 37 days to complete, Alternative 3 would require approximately seven months.

Table V-10
Alternative 3 - Estimated Daily Construction Emissions (Unmitigated)

Construction Phase[A]	Daily Emissions (Pounds Per Day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Regional Emissions						
Asbestos Abatement	0.6	5.0	6.9	<0.1	0.4	0.3
Partial Demolition	1.3	10.8	15.8	<0.1	0.8	0.6
Grading	1.2	11.8	10.8	<0.1	3.5	2.0
Building Construction[B]	2.5	21.8	23.1	<0.1	1.0	1.0
Paving	1.4	5.5	7.7	<0.1	0.3	0.3
Architectural Coating	37.6	1.3	2.0	<0.1	0.1	0.1
Maximum Regional Emissions	37.6	21.8	23.1	<0.1	3.5	2.0
Regional Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
Asbestos Abatement	0.6	4.5	6.1	<0.1	0.3	0.2
Partial Demolition	1.2	10.1	15.2	<0.1	0.7	0.5
Grading	1.2	11.8	10.4	<0.1	3.5	2.0
Building Construction[B]	2.5	21.5	22.6	<0.1	1.0	1.0
Paving	0.8	5.5	7.0	<0.1	0.3	0.2
Architectural Coating	37.6	1.3	1.8	<0.1	0.1	0.1
Maximum Localized Emissions	37.6	21.5	22.6	<0.1	3.5	2.0
Localized Significance Threshold[C]	N/A	103	562	N/A	4	3
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Table V-10
Alternative 3 - Estimated Daily Construction Emissions (Unmitigated)

[A] A January 2023 starting date was chosen to estimate Alternative 3's construction activities, but Alternative 3 does not have a pre-determined starting date as of the time of this analysis. A different starting date would have a nominal effect on emissions projections.

[B] "Building Construction" would consist of performing the proposed preservation measures for the Barry Building, as well as constructing the new office building.

[C] Localized Significance Thresholds based on one-acre site with 25-meter distance to nearest sensitive receptors in the Northwest Coastal LA County monitoring area. This is the shortest distance used for analysis in the LST guidance methodology.

Source: Noah Tanski Environmental Consulting, 2023, based on CalEEMod 2020.4.0 model runs (included in Appendix H-8 of this Draft EIR).

(ii) Operation

Localized and regional emissions were also estimated for Alternative 3's operations. As shown below in Table V-11, operations of the retained portion of the Barry Building and the proposed office building as leasable space for retail, commercial, and/or office tenants would not introduce any new major sources of air pollution; emissions would not exceed SCAQMD regional significance thresholds for, VOC, NO_X, CO, PM_{10}, and $PM_{2.5}$, nor would they exceed SCAQMD LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$. As a result, Alternative 3's operational impacts on regional and localized air quality would be considered less than significant. Note that the emissions shown in Table V-11 are not "net" emissions that have been quantified by calculating the change in emissions between the building's previous uses and its potential future uses. The building's previous uses, and what their operational emissions might have been, have not been considered in this particular analysis.

Neither the Project's operational emissions nor Alternative 3's operational emissions would result in a significant impact on regional or localized air quality. However, Alternative 3 would result in greater daily operations emissions than the Project, both regionally and locally.

Table V-11
Alternative 3 - Estimated Daily Operational Emissions (Unmitigated)

Emissions Source	Daily Emissions (Pounds Per Day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area	0.4	<0.1	<0.1	<0.1	<0.1	<0.1
Energy	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Mobile Sources	1.2	1.1	10.2	<0.1	2.3	0.6
Project Regional Emissions	1.6	1.2	10.3	<0.1	2.3	0.6
Regional Daily Thresholds	55	55	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Project Localized Emissions	0.4	<0.1	<0.1	<0.1	<0.1	<0.1
Localized Significance Thresholds	N/A	103	562	N/A	1	1
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

Localized Significance Thresholds based on one-acre site with 25-meter distance to nearest receptors in the Northwest Coastal LA County monitoring area (SRA No. 2).

Source: Noah Tanski Environmental Consulting, 2023, based on CalEEMod 2020.4.0 model runs (included in Appendix H-8 of this Draft EIR).

(iii) Sensitive Receptors

As demonstrated in Tables V-10 and V-11, above, Alternative 3's construction and operational emissions would not exceed SCAQMD's applicable regional thresholds and LSTs. These SCAQMD thresholds represent the maximum emissions that would not be expected to cause or materially contribute to an exceedance of NAAQS or CAAQS, which themselves represent the maximum concentrations of pollutants that can be present in outdoor air without any harmful effects on people or the environment. Therefore, neither Alternative 3's construction nor its operational emissions would be expected to cause or measurably contribute to adverse air quality-related health impacts at any nearby receptors, and Alternative 3's construction and operational emissions impacts to local and regional receptors would be considered less than significant.

As noted earlier, neither the Project's emissions nor Alternative 3's emissions would have a significant impact on regional air quality or localized air quality at nearby sensitive receptors. However, as also discussed, Alternative 3 would result in greater construction and operational emissions than the Project.

(b) Cultural Resources

As discussed in Section IV.B (Cultural Resources) of this Draft EIR, the existing building is designated as City HCM No. LA-887. While the Project proposes to demolish the existing building, Alternative 3 would retain the east, west, and south wings of the existing building, as well as the courtyard and the southern façade of the north wing but would demolish the building volume of the north wing. Alternative 3 would also include the work necessary to comply with the City's Soft Story

Ordinance, as well as the voluntary seismic retrofit and ADA, building code, and energy efficiency upgrades of the existing building.

As discussed previously for Alternative 2, Historic Resources Group prepared a memorandum (included in Appendix H-7 of this Draft EIR) to determine whether the proposed seismic retrofit and ADA upgrades would comply with the Secretary of the Interior's Standards for Rehabilitation and whether the existing building would continue to retain its historic significance, and provided design alterations to the proposed ADA upgrade. Alternative 3 would incorporate the design alterations that were provided by Historic Resources Group for Alternative 2.

As discussed in the memo prepared by Historic Resources Group (included as Appendix H-9 to this Draft EIR), Alternative 3 would retain the building's south (front), east, and west wings in their existing locations and configurations, including windows, doors, and other architectural features and materials; the south façade of the north wing; and the entire courtyard, including the "floating" stairs, open balconies with metal pipe guardrails, wood and metal screens, and landscaping features and materials. This scenario would retain more than 75 percent of the building itself, plus the entire courtyard, and would retain the most visible features of the Barry Building, which are its configuration around a central courtyard and its important relationship to the street. According to Historic Resources Group, the demolition of approximately 25 percent of the building might not meet the Secretary of the Interior's Standards for Rehabilitation, but Alternative 3 would retain enough historic integrity to maintain the property's eligibility for designation as an HCM. Therefore, Alternative 3's impacts with respect to historic resources would be less than significant, which is less than the Project's significant and unavoidable impact with respect to historical resources.

(c) Greenhouse Gas Emissions

(i) GHG Emissions Calculation

Alternative 3's construction activities described above are estimated to take approximately seven months to complete, during which GHG emissions would be generated as a result of equipment used on-site as well as off-site activities, such as truck trips. As recommended by the SCAQMD, the total GHG construction emissions should be amortized over a 30-year lifetime of a project (i.e., total construction GHG emissions should be divided by 30 to determine an annual construction emissions estimate that can be added to a project's operational emissions) to determine a project's annual GHG emissions inventory.

Alternative 3 would also result in direct and indirect GHG emissions generated by the buildings' operations and their related vehicle trips. The emissions shown in Table V-12 are not "net" emissions that have been quantified by calculating the change in GHG emissions between the existing building's previous uses and Alternative 3's potential future uses. The existing building's previous uses, and what their operational GHG emissions might have been, have not been considered by the analysis. The emissions shown in Table V-12 are disclosed for informational purposes only.

Table V-12
Alternative 3 – Estimated GHG Emissions

Source	Metric Tons of CO_2e[a]
Construction	
2023	220.8
Total	220.8
Amortized Over 30 Years	7.4
Operations (annual)	
Area Source(s)	<0.1
Energy Source(s)	86.2
Mobile Sources	310.3
Solid Waste	9.8
Water/Wastewater	19.7
Construction (from above)	7.4
Total Annual Emissions	433.3

[a] CO_2e was calculated using the CalEEMod 2020.4.0 model. Some figures may not add up properly due to rounding.

Source: Noah Tanski Environmental Consulting, 2023. Refer to Appendix H-8 of this Draft EIR.

(ii) Plan Consistency

The Barry Building has been vacant since 2017. This building, as partially preserved via Alternative 3, would not be substantially different than what was vacated approximately five years ago, and the proposed seismic and ADA-related upgrades, such as the addition of elevators and plumbing improvements, would not introduce any new major direct or indirect sources of GHG emissions. Given the age of the Barry Building and its improvements, updates to its plumbing, electrical, glazing, and other systems/features would be made in accordance with the latest CALGreen and LA Green Building Code requirements, which would provide some measure of GHG emissions reductions via energy and water conservation. Nonresidential buildings built to the latest 2019 Title 24 Building Energy Efficiency Standards are expected to use about 30 percent less energy than nonresidential buildings built to the previous 2016 standards. Considering the age of the Barry Building, it is reasonable to anticipate that the upgrades and renovations proposed by Alternative 3 would improve its energy efficiency by greater than 30 percent. The proposed new building would be built to the latest CALGreen and LA Green Building Code requirements, as well.

Updating the Barry Building's lighting, glazing, plumbing, insulation, and other features to the latest CALGreen and LA Green Building Code Standards is one way that Alternative 3 would be consistent with the Climate Change Scoping Plan's actions and strategies to improve lighting efficiencies, reduce statewide electrical energy consumption, and reduce water consumption. The partial preservation and renewed operations of the Barry Building, as well as the operations of the additionally proposed new building, would also be consistent with the Scoping Plan's actions and strategies related to SB 375, as well as the GHG-reducing plans and strategies developed

pursuant to SB 375. SCAG's 2020-2045 RTP/SCS, "Connect SoCal," is the latest plan to achieve CARB's GHG emissions reduction targets for the region, per SB 375. The land use pattern emphasized by the 2020-2045 RTP/SCS involves concentrating new housing, employment, and other development in infill locations and HQTAs in an effort to reduce regional GHG emissions by facilitating alternative transportation modes and reducing VMT. The Project Site is located in a HQTA (as defined by the 2020-2045 RTP/SCS) and a "Pedestrian Enhanced District" (as defined by the City's Mobility Plan 2035). By enabling the renewed operations of the Barry Building and constructing a new office building, Alternative 3 would contribute to growth in a walkable community with ready access to transit infrastructure and would thus be consistent with the 2020-2045 RTP/SCS's land use pattern and smart growth policies. The location would provide the opportunity for employees and other users to utilize transit infrastructure to reduce vehicle trips and VMT. Further, the RTP/SCS encourages growth in low-intensity infill locations. Given that the Barry Building is currently vacant and inoperable, Alternative 3 would not merely add growth to a low-intensity infill location, but it would add growth to a no-intensity infill location. This could reduce demands for growth in urbanizing areas that likely possess fewer alternative transportation options and that may contribute to sprawl. For similar reasons, Alternative 3 would also be consistent with aspects of LA's Green New Deal that relate to development and mobility, such as targets to reduce VMT per capita and to increase the number of trips made by walking, biking, or transit.

In summary, Alternative 3 would not conflict with the Climate Change Scoping Plan and its updates, the 2020-2045 RTP/SCS, or LA's Green New Deal, which represent the GHG-reduction plans and policies that are most relevant to Alternative 3. Furthermore, renewed operations of the Barry Building and operations of the proposed new building would benefit from items such as SB 100's requirement for LADWP and other energy providers to supply 100 percent of electricity from renewable resources by 2045 and CAFE standards that establish increasing fuel efficiency standards for on-road vehicles. Given these considerations, Alternative 3's impacts with regard to climate change would be less than significant.

Compared to the Project, Alternative 3 would emit more GHG emissions on an ongoing basis because it proposes the renewed operations of the Barry Building and the additional operations of a new office building, as well. However, both the Project and Alternative 3 would be consistent with relevant GHG-reduction plans and policies and result in a less than significant impact with regard to climate change.

(d) Land Use and Planning

(i) SCAG 2020-2045 RTP/SCS

The 2020-2045 RTP/SCS includes strategies for accommodating projected population, household, and employment growth in the SCAG region by 2045. These land use strategies are directly tied to supporting related GHG emissions reductions through increasing transportation choices aimed at triggering reduced dependence on automobiles and increased growth in walkable, mixed-use communities. Alternative 3 involves the partial preservation of the existing building (including the voluntary seismic retrofit, and ADA, building code, and energy efficiency

upgrades) and also involves the construction of a new, approximately 10,815 square foot building behind (north of) the existing building, on a site zoned for such uses. The land use pattern emphasized by the 2020-2045 RTP/SCS involves concentrating new housing, employment, and other development in infill locations and HQTAs in an effort to reduce regional GHG emissions by facilitating alternative transportation modes and reducing VMT. The Project Site is located in a HQTA (as defined by the 2020-2045 RTP/SCS) and a "Pedestrian Enhanced District" (as defined by the City's Mobility Plan 2035). By enabling the renewed operations of a majority of the Barry Building as well as the construction of an additional retail/office building on the Project Site, Alternative 3 would contribute to growth in a walkable community with ready access to transit infrastructure and would thus be consistent with the 2020-2045 RTP/SCS's land use pattern and smart growth policies. The location of Alternative 3's retail and office uses would provide the opportunity for employees and other users to utilize transit infrastructure to reduce vehicle trips and VMT. Therefore, Alternative 3 would be consistent with the 2020-2045 RTP/SCS and this impact would be less than significant.

(ii) City of Los Angeles General Plan

Alternative 3's consistency with the applicable objectives and policies of the General Plan is discussed below in Table V-13.

Table V-13
Alternative 3 Consistency with Applicable Policies of the General Plan

Objectives and Policies	Alternative 3 Consistency
Framework Element	
3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	**No Conflict.** Alternative 3 includes the partial preservation of the Barry Building, including the central courtyard, which would promote pedestrian and bicycle access into the Project Site,
3.8.1: Accommodate the development of neighborhood-serving uses in areas designated as "neighborhood district." The range and densities of uses permitted in any area shall be identified in the community plans.	**No Conflict.** Alternative 3 includes the partial preservation of the Barry Building, which would contain approximately 8,956 square feet of retail uses that would serve the surrounding neighborhood, on a site with a land use designation of Neighborhood Office Commercial.
3.8.2: Encourage the retention of existing and development of new commercial uses that primarily are oriented to the residents of adjacent neighborhoods and promote the inclusion of community services (e.g., child care and community meeting rooms).	**No Conflict.** Alternative 3 includes the partial preservation of the Barry Building, including the re-occupation of the preserved portion of building with 8,956 square feet of new retail uses. While the tenants that could occupy the building under Alternative 3 are unknown, it is likely that they would be uses that would serve the residents of the adjacent neighborhoods. In addition, Alternative 3 includes the construction of 10,815 square feet of new office uses which could also serve the residents of the adjacent neighborhoods.
Conservation Element	
Cultural and historical objective and policy: Objective: protect important cultural and historical sites and resources for historical,	**No Conflict.** Whereas the Project involves the demolition of the Barry Building, which the City of Los Angeles designated as HCM No. LA-887 in 2007, Alternative 3 involves the partial

Table V-13
Alternative 3 Consistency with Applicable Policies of the General Plan

Objectives and Policies	Alternative 3 Consistency
cultural, research, and community education purposes. Policy: continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities.	preservation of the existing building and the construction of a new commercial (office) building on the Project Site. Further, as discussed above under "Cultural Resources," the work performed on the building under Alternative 3 would not impact the historic significance of the existing building, as long as Alternative 3 includes the recommendations provided by Historic Resources Group (in the memo contained in Appendix H-7 of this Draft EIR). Therefore, Alternative 3 would not conflict with this objective.
Air Quality Element	
4.2.2: Improve accessibility for the City's residents to places of employment, shopping centers, and other establishments.	**No Conflict.** Alternative 3 includes the partial preservation and re-occupation of the Barry Building with 8,956 square feet of retail uses, as well as the construction of 10,815 square feet of new office uses, all of which would provide residents of surrounding areas with places of employment and places to shop.
Source: City of Los Angeles General Plan.	

As provided above, Alternative 3 would be substantially consistent with the applicable objective and policies of the General Plan and therefore, Alternative 3's impacts would be less than significant.

(iii) Brentwood – Pacific Palisades Community Plan

Alternative 3's consistency with applicable goals, objectives, and policies contained in the Brentwood – Pacific Palisades Community Plan is provided below in Table V-14.

Table V-14
Alternative 3 Consistency with Applicable Goals, Objectives, and Policies of the Brentwood-Pacific Palisades Community Plan

Policy	Alternative 3 Consistency
Objective 1-4: To preserve and enhance neighborhoods with a distinctive historic character. **Policy 1-4.1:** Protect and encourage reuse of the area's historic resources. **Policy 1-4.2:** Preserve architecturally or historically significant features and incorporate such features as an integral part of new development when appropriate.	**No Conflict.** Unlike the Project, Alternative 3 involves the partial preservation of the existing building, which is City HCM No. LA-887. Further, as discussed above under "Cultural Resources," the work performed on the building under Alternative 3 would not impact the historic significance of the existing building, as long as Alternative 3 includes the recommendations provided by Historic Resources Group (in the memo contained in Appendix H-7 of this Draft EIR). Therefore, Alternative 3 would not conflict with this objective and these policies calling for historic preservation.

Table V-14
Alternative 3 Consistency with Applicable Goals, Objectives, and Policies of the Brentwood-Pacific Palisades Community Plan

Policy	Alternative 3 Consistency
Policy 2-1.1: New commercial uses shall be located in existing established commercial areas or shopping centers.	**No Conflict.** Alternative 3 includes the partial preservation and re-occupation of the Barry Building with 8,956 square feet of retail uses, as well as the construction of 10,815 square feet of new office uses, all of which would be located along an established commercial area on San Vicente Boulevard.
Policy 2-3.5: Require that the first-floor street frontage of structures, including mixed-use projects and parking structures located in pedestrian oriented districts, incorporate commercial uses directed at pedestrian traffic.	**No Conflict.** Alternative 3 includes the re-occupation of the Barry Building with 8,956 square feet of retail uses. Therefore, the ground floor uses that front San Vicente Boulevard would be directed at pedestrian traffic.
Policy 2-4.2: Preserve community character, scale, and architectural diversity.	**No Conflict.** Alternative 3 involves the partial preservation of the existing building, which is City HCM No. LA-887. Therefore, Alternative 3 would preserve community character and architectural diversity.
Policy 2-4.4: Landscape corridors should be created and enhanced and maintained through the planting of street trees.	**No Conflict.** While Alternative 3 would not result in the planting of new street trees, the two existing street trees located adjacent to the Project Site along San Vicente Boulevard would be retained.
Goal 17: A community which preserves and restores the monuments, cultural resources, neighborhoods, and landmarks which have historic and/or cultural significance. **Objective 17-1:** To ensure that the Plan Area's significant cultural and historic resources are protected, preserved, and/or enhanced. **Policy 17-1.1:** Identify all designated City of Los Angeles Historic and Cultural Monuments in order to foster public appreciation of the City of Los Angeles' valuable historic resources and to promote education of the public.	**No Conflict.** Unlike the Project, Alternative 3 involves the partial preservation of the existing building, which is City HCM No. LA-887, as well as the construction of a new commercial (office) building. Further, as discussed above under "Cultural Resources," the work performed under Alternative 3 would not impact the historic significance of the existing building, as long as Alternative 3 includes the recommendations provided by Historic Resources Group (in the memo contained in Appendix H-7 of this Draft EIR). Therefore, Alternative 3 would not conflict with this goal, objective, and policy calling for historic preservation.
Policy 17-1.2: Protect and preserve archaeological sites of Native Americans.	**No Conflict.** As discussed in Section IV.G, Tribal Cultural Resources, of this Draft EIR, in response to a sacred lands file search conducted with the NAHC, the NAHC indicated that no sacred lands or sites are documented within the Project area. In addition, the Tribal Cultural Resources Report prepared for the Project concluded that the Project Site has a low sensitivity for containing unknown tribal cultural resources. Like the Project, Alternative 3 would comply with the City's standard condition of approval for the inadvertent discovery of tribal cultural resources. Therefore, Alternative 3 would not conflict with this policy.
Source: City of Los Angeles, Brentwood-Pacific Palisades Community Plan, adopted June 1998.	

As shown above, Alternative 3 would be substantially consistent with the applicable policies of the Brentwood – Pacific Palisades Community Plan. Further, Alternative 3 would be consistent with policies for the preservation of the existing building as the retained portion of the existing building (east, west, and south wings; southern façade of north wing; and the courtyard) would allow the building to retain its historic significance. The retrofit and ADA, building code, and energy efficiency upgrades would not impact the historic significance of the existing building with the recommendations provided by Historic Resources Group (in the memo contained in Appendix H-7 of this Draft EIR). Overall, Alternative 3's land use impacts related to consistency with the Brentwood – Pacific Palisades Community Plan would be less than significant.

(iv) San Vicente Scenic Corridor Specific Plan

Alternative 3's consistency with applicable policies contained in the San Vicente Scenic Corridor Specific Plan is provided below in Table V-15.

Table V-15
Alternative 3 Consistency with Applicable Provisions of the San Vicente Scenic Corridor Specific Plan

Provision	Alternative 3 Consistency
5.D.: Ground Floor Frontage Uses 1. On lots located on streets specified in Subsection D4 of this Section, at least 80% of the Ground Floor Frontage shall contain the following uses: a. Retail Sales. b. Personal Services. c. Restaurants and Bars. d. Signs. e. Parks and Plazas. f. Driveways, when no other means of access to parking exists or for the purpose of providing access to parking for a supermarket which contains a gross floor area exceeding 10,000 square feet. g. Pedestrian Entrances, which are not more than 15 linear feet in width or 15% of the linear frontage of the structure, whichever is greater. h. Schools. i. Libraries.	**No Conflict.** The Project Site is located on the north side of San Vicente Boulevard, which is one of the streets specified in Subsection D4. As part of Alternative 3, the preserved portion of the existing building (the south, east, and west wings) would be re-occupied entirely with retail uses. Therefore, the entire ground floor frontage would contain retail uses and Alternative 3 would be consistent with this provision.
7.C.1: The erection of any structure, or the enlargement of any existing structure after the effective date of this ordinance, shall conform to the following requirements: 1. Shade-producing street trees shall be planted at a ratio of at least one for every 30 feet of lot frontage and at a distance of no greater than 10 feet from the curb. The species shall be selected by the Street Tree Division of Public Works. Minimum sizes for said street trees shall be 10 feet in height or 2 inches in caliper.	**No Conflict.** Alternative 3 includes the construction of a new 10,815 square foot building, and therefore would be subject to this provision. However, there are two existing street trees that meet this provision and that would remain as part of Alternative 3.
9.A.1: Sidewalks abutting San Vicente Boulevard shall be at least 12 feet in width and maintain a	**No Conflict.** The existing sidewalk along San Vicente Boulevard is at least 12 feet in width, with a

Table V-15
Alternative 3 Consistency with Applicable Provisions of the San Vicente Scenic Corridor Specific Plan

Provision	Alternative 3 Consistency
minimum unobstructed width of 10 feet for pedestrian access.	minimum unobstructed width of 10 feet for pedestrian access. The existing sidewalk abutting San Vicente Boulevard would not be altered as part of Alternative 3.
9.B.1: Open Space Uses The required open space shall contain one or more of the following amenities: a. Plaza b. Seating c. Landscaping d. Bicycle Racks e. Outdoor café f. Tables for outdoor eating g. Other uses similar to a-f above	**No Conflict.** Alternative 3 includes the partial preservation of the existing building, including the landscaped central courtyard, which would be similar to a plaza. Therefore, Alternative 3 would be consistent with this provision.
12.A.4: Parking A garage or off-street parking area shall be provided in connection with and at the time of erection of each new commercial structure or at the time any existing commercial structure is enlarged or increased in floor area or seating capacity, or when any building is converted from a more restrictive use to a commercial uses. The following minimum parking requirements shall apply to new structures, conversions and to the net additional floor area added to an existing structure: 4. For buildings or premises occupied by any other commercial use, one space shall be required for each 300 square feet of gross floor area.	**Inconsistent.** Per LAMC Section 12.21 A.4 (x)(2), parking for the rehabilitated Barry Building may, in the City's discretion, remain the same as the parking currently existing on the parcel where the Barry Building is located. However, that LAMC section may not apply to the parking required for the new floor area constructed behind the Barry Building. As described previously, the Specific Plan would require approximately 36 parking spaces for the new building and there would only be room for approximately 15 parking spaces on the Project Site. Therefore, Alternative 3 may require the City to grant a parking variance in case additional parking is required.
13.B: Temporary construction fences required by the Los Angeles Municipal Code shall be painted a single earth tone color.	**No Conflict.** The construction fence placed around the Project Site would be painted a single earth tone color.
Source: San Vicente Scenic Corridor Specific Plan.	

As provided above, Alternative 3 would be substantially consistent with the majority of the applicable policies of the San Vicente Scenic Corridor Specific Plan and therefore, on balance, Alternative 3's impacts would be less than significant.

(v) Los Angeles Municipal Code

The Project Site is zoned C4-1VL (Commercial Zone, Height District 1VL). The Commercial Zone permits a range of commercial uses including retail and office uses. Within Height District 1VL, the C4 zone allows for a building height maximum of up to 45 feet and establishes an FAR of 1.5:1. Under Alternative 3, the existing building would be partially preserved and a new, approximately 10,815 square foot commercial building would be added to the Project Site. Therefore, Alternative 3 would include a total of approximately 19,771 square feet of development,

for an FAR of approximately 0.74:1, which is less than the maximum allowable FAR of 1.5:1 for the Project Site. In addition, Alternative 3 would be within the maximum height limit of 45 feet and would include retail and office uses that are allowed under the Project Site's existing C4 zoning. Therefore, Alternative 3 would not conflict with the existing zoning, and a less than significant impact would occur.

(vi) Conclusion

As described above, Alternative 3 would be substantially consistent with the applicable plans and policies adopted for the purpose of avoiding or mitigating an environmental effect, and Alternative 3 would not result in any changes to the General Plan land use designation and zoning regulations applicable to the Project Site. Further, Alternative 3 would not conflict with policies for the preservation of the existing building and would not affect the historic significance of this building with the recommendations provided by Historic Resources Group (in the memo contained in Appendix H-7 of this Draft EIR). Therefore, Alternative 3's impacts with respect to land use and planning would be less than significant, and less than the Project's significant and unavoidable land use impact.

(e) Noise

(i) Construction Noise

Noise would be generated during Alternative 3's estimated seven months of construction activities. Noise-generating activities could occur at the Project Site between 7:00 A.M. and 9:00 P.M. Monday through Friday, in accordance with LAMC Section 41.40(a). On Saturdays, construction would be permitted to occur between 8:00 A.M. and 6:00 P.M. No construction is permitted on Sundays. Because Alternative 3's construction activities would last more than ten days in a three-month period, the applicable threshold of significance for noise impacts is an increase of 5 dBA over existing ambient noise levels.

Alternative 3 would involve a wide range of construction activities. Prior to all other work, asbestos abatement would be required. This would involve the removal of asbestos-containing building materials from the Barry Building and hauling it to an off-site landfill that accepts friable asbestos waste. This would require the onsite use of powered hand tools and other electric or pneumatic equipment, but no heavy-duty off-road construction vehicles. Partial demolition of the Barry Building's north wing, as well as partial removal of paved surfaces for construction of the new office building, would require off-road construction vehicles such as an excavator and a front-end loader. Grading for the new office building pad would require similar off-road construction vehicles, as well as a roller and bulldozer. After grading has been completed, the additional preservation, seismic, ADA, building code, and energy efficiency upgrades would be performed at the Barry Building. Construction of the proposed office building would also begin. This activity would require a variety of construction equipment such as truck-mounted cranes, forklifts, welding tools, and powered hand tools. Finishing activities would require paving equipment to pave surfaces and air compressors to apply architectural coatings. Of the described activities, demolition of the Barry Building's north wing and grading for the proposed office building would

have the greatest potential to result in substantial noise increases at nearby sensitive receptors. Both of these phases would require extensive use of excavators and front-end loaders. These vehicles would work in tandem to demolish the north wing and grade for the new office building's pad. They would also load demolition debris onto haul trucks for export.

Table V-16, below, shows the estimated unmitigated noise impact that could result from this demolition and grading activity at 11900 Saltair Terrace, which is both the nearest sensitive receptor to the Project Site and the receptor with the lowest ambient noise level. Given these factors, no other sensitive receptors would experience noise levels or noise increases greater than 11900 Saltair Terrace. As shown, the 67.5 dBA L_{eq} noise level would be below the 75 dBA at 50 feet noise limit for powered equipment that is established by LAMC Section 112.05. However, the resultant noise increase at 11900 Saltair Terrace would be 12.5 dBA, which is above the City's significance threshold of 5 dBA. As a result, without mitigation, this impact would be considered potentially significant.

Table V-16
Alternative 3 – Demolition and Grading Noise Impact at 11900 Saltair Terrace (Unmitigated)

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant?
Residence – 11900 Saltair Terrace	67.5	55.3	67.8	12.5	Yes
Calculations provided in Appendix H-10 of this Draft EIR. Source: Noah Tanski Environmental Consulting, 2022.					

To ensure that Alternative 3's construction-related noise increases at 11900 Saltair Terrace and other sensitive receptors do not exceed 5 dBA, the following mitigation measure is required for Alternative 3:

ALT3 MM-1 Sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along the following boundaries:

- The east and west parking area boundaries (both the Project Site's east and west parking area boundaries and the east and west boundaries of the parcel immediately to the north of the Project Site (APN 4404-025-016)). (While the parcel to the north of the Project Site is not part of either the Project or Alternative 3, that parcel would be used for construction staging.)

- The northern property line of the parcel to the north of the Project Site (APN 4404-025-016) that separates this parcel from the residential uses to the north. Sound barriers along this property line shall be connected to the sound barriers described for the east and west property lines, so that all of Alternative 3's construction areas are fully enclosed by sound barriers.

The sound barriers shall be tall enough to shield line of sight paths from operating paving equipment to the 2nd stories of nearby residential uses. The prescribed sound barriers shall be installed for the duration of Alternative 3's construction activities.

As shown in Table V-17, implementation of Mitigation Measure ALT3 MM-1 would reduce demolition and grading-related construction noise impacts to below the 5 dBA increase threshold of significance. After mitigation, demolition and grading-related noise increases at 11900 Saltair Terrace would be just 1.8 dBA. Because 11900 Saltair Terrace is the sensitive receptor in nearest proximity to the Project Site and with the lowest ambient noise level, impacts to other sensitive receptors would be less than this 1.8 dBA increase. Additionally, because other construction phases would generate less noise than demolition of the north wing and grading for the new office building, Mitigation Measure ALT3 MM-1 would ensure that noise impacts due to other construction phases are also less than significant (i.e., less than a 5.0 dBA increase). Thus, implementation of Mitigation Measure ALT3 MM-1 would result in a less than significant impact with mitigation as it pertains to Alternative 3's construction noise impacts.

Alternative 3 and the Project would both result in less than significant construction noise impacts after mitigation. In terms of noise increase, the maximum 1.8 dBA impact generated by Alternative 3 at 11900 Saltair Terrace would be greater than the maximum 1.1 dBA impact generated by the Project at this same sensitive receptor. The difference between the two noise increases is unlikely to be perceptible – it is well-below the 3 dBA threshold of perception for humans. However, it should be noted that while the Project would last an estimated 37 days, Alternative 3 is anticipated to last approximately seven months. Thus, Alternative 3 would expose sensitive receptors to construction noise for a far greater duration that the Project.

Table V-17
Alternative 3 – Demolition and Grading Noise Impact at 11900 Saltair Terrace (Mitigated)

Receptor	Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant?
Residence – 11900 Saltair Terrace	52.5	55.3	57.1	1.8	No
Calculations provided in Appendix H-10 of this Draft EIR. Source: Noah Tanski Environmental Consulting, 2022.					

It should also be noted that the parking area north of the Project Site (on parcel 4404-025-016) may be utilized for construction staging, which may consist of materials and equipment storage. Despite this area's reduced distances to residential receptors to the north, any equipment operations in this area would be transient and incapable of causing or appreciably contributing to substantial noise increases at these or other receptors. For example, equipment operations in this area may include a forklift occasionally storing or retrieving construction materials. Construction vehicles also may be parked in this area when not in use. Mitigation Measure ALT3 MM-1 would fully shield this area from nearby residential receptors.

Concerning off-site construction noise sources, trucks and other construction-related vehicles would access the Project Site over the course of all construction phases. However, no phase would be anticipated to generate more than five construction truck trips per hour. The addition of a maximum of five construction truck trips per hour to San Vicente Boulevard would not have a discernible effect on roadside ambient noise levels, much less a 5 dBA L_{eq} increase over the course of a workday. As explained in the Project analysis (contained in Section IV.E. of this Draft EIR), an approximate doubling of traffic volumes is required to increase traffic noise levels by 3 dBA. Because construction trucks emit more noise than passenger vehicles, a 19.1 PCE is used to convert construction truck trips to a passenger car equivalent. In this way, five construction truck trips per hour would be similar in noise to approximately 96 passenger car trips per hour. Because San Vicente Boulevard is a major arterial roadway that carries more than a thousand vehicles per hour during the daytime hours in which Alternative 3's construction activities would take place, the 96 PCE trips per hour generated by Alternative 3's construction trucks would not be capable of doubling traffic volumes on San Vicente Boulevard and causing noise increases in excess of 3 dBA. Therefore, Alternative 3's impact from off-site construction noise sources would therefore be less than significant.

Neither the Project nor Alternative 3 would generate substantial noise increases due to off-site noise sources such as construction trucks. Alternative 3 would generate a greater number of off-site construction trips than the Project and would presumably result in greater off-site noise impacts than the Project as a result. However, it is unlikely that any difference in impact would be noticeable because the threshold of perception for humans is a 3 dBA difference. The difference in noise impacts would be far less than this 3 dBA threshold.

(ii) Construction Vibration

Ground-borne vibration would be generated by demolition, grading, and other construction activities at the Project Site for Alternative 3. Heavy-duty steel-tracked equipment such as an excavator or loader, assumed to be the vibrational equivalent of the FTA's "Large Bulldozer" equipment, can produce vibration levels of 0.089 inches per second PPV at a reference distance of 25 feet. As discussed earlier, these vehicles would be required by the Alternative 3's demolition and grading activities. Other construction equipment utilized by the alternative, such as skid steer loaders or forklifts, would produce less ground-borne vibration levels. As shown in Table V-18, Alternative 3's estimated demolition and grading-related vibration impacts from the on-site operations of excavators and loaders would not exceed FTA thresholds for potential damage at nearby structures. As a result, Alternative 3's on-site construction activities would not result in architectural damage to structures near the Project Site, and its building damage-related vibration impacts would be less than significant.

Neither the Project nor Alternative 3 would generate potentially damaging levels of construction-related ground-borne vibration at nearby structures. The estimated ground-borne vibration level generated by both the Project and Alternative 3 would be similar.

Table V-18
Alternative 3 – Building Damage Vibration Levels, On-Site Sources (Unmitigated)

Building	Distance (feet)	Condition[1]	Significance Criteria (in/sec)	Estimated Maximum Vibration Velocity (in/sec PPV)	Significant Impact?
11900 Saltair Terrace	100	I. Reinforced-concrete, steel or timber	0.5	0.019	No
11961 San Vicente Boulevard	10	I. Reinforced-concrete, steel or timber	0.5	0.244	No
11980 San Vicente Boulevard	125	I. Reinforced-concrete, steel or timber	0.5	0.015	No
11999 San Vicente Boulevard	150	I. Reinforced-concrete, steel or timber	0.5	0.012	No

[1] Structural condition and significance criteria based on FTA guidelines issued in the 2018 FTA Transit Noise and Vibration Impact Assessment manual.
Calculations provided in Appendix H-10 of this Draft EIR.
Source: Noah Tanski Environmental Consulting, 2022.

With regard to the human annoyance effects of ground-borne vibration, the same excavator and loader vehicles may produce RMS vibration levels of 87 VdB at a reference distance of 25 feet. As shown in Table V-19, Alternative 3's estimated vibration impacts as generated by on-site excavator and loader operations would not exceed the applicable 72 VdB threshold of significance at residential sensitive receptors. As a result, Alternative 3's human annoyance-related vibration impacts as generated by on-site construction activities would be less than significant.

Table V-19
Alternative 3 – Human Annoyance Vibration Levels, On-Site Sources (Unmitigated)

Building	Distance (feet)	Vibration Category[1]	Significance Criteria (VdB)[2]	Estimated RMS Velocity (VdB)	Significant Impact?
11900 Saltair Terrace	100	2. Residences and buildings where people normally sleep	72	68.9	No
640 Saltair Avenue	220	2. Residences and buildings where people normally sleep	72	58.7	No
529 Westgate Avenue	220	2. Residences and buildings where people normally sleep	72	58.7	No

[1] FTA "Vibration Category 2" includes residential uses and other buildings where people sleep, such as hospitals.
[2] 72 VdB is the FTA's Vibration Category 2 threshold for frequent events, which are defined as more than 70 vibration events of the same source per day. It is conservatively assumed that construction activities may generate more than 70 "vibration events" per day.

Calculations provided in Appendix H-10 of this Draft EIR.
Source: Noah Tanski Environmental Consulting, 2022.

As discussed earlier, Alternative 3 would generate a maximum of five construction truck trips per hour to and from the Project Site. Buildings situated along the truck route could be exposed to

ground-borne vibrations from these vehicles. Based on FTA data, the vibration generated by a typical heavy-duty truck would be approximately 0.076 inches per second PPV at a distance of 25 feet from the truck. This is below the FTA's most stringent 0.12 inches per second PPV threshold for buildings that are extremely susceptible to vibration. As a result, Alternative 3's construction trucks and other on-road construction vehicles would not expose any roadside building to potentially damaging levels of ground-borne vibration.

Regarding human annoyance, both the FTA and Caltrans note that vehicles, even buses and trucks, are rarely a source of perceptible ground-borne vibrations. The analysis for the Project (included in Section IV.E. of this Draft EIR) details why haul trucks and other construction vehicles traveling off-site on local roadways would not be expected to expose roadside land uses to ground-borne vibrations of such an intensity and frequency that substantial human annoyance may result. Given these considerations, Alternative 3's human annoyance-related ground-borne vibration impact from off-site sources would be less than significant.

Neither the Project nor Alternative 3 would expose roadside land uses to substantial ground-borne vibration levels associated with architectural damage and substantial human annoyance. Impacts would be similar under either scenario.

(iii) Operational Noise

On-site operational sources of noise associated with Alternative 3 would mainly consist of mechanical systems and auto-related activities. Given the distances to residential sensitive receptors, elevated surrounding ambient noise levels, and the relatively quiet operation of modern HVAC systems, it is unlikely that any new rooftop-mounted HVAC equipment installed per Alternative 3 (for the Barry Building or the proposed new building) would be capable of increasing off-site noise levels by a discernable degree. Furthermore, many surrounding land uses, both commercial and residential, also contain rooftop-mounted HVAC equipment. Regarding auto-related noises (e.g., doors slamming, engines starting, etc.), these intermittent noises would not contribute to substantial noise increases. According to FTA equations for the prediction of parking facility noise impacts, a facility with an hourly activity of 65 vehicles would be expected to result in a noise level of just 45 dBA L_{eq}. As noise levels at the nearest and most-sensitive residential receptors are approximately 55 dBA L_{eq} or greater, the addition of auto-related noise from the portion of the parking lot on the Project Site would have a nominal effect on surrounding ambient noise levels; noise increases at sensitive receptors would be far less than 1 dBA. The off-site effect of Alternative 3's auto-related noises due to trip generation would be even less. Generally, a minimum 3 dBA CNEL increase in roadside noise levels requires an approximate doubling of traffic volumes. Reasonably, the renewed operations of the Barry Building and the operations of the proposed office building would not cause traffic volumes to double on San Vicente Boulevard or any other nearby roadway that employees and users may utilize when accessing the Project Site. Operations would add well-below 100 trips per hour to roadways with hundreds to thousands of existing trips per hour. Measurable noise increases, if any, would be just fractions of a decibel.

Overall, the partially preserved Barry Building and the proposed office building would be located in an urbanized area with a mix of land uses that include numerous other multi-story commercial

uses fronting San Vicente Boulevard. The renewed operations of the Barry Building and the new operations of the proposed office building would not alter the noise environment of their surroundings by a substantial degree – far below the minimum 3 dBA CNEL increase criteria that may represent a significant impact. As a result, Alternative 3's impact from operational noise sources would be less than significant.

Neither the Project nor Alternative 3 would cause substantial noise increases due to operations. However, because Alternative 3 proposes the renewed operations of the Barry Building and an additional new office building, it would naturally result in a greater operational noise impact than the Project, which proposes to demolish the Barry Building.

(iv) Operational Vibration

Renewed operation of the Barry Building and operation of the proposed office building would not involve the use of heavy equipment or industrial operations capable of generating substantial groundborne vibrations. Related vehicle travel would not be considered a significant source of vibration because vehicle travel rarely generates perceptible groundborne vibrations. As a result, Alternative 3's potential to generate excessive groundborne vibration levels due to its operations would be considered less than significant.

Neither the Project nor Alternative 2 would cause generate substantial or perceptible ground-borne vibrations due to operations.

(f) Transportation

(i) Plan Consistency

Alternative 3 involves the partial preservation of the existing building (including the voluntary seismic retrofit and ADA, building code, and energy efficiency upgrades) and also involves the construction of a new, approximately 10,815 square foot building behind (north of) the existing building. Alternative 3 would therefore not trigger the requirement for additional review pursuant to the City of Los Angeles Transportation Assessment Guidelines screening criteria for the following reasons. First, Alternative 3 would not require the decision maker to find that it substantially conforms to the purpose, intent, and provisions of the General Plan. Second, Alternative 3 involves the partial preservation and re-occupancy of the existing building and the construction of new retail/office uses consistent with the existing zoning and land use designation for the Project Site. As such, Alternative 3 would not directly conflict with a transportation plan, policy, or program adopted to support multi-modal transportation options or public safety. Third, while Alternative 3 would widen the sidewalk along the eastern façade to five feet to meet ADA requirements, this would not conflict with a transportation plan, policy, or program adopted to

support multi-modal transportation options or public safety.[10] Therefore, a less than significant impact would occur as a result of Alternative 3, which would be greater than the Project's impact.

(ii) Vehicle Miles Traveled

LADOT's VMT calculator was used to evaluate VMT as a result of Alternative 3 (see Appendix H-11 of this Draft EIR for the VMT calculator sheets for Alternative 3). As shown in Appendix H-11, Alternative 3 is estimated to generate 4,293 daily VMT, which results in an average work VMT per capita of 13.2. The average work VMT per capita would therefore exceed the West Los Angeles Area Planning Commission (APC) significant work VMT impact threshold of 11.1. However, as also shown in Appendix H-11, with the inclusion of Transportation Demand Management (TDM) strategies, which could include strategies such as a reduced parking supply, parking cash-out, and workplace parking pricing measures, the average work VMT per capita would be 11.1, which would not exceed the West Los Angeles APC threshold of 11.1. Therefore, Alternative 3 would not result in a significant VMT impact, but this impact would be greater than the Project's impact.

(iii) Design Feature Hazards

The roadways adjacent to the Project Site are part of the existing roadway network and contain no sharp curves or dangerous intersections. In addition, implementation of Alternative 3 would not result in roadway improvements, and no safety hazards would be introduced to the existing roadway network. Further, no new driveways are proposed. Thus, Alternative 3 would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment), and no impact would occur, similar to the Project.

(iv) Emergency Access

Like the Project, Alternative 3 would implement PDF-TRA-1 (Construction Management Plan) during the construction activities proposed as part of this alternative. With implementation of PDF-TRA-1, these construction activities would not create hazards for roadway travelers, bus riders, or parkers, as procedures and other measures (e.g., to address temporary traffic control, lane closures, sidewalk closures, etc.) would be incorporated into the Construction Management Plan. As discussed below, construction-related impacts associated with access (including emergency access) to other businesses and transit would be less than significant.

Construction activities would primarily be contained within the Project Site boundaries. All construction equipment would be staged entirely on-site or delivered on an as-needed basis. However, temporary closures of the sidewalks adjacent to the Project Site could be required.

[10] It appears that there is only a two-foot wide sidewalk between the building and the driveway. However, it is unlikely that the sidewalk can be widened into the driveway, as the driveway is only 16.5 feet wide and is already too narrow.

Temporary traffic controls (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths, and/or providing overhead covering) would be provided to direct pedestrians safely around any closures and maintain safe pedestrian access along San Vicente Boulevard, as required in the Construction Management Plan (PDF-TRA-1). The temporary traffic controls would be provided to maintain a safe pedestrian route to the nearby Brentwood Science Magnet School. Construction activities would not result in bicycle lane or vehicular travel lanes closures along San Vicente Boulevard. Thus, bicycle and vehicular operations along San Vicente Boulevard adjacent to the Project Site would be maintained. In addition, emergency access in the vicinity would not be affected by Alternative 3's construction activities, and Alternative 3's impacts with respect to emergency access during construction would be less than significant.

During operation of Alternative 3, vehicular access to the Project Site would be maintained from the existing driveway at the eastern portion of the Project Site on San Vicente Boulevard. Alternative 3 would also not include the installation of barriers that could impede emergency vehicle access both during and post-construction. Drivers of emergency vehicles are also trained to utilize center turn lanes, or travel in opposing through lanes (on two-way streets) to pass through crowded intersections or streets. Accordingly, the respect entitled to emergency vehicles and driver training allows emergency vehicles to negotiate typical street conditions in urban areas. As such, emergency access to the Project Site and surrounding area would be maintained both during and post-construction. Therefore, Alternative 3 would not result in inadequate emergency access during construction or operation, and, as such, impacts to emergency access as a result of Alternative 3 would be less than significant, but greater than the Project due to inclusion of an operational component for Alternative 3.

(f) Tribal Cultural Resources

The Project Site is located in an urbanized area of the City and has been disturbed by past development activities. Alternative 3 involves the partial preservation of the existing building (including work to comply with the City's Soft Story Ordinance as well as the voluntary seismic retrofit and ADA, building code, and energy efficiency upgrades of the preserved portion of the existing building), as well as the construction of an approximately 10,815 square foot commercial building.

As discussed in Section IV.G (Tribal Cultural Resources) of this Draft EIR, there are no known tribal cultural resources within the Project Site. Like the Project, Alternative 3 would only disturb soils that have been previously disturbed by past development activities. The City has established a standard condition of approval to address the inadvertent discovery of tribal cultural resources. The condition requires that in the event a potential tribal cultural resource is discovered in the Project Site during ground-disturbing activities, all ground-disturbing activities temporarily cease until it is determined whether the discovery is a tribal cultural resource and appropriate treatment is determined through consultation with a California Native American tribe on the City's AB 52 list and with a qualified archaeologist. Therefore, Alternative 3's impacts with respect to tribal cultural resources would be less than significant.

(3) Summary of Impacts

As demonstrated above, all of Alternative 3's impacts would be less than significant, including with respect to historical resources and land use. The Project would result in significant and unavoidable impacts with respect to historical resources and land use, as the Project would demolish the existing building, which is City HCM No. LA-887. As Alternative 3 involves the partial preservation of the existing building, Alternative 3 would avoid the Project's significant and unavoidable impacts with respect to historical resources and land use. However, as Alternative 3 involves the construction of a new building and also includes an operational component (the re-occupancy of the preserved portion of the existing building with retail uses and a new building with new office uses), Alternative 3 would result in greater impacts than the Project with respect to air quality, greenhouse gas emissions, noise, and traffic, although these impacts would still be less than significant.

(4) Relationship of Alternative 3 to the Project Objectives

Based on the analysis provided above, Alternative 3 would meet both of the Project objectives:[11]

1. Comply with the City's Soft Story Retrofit Program (LAMC Section 91.9300 et seq., Ordinance entitled Mandatory Earthquake Hazard Reduction in Existing Wood Frame Buildings with Soft, Weak or Open Front Walls), which includes complying with the requirements under LAMC Section 91.9305.2.

2. Abate fire, loitering, vandalism, and other public safety hazards associated with the structural defects and current vacancy of the Barry Building.

d) Alternative 4: Relocation Alternative

(1) Description of the Alternative

Alternative 4 involves the dismantling of the Barry Building into multiple small building portions to facilitate its relocation to a new site, which has yet to be determined. At the new location, the Barry Building would be reconstructed, which would incorporate additional preservation measures relating to seismic retrofitting, ADA updates, building code updates, and energy efficiency upgrading that were described previously for Alternative 2. Once the Barry Building has been moved and rehabilitated, this analysis assumes that the Barry Building would be occupied by 12,800 square feet of retail uses.

HKA prepared a report analyzing four options to move the existing building to another site (see Appendix H-12 of this Draft EIR for this report), which are described below:

- Option 1: Relocate virtually all building elements intact in one massive piece. This option was determined to be infeasible from a structural moving perspective, as the logistical

[11] The EIR is not analyzing the economic feasibility of Alternative 3.

challenges are extremely high. Besides undercutting beneath the building and then supporting the entire building while on the Project Site, it is infeasible to move the intact building in one piece once it is on City streets to its next property due to the physical challenges (street trees, traffic signals, overhead wires, etc.) that would be encountered during the move. Therefore, HKA determined that Option 1 is infeasible due to these logistical challenges.

- Option 2: This option considers partially dismantling the building elements into six parts at strategic vertical locations resulting in multiple two-story building portions which would be moved individually. This option proposes separating the north and the south two-story building elements from the connecting west and east two-story elements. This option also suggests removing, cataloging, and crating exterior stair elements, applied architectural features, such as aluminum sun-control fins, and applied architectural fixed-in-place wooden sun-control and ornamental architectural features. However, this option would present a mixture of transportation challenges. The length of the building segments would make the transporting maneuverability infeasible at turns from one street to another street along the path from San Vicente Boulevard to a presently undetermined property. The overall height would also make this option infeasible for the same reasons as described for Option 1 (inability to clear street landscaping, utilities, street lighting, and traffic signals). Therefore, HKA determined that Option 2 is infeasible due to these logistical challenges.

- Option 3: This option proposes partially dismantling the building elements at strategic horizontal locations into nine total pieces, thereby achieving multiple one-story building portions. In addition, strategic vertical separations would also be necessary to keep the overall length for each building element respectful to the architectural massing. Since the structure would be separated at a point above the second-floor plane but below the historic windows, the structure must be stabilized temporarily (addition of wood and steel beams, vertical and diagonal braces, diaphragms, and temporary floor construction to take place of the floor which will remain as part of the first story) to protect the construction from excessive movement during the relocation trip. This option also suggests removing, cataloging, and crating exterior stair elements, applied architectural features, such as aluminum sun-control fins, and applied architectural fixed-in-place wooden sun-control and ornamental architectural features. This option also presents a mixture of transportation moving challenges, as the overall length of the building elements would remain a challenge, which would make the transporting maneuverability difficult at turns from one street to another street along the path from San Vicente Boulevard to a presently undetermined property. The overall height might be less of a challenge with respect to clearance of street landscaping, utilities, street lighting, and traffic signals since the singular floor height would be substantially less than the building's two-story height. The work required under Option 3 would be performed over approximately 14-18 months.

- Option 4: This portion proposes partially dismantling the building elements at strategic horizontal and vertical locations into 20 pieces achieving multiple small building portions.

This option also suggests removing, cataloging, and crating exterior stair elements, applied architectural features, such as aluminum sun-control fins, and applied architectural fixed-in-place wooden sun-control and ornamental architectural features. This option presents fewer transportation moving challenges and would make the transporting maneuverability somewhat easier at turns from one street to another street along the path from San Vicente Boulevard to a presently undetermined property. The overall height might be less of a challenge, for clearance of street landscaping, utilities, street lighting, traffic signals, and overhead power/telephone/cable lines since the singular floor height would be substantially less than an option where the building remains at two stories during the relocation. This option presents a temporary construction challenge (addition of wood and steel beams, vertical and diagonal braces, diaphragms, and temporary floor construction to take place of the floor which will remain as part of the first story) as previously discussed for Option 3, but this challenge is much more significant for Option 4, as an immense amount of structure must be added to stabilize portions of the building temporarily to protect the building from excessive movement during the relocation trip. The work required under Option 4 would be performed over approximately 16-20 months.

As Options 1 and 2 were determined to be infeasible, the analysis provided below addresses Options 3 and 4 from the HKA report. This analysis assumes that asbestos abatement activities, which would take place prior to all other work, are anticipated to last two weeks. Following this, preparing the Barry Building for dismantling and transporting would involve removing exterior elements (e.g., stairways) and other ornamental features, as well as adding temporary stabilizing structures to portions of the building that would be transported. This is estimated to take approximately two months. During this two-month period, preparatory work at the new location may involve trenching for utility connections and constructing a new foundation for the Barry Building. Transporting the dismantled building portions to a new location would likely take no more than one week. Reassembling the Barry Building and performing the additional preservation measures is estimated to take approximately 15 months. During this time, any remaining features of the Barry Building at its original location, such as foundation materials and utility connections, would be removed, and a modest landscape buffer would be constructed.

While a relocation site has not yet been identified, according to Historic Resources Group (see memo provided in Appendix H-13 of this Draft EIR), the new site would have to be located on a similar commercial thoroughfare and have a similar flat topography as the Project Site. The building would have to be located in the same general orientation to the street, facing generally south, with similar setbacks, hardscape, and landscape. Further, as long as the new site is located within the City of Los Angeles so that the building remains eligible for designation as an HCM, there is no limit to the distance from the old site to the new site, other than those limits imposed by physical and economic feasibility.

(2) Environmental Impacts

(a) Air Quality

(i) Construction

Alternative 4 involves dismantling the Barry Building into multiple small building portions to facilitate its relocation to a new site, which would be along a commercial thoroughfare in the City of Los Angeles. At the new location, which has yet to be determined, the Barry Building would be re-constructed. Reconstruction of the building would incorporate additional preservation measures relating to seismic retrofitting, ADA updates, building code updates, and energy efficiency upgrading. The differences between Option 3 and Option 4 chiefly concern whether the Barry Building would be dismantled into 9 or 20 pieces. While these differences have some implications with regard to the logistical challenges surrounding relocation, these differences would not translate into substantially different air quality impacts between Option 3 and Option 4. Also, given the complexities of relocation, there is uncertainty regarding the scheduling of both Option 3 and Option 4. Given these factors, in analyzing the air quality impacts of Alternative 4, a generalized account of the potential construction requirements and scheduling has been taken into consideration, and it is described below. Where appropriate, conservative assumptions have been made. For example, the analysis has considered the effect of 20 truck trips to relocate the Barry Building pursuant to Option 4, rather than the lesser 9 trips that would be required pursuant to Option 3. An 18-month schedule was assumed, which is consistent with scheduling estimates for either Option 3 or Option 4.

Alternative 4's unmitigated maximum daily regional and localized emissions from construction were estimated using CalEEMod and account for the fact that simultaneous work would occur on both the existing Barry Building site and the future relocation site. As shown in Table V-20, blow, the Project's unmitigated regional construction emissions would not exceed SCAQMD regional significance thresholds for VOC, NO_X, CO, PM_{10}, or $PM_{2.5}$, and localized emissions from neither the existing Barry Building site nor the future relocation site would exceed SCAQMD LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$. As a result, Alternative 4's construction-related emissions impacts on regional and localized air quality would be less than significant.

Concerning cumulative impacts, the SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed using the same significance criteria as those for project-specific impacts – i.e., the regional and localized significance thresholds. Because Alternative 4's construction emissions would not exceed SCAQMD regional thresholds and LST's, Alternative 4 also would not cause a cumulatively considerable increase in pollutant emissions.

Neither the Project's construction emissions nor Alternative 4's construction emissions would have a significant impact on regional or localized air quality. However, Alternative 4 would result in greater maximum daily construction emissions than the Project, both regionally and locally. Alternative 4 would also generate construction emissions over a much longer period than the Project. Whereas the Project would take an estimated 37 days to complete, Alternative 4 may require up to 20 months.

Table V-20
Alternative 4 - Estimated Daily Construction Emissions (Unmitigated)

Construction Phase[A]	Daily Emissions (Pounds Per Day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Regional Emissions						
Maximum Regional Emissions[B]	27.0	28.1	25.8	<0.1	4.4	2.9
Regional Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
Maximum Existing Site Emissions	1.8	14.0	13.7	<0.1	0.7	0.7
Maximum Future Site Emissions	27.0	14.0	10.9	<0.1	3.4	2.1
Localized Significance Threshold[C]	N/A	103	562	N/A	4	3
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

[A] A January 2022 starting date was chosen for the start of Alternative 4's construction activities, but Alternative 4 does not have a pre-determined starting date as of the time of this analysis. A different starting date would have a nominal effect on emissions projections.

[B] Alternative 4 consists of two sites (the current Project Site and the relocation site) with overlapping emissions at times. CalEEMod cannot model emissions from two sites at once, so separate models were performed for work that would occur at the existing Project Site and the relocation site. Daily emissions from overlapping phases were then added together to obtain the maximum regional emissions that would be generated by both sites.

[C] Localized significance thresholds assumed the following:

- Location in SRA No. 2, "Northwest Coastal LA County." The "Existing Site" is located in this source receptor area, so LSTs for SRA No. 2 would apply to construction emissions at the existing Barry Building Site. A future relocation site in the City of Los Angeles is currently undetermined, so it is not possible to determine which LSTs from which SRA would apply to construction emissions at the future relocation site. However, the estimated maximum daily emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ at the future relocation site would not exceed these pollutants' minimum LST values for any SRA in the entire South Coast Air Basin. Therefore, despite not knowing the exact LSTs that would apply to construction emissions at the future relocation site, the analysis nevertheless demonstrates that no exceedance of LSTs would occur.
- One-acre site. The existing Barry Building site is less than one-acre, and it is presumed that any future relocation site would be similarly sized. This is the smallest project site used for analysis in the LST guidance methodology – use of a larger project site would result in less-stringent LSTs.
- 25-meter (82-foot) receptor distance. This is the shortest distance used for analysis in the LST guidance methodology, and it is consistent with the existing site's distances to surrounding receptors. Utilizing this receptor distance results in the most-stringent LSTs.

Source: Noah Tanski Environmental Consulting, 2021, based on CalEEMod 2020.4.0 model runs (included in Appendix H-14 of this Draft EIR).

(ii) Operation

Localized and regional emissions were also estimated for Alternative 4's operations, which would take place at the future relocation site (except for mobile emissions which would be off-site). As shown below in Table V-21, the operations of the relocated Barry Building as leasable space for retail tenants would not introduce any new major sources of air pollution; emissions would not exceed SCAQMD regional significance thresholds for VOC, NO_X, CO, PM_{10}, and $PM_{2.5}$, nor would they exceed SCAQMD LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$. As a result, Alternative 4's operational

impacts on regional and localized air quality would be considered less than significant. Note that the emissions shown in Table V-21 are not "net" emissions that have been quantified by calculating the change in emissions between the Barry Building's previous uses and its potential future uses. The building's previous uses, and what their operational emissions might have been, have not been considered in this particular analysis.

Neither the Project's operations emissions nor Alternative 4's operations emissions would have a significant impact on regional or localized air quality. However, because it proposes the renewed operations of the Barry Building, Alternative 4 would result in greater daily operational emissions than the Project, both regionally and locally.

Table V-21
Alternative 4 - Estimated Daily Operational Emissions (Unmitigated)

Emissions Source	Daily Emissions (Pounds Per Day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area	0.3	<0.1	<0.1	<0.1	<0.1	<0.1
Energy	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Mobile Sources	1.5	1.4	12.4	<0.1	2.5	0.7
Project Regional Emissions	1.8	1.4	12.4	<0.1	2.5	0.7
Regional Daily Thresholds	55	55	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Project Localized Emissions	0.3	<0.1	<0.1	<0.1	<0.1	<0.1
Localized Significance Thresholds[A]	N/A	103	562	N/A	1	1
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

[A] Localized significance thresholds assumed the following:

- Location in SRA No. 2, "Northwest Coastal LA County." The "Existing Site" is located in this source receptor area, so this SRA's operational LSTs are shown for informational and comparative purposes. Because a future relocation site in the City of Los Angeles is currently undetermined, it is not possible to determine which LSTs from which SRA would apply to operational emissions at the future relocation site. However, the estimated maximum daily emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ at the future relocation site would not exceed these pollutants' minimum LST values for any SRA in the entire South Coast Air Basin. Therefore, despite not knowing the exact LSTs that would apply to operational emissions at the future relocation site, the analysis nevertheless demonstrates that no exceedance of LSTs would occur.
- One-acre site. The existing Barry Building site is less than one-acre, and it is presumed that any future relocation site would be similarly sized. This is the smallest project site used for analysis in the LST guidance methodology – use of a larger project site would result in less-stringent LSTs.
- 25-meter (82-foot) receptor distance. This is the shortest distance used for analysis in the LST guidance methodology. Utilizing this receptor distance results in the most-stringent LSTs.

Under Alternative 4, the existing Barry Building site would contain no residual land usage or operations except for a modest landscaped buffer with a timed irrigation system. Any daily emissions associated with this feature and its occasional maintenance would be de minimis.

Source: Noah Tanski Environmental Consulting, 2021, based on CalEEMod 2020.4.0 model runs (included in Appendix H-14 of this Draft EIR).

(iii) Sensitive Receptors

As demonstrated in Tables V-20 and V-21, above, Alternative 4's construction and operational emissions would not exceed SCAQMD's applicable regional thresholds and LSTs. These SCAQMD thresholds represent the maximum emissions that would not be expected to cause or materially contribute to an exceedance of NAAQS or CAAQS, which themselves represent the maximum concentrations of pollutants that can be present in outdoor air without any harmful effects on people or the environment. Therefore, neither Alternative 4's construction nor its operational emissions would be expected to cause or measurably contribute to adverse air quality-related health impacts at any nearby receptors, and Alternative 4's construction and operational emissions impacts to local and regional receptors would be considered less than significant.

As noted earlier, neither the Project's emissions nor Alternative 4's emissions would have a significant impact on regional air quality or localized air quality at nearby sensitive receptors within 25 meters (82 feet) of the Project Site. However, as discussed, Alternative 4 would result in greater construction and operational emissions than the Project.

(b) Cultural Resources

As discussed in Section IV.B (Cultural Resources) of this Draft EIR, the existing building is designated as City HCM No. LA-887. While the Project proposes to demolish the existing building, Alternative 4 involves dismantling the Barry Building into multiple small building portions to facilitate its relocation to a new site, which has yet to be determined. At the new location, the Barry Building would be reconstructed, which would incorporate additional preservation measures relating to seismic retrofitting, ADA updates, building code updates, and energy efficiency upgrading. Finally, the Barry Building would then be occupied by 12,800 square feet of retail uses. As described previously, the report prepared by HKA (included in Appendix H-12 of this Draft EIR) analyzed the feasibility of four options to move the Barry Building but concluded that only Options 3 and 4 would be feasible. Therefore, the following analyzes the impacts of relocation Options 3 and 4 with respect to historic resources.

As discussed above, Option 3 would require the building to be separated at a point above the second-floor plane but below the historical windows, and therefore would require the structure to be stabilized temporarily (addition of wood and steel beams, vertical and diagonal braces, diaphragms, and temporary floor construction to take place of the floor which will remain as part of the first story) to protect the construction from excessive movement during the relocation trip. According to HKA, while this option is feasible, it is impractical, and the risks associated with it are significant both during the relocation and once at the new property to put the building back together. This option presents significant architectural destruction and damage when separating the building into portions for moving. Separating the two-story building slightly above the second-floor line presents a long horizontal line of destruction and damage to the architectural exterior veneer plaster, as well as similar damage and destruction at the vertical separations. As the overall building is separated into strategic portions to facilitate structural relocation, more and more damage and restoration would be required. Restoring the veneer plaster at the separation

locations would require feathering the plaster between the old and the new and/or installing screeds as plaster stops and expansion joints. According to HKA, this would result in significant degradation to the historic fabric of the building's exterior and to the historical character defining features, eliminating the benefit of preserving the historic characteristics of the building through relocation.

While Option 4 would be the most feasible from a logistical perspective, according to HKA, this option presents the greatest risk to the architectural and historical feature integrity. The process to separate the building elements, both horizontally and vertically, into smaller and more mover friendly portions would result in unrepairable devastation to the building's historical character defining features and finishes. With the anticipated wall openings and cuts, the ability to restore these elements once relocated would be impossible to accomplish. The characteristic veneer plaster would be cut and removed over major portions of the building's exterior to allow for the separation of the building into movable portions. At many vertical locations, it is unavoidable to accomplish the separation without cutting through the line of the character defining windows. According to HKA, this option, by chopping the building into many pieces, would impact the building's historical character defining features.

Historic Resources Group prepared a memo based on their review of the HKA report (Appendix H-16 of this Draft EIR). As stated in this memo, Historic Resources Group concurs with HKA's findings that while technically feasible, Options 3 and 4 present a high risk of damage and loss of the Barry Building's character-defining features and thus could result in significant adverse impacts. In particular, according to Historic Resources Group, the exterior cement plaster would almost certainly be completely lost. However, most exterior features including windows, doors, louvered screens, the courtyard staircases, and balcony railings could be removed and catalogued prior to disassembly, stored securely during relocation, and reinstalled in their original configuration after the building is relocated. According to Historic Resources Group (in their memo contained in Appendix H-16 of this Draft EIR), the risks associated with disassembly could potentially be mitigated to a less than significant impact, with the implementation of Mitigation Measure ALT4 MM-1, provided below.

ALT4 MM-1 Potential mitigation measures to reduce the risks associated with disassembly of the Barry Building could include, but not necessarily be limited to, the following:

- Historic American Buildings Survey (HABS) documentation including photographs, drawings, and narrative, completed prior to the issuance of permits.

- Preparation of an Historic Structure Report (HSR) in conformance with Preservation Brief 43 prior to the issuance of permits, to document existing features, evaluate conditions, and recommend appropriate treatments.

- Preparation of a Relocation and Rehabilitation Plan, to be reviewed and approved by the City of Los Angeles Office of Historic Resources (OHR) prior to the issuance of any permits.

- Selection of a new site that meets the requirements of Criteria Consideration B as outlined in *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation.*

- Inclusion of an historic architect on the Project team to monitor disassembly, relocation, and rehabilitation activities.

- Rehabilitation of the relocated Barry Building in conformance with the Secretary of the Interior's Standards for Rehabilitation (36 CFR 67) including replication of the historic cement plaster and reinstallation of salvaged architectural features.

As discussed previously for Alternative 2, Historic Resources Group prepared a memorandum (included in Appendix H-7 of this Draft EIR) to determine whether the proposed seismic retrofit and ADA upgrades would comply with the Secretary of the Interior's Standards for Rehabilitation and whether the existing building would continue to retain its historic significance and provided design alterations to the proposed ADA upgrade. Alternative 4 would incorporate the design alterations that were provided by Historic Resources Group for Alternative 2.

Therefore, with implementation of Mitigation Measure ALT4 MM-1 (or other equivalent measures), Alternative 4's impacts with respect to historic resources would be less than significant and the Barry Building would continue to be eligible as an HCM. Alternative 4's impacts would be less than the Project's significant and unavoidable impact with respect to historic resources.

(c) Greenhouse Gas Emissions

(i) GHG Emissions Calculation

During the construction activities for Alternative 4 described above, GHG emissions would be generated by construction equipment and vehicles. As described earlier, Alternative 4 involves dismantling the Barry Building into multiple small building portions to facilitate its relocation to a new site, which would be along a commercial thoroughfare in the City of Los Angeles. At the new location, which has yet to be determined, the Barry Building would be re-constructed. Reconstruction of the building would incorporate additional preservation measures relating to seismic retrofitting, ADA updates, building code updates, and energy efficiency upgrading. The differences between Option 3 and Option 4 chiefly concern whether the Barry Building would be dismantled into 9 or 20 pieces, respectively. While these differences have some implications with regard to the logistical challenges surrounding relocation, these differences would not translate into substantially different greenhouse gas emissions between Option 3 and Option 4. Also, given the complexities of relocation, there is uncertainty regarding the scheduling of both Option 3 and Option 4. Given these factors, in analyzing the greenhouse gas emissions of Alternative 4, a generalized account of the potential construction requirements and scheduling has been taken into consideration, and it is described below. Where appropriate, conservative assumptions have been made. For example, the analysis has considered the effect of 20 truck trips to relocate the Barry Building pursuant to Option 4, rather than the lesser 9 trips that would be required pursuant to Option 3. An 18-month schedule was assumed, which is consistent with scheduling estimates for either Option 3 or Option 4.

Alternative 4's construction and operational GHG emissions were estimated using CalEEMod. As recommended by the SCAQMD, the total GHG construction emissions should be amortized over a 30-year lifetime of a project (i.e., total construction GHG emissions should be divided by 30 to determine an annual construction emissions estimate that can be added to a project's operational emissions) to determine a project's annual GHG emissions inventory. Operational GHG emissions include direct GHG emissions generated by the building's operations and indirect GHG emissions generated by its related vehicle trips.

Note that the emissions shown in Table V-22 are not "net" emissions that have been quantified by calculating the change in GHG emissions between the Barry Building's previous uses and its potential future uses. The building's previous uses, and what their operational GHG emissions might have been, have not been considered by the analysis. Finally, the emissions shown in Table V-22 are disclosed for informational purposes only.

Table V-22
Alternative 4 – Estimated GHG Emissions

Source	Metric Tons of CO_2e[a]
Construction	
2022	284.6
2023	102.2
Total	386.8
Amortized Over 30 Years	12.9
Operations (annual)	
Area Source(s)	<0.1
Energy Source(s)	59.2
Mobile Sources	375.3
Solid Waste	7.4
Water/Wastewater	7.9
Construction (from above)	12.9
Total Annual Emissions	462.7

[a] CO_2e was calculated using the CalEEMod 2020.4.0 model. Some figures may not add up properly due to rounding.

Source: Noah Tanski Environmental Consulting, 2021. Refer to Appendix H-14 of this Draft EIR.

(ii) Plan Consistency

The Barry Building has been vacant since 2017. This building, as relocated and preserved via Alternative 4, would not be substantially different than what was vacated approximately five years ago, and the proposed seismic and ADA-related upgrades, such as the addition of elevators and plumbing improvements, would not introduce any new major direct or indirect sources of GHG emissions. Given the age of the Barry Building and its improvements, updates to its plumbing, electrical, glazing, and other systems/features would be made in accordance with the latest CALGreen and LA Green Building Code requirements, which would provide some measure of GHG emissions reductions via energy and water conservation. Nonresidential buildings built to

the latest 2019 Title 24 Building Energy Efficiency Standards are expected to use about 30 percent less energy than nonresidential buildings built to the previous 2016 standards. Considering the age of the Barry Building, it is reasonable to anticipate that the upgrades and renovations proposed by Alternative 4 would improve its energy efficiency by greater than 30 percent. The proposed new building would be built to the latest CALGreen and LA Green Building Code requirements, as well.

Updating the Barry Building's lighting, glazing, plumbing, insulation, and other features to the latest CALGreen and LA Green Building Code Standards is one way that Alternative 4 would be consistent with the Climate Change Scoping Plan's actions and strategies to improve lighting efficiencies, reduce statewide electrical energy consumption, and reduce water consumption. The preservation and renewed operations of the Barry Building would also be consistent with the Scoping Plan's actions and strategies related to SB 375, as well as the GHG-reducing plans and strategies developed pursuant to SB 375. SCAG's 2020-2045 RTP/SCS, "Connect SoCal," is the latest plan to achieve CARB's GHG emissions reduction targets for the region, per SB 375. The land use pattern emphasized by the 2020-2045 RTP/SCS involves concentrating new housing, employment, and other development in infill locations and HQTAs in an effort to reduce regional GHG emissions by facilitating alternative transportation modes and reducing VMT. While it is not known where the Barry Building would be relocated, it must be located on a similar commercial thoroughfare in the City of Los Angeles. As the Barry Building's existing location is along San Vicente Boulevard, which is a HQTA (as defined by the 2020-2045 RTP/SCS) and a "Pedestrian Enhanced District" (as defined by the City's Mobility Plan 2035), these requirements ensure that the Barry Building must be relocated along a roadway with similar qualities, which in turn virtually guarantees that the Barry Building would be relocated to a site that is consistent with the 2020-2045 RTP/SCS's land use pattern and smart growth policies. Further, it means that the Barry Building's rehabilitation and eventual re-use would likely contribute to growth in an urban infill location, as opposed to growth in urbanizing areas that likely possess fewer alternative transportation options and that may contribute to sprawl. For similar reasons, Alternative 4 would also be consistent with aspects of LA's Green New Deal that relate to development and mobility, such as targets to reduce VMT per capita and to increase the number of trips made by walking, biking, or transit.

In summary, Alternative 4 would not conflict with the Climate Change Scoping Plan and its updates, the 2020-2045 RTP/SCS, or LA's Green New Deal, which represent the GHG-reduction plans and policies that are most relevant to Alternative 4. Additionally, the renewed operations of the Barry Building would benefit from items such as SB 100's requirement for LADWP and other energy providers to supply 100 percent of electricity from renewable resources by 2045 and CAFE standards that establish increasing fuel efficiency standards for on-road vehicles. Given these considerations, Alternative 4's impacts with regard to climate change would be less than significant.

Compared to the Project, Alternative 4 would emit more GHG emissions on an ongoing basis because it proposes the renewed operations of the Barry Building. However, both the Project and

Alternative 4 would be consistent with relevant GHG-reduction plans and policies and result in a less than significant impact with regard to climate change.

(d) Land Use and Planning

Options 3 and 4 would result in the same impacts with respect to land use and planning. Therefore, the following analysis would apply to both Options 3 and 4.

(i) SCAG 2020-2045 RTP/SCS

The 2020-2045 RTP/SCS includes strategies for accommodating projected population, household, and employment growth in the SCAG region by 2045. These land use strategies are directly tied to supporting related GHG emissions reductions through increasing transportation choices aimed at triggering reduced dependence on automobiles and increased growth in walkable, mixed-use communities. Alternative 4 would involve the relocation of the Barry Building to a site on a similar commercial thoroughfare in the City of Los Angeles. As the Barry Building's existing location is along San Vicente Boulevard, which is a HQTA (as defined by the 2020-2045 RTP/SCS) and a "Pedestrian Enhanced District" (as defined by the City's Mobility Plan 2035), these requirements ensure that the Barry Building must be relocated along a roadway with similar qualities, which would likely result in the Barry Building being relocated to a site that is consistent with the 2020-2045 RTP/SCS's land use pattern and smart growth policies. Therefore, Alternative 4 would be consistent with the 2020-2045 RTP/SCS and this impact would be less than significant.

(ii) City of Los Angeles General Plan

Alternative 4's consistency with the applicable objectives and policies of the General Plan is discussed below in Table V-23.

Table V-23
Alternative 4 Consistency with Applicable Policies of the General Plan

Objectives and Policies	Alternative 4 Consistency
Framework Element	
3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	**No Conflict.** Alternative 4 includes the relocation of the Barry Building to a new site that has yet to be identified. However, based on the configuration of the Barry Building, it is likely that on the new site, there would also be a central courtyard with the building surrounding the courtyard, which would promote pedestrian and bicycle access to the site.
3.8.1: Accommodate the development of neighborhood-serving uses in areas designated as "neighborhood district." The range and densities of uses permitted in any area shall be identified in the community plans.	**No Conflict.** Alternative 4 includes the re-occupation of the Barry Building with 12,800 square feet of retail uses after it has been relocated to a new site. The retail uses that would occupy the Barry Building would likely serve the neighborhood surrounding the new site.
3.8.2: Encourage the retention of existing and development of new commercial uses that	**No Conflict.** Alternative 4 includes the re-occupation of the Barry Building with 12,800

Table V-23
Alternative 4 Consistency with Applicable Policies of the General Plan

Objectives and Policies	Alternative 4 Consistency
primarily are oriented to the residents of adjacent neighborhoods and promote the inclusion of community services (e.g., child care and community meeting rooms).	square feet of retail uses after it has been relocated to a new site. While the tenants that could occupy the building under Alternative 4 are unknown, it is likely that they would be uses that would serve the residents of the adjacent neighborhoods.
Conservation Element	
Cultural and historical objective and policy: Objective: protect important cultural and historical sites and resources for historical, cultural, research, and community education purposes. Policy: continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities.	**No Conflict.** Whereas the Project involves the demolition of the Barry Building, which the City of Los Angeles designated as HCM No. LA-887 in 2007, Alternative 4 involves the relocation of the Barry Building to a new site, that has yet to be identified. However, as discussed above under "Cultural Resources," the relocation of the Barry Building to another site would jeopardize the building's historical character defining features. Nevertheless, as also discussed above under "Cultural Resources," Alternative 4's impact with respect to historical resources would be less than significant with implementation of Mitigation Measure ALT4 MM-1 and the inclusion of the recommendations provided by Historic Resources Group (in their memo contained in Appendix H-7 of this Draft EIR).
Air Quality Element	
4.2.2: Improve accessibility for the City's residents to places of employment, shopping centers, and other establishments.	**No Conflict.** Alternative 4 includes the re-occupation of the Barry Building with 12,800 square feet of retail uses after it has been relocated to a new site. The new retail uses would provide residents of surrounding areas with places of employment and places to shop.
Source: City of Los Angeles General Plan.	

As provided above, Alternative 4 would be substantially consistent with the applicable policies of the General Plan and therefore, Alternative 4's impacts would be less than significant.

(iii) Brentwood – Pacific Palisades Community Plan

Alternative 4 involves the relocation of the Barry Building to a new site, which has not yet been identified. No owner of another site has agreed to take the Barry Building. Since a new site has not been identified, this analysis examines Alternative 4's consistency with the Brentwood – Pacific Palisades Community Plan, even though the new site may be outside the Brentwood – Pacific Palisades Community Plan area, in order to present a comparison to the analysis prepared for the Project. Alternative 4's consistency with applicable goals, objectives, and policies contained in the Brentwood – Pacific Palisades Community Plan is provided below in Table V-24.

Table V-24
Alternative 4 Consistency with Applicable Goals, Objectives, and Policies of the Brentwood-Pacific Palisades Community Plan

Policy	Alternative 4 Consistency
Objective 1-4: To preserve and enhance neighborhoods with a distinctive historic character. **Policy 1-4.1:** Protect and encourage reuse of the area's historic resources. **Policy 1-4.2:** Preserve architecturally or historically significant features and incorporate such features as an integral part of new development when appropriate.	**No Conflict.** Whereas the Project involves the demolition of the Barry Building, which the City of Los Angeles designated as HCM No. LA-887 in 2007, Alternative 4 involves the relocation of the Barry Building to a new site, that has yet to be identified. However, as discussed above under "Cultural Resources," the relocation of the Barry Building to another site will jeopardize the building's historical character defining features. Nevertheless, as also discussed above under "Cultural Resources," Alternative 4's impact with respect to historical resources would be less than significant as long as Alternative 4 implements Mitigation Measure ALT4 MM-1 and includes the recommendations provided by Historic Resources Group (in the memo contained in Appendix H-7 of this Draft EIR).
Policy 2-1.1: New commercial uses shall be located in existing established commercial areas or shopping centers.	**No Conflict.** Alternative 4 includes the re-occupation of the Barry Building with 12,800 square feet of retail uses after it has been relocated to a new site. While a new site has not yet been identified, it would be on a similar commercial street and therefore, Alternative 4 would not conflict with this policy.
Policy 2-3.5: Require that the first-floor street frontage of structures, including mixed-use projects and parking structures located in pedestrian oriented districts, incorporate commercial uses directed at pedestrian traffic.	**No Conflict.** Alternative 4 includes the relocation of the Barry Building to a new site that has yet to be identified. Once relocated the Barry Building would be occupied with 12,800 square feet of retail uses, including on the first floor, which would be directed at pedestrian traffic.
Policy 2-4.2: Preserve community character, scale, and architectural diversity.	**No Conflict.** While Alternative 4 includes the relocation of the Barry Building to a new site, at the new location the Barry Building would be reconstructed. Therefore, Alternative 4 would preserve architectural diversity through the preservation of the Barry Building.
Policy 2-4.4: Landscape corridors should be created and enhanced and maintained through the planting of street trees.	**No Conflict.** A relocation site has not yet been identified for the Barry Building. Therefore, it is unknown whether there are any existing street trees at that theoretical site. However, Alternative 4 would include the planting of street trees, as required by the City. In addition, the existing street trees at the Project Site would remain, even after the Barry Building has been moved to the relocation site.
Goal 17: A community which preserves and restores the monuments, cultural resources, neighborhoods, and landmarks which have historic and/or cultural significance. **Objective 17-1:** To ensure that the Plan Area's significant cultural and historic resources are protected, preserved, and/or enhanced. **Policy 17-1.1:** Identify all designated City of Los Angeles Historic and Cultural Monuments in order	**No Conflict.** Whereas the Project involves the demolition of the Barry Building, which the City of Los Angeles designated as HCM No. LA-887 in 2007, Alternative 4 involves the relocation of the Barry Building to a new site, that has yet to be identified. However, as discussed above under "Cultural Resources," the relocation of the Barry Building another site would jeopardize the building's historical character defining features. Nevertheless, as also discussed above under "Cultural Resources," Alternative 4's impact with respect to historical

Table V-24
Alternative 4 Consistency with Applicable Goals, Objectives, and Policies of the Brentwood-Pacific Palisades Community Plan

Policy	Alternative 4 Consistency
to foster public appreciation of the City of Los Angeles' valuable historic resources and to promote education of the public.	resources would be less than significant as long as Alternative 4 implements Mitigation Measure ALT4 MM-1 and includes the recommendations provided by Historic Resources Group (in the memo contained in Appendix H-7 of this Draft EIR).
17-1.2: Protect and preserve archaeological sites of Native Americans.	**No Conflict.** As discussed in Section IV.G, Tribal Cultural Resources, of this Draft EIR, in response to a sacred lands file search conducted with the NAHC, the NAHC indicated that no sacred lands or sites are documented within the Project area. In addition, the Tribal Cultural Resources Report prepared for the Project concluded that the Project Site has a low sensitivity for containing unknown tribal cultural resources. As a relocation site has not yet been identified and no owner of another site has agreed to take the Barry Building, the conditions of that site with respect to tribal cultural resources is unknown. However, the City has established a condition of approval to address the inadvertent discovery of tribal cultural resources. Compliance with this condition of approval would ensure that Alternative 4's impacts with respect to tribal cultural resources are less than significant.
Source: City of Los Angeles, Brentwood-Pacific Palisades Community Plan, adopted June 1998.	

As shown above, Alternative 4 would be substantially consistent with the applicable policies of the Brentwood – Pacific Palisades Community Plan. Further, Alternative 4 would be consistent with policies for the preservation of the existing building as Alternative 4's impacts with respect to historical resources were determined to be less than significant with implementation of Mitigation Measure ALT4 MM-1 as well as the inclusion of the recommendations provided by Historic Resources Group (in the memo contained in Appendix H-7 of this Draft EIR). Overall, Alternative 4's land use impacts related to consistency with the Brentwood – Pacific Palisades Community Plan would be less than significant.

(iv) San Vicente Scenic Corridor Specific Plan

Alternative 4 involves the relocation of the Barry Building to a new site, which has not yet been identified. No owner of another site has agreed to take the Barry Building. Since a new site has not been identified, this analysis examines Alternative 4's consistency with the San Vicente Scenic Corridor Specific Plan, even though the new site may be outside the San Vicente Scenic Corridor Specific Plan area, in order to present a comparison to the analysis prepared for the Project. Alternative 4's consistency with applicable policies contained in the San Vicente Scenic Corridor Specific Plan is provided below in Table V-25.

Table V-25
Alternative 4 Consistency with Applicable Provisions of the San Vicente Scenic Corridor Specific Plan

Provision	Alternative 4 Consistency
7.H.: Vacant lots. Where a building or structure has been demolished and plans for new construction have not been submitted to the Department of Building and Safety within six months of the completion of demolition, a landscape buffer shall be installed pursuant to Section 7G.	**No Conflict.** Alternative 4 involves the relocation of the Barry Building to another site, which will result in a vacant lot on the Project Site. Therefore, Alternative 4 would include the timely installation of a landscape buffer at the Project Site.
9.A.1: Sidewalks abutting San Vicente Boulevard shall be at least 12 feet in width and maintain a minimum unobstructed width of 10 feet for pedestrian access.	**No Conflict.** The existing sidewalk is at least 12 feet in width, with a minimum unobstructed width of 10 feet for pedestrian access. The existing sidewalk would not be altered as part of Alternative 4. While a relocation site has not yet been identified, should it be on San Vicente Boulevard, it is assumed that it would comply with this provision.
9.B.1: Open Space Uses The required open space shall contain one or more of the following amenities: a. Plaza b. Seating c. Landscaping d. Bicycle Racks e. Outdoor café f. Tables for outdoor eating g. Other uses similar to a-f above	**No Conflict.** Alternative 4 includes the relocation of the Barry Building to a new site that has yet to be identified. However, based on the configuration of the Barry Building, it is likely that on the new site, there would also be a central courtyard with the building surrounding the courtyard, which would provide open space consistent with this provision.
12.A.4: Parking A garage or off-street parking area shall be provided in connection with and at the time of erection of each new commercial structure or at the time any existing commercial structure is enlarged or increased in floor area or seating capacity, or when any building is converted from a more restrictive use to a commercial uses. The following minimum parking requirements shall apply to new structures, conversions and to the net additional floor area added to an existing structure: 4. For buildings or premises occupied by any other commercial use, one space shall be required for each 300 square feet of gross floor area.	**No Conflict.** Alternative 4 includes the relocation of the Barry Building to a new site that has yet to be identified. Should the new site be within the boundaries of the San Vicente Scenic Corridor Specific Plan, 43 parking spaces would be required at the relocation site. It is assumed that a relocation site would be able to accommodate the required parking.
13.B: Temporary construction fences required by the Los Angeles Municipal Code shall be painted a single earth tone color.	**No Conflict.** The construction fence placed around the Project Site and also the relocation site would be painted a single earth tone color.
Source: San Vicente Scenic Corridor Specific Plan.	

As provided above, Alternative 4 would be substantially consistent with the applicable policies of the San Vicente Scenic Corridor Specific Plan and therefore, Alternative 4's impacts would be less than significant.

(v) Los Angeles Municipal Code

It is assumed that the site selected for relocation of the Barry Building would allow for retail uses to occupy the Barry Building, consistent with the existing zoning and land use designation for the relocation site. Therefore, it is assumed that Alternative 4 would not conflict with the existing zoning, and a less than significant impact would occur.

(vi) Conclusion

As described above, Alternative 4 would be substantially consistent with the applicable plans and policies adopted for the purpose of avoiding or mitigating an environmental effect. Further, Alternative 4 would not conflict with policies for the preservation of the existing building and would not affect the historic significance of this building with implementation of Mitigation Measure ALT4 MM-1 as well as the inclusion of recommendations provided by Historic Resources Group (in their memo contained in Appendix H-7 of this Draft EIR). Therefore, Alternative 4's impacts with respect to land use and planning would be less than significant, and less than the Project's significant and unavoidable land use impact.

(e) Noise

(i) Construction Noise

Noise-generating activities could occur at the Project Site between 7:00 A.M. and 9:00 P.M. Monday through Friday, in accordance with LAMC Section 41.40(a). On Saturdays, construction would be permitted to occur between 8:00 A.M. and 6:00 P.M. No construction is permitted on Sundays. Because Alternative 4's construction activities would last more than ten days in a three-month period, the applicable threshold of significance for noise impacts is an increase of 5 dBA over existing ambient noise levels. The differences between Option 3 and Option 4 chiefly concern whether the Barry Building would be dismantled into 9 or 20 pieces, respectively. While these differences have some implications with regard to the logistical challenges surrounding relocation, these differences would not translate into substantially different noise impacts between Option 3 and Option 4. Also, given the complexities of relocation, there is uncertainty regarding the scheduling of both Option 3 and Option 4. Given these factors, in analyzing the noise impacts of Alternative 4, a generalized account of the potential construction requirements and scheduling has been taken into consideration, and it is described below. Where appropriate, conservative assumptions have been made. For example, the analysis has considered the effect of 20 truck trips to relocate the Barry Building pursuant to Option 4, rather than the lesser 9 trips that would be required pursuant to Option 3. An 18-month schedule was assumed, which is consistent with scheduling estimates for either Option 3 or Option 4.

Alternative 4's on-site construction activities would occur from two locations: the existing Barry Building location and the future relocation site, which has yet to be determined. The following analysis separately assesses the potential creation of significant on-site construction noise impacts at both sites.

On-site construction activities at the existing location would consist of those related to asbestos abatement, preparing the Barry Building for relocation, the subsequent removal of its existing utility connections, and the eventual installation of a modest landscape buffer. Asbestos abatement would involve the removal of asbestos-containing building materials from the Barry Building and hauling it to an off-site landfill that accepts friable asbestos waste. This would require the on-site use of powered hand tools and other electric or pneumatic equipment, but no heavy-duty off-road construction vehicles such as an excavator or a bulldozer. Preparing the Barry Building for relocation would require the use of powered hand tools to dismantle the building into transportable segments, welding tools to construct temporary braces and frames to secure these segments during relocation, and a crane or crane truck to assist with all tasks. Once the Barry Building has been relocated, a backhoe would be used to dig and backfill trenches to facilitate removal of the building's underground utilities. It may also demolish any remaining foundation materials. After this, a modest landscape buffer would be constructed at the site, but this would not require substantial use of heavy-duty off-road construction vehicles or other powered equipment.

Given its greater and more-intensive equipment requirements, relocation preparation would be the phase with the greatest potential to result in substantial noise increases at surrounding sensitive receptors. Cranes can produce noise levels of 74.2 dBA L_{eq} at 50 feet when performing work cycles. Welders can produce noise levels of 71.2 dBA L_{eq} at a similar distance. Table V-26, below, shows the estimated unmitigated noise impact at 11900 Saltair Terrace that could result from a workday's relocation preparation activities at the existing Barry Building site. 11900 Saltair Terrace is both the nearest sensitive receptor to the Project Site and the receptor with the lowest ambient noise level. Given these factors, no other sensitive receptors would experience greater noise levels or noise increases than 11900 Saltair Terrace. As shown, the resultant 67.0 dBA L_{eq} noise level would be well below the 75 dBA L_{eq} at 50 feet noise limit for powered construction equipment that is established by LAMC Section 112.05. However, the resultant noise increase at 11900 Saltair Terrace would be 12.0 dBA, which is above the City's significance threshold of 5 dBA. As a result, without mitigation, this impact would be considered significant.

Table V-26
Alternative 4 –Relocation Preparation Noise Impact at 11900 Saltair Terrace (Unmitigated)

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant?
Residence – 11900 Saltair Terrace	67.0	55.3	67.3	12.0	Yes
Calculations provided in Appendix H-15 of this Draft EIR. Source: Noah Tanski Environmental Consulting, 2021.					

To ensure that Alternative 4's construction-related noise increases at 11900 Saltair Terrace and other sensitive receptors do not exceed 5 dBA, the following mitigation measure is required:

ALT4 MM-2 Sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along the following boundaries:

- The east and west parking area boundaries (both the Project Site's east and west parking area boundaries and the east and west boundaries of the parcel immediately to the north of the Project Site (APN 4404-025-016)). (While the parcel to the north of the Project Site is not part of either the Project or Alternative 4, that parcel would be used for construction staging.)

- The northern property line of the parcel to the north of the Project Site (APN 4404-025-016) that separates this parcel from the residential uses to the north. Sound barriers along this property line shall be connected to the sound barriers described for the east and west property lines, so that all of Alternative 4's construction staging areas are fully enclosed by sound barriers.

The sound barriers shall be tall enough to shield line of sight paths from operating construction equipment to the 2nd stories of nearby residential uses. The prescribed sound barriers shall be installed for the duration of Alternative 4's relocation preparation and utilities removal phases.

Implementation of Mitigation Measure ALT4 MM-2 would reduce noise impacts to 11900 Saltair Terrace and all other nearby sensitive receptors to below the 5 dBA increase threshold of significance. As noise levels due to Alternative 4 utilities removal would not exceed noise levels associated with relocation preparation, implementation of Mitigation Measure ALT 4 MM-2 would also ensure that the noise impacts of this phase are less than significant (asbestos abatement and landscape buffer installation have no potential to result in significant construction noise impacts, even without mitigation). As shown in Table V-27, after mitigation, the relocation preparation-related noise increase at 11900 Saltair Terrace would be 1.7 dBA, below the City's 5 dBA increase threshold. As 11900 Saltair Terrace is the receptor in nearest proximity to the Project Site and with the lowest ambient noise level, impacts to other sensitive receptors would be less than this 1.7 dBA increase. Thus, implementation of Mitigation Measure ALT 4 MM-2 would ensure that on-site construction noise resulting from existing Barry Building site activities as a part of Alternative 4 would be less than significant with mitigation.

Table V-27
Alternative 4 –Relocation Preparation Noise Impact at 11900 Saltair Terrace (Mitigated)

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant?
Residence – 11900 Saltair Terrace	52.0	55.3	57.0	1.7	No
Calculations provided in Appendix H-15 of this Draft EIR. Source: Noah Tanski Environmental Consulting, 2021.					

It should be noted that the parking area behind the Alternative 4 site (to the north) may be utilized for construction staging, which may consist of materials and equipment storage. Construction vehicles may also be parked in this area when not in use. Despite this area's reduced distances to residential receptors to the north, including 11900 Saltair Terrace, any equipment operations in this area would be transient and incapable of causing or appreciably contributing to substantial noise increases at these or other receptors. And as explained, Mitigation Measure ALT4 MM-2 would fully shield this area from nearby residential receptors.

On-site construction activities at the future relocation site would require preparatory work prior to the delivery of the Barry Building. Preparatory work could include trenching for utility connections and constructing a new foundation for the relocated Barry Building. Trenching for these connections and grading for a new foundation could require an excavator and a loader. After the building has been delivered, activities would center around reassembling the Barry Building and performing additional preservation measures (e.g., rehabilitation, seismic retrofitting, ADA updates, building code updates, energy efficiency upgrades, etc.). Work associated with the reassembly and preservation of the Barry Building could require a range of equipment including cranes or crane trucks, aerial lifts, cement/mortar mixers, forklifts, welding tools, and various handheld power tools. Should the future relocation site require paving for a parking lot, a paver and asphalt compactors would be required.

Trenching for utility connections and grading for a new foundation would be the phases with the greatest potential to result in substantial noise increases, as these phases would require extensive use of heavy-duty, diesel-powered earthmoving equipment. Excavators can produce noise levels of 75.9 dBA L_{eq} at 50 feet when performing work cycles. Loaders can produce noise levels of 72.4 dBA L_{eq} at a similar distance. Table V-28, below, shows the estimated noise impacts that could result from a workday's trenching or grading activities at a future relocation site. Because a future relocation site has not been determined, it is not possible to know what noise-sensitive receptors may surround the future site or what their existing ambient noise conditions may be. However, it is known – and in fact required – that the Barry Building would be relocated to a site that is along an urbanized commercial thoroughfare similar to San Vicente Boulevard. It is therefore reasonable to assume that any future relocation site would have a similar pattern of land uses as the existing Barry Building site (i.e., mostly commercial) and a similar noise environment (i.e., noisier along the commercial thoroughfare, but possibly quieter at more distant receptor locations that are removed from the immediate roadway environment). Based on this reasoning, noise impacts have been modeled for potential receptors ranging at distances of 50 to 300 feet from the future relocation site. The ambient noise level for this modeling is 55.3 dBA L_{eq}, which is consistent with the lowest ambient noise level monitored in proximity of the existing Barry Building Site. It is unlikely that potential noise-sensitive receptors would be located closer than 50 feet to the future relocation site, because it is a requirement that the Barry Building would be relocated to a commercial thoroughfare with similar setbacks as the existing site. Having neighboring residential or other common noise-sensitive uses (e.g., schools, places of worship, etc.) would be contrary to this requirement. The use of a 55.3 dBA L_{eq} ambient noise level branches from this reasoning: if the Barry Building must be located along a commercial thoroughfare, then it is highly unlikely that nearby receptors, especially those located as near as

50 feet away, would experience lower ambient conditions than this. It is worth noting that the 55.3 dBA L_{eq} noise level was measured approximately 250 feet from the existing Barry Building site and over 350 feet from the San Vicente Boulevard commercial thoroughfare – substantially farther than 50 feet.

Table V-28
Alternative 4 –Trenching and Grading Noise Impact (Unmitigated)

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Potential Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant?
Potential Receptor – 50 feet away	73.5	55.3	73.6	18.3	Yes
Potential Receptor – 75 feet away	70.0	55.3	70.1	14.8	Yes
Potential Receptor – 100 feet away	67.5	55.3	67.8	12.5	Yes
Potential Receptor – 200 feet away	61.5	55.3	62.4	7.1	Yes
Potential Receptor – 300 feet away	58.0	55.3	59.8	4.5	No
Calculations provided in Appendix H-15 of this Draft EIR. Source: Noah Tanski Environmental Consulting, 2021.					

As shown, based on the previously explained assumptions, it is conservatively estimated that Alternative 4's trenching and grading activities could result in significant noise increases at potential receptors that are located between 50 feet and less than 300 feet away from a future relocation site. As a result, without mitigation, this impact would be considered significant. Receptors that are 300 feet or farther from a future relocation site are not likely to experience construction-related noise increases in excess of the 5 dBA increase threshold of significance. And as also shown, construction noise levels experienced by all potential receptors would be below the 75 dBA L_{eq} at 50 feet noise limit for powered construction equipment that is established by LAMC Section 112.05.

To ensure that Alternative 4's construction-related noise increases at potential receptors surrounding the future relocation site do not exceed 5 dBA, the following mitigation measure is required:

ALT4 MM-3 Sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along perimeters of the future relocation site facing noise-sensitive receptors that are located less than 300 feet from the future relocation site. The sound barriers shall be tall enough to shield line of sight paths from operating construction equipment to any above-ground stories that these receptors may possess. The sound barriers shall be installed for the duration of Alternative 4's relocation preparation activities (including trenching for utility connections and grading for foundations), Barry Building reassembly and preservation activities, and any paving.

As shown in Table V-29, implementation of Mitigation Measure ALT4 MM-3 would reduce noise impacts to below the 5 dBA increase threshold of significance at potential receptors that are

located between 50 feet and less than 300 feet away from the future relocation site. As noise levels due to other on-site construction activities at the future relocation site would not exceed noise levels associated with trenching and grading, implementation of Mitigation Measure ALT4 MM-3 would further ensure that the noise impacts of any other phases are less than significant. Thus, with implementation of Mitigation Measure ALT4 MM-3, on-site construction noise stemming from future relocation site activities as a part of Alternative 4 would be less than significant with mitigation.

Table V-29
Alternative 4 –Trenching and Grading Noise Impact (Mitigated)

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Potential Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant?
Potential Receptor – 50 feet away	58.5	55.3	60.2	4.9	No
Potential Receptor – 75 feet away	55.0	55.3	58.2	2.9	No
Potential Receptor – 100 feet away	52.5	55.3	57.1	1.8	No
Potential Receptor – 200 feet away	46.5	55.3	55.8	0.5	No
Potential Receptor – 300 feet away	43.0	55.3	55.5	0.2	No
Calculations provided in Appendix H-15 of this Draft EIR. Source: Noah Tanski Environmental Consulting, 2021.					

Concerning off-site construction noises, trucks and other construction-related vehicles would access both sites over the course of all Alternative 4 construction phases. However, Alternative 4 would not require the types of construction activities that result in substantial construction truck traffic generation. For example, Alternative 4 would not require basement excavation that often necessitates five or more haul truck trips per hour to remove cut soils and transport this matter to landfills. Alternative 4 also would not require substantial concrete deliveries, as is sometimes necessary for pouring thick mat foundation slabs. The removal of asbestos-containing waste from the existing Barry Building site would generate less than two haul truck trips per day, on average. Building construction and other phases would require no more than a few vendor delivery trips per day. These impacts would not result in discernible noise increases, much less significant 5 dBA increases, along San Vicente Boulevard or any other roadway utilized by Alternative 4 haul trucks and vendor trucks.

Trucks would also be required to transport disassembled portions of the Barry Building to the future relocation site. Moving buildings in this fashion necessitates traveling on major thoroughfares with high existing noise levels where the potential for significant noise increases at roadside noise-sensitive receptors is substantially reduced. Police or another supervising authority would temporarily shut-down access to and divert traffic from the relocation route to the future relocation site. The temporary diversion and/or holding of this traffic could actually result in roadside noise decreases. Building portions would be slowly and cautiously transported by a truck and a small supporting fleet of pilot and escort cars, which would generate transient noise impacts at roadside receptors. However, any noise impact from these vehicles would be significantly offset

by the simultaneous diversion of through traffic. Additionally, the duration of impact to any roadside receptor is not likely to exceed more than a few minutes at most.

Given these considerations, Alternative 4's impact from off-site construction noise sources would not be capable of causing 5 dBA noise increase at roadside noise-sensitive receptors, as measured over any meaningful time-averaged period. This impact would therefore be less than significant.

Neither the Project nor Alternative 4 would result in significant construction-related noise impacts at sensitive receptors due to on-site sources. However, as shown in Table V-29, Alternative 4 could potentially expose nearby sensitive receptors to construction-related noise increases as great as 4.9 dBA. The Project's maximum construction-related noise increase at 11900 Saltair Terrace would be just 1.1 dBA. Therefore, Alternative 4's on-site construction noise sources would result in a greater noise impact than the Project. Concerning off-site construction noise sources, such as construction trucks, neither the Project nor Alternative 4 would result in substantial off-site noise increases. Alternative 4 would generate a greater number of off-site construction trips than the Project and would presumably result in greater off-site noise impacts than the Project as a result. However, it is unlikely that any difference in impact would be noticeable because the threshold of perception for humans is a 3 dBA difference. The difference in noise impacts would be far less than this 3 dBA threshold.

(ii) Construction Vibration

Groundborne vibration would be generated by primarily demolition (i.e., utilities removal), trenching, and grading activities for Alternative 4. Heavy-duty steel-tracked equipment such as an excavator or loader, assumed to be the vibrational equivalent of the FTA's "Large Bulldozer" equipment, can produce vibration levels of 0.089 inches per second PPV at a reference distance of 25 feet. As discussed earlier, these vehicles would be required by Alternative 4, potentially at both the existing Barry Building site and the future relocation site. Other equipment, such as forklifts or plate compactors, would produce less groundborne vibrations.

Table V-30, below, shows the estimated construction-related vibration impacts at the existing Barry Building site's nearest off-site structures. Because a future relocation site has not been determined, it is not possible to know what structures may surround the future site, how far away they may be located, and what their structural condition may be. However, it is known – and once again required – that the Barry Building would be relocated to a site where it possesses a similar orientation to a commercial thoroughfare and similar setbacks to surrounding structures. As the nearest structure to the Barry Building is currently setback at approximately 25 feet, it is unlikely that any future neighboring structure would be located within 25 feet of the relocated Barry Building structure. Based on this, it is reasonable to assume that construction equipment operating at the future relocation site would be capable of maintaining similar operational setbacks to surrounding structures – no less than 10 feet. Therefore, to assess the potential for construction activities at the future relocation site to result in significant vibration impacts at potential surrounding structures, vibration impacts have been estimated for potential receptors of varying structural conditions at a minimum distance of 10 feet.

As shown in Table V-30, Alternative 4 would not expose structures in proximity of the existing Barry Building site to construction-related vibration levels that are in excess of their applicable FTA thresholds for potential damage. Therefore, construction-related vibration impacts as the result of existing Barry Building site activities would be less than significant. Trenching and grading activities at the future relocation site would not expose structures at the minimum assumed distance to construction-related vibration levels that are in excess of FTA thresholds for Category I or Category II structures. Put another way, this means that reinforced concrete, steel, timber, engineered concrete, or masonry buildings would not be exposed to damaging levels of vibration that may be caused by trenching and grading activities at the future relocation site. However, Category III (non-engineered timber and masonry) and Category IV (buildings extremely susceptible to vibration damage) structures at the minimum assumed distance (10 feet) could be exposed to potentially damaging levels of construction-related vibration by these activities. As a result, without mitigation, this impact would be considered significant.

Table V-30
Alternative 4 - Building Damage Vibration Levels, On-Site Sources (Unmitigated)

Building	Distance (feet)	Condition[1]	Significance Criteria (in/sec)	Estimated Maximum Vibration Velocity (in/sec PPV)	Significant Impact?
Existing Barry Building Site					
11961 San Vicente Boulevard	10	I. Reinforced-concrete, steel or timber	0.5	0.244	No
11980 San Vicente Boulevard	250	I. Reinforced-concrete, steel or timber	0.5	0.007	No
11999 San Vicente Boulevard	150	I. Reinforced-concrete, steel or timber	0.5	0.012	No
11900 West Saltair Terrace	175	I. Reinforced-concrete, steel or timber	0.5	0.010	No
Future Relocation Site					
Potential FTA Category I Receptor at 10 feet	10	I. Reinforced-concrete, steel or timber	0.5	0.244	No
Potential FTA Category II Receptor at 10 feet	10	II. Engineered concrete and masonry	0.3	0.244	No
Potential FTA Category III Receptor at 10 feet	10	III. Non-engineered timber and masonry buildings	0.2	0.244	Yes
Potential FTA Category IV Receptor at 10 feet	10	IV. Buildings extremely susceptible to vibration damage	0.12	0.244	Yes

[1] Structural condition and significance criteria based on FTA guidelines issued in the 2018 FTA Transit Noise and Vibration Impact Assessment manual.

Calculations provided in Appendix H-15 of this Draft EIR.
Source: Noah Tanski Environmental Consulting, 2021.

To ensure that trenching and grading activities at the future relocation site do not expose Category III and Category IV structures to vibration levels in excess of their respective FTA thresholds, the following mitigation measure is required:

ALT4 MM-4 The Barry Building shall not be relocated to a future site that would require heavy-duty, steel-tracked construction equipment (or the vibrational equivalent thereof) to operate within 15 feet of structures that meet FTA Category III conditions or within 20 feet of structures that meet FTA Category IV conditions.

As shown in Table V-31, below, implementation of ALT4 MM-4 would ensure that the relocation of the Barry Building – more specifically the trenching and grading activities made in preparation for its relocation – would not expose Category III or Category IV structures to potentially damaging levels of vibration. Therefore, Alternative 4's impact pertaining to construction-related vibrations would be considered less than significant with mitigation. However, it is worth noting that due to requirements that the Barry Building be relocated to an urbanized commercial thoroughfare that is similar to its current location at San Vicente Boulevard,

Table V-31
Alternative 4 - Building Damage Vibration Levels, On-Site Sources (Mitigated)

Building	Distance (feet)	Condition[1]	Significance Criteria (in/sec)	Estimated Maximum Vibration Velocity (in/sec PPV)	Significant Impact?
Future Relocation Site					
Potential FTA Category III Receptor at 15 feet	15	III. Non-engineered timber and masonry buildings	0.2	0.156	No
Potential FTA Category IV Receptor at 20 feet	20	IV. Buildings extremely susceptible to vibration damage	0.12	0.114	No

[1] Structural condition and significance criteria based on FTA guidelines issued in the 2018 FTA Transit Noise and Vibration Impact Assessment manual.

Calculations provided in Appendix H-15 of this Draft EIR.
Source: Noah Tanski Environmental Consulting, 2021.

With regard to the human annoyance effects of ground-borne vibration, the same excavator and loader vehicles may produce RMS vibration levels of 87 VdB at a reference distance of 25 feet. As shown in Table V-32, Alternative 4's estimated vibration impacts as generated by excavator and loader operations at the existing Barry Building site would not exceed the applicable 72 VdB threshold of significance at residential sensitive receptors. As a result, Alternative 4's human annoyance-related vibration impacts as generated by construction activities at the existing Barry Building site would be less than significant.

Table V-32
Alternative 4 – Human Annoyance Vibration Levels, On-Site Sources (Unmitigated)

Building	Distance (feet)	Vibration Category[1]	Significance Criteria (VdB)[2]	Estimated RMS Velocity (VdB)	Significant Impact?
11900 Saltair Terrace	175	2. Residences and buildings where people normally sleep	72	61.6	No
640 Saltair Avenue	265	2. Residences and buildings where people normally sleep	72	56.2	No
529 Westgate Avenue	260	2. Residences and buildings where people normally sleep	72	56.5	No

[1] FTA "Vibration Category 2" includes residential uses and other buildings where people sleep, such as hospitals.
[2] 72 VdB is the FTA's Vibration Category 2 threshold for frequent events, which are defined as more than 70 vibration events of the same source per day. It is conservatively assumed that construction activities may generate more than 70 "vibration events" per day.

Calculations provided in Appendix H-15 of this Draft EIR.
Source: Noah Tanski Environmental Consulting, 2021.

However, excavator and loader operations at a future relocation site could potentially be in closer proximity to sensitive residential receptors. Residential receptors less than 85 feet from the operations of these vehicles could be exposed to ground-borne vibration levels in excess of the 72 VdB threshold of significance. Thus, any residential uses within 85 feet of a future location site could be substantially annoyed by construction-related ground-borne vibrations. As a result, without mitigation, this impact would be significant.

To ensure that construction activities at the future relocation site do not expose sensitive residential uses to substantially annoying ground-borne vibrations, the following mitigation measure is required:

ALT4 MM-5 The Barry Building shall not be relocated to a future site that would require heavy-duty, steel-tracked construction equipment (or the vibrational equivalent thereof) to operate within 85 feet of residential land uses.

Implementation of Mitigation Measure ALT4 MM-5 would ensure that construction activities at a future relocation site do not expose nearby residential land uses to ground-borne vibration levels in excess of their 72 VdB threshold of significance. Therefore, Alternative 4's impact pertaining to the human annoyance effects of construction vibration would be less than significant after mitigation.

Regarding off-site vibration sources, Alternative 4 would generate construction truck trips to and from the existing Barry Building site and the future relocation site. Transportation of disassembled portions of the Barry Building would also utilize heavy duty trucks. Buildings situated along truck routes or the Barry Building relocation route could be exposed to ground-borne vibrations from these vehicles. Based on FTA data, the vibration generated by a typical heavy-duty truck would

be approximately 0.076 inches per second PPV at a distance of 25 feet from the truck. This is below the FTA's most stringent PPV threshold for buildings that are extremely susceptible to vibration, which is 0.12 inches per second PPV. As a result, Alternative 4's construction trucks and other on-road vehicles would not expose any roadside building to potentially damaging levels of ground-borne vibration.

Regarding human annoyance, both the FTA and Caltrans note that vehicles, even buses and trucks, are rarely a source of perceptible ground-borne vibrations. The analysis prepared for the Project (included in Section IV.E. of this Draft EIR) details why haul trucks and other construction vehicles traveling off-site on local roadways would not be expected to expose roadside land uses to ground-borne vibrations of such an intensity and frequency that substantial human annoyance may result. Given these considerations, Alternative 4's human annoyance-related ground-borne vibration impact from off-site sources would be less than significant.

Neither the Project nor Alternative 4 (after mitigation) would have the potential to expose nearby structures to potentially damaging levels of construction-related ground-borne vibrations. Additionally, neither the Project nor Alternative 4 (after mitigation) would expose sensitive residential uses to ground-borne vibration levels capable of causing substantial human annoyance. Because a future relocation site has not been chosen, it is not possible to know whether vibration-sensitive receptors are nearby, or how close they may be to the site. Given this uncertainty, it is possible that Alternative 4 would result in greater ground-borne vibrations than the Project. However, as stated, neither the Project nor Alternative 4 would result in significant vibration-related impacts after mitigation of Alternative 4 has been implemented.

(iii) Operational Noise

Because a future relocation site has not been determined, it is not possible to know what noise-sensitive receptors may surround the future site or what their existing ambient noise conditions – and therefore their degree of sensitivity to operational noise – may be. However, as explained earlier, the Barry Building would be relocated to an urban commercial thoroughfare that is similar to its existing location along San Vicente Boulevard. This more than likely rules out the potential for Alternative 4 to result in significant impacts related to operational noise, because the Barry Building would be relocated to a roadside location with presumably above-average existing ambient noise levels where it would be surrounded by other non-sensitive commercial uses. For example, noises from the building's modernized rooftop HVAC equipment are not likely to be audible along a roadway that is similar to San Vicente Boulevard, and surrounding commercial uses are also likely to possess mechanical HVAC equipment that produce similar noise levels. Concerning parking, according to FTA equations for the prediction of parking facility noise impacts, a facility with an hourly activity of 60 vehicles (likely a conservative overestimate of what Alternative 4's actual peak hour vehicle activity would be) would be expected to result in a noise level of just 44 dBA L_{eq}. However, a commercial thoroughfare that is similar to San Vicente Boulevard is likely to have hourly noise levels in excess of 65 dBA L_{eq}. In fact, noise measurements taken along San Vicente Boulevard indicate that its daytime noise levels range between 66.3 dBA L_{eq} and 71.7 dBA L_{eq}. Thus, noise from the Barry Building's parking activities

would likely have a negligible effect on surrounding ambient noise levels. The off-site effect of Alternative 4's traffic generation would also be negligible. Generally, a minimum 3 dBA CNEL increase in roadside noise levels requires an approximate doubling of traffic volumes. Reasonably, the renewed operations of the Barry Building along an urban commercial thoroughfare that is similar to San Vicente Boulevard would not cause local traffic volumes to double. Operations would add well-below 100 trips per hour to a commercial thoroughfare that would likely experience hundreds to thousands of existing trips per hour. Measurable noise increases, if any, would likely be just fractions of a decibel.

Given these considerations, renewed operations of the relocated Barry Building per Alternative 4 is not likely to alter the noise environment of its surroundings by a substantial degree – far below the minimum 3 dBA CNEL increase criteria that may represent a significant impact. As a result, Alternative 4's impact from operational noise sources would be considered less than significant.

Neither the Project nor Alternative 4 would cause substantial noise increases due to operations. However, because Alternative 4 proposes the renewed operations of the Barry Building, it would naturally result in a greater operational noise impact than the Project, which proposes to demolish the Barry Building.

(iv) Operational Vibration

The renewed operations of the Barry Building would not involve the use of heavy equipment or industrial operations capable of generating substantial groundborne vibrations. Related vehicle travel would not be considered a significant source of vibration because vehicle travel rarely generates perceptible groundborne vibrations. As a result, Alternative 4's potential to generate excessive groundborne vibration levels due to its operations would be considered less than significant.

Neither the Project nor Alternative 4 would generate substantial or perceptible ground-borne vibrations due to operations.

(f) Transportation

Options 3 and 4 would result in the same impacts with respect to transportation. Therefore, the following analysis would apply to both Options 3 and 4.

(i) Plan Consistency

Alternative 4 involves dismantling the Barry Building into multiple small building portions to facilitate its relocation to a new site, which would be along a commercial thoroughfare in the City of Los Angeles. At the new location, which has yet to be determined, the Barry Building would be re-constructed. Reconstruction of the building would incorporate additional preservation measures relating to seismic retrofitting, ADA updates, building code updates, and energy efficiency upgrades. Alternative 4 would therefore not trigger the requirement for additional review pursuant to the City of Los Angeles Transportation Assessment Guidelines screening criteria for

the following reasons. First, Alternative 4 would not require the decision maker to find that it substantially conforms to the purpose, intent, and provisions of the General Plan. Second, Alternative 4 involves the relocation of the existing building to a site on another commercial thoroughfare within the City of Los Angeles. It is assumed that the site selected for relocation would allow for retail uses to occupy the Barry Building, consistent with the existing zoning and land use designation for the relocation site. As such, Alternative 4 would not directly conflict with a transportation plan, policy, or program adopted to support multi-modal transportation options or public safety. As a potential relocation site has not been identified, it is unknown whether any modifications would be required to the public right-of-way at the relocation site. If any modifications to the public right-of-way are required for Alternative 4, it is assumed that these modifications would not conflict with a transportation, policy, or program adopted to support multi-modal transportation options or public safety. Therefore, a less than significant impact would occur as a result of Alternative 4, which would be greater than the Project's impact.

(ii) Vehicle Miles Traveled

As discussed previously, Alternative 4 involves the relocation of the Barry Building to a new site that has yet to be determined. Once the Barry Building has been relocated to a new site, it would be reconstructed and then occupied with 12,800 square feet of retail uses. According to LADOT's Transportation Assessment Guidelines, small-scale or local serving retail uses are assumed to have less than significant VMT impacts.[12] As Alternative 4 only includes 12,800 square feet of retail uses, no further analysis with respect to VMT is required, and Alternative 4's impacts would be less than significant, although the impacts would be greater than the Project's impacts due to the operational component of Alternative 4.

(iii) Design Feature Hazards

The roadways adjacent to the Project Site are part of the existing roadway network and contain no sharp curves or dangerous intersections. While a relocation site has not been identified and no owner of another site has agreed to take the Barry Building, it is assumed that the roadways adjacent to any relocation site would also not contain any sharp curves or dangerous intersections. In addition, implementation of Alternative 4 would not result in roadway improvements, and no safety hazards would be introduced to the existing roadway network. Further, no new driveways are proposed on the Project Site and it is assumed that no new driveways would be required on the relocation site. Thus, Alternative 4 would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment), and a less than significant impact would occur, which would be greater than the Project's impact.

[12] According to LADOT's Transportation Assessment Guidelines, retail projects that fall under 50,000 square feet are considered local serving.

(iv) Emergency Access

Like the Project, Alternative 4 would implement PDF-TRA-1 (Construction Management Plan) during the construction activities proposed as part of this alternative. With implementation of PDF-TRA-1, these construction activities would not create hazards for roadway travelers, bus riders, or parkers, as procedures and other measures (e.g., to address temporary traffic control, lane closures, sidewalk closures, etc.) would be incorporated into the Construction Management Plan. As discussed below, construction-related impacts associated with access (including emergency access) to other businesses and transit would be less than significant.

During construction, all construction equipment required at both the Project Site and the relocation site would be staged entirely on-site or delivered on an as-needed basis. However, temporary closures of the sidewalks adjacent to the Project Site or the relocation site could be required. Temporary traffic controls (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths, and/or providing overhead covering) would be provided to direct pedestrians safely around any closures and maintain safe pedestrian access, as required in the Construction Management Plan (PDF-TRA-1). While Alternative 4 involves large trucks moving portions of the building along streets throughout the City, it is not anticipated that these activities would affect emergency access, as the respect entitled to emergency vehicles and driver training allows emergency vehicles to negotiate typical street conditions in urban areas. Therefore, Alternative 4's impacts with respect to emergency access during construction would be less than significant.

During operation of Alternative 4, vehicular access to the site of the relocated building would be maintained from the existing street system. Alternative 4 would also not include the installation of barriers that could impede emergency vehicle access both during and post-construction. Drivers of emergency vehicles are also trained to utilize center turn lanes, or travel in opposing through lanes (on two-way streets) to pass through crowded intersections or streets. Accordingly, the respect entitled to emergency vehicles and driver training allows emergency vehicles to negotiate typical street conditions in urban areas. As such, emergency access would be maintained both during and post-construction. Therefore, Alternative 4 would not result in inadequate emergency access during construction or operation, and, as such, impacts to emergency access as a result of Alternative 4 would be less than significant, but greater than the Project's impacts due to the operational component of Alternative 4.

(f) Tribal Cultural Resources

Options 3 and 4 would result in the same impacts with respect to tribal cultural resources. Therefore, the following analysis would apply to both Options 3 and 4. The Project Site is located in an urbanized area of the City and has been disturbed by past development activities. Alternative 4 involves relocation of the Barry Building to another site. Any excavation required on the Project Site for Alternative 4 would be minimal and would only disturb soils that have been previously disturbed by past development activities. In addition, as discussed in Section IV.G (Tribal Cultural Resources) of this Draft EIR, there are no known tribal cultural resources within the Project Site. Therefore, the potential to encounter tribal cultural resources as part of Alternative 4's

construction activities on the Project Site is low and impacts would be less than significant. As a relocation site has not yet been identified and no owner of another site has agreed to take the Barry Building, the conditions of that site with respect to tribal cultural resources is unknown, nor is it known whether subterranean parking would be required at the relocation site. However, the City has established a standard condition of approval to address the inadvertent discovery of tribal cultural resources. The condition requires that in the event a potential tribal cultural resource is discovered during ground-disturbing activities, all ground-disturbing activities temporarily cease until it is determined whether the discovery is a tribal cultural resource and appropriate treatment is determined through consultation with a California Native American tribe on the City's AB 52 list and with a qualified archaeologist. Therefore, Alternative 4's impacts with respect to tribal cultural resources would be less than significant, but could be greater than the Project's impacts depending on the conditions of the relocation site and whether or not subterranean parking would

(3) Summary of Impacts

As demonstrated above, all of Alternative 4's impacts would be less than significant, including with respect to historical resources (with mitigation) and land use. The Project would result in significant and unavoidable impacts with respect to historical resources and land use, as the Project would demolish the existing building, which is City HCM No. LA-887. As Alternative 4 involves the relocation of the existing building, Alternative 4 would avoid the Project's significant and unavoidable impacts with respect to historical resources and land use, with implementation of Mitigation Measure ALT4 MM-1 with respect to historical resources, as well as inclusion of the recommendations provided by Historic Resources Group (in their memo contained in Appendix H-7 of this Draft EIR). However, Alternative 4 would be required to implement mitigation measures (Mitigation Measures ALT4 MM-2 through ALT4 MM-5) related to construction noise and vibration to ensure that that these impacts are less than significant at both the Project Site and the potential relocation site. Finally, as Alternative 4 involves an operational component (the re-occupancy of the relocated Barry Building), Alternative 4 would result in greater impacts than the Project with respect to air quality, greenhouse gas emissions, noise, and traffic, although these impacts would still be less than significant.

(4) Relationship of Alternative 4 to the Project Objectives

The ability of Alternative 4 to meet the Project objectives depends on finding a new site for the Barry Building, which has not occurred, nor does the EIR include analysis as to the feasibility of finding a new site. Assuming a new site could be identified, the analysis provided above demonstrates that Alternative 4 would meet both of the Project objectives:[13]

1. Comply with the City's Soft Story Retrofit Program (LAMC Section 91.9300 et seq., Ordinance entitled Mandatory Earthquake Hazard Reduction in Existing Wood

[13] The EIR is not analyzing the economic feasibility of Alternative 4.

Frame Buildings with Soft, Weak or Open Front Walls), which includes complying with the requirements under LAMC Section 91.9305.2.

2. Abate fire, loitering, vandalism, and public safety hazards associated with structural defects and current vacancy of the Barry Building.

6. Environmentally Superior Alternative

Alternative 1 (the No Project Alternative) would be environmentally superior to the Project, since this alternative would avoid the Project's significant and unavoidable impacts with respect to historical resources and land use. In addition, Alternative 1 would not include an operational component and therefore would not result in any operational impacts.

In accordance with *CEQA Guidelines* Section 15126.6(e), if the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. The determination of which alternative is environmentally superior does not take into account the feasibility of the alternative. Alternative 2 is environmentally superior to Alternatives 3 and 4. When compared to Alternative 3, Alternative 2 consists of less development and as such, would result in fewer impacts than Alternative 3. Comparing Alternative 2 and Alternative 4, Alternative 4 would result in greater impacts with respect to the character-defining features of the Barry Building, and would therefore require the implementation of mitigation measures to avoid a significant impact with respect to historical resources. Therefore, Alternative 2 is the Environmentally Superior Alternative.

Table V-33
Project and Alternatives Impact Comparison

Impact Area	Project Impact Level	Alternative 1 Impact Level	Alternative 2 Impact Level	Alternative 3 Impact Level	Alternative 4 Impact Level
Air Quality					
Construction	LTS	LTS (-)	LTS (=)	LTS (+)	LTS (+)
Operation	LTS	LTS (=)	LTS (+)	LTS (+)	LTS (+)
Sensitive Receptors	LTS	LTS (=)	LTS (+)	LTS (+)	LTS (+)
Cultural Resources					
Historical Resources	S/U	LTS (-)	LTS (-)	LTS (-)	LTS-M (-)
GHG Emissions					
Construction	LTS	LTS (-)	LTS (=)	LTS (+)	LTS (+)
Operation	LTS	LTS (-)	LTS (+)	LTS (+)	LTS (+)
Plan Consistency	LTS	LTS (-)	LTS (=)	LTS (=)	LTS (=)
Land Use and Planning	S/U	LTS (-)	LTS (-)	LTS (-)	LTS (-)
Noise					
Construction Noise	LTS-M	LTS (-)	LTS-M (=)	LTS-M (+)	LTS-M (+)
Construction Vibration	LTS	LTS (-)	LTS (-)	LTS (+)	LTS-M (+)
Operational Noise	LTS	LTS (=)	LTS (+)	LTS (+)	LTS (+)
Operation Vibration	LTS	LTS (=)	LTS (=)	LTS (=)	LTS (=)
Transportation/Traffic					
Plan Consistency	NI	NI (=)	LTS (+)	LTS (+)	LTS (+)
VMT	NI	NI (=)	LTS (+)	LTS (+)	LTS (+)
Design Feature Hazard	NI	NI (=)	NI (=)	NI (=)	LTS (+)
Emergency Access	LTS	LTS (=)	LTS (+)	LTS (+)	LTS (+)
Tribal Cultural Resources	LTS	LTS (=)	LTS (=)	LTS (=)	LTS (+)

NI = no impact
LTS = less than significant impact
LTS-M = less than significant impact with implementation of mitigation measures
SU = significant and unavoidable impact
+ refers to impacts that are greater than the Project's impacts
= refers to impacts that are equal or similar to the Project's impacts
- refers to impacts that are less than the Project's impacts

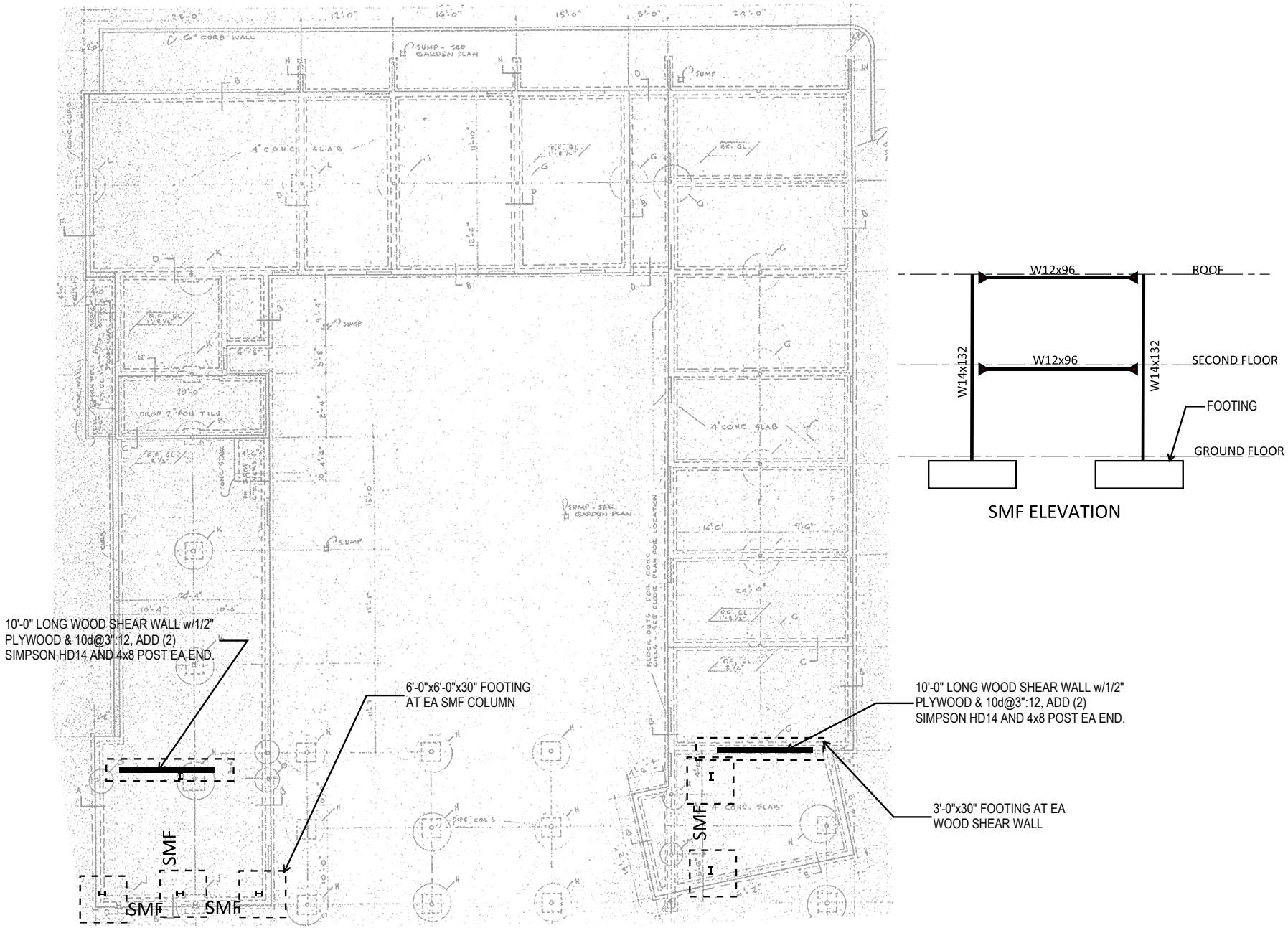


Figure V-1
Alternative 1 Soft Story Retrofit, Foundation Plan

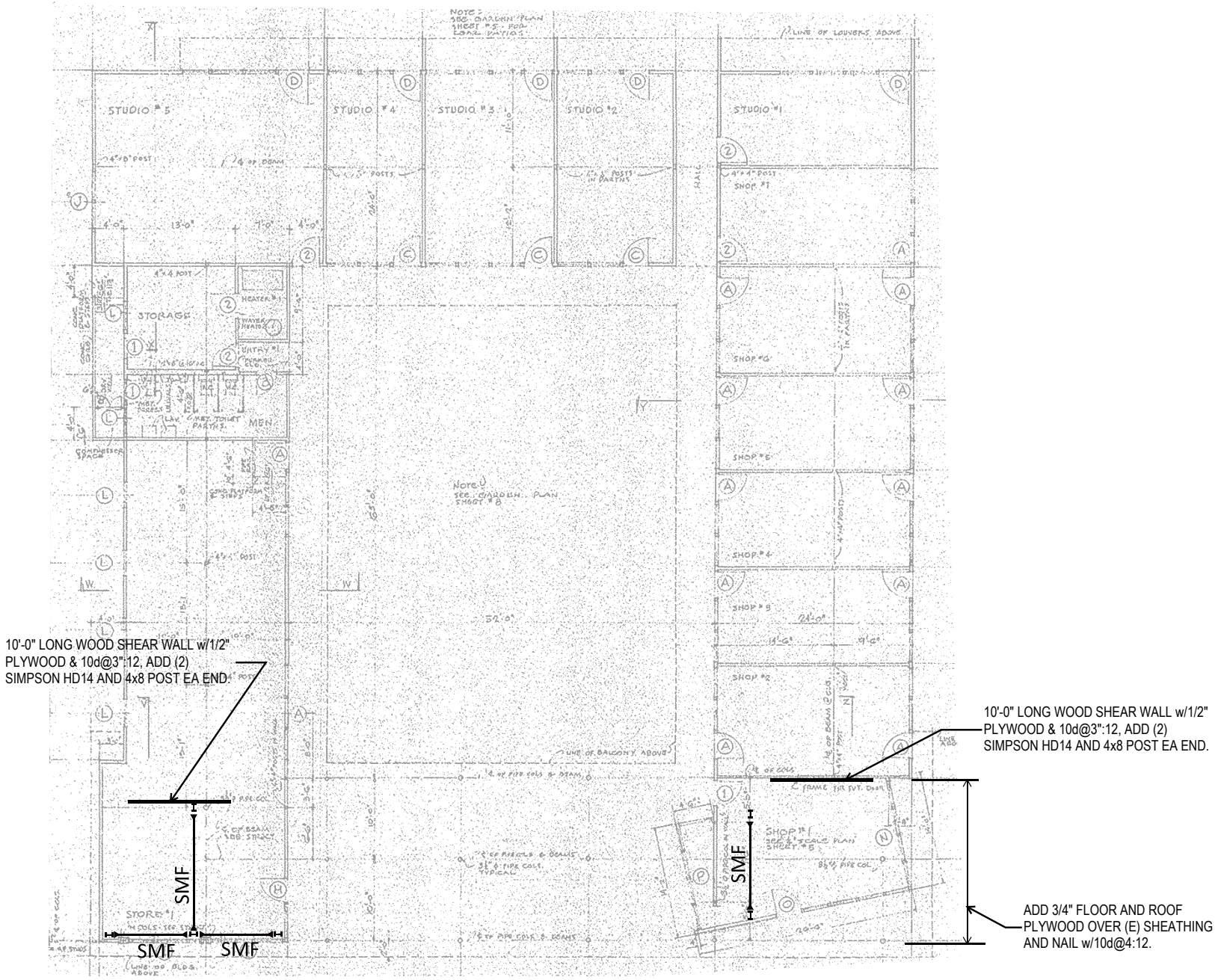


Figure V-2
Alternative 1 Soft Story Retrofit, First Floor Plan

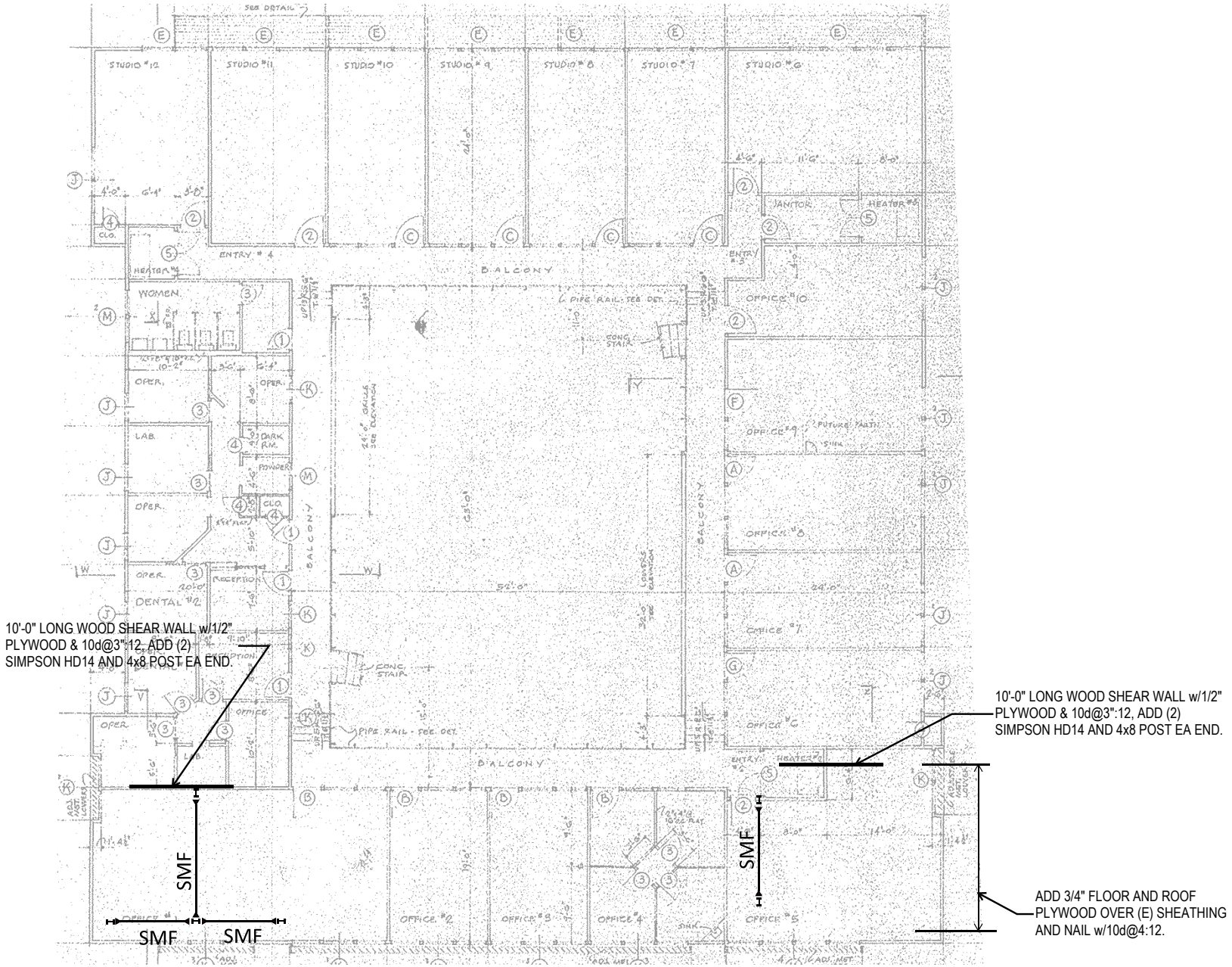


Figure V-3
Alternative 1 Soft Story Retrofit, Second Floor Plan

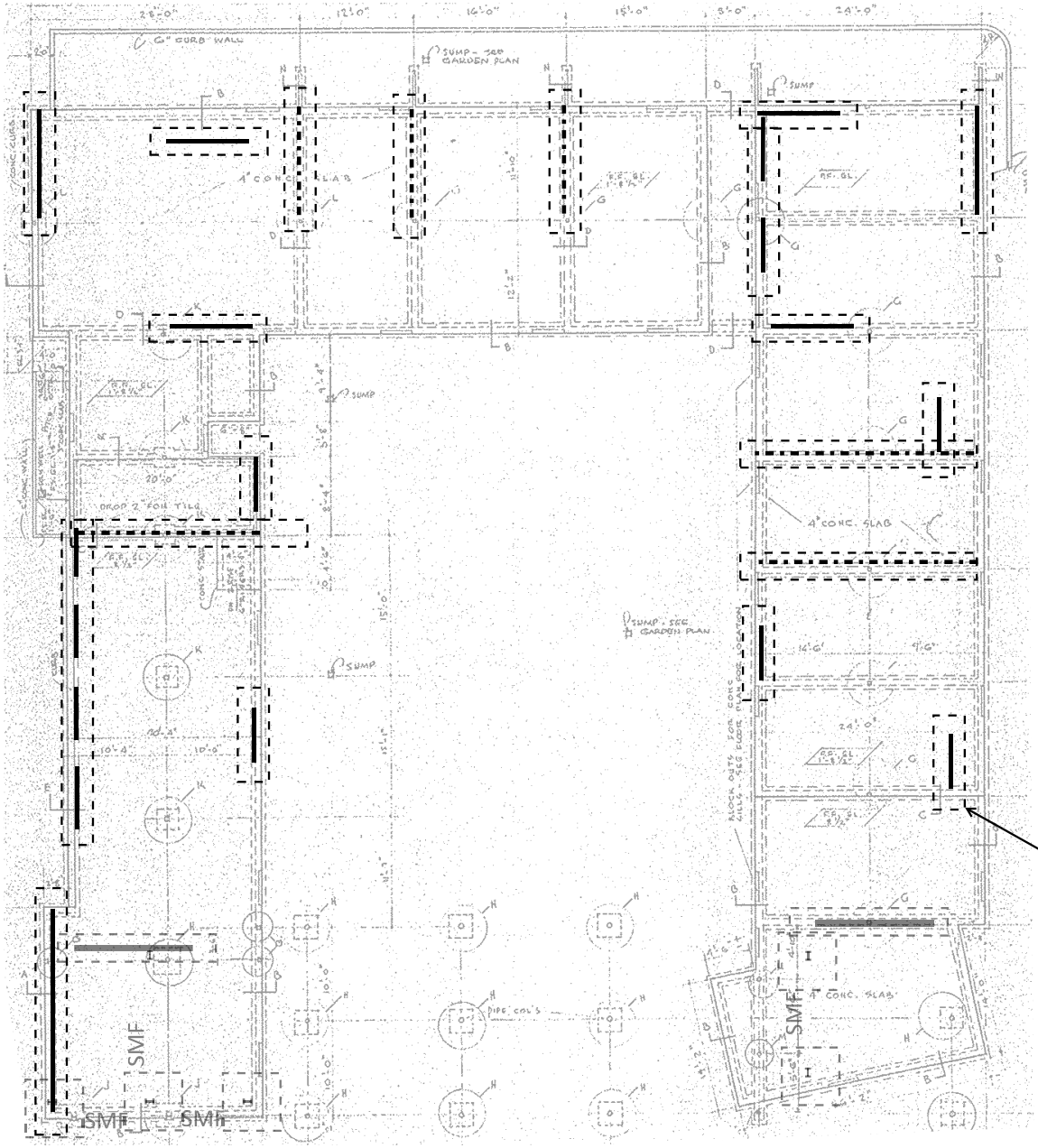
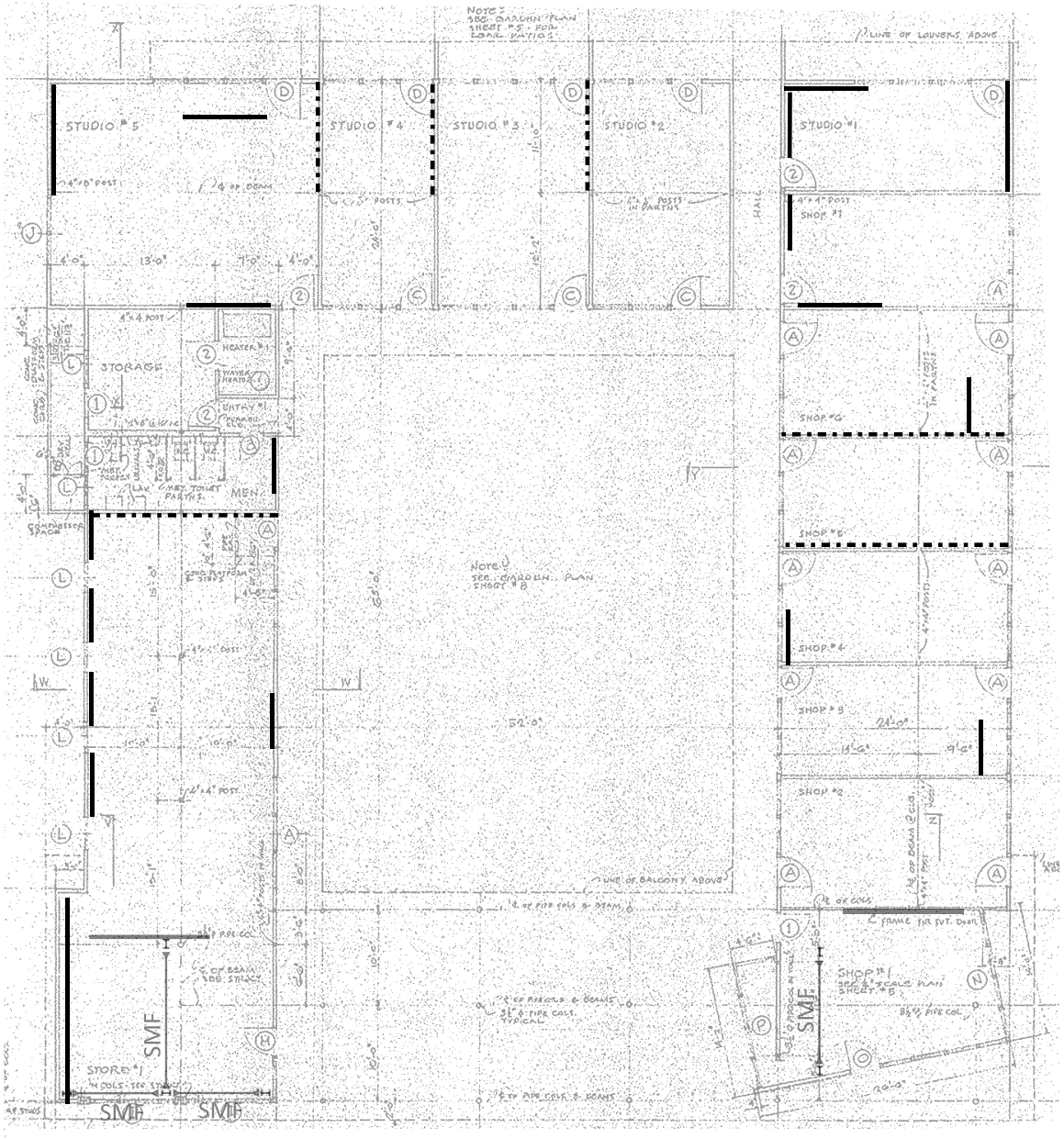


Figure V-4
Alternative 2 Voluntary Seismic Retrofit, Foundation Plan

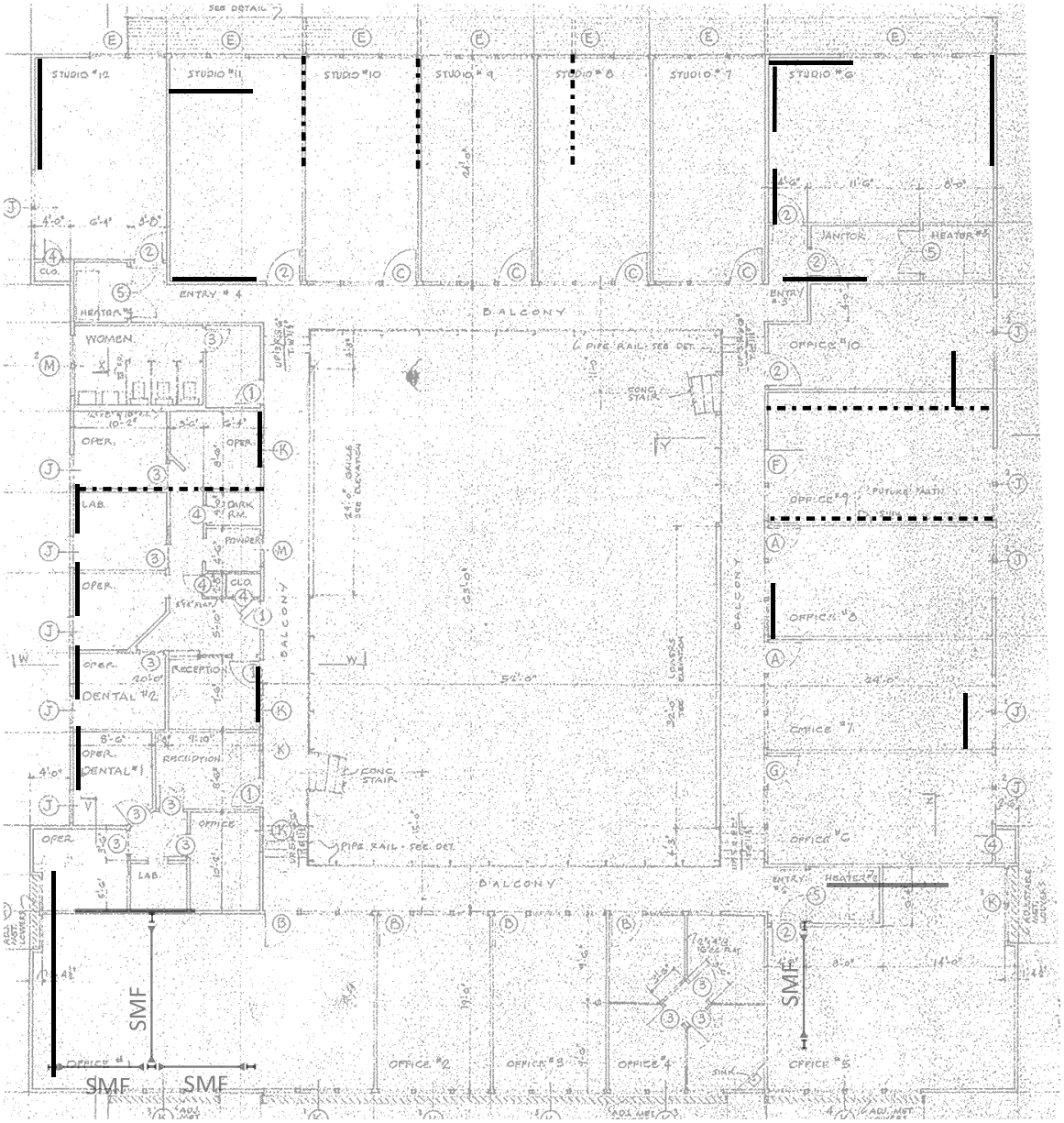


10'-0" LONG WOOD SHEAR WALL w/1/2" PLYWOOD & 10d@3":12, ADD (2) SIMPSON HD14 AND 4x8 POST EA END.

STRENGTHEN (E) WOOD SHEAR WALL w/1/2" PLYWOOD & 10d@3":12, ADD (2) SIMPSON HD14 AND 4x8 POST EA END.

TYPICAL AT ALL FLOOR AND ROOF: ADD 3/4" FLOOR AND ROOF PLYWOOD OVER (E) SHEATHING AND NAIL w/10d@4:12.

Figure V-5
Alternative 2 Voluntary Seismic Retrofit, First Floor Plan



10'-0" LONG WOOD SHEAR WALL w/1/2" PLYWOOD & 10d@3":12, ADD (2) SIMPSON HD14 AND 4x8 POST EA END.

STRENGTHEN (E) WOOD SHEAR WALL w/1/2" PLYWOOD & 10d@3":12, ADD (2) SIMPSON HD14 AND 4x8 POST EA END.

TYPICAL AT ALL FLOOR AND ROOF: ADD 3/4" FLOOR AND ROOF PLYWOOD OVER (E) SHEATHING AND NAIL w/10d@4:12.

Figure V-6
Alternative 2 Voluntary Seismic Retrofit, Second Floor Plan

Figure V-7
Alternative 3 Conceptual Site Plan