

## **V. Alternatives**

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# V. Alternatives

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## 1. Introduction

The identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process under CEQA. Specifically, Public Resources Code (PRC) Section 21001 states, in part, that the environmental review process is intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives which will avoid or substantially lessen such significant effects. In addition, PRC Section 21002.1(a) states that the purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.

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

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

The CEQA Guidelines indicate that the selection of project alternatives be based primarily on the ability to avoid or substantially lessen significant impacts relative to the proposed project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. The CEQA Guidelines further direct that the range of alternatives be guided by a “rule of reason,” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.

In addition, in selecting project alternatives for analysis, potential alternatives must be feasible. CEQA Guidelines Section 15126.6(f)(1) states that:

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

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

## **2. Overview of Selected Alternatives**

As described in Section II, Project Description, of this Draft EIR, the Project would consist of the development of a 25-story mixed-use building that would include 270 multi-family residential units (including 27 units restricted for Extremely Low-Income households) and 6,790 square feet of ground floor commercial space, including restaurant and retail uses. The height of the building would be approximately 268 feet to the top of the parapet, with additional projections (e.g., stairwell and elevator penthouses and mechanical enclosures) reaching a maximum height of 286 feet. The uses within the Project Site would be supported by up to 320 vehicle parking spaces located in two above-ground and four subterranean parking levels, and 166 bicycle parking spaces. The Project would also include approximately 30,918 square feet of open space and recreational amenities. The Project would replace the surface parking area within the northeast portion of the Project Site (Development Area), while the six existing buildings located in the southern and western portions of the Project Site, containing 33,828 square feet of commercial uses (including approximately 4,000 square feet of floor area that has been vacant since prior to 2018) would be retained.

As indicated above, the intent of the alternatives is to avoid or substantially lessen any of the significant effects of a project while still feasibly obtaining most of the basic project objectives. Based on the analyses in Section IV, Environmental Impact Analysis, of this Draft EIR, the Project would result in significant unavoidable construction noise and vibration impacts (specifically, Project-level on-site and off-site construction noise and Project-level on- and off-site construction vibration associated with human annoyance). In addition, based on the analyses in Section IV, the Project would result in significant unavoidable cumulative construction noise and vibration impacts (specifically, on- and

off-site construction noise off-site and off-site construction vibration associated with human annoyance).<sup>1</sup>

Based on the significant environmental impacts of the Project, the basic objectives established for the Project (refer to Section II, Project Description, of this Draft EIR), and the feasibility of the alternatives considered, the three alternatives to the Project listed below were selected for evaluation in this Draft EIR. Table V-1 on page V-4 compares the amount of development proposed under the Project and the alternatives. Table V-2 on page V-5 compares the number of residents, housing units, and employees under the Project and the alternatives.

- **Alternative 1—No Project/No Build Alternative:** Alternative 1 assumes that no new development would occur within the Project Site. The existing conditions on the Project Site would remain. The Project Site is currently occupied by a surface parking area located in the northeast portion of the Project Site (Development Area) containing approximately 84 parking spaces, and six one- and two-story commercial structures located in the southern and western portions of the Project Site, containing approximately 33,828 square feet of commercial floor area, including approximately 4,000 square feet of floor area that has been vacant since prior to 2018. The existing conditions would be unchanged by Alternative 1.
- **Alternative 2—Reduced Density Alternative:** Alternative 2 would include the same types of uses proposed by the Project while reducing the amount of total new residential units and commercial area by 25 percent. Thus, Alternative 2 would include 203 residential units (195,284 square feet) and 5,093 square feet of ground-floor commercial uses. The building footprint would remain the same, but the height would be reduced to a maximum of 209 feet (19 stories). Alternative 2 would include 252 vehicle parking spaces located within five parking levels (2 above ground and 3 subterranean levels), which would require a depth of excavation on the Project Site of 40 feet below grade. The total floor area for Alternative 2 would be 234,205 square feet with a floor area ratio (FAR) of 3.5:1.
- **Alternative 3—Office Alternative:** Instead of the Project's residential and commercial uses, Alternative 3 would develop office and ground-floor commercial uses that are compliant with the existing floor area limits. Accordingly, Alternative 3 would develop 160,070 square feet of office uses and 6,790 square feet of ground floor retail/restaurant uses. The building footprint

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<sup>1</sup> *On-site construction noise and vibration impacts would be associated with the on-site operation of heavy construction equipment. Off-site construction noise and vibration impacts would be associated with off-site construction trucks traveling to and from the Project Site.*

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

<b>Land Use</b>	<b>Proposed Project</b>	<b>Alternative 1: No Project/No Build</b>	<b>Alternative 2: Reduced Density</b>	<b>Alternative 3: Office/Restaurant</b>
Residential <sup>a</sup>	260,378 sf (270 units)	—	195,284 sf (203 units)	0
Proposed Commercial <sup>b</sup>	6,790 sf (up to 226 seats)	—	5,093 sf (up to 170 seats)	6,790 sf (up to 226 seats)
Existing Commercial (retail/restaurant to remain) <sup>c</sup>	33,828 sf (4,000 sf vacant = 133 seats)	33,828 sf	33,828 sf (4,000 sf vacant = 133 seats)	33,828 sf (4,000 sf vacant = 133 seats)
Office	0 sf	—	0 sf	160,070 sf
<b>Total Floor Area</b>	300,996 sf	—	234,205 sf	200,688 sf
<b>Project Site Lot Area</b>	66,896 sf	66,896 sf	66,896 sf	66,896 sf
<b>FAR</b>	4.5:1	—	3.5:1	3:1
<b>Total Parking</b>	6 levels (2 above grade/ 4 below grade) 320 spaces	—	5 levels (2 above grade/ 3 below grade) 252 spaces	7 levels (2 above grade/ 5 below grade) 402 spaces
<b>Total Open Space</b>	30,918 sf	—	23,189 sf	0 sf
<b>Building Height</b>	25 floors 286 ft	—	19 floors 209 ft	10 floors 155 ft
<b>Maximum Depth of Excavation</b>	50 ft below grade	—	40 ft below grade	60 ft below grade
<b>Residents</b>	632	—	476	0
<b>Housing Units</b>	270 du (includes 27 Extremely Low-Income units)	—	203 du (includes 21 Extremely Low-Income units)	0
<b>Employees</b>	43	—	36	683
<b>Total Population (Residents + Employees)</b>	<b>675</b>	<b>—</b>	<b>512</b>	<b>683</b>

*du = dwelling units*

*sf = square feet*

<sup>a</sup> A total of 10 percent of the residential units would be restricted for Extremely Low-Income households.

<sup>b</sup> The new proposed commercial space may be occupied by either a retail or restaurant tenant. However, for purposes of a conservative analysis, the analyses included throughout this Draft EIR assumes the entirety of the new commercial space as being occupied by high-turnover restaurant uses.

<sup>c</sup> Existing commercial floor area includes 4,000 square feet of space that has been vacant since prior to 2018 and is conservatively assumed to be occupied in the future with high-turnover restaurant uses.

Source: Gensler, 2021; Eyestone, 2021

would remain the same, but the height would be reduced to a maximum of 155 feet (10 stories). Alternative 3 would include 402 vehicle parking spaces (two above ground and five subterranean levels), which would require excavation to 60 feet below grade. The total floor area for Alternative 3 would be 200,688 square feet with an FAR of 3:1.

**Table V-2  
Residents, Housing Units, and Employees for the Alternatives**

	<b>Proposed Project</b>	<b>Alternative 1: No Project/ No Build</b>	<b>Alternative 2: Reduced Density</b>	<b>Alternative 3: Office</b>
Housing Units	270	—	203	0
Residents <sup>a</sup>	632	—	475	0
Employees <sup>b</sup>	43 <sup>c</sup>	—	36	683
Total Population (Residents + Employees)	675	—	512	683

<sup>a</sup> Based on a rate of 2.25 persons per multi-family unit and 3.14 persons per affordable housing—family, included in the City of Los Angeles VMT Calculator Documentation, Table 1, May 2020.

<sup>b</sup> Based on rate of 4/1,000 sf for high-turnover restaurant uses applied to the new commercial floor area and the existing commercial floor area that has been vacant since prior to 2018, and 4/1,000 sf for office uses, included in the City of Los Angeles VMT Calculator Documentation, Table 1, May 2020.

Source: Eyestone Environmental, 2021.

### 3. Alternatives Considered and Rejected as Infeasible

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 the CEQA Guidelines, among the factors that may be used to eliminate an alternative from detailed consideration are the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives to the Project that have been considered and rejected as infeasible include the following:

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

- Approach (a)—Above-Grade Parking: Under this approach, all parking would be provided above grade rather than below and above grade, thus avoiding much of

the excavation and hauling activity required under the Project. However, this approach was reviewed and rejected for the following reasons:

- Although the on-site construction activities would be shorter in overall duration during site grading due to less excavation, the maximum daily on-site construction noise levels would be similar to the Project as the number of and type of construction equipment used would be similar on a peak day, which is used for the evaluation of impacts. As such, noise and vibration impacts from on-site construction activities would be significant and unavoidable, similar to the Project. Therefore, this alternative approach would not substantially reduce the significant construction noise impacts.
- Off-site construction noise levels are dependent on truck volumes (i.e., a reduction of 50 percent in truck volume would reduce the noise level by 3 dBA, which is just perceptible).<sup>2</sup> This above-grade parking approach would reduce the total number of haul truck trips due to a reduced amount of excavation required. However, demolition, grading, and associated hauling would still be required and the hauling activities on a peak day would likely be similar to the Project. Thus, feasible reductions in truck trips would not accomplish significant reductions in off-site construction noise levels. For example, reducing the number of construction trucks during the site grading phase from 17 to 9 truck trips per hour (approximately 50 percent) would reduce the truck noise to 63.9 dBA  $L_{eq}$  along Selma Avenue (between Argyle Avenue and the Project Site), 62.0 dBA  $L_{eq}$  along Argyle Avenue and Gower Street, and to 60.4 dBA  $L_{eq}$  along Selma Avenue (between Gower Street and Argyle Avenue (a 2.8- to 3.0 dBA reduction). However, when accounting for ambient noise levels, the Project plus ambient noise levels due to construction trucks would only be reduced by 2.4 dBA, 0.7 dBA, 0.6 dBA, and 1.7 dBA along Selma Avenue (between Argyle Avenue and the Project Site), Argyle Avenue, Gower Street and Selma Avenue (between Gower Street to Argyle Avenue), respectively. In addition, a reduction in the number of construction trucks during the mat foundation phase from 21 to 11 truck trips per hour (approximately 50 percent) would reduce the truck noise level along Selma Avenue (between Argyle Avenue and the Project Site) from 68.0 dBA  $L_{eq}$  to 65.0 dBA  $L_{eq}$  (3.0-dBA reduction). However, when accounting for ambient noise levels, the Project-generated noise under Approach (a) plus ambient noise levels due to construction trucks would only be reduced by 2.5 dBA, which would still increase the ambient noise levels by 6.4 dBA. Thus, as analyzed, even with an approximately 50-percent reduction in the

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<sup>2</sup> The rule-of-thumb that a 50-percent reduction in traffic volumes results in a 3-dBA reduction in associated noise levels comes from the Caltrans Technical Noise Supplement, Chapter 2.1.3.5, September 2013. This rule-of-thumb is based on the fact that the addition or subtraction of sound level in decibel (dB) are performed based on logarithmic basis per the following equation:  $SPL_{total} = SPL_1 + 10\log_{10}(N)$ , where  $SPL_1 = SPL$  of one source and  $N =$  number of identical sources to be added or subtracted. For example,  $N=1/2$  for a reduction of 50 percent. Thus,  $SPL_{total} = SPL_1 + 10\log_{10}(1/2) = SPL_1 - 3$  dB.

truck trips, the off-site construction noise plus ambient noise would result in only minimal noise reduction (i.e., less than the 3 dBA perceptible level for noise). As such, despite potential reductions in truck trips, off-site construction noise would not be significantly reduced and impacts would remain significant along Selma Avenue (between Argyle Avenue and the Project Site).

- Construction equipment utilized under this approach would be similar to the Project (e.g., drill rig, large bulldozer, and excavator), which would generate similar vibration levels. Therefore, on-site construction vibration impacts (human annoyance) would be significant and similar to the Project, as the vibration impact analysis is based on the peak vibration level generated by individual pieces of construction equipment. In addition, off-site construction vibration impacts (human annoyance) due to heavy trucks traveling by sensitive receptors, would also continue to be significant.
- Approach (b)—Extended Construction Duration: An approach that extends the construction period, thus reducing the amount of daily construction activity that would occur under the Project, was also evaluated. This approach was rejected for the following reasons:
  - Construction noise levels are dependent on the number of pieces of construction equipment (on-site equipment or off-site construction trucks). It is anticipated the number of on-site construction equipment and off-site construction trips would be reduced under this approach. Typically, a reduction of 50 percent in the number of construction equipment pieces or construction traffic (haul and delivery trucks) trips would reduce the construction-related noise levels by approximately 3 dBA (just perceptible).<sup>3</sup> Similar to Approach (a) above, reducing the number of construction trucks during the site grading phase from 17 to 9 truck trips per hour (approximately 50 percent) would reduce the truck noise to 63.9 dBA  $L_{eq}$  along Selma Avenue (between Argyle Avenue and the Project Site), 62.0 dBA  $L_{eq}$  along Argyle Avenue and Gower Street, and to 60.4 dBA  $L_{eq}$  along Selma Avenue (between Gower Street and Argyle Avenue) (a 2.8- to 3.0 dBA reduction). However, when accounting for ambient noise levels, the Project-generated noise under Approach (b) plus ambient noise levels due to construction trucks would only be reduced by 2.4 dBA, 0.7 dBA, 0.6 dBA, and 1.7 dBA along Selma Avenue (between Argyle Avenue and the Project Site), Argyle Avenue,

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<sup>3</sup> *The reference to 3 dBA here and in other parts of the discussion of the noise options considered does not have to do with how much construction noise levels need to be reduced to avoid significant impacts. Rather, it has to do with: (1) the minimum reduction required to be audible to the human ear; and (2) the fact that a lowering of the number of construction pieces and volume of construction traffic by 50% is required to result in an audible reduction in on- and off-site construction noise, respectively. Another words, reducing peak day construction activities by 50% would result in a barely audible reduction in construction noise.*



Gower Street, and Selma Avenue (between Gower Street and Argyle Avenue), respectively. In addition, a reduction in the number of construction trucks during the mat foundation phase from 21 to 11 truck trips per hour (approximately 50 percent) would reduce the truck noise level along Selma Avenue (between Argyle Avenue and the Project Site) from 68.0 dBA  $L_{eq}$  to 65.0 dBA  $L_{eq}$  (3.0-dBA reduction). However, when accounting for ambient noise levels, the Project-generated noise under Approach (b) plus ambient noise levels due to construction trucks would only be reduced by 2.5 dBA, which would increase the ambient noise levels by 6.4 dBA. Thus, as analyzed, even with a 50-percent reduction in the truck trips, the off-site construction noise plus ambient noise would result in only minimal noise reduction (i.e., less than the 3 dBA perceptible level for noise), and impacts would remain significant along Selma Avenue.

With respect to the on-site construction, a reduction in the number of pieces of on-site construction equipment would reduce the construction noise, depending on the number and type of equipment. Specifically, reducing the on-site construction equipment during the site grading phase from 17 pieces to 9 pieces (approximately 50 percent) would reduce the construction noise at the off-site receptors by 1.7 dBA  $L_{eq}$  at receptor location R7, 2.1 dBA  $L_{eq}$  at receptor location R1, 2.2 dBA  $L_{eq}$  at receptors R2 and R4, 2.4 dBA  $L_{eq}$  at receptor locations R3 and R6, and 2.5 dBA  $L_{eq}$  at receptor location R5 (as compared to the Project). The estimated construction noise levels with a 50-percent reduction in the number of pieces of construction equipment would still exceed the significance threshold by up to 19.4 dBA  $L_{eq}$  at receptor location R7 (nearest sensitive receptor). Therefore, the construction noise levels under this approach (both on- and off-site construction noise) would be somewhat less than the Project (depending on the amount of reduction) but would not significantly reduce the impact and would still exceed the significance threshold. In addition, the reduction would be less than 3.0 dBA, which is the level where noise is perceptible. In addition, this approach would be inefficient and would increase the number of days that the sensitive receptors would be impacted by construction activities. Furthermore, due to the close proximity of the off-site noise sensitive receptors, it would not be practical to reduce the construction noise levels to below the significance threshold as even a single piece of equipment would result in noise levels above the significance threshold. As such, the on-site construction noise impacts under this approach would not be substantially less than the Project and would remain significant.

- The on-site construction vibration impacts (human annoyance) would be significant, similar to the Project, as the vibration impact analysis is based on the peak vibration level generated by individual pieces of construction equipment, and the approach would utilize similar construction equipment (e.g., large bulldozers, drill rigs, and loaded trucks). In addition, off-site construction vibration impacts (human annoyance), due to heavy trucks

traveling by sensitive receptors, would also continue to be significant, similar to the Project.

- Approach (c)—Reduced Development Beyond 25 Percent: An approach that reduces the amount of development beyond the 25-percent reduction outlined in Alternative 2 to the extent that the significant construction-related noise and vibration impacts of the Project would be avoided or substantially reduced was also considered. However, due to the close proximity of the sensitive receptors (and a constrained Project Site that does not have the space to create a meaningful buffer zone), it would not be practical to mitigate the on-site construction noise impacts of the Project even with such additional reduced scope. In addition, the on-site construction vibration impacts (human annoyance) of this option would continue to be significant since the vibration impact analysis is based on the peak vibration level generated by individual construction equipment pieces that would still be required near the perimeter of the Project Site. In addition, off-site construction vibration impacts (human annoyance), due to heavy trucks traveling by sensitive receptors, would remain significant.

As indicated, none of the above approaches would feasibly substantially reduce or avoid the significant unavoidable construction-related on- and off-site noise impacts and construction-related on- and off-site vibration (human annoyance) impacts of the Project. This is because the significant unavoidable construction-related noise and vibration impacts of the Project are heavily influenced by the close proximity of the Project Site and the proposed haul route to existing noise- and vibration-sensitive uses rather than the amount or duration of Project construction activities. Furthermore, the approaches outlined above would not achieve the underlying purpose and/or objectives of the Project, as outlined below and in Section II, Project Description, of this Draft EIR, to the degree of the Project. In addition, Approach (a) would not be consistent with the land use objectives for the Project Site regarding visual character and neighborhood form; Approach (b) would cost substantially more to construct than the proposed Project given the extended construction period; and Approach (c) would not allow for the maximization of land uses in a transit-rich neighborhood. Therefore, as each of these alternative approaches present issues and would not substantially reduce or eliminate the significant noise and vibration impacts of the Project, no further consideration of these approaches in this Draft EIR is required.

**Alternative Project Site:** The results of a search to find an alternative site on which the Project could be built determined that suitable similar locations are not available to meet the underlying purpose of the Project to redevelop the Project Site by constructing a new mixed-use development that provides new multi-family housing opportunities at a range of income levels as well as new neighborhood-focused ground-floor commercial uses that serve the community and promote walkability. The availability of an alternative site is also restricted by the Project's objectives, which include, but are not limited to: locating residential and commercial uses in a high quality transit area and transit priority

area, thereby promoting sustainability and reducing automobile dependency and Vehicle Miles Traveled (VMT); redeveloping and improving the visual character of the surface parking portion of the Project Site with a development that is compatible in scale and design with the character of the surrounding area; contributing to economic investment in the Hollywood Community Plan area through the creation of construction and retail/restaurant jobs; and creating a street-level identity for the Project Site and improve the pedestrian experience through the introduction of active street-level uses. In addition, it is not expected that the Applicant could reasonably acquire, control, or have access to an alternative site of similar size to the Project Site. Furthermore, if a suitable alternative site could be found, it is anticipated that the significant and unavoidable impacts with respect to construction noise from on-site and off-site sources, and construction vibration with respect to the significance threshold for human annoyance from on-site and off-site sources, would still occur. Specifically: (1) given that an alternative site would also likely be an infill site with nearby noise-sensitive receptors, and since noise levels during peak day construction activities are used for measuring impacts, noise levels from on- and off-site construction activities would be similar to those of the Project; and (2) since construction vibration impacts are evaluated based on the peak vibration levels generated by each type of construction equipment, vibration levels associated with on- and off-site construction activities would be similar to the Project. Thus, in accordance with CEQA Guidelines Section 15126.6(f), this alternative was rejected from further consideration.

## 4. Alternatives Analysis Format

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the Project as measured against the baseline (existing conditions). Furthermore, each alternative is evaluated to determine whether the Project's underlying purpose and objectives, identified in Section II, Project Description, of this Draft EIR, would be substantially attained by the alternative.<sup>4</sup> The evaluation of each of the alternatives follows the process described below:

- a. The net environmental impacts of the alternative are determined for each environmental issue area analyzed in Section IV, Environmental Impact Analysis, of this Draft EIR, assuming that the alternative would implement the same Project Design Features and mitigation measures identified in Section IV, Environmental Impact Analysis, of this Draft EIR.

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<sup>4</sup> *State of California, CEQA Guidelines Section 15126.6(c).*

- b. Post-mitigation significant and non-significant environmental impacts of the alternative and the Project are compared for each environmental issue area as follows:
- Less: Where the net impact of the alternative would be clearly less adverse or more beneficial than the impact of the Project, the comparative impact is said to be “less.”
  - Greater: Where the net impact of the alternative would clearly be more adverse or less beneficial than the Project, the comparative impact is said to be “greater.”
  - Similar: Where the impact of the alternative and Project would be roughly equivalent, the comparative impact is said to be “similar.”
- c. The comparative analysis of the impacts is followed by a general discussion of whether the underlying purpose and Project objectives are feasibly and substantially attained by the alternative.

A summary matrix that compares the impacts associated with the Project with the impacts of each of the analyzed alternatives is provided in Table V-3 on page V-12.

As evaluated in the Initial Study prepared for the Project, included as Appendix A of this Draft EIR, and in Section VI. Other CEQA Considerations, of this Draft EIR, the Project would not result in significant impacts related to aesthetics, agriculture and forest resources, objectionable odors, biological resources, geology and soils (fault rupture, strong seismic ground shaking, liquefaction, landslides, soil erosion, lateral spreading, subsidence, collapse, expansive soils, and soils incapable of supporting septic tanks), hazards and hazardous materials, hydrology and water quality, physical division of an established community, mineral resources, airport and airstrip noise, population and housing, public services (schools), emergency access, stormwater drainage facilities, telecommunications facilities, solid waste, and wildfire. Therefore, no further analysis of these topics in this section is required or provided.

**Table V-3  
Comparison of Impacts Associated with the Development Alternatives**

<b>Impact Area</b>	<b>Project</b>	<b>Alternative 1: No Project/No Build</b>	<b>Alternative 2: Reduced Density</b>	<b>Alternative 3: Office</b>
<b>A. AIR QUALITY</b>				
<i>Consistency with Air Quality Plans</i>	Less than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Regional Emissions</i>				
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No impact)	Less (Less Than Significant)	Greater (Less Than Significant)
<i>Localized Emissions</i>				
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Toxic Air Contaminants</i>				
<i>Construction</i>	Less Than Significant	Less (No impact)	Less (Less Than Significant)	Similar (Less Than significant)
<i>Operation</i>	Less Than Significant	Less (No impact)	Less (Less Than Significant)	Greater (Less Than Significant)
<b>B. CULTURAL RESOURCES</b>				
<i>Historical Resources</i>	Less Than Significant	Less (No impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Archaeological Resources</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Greater (Less Than Significant)
<i>Human Remains</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<b>C. ENERGY</b>				
<i>Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources</i>				
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Consistency with Plans for Renewable Energy or Energy Efficiency</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<b>D. GEOLOGY AND SOILS</b>				
<i>Paleontological Resources</i>	Less Than Significant With Mitigation	Less (No Impact)	Less (Less Than Significant With Mitigation)	Greater (Less Than Significant With Mitigation)
<b>E. GREENHOUSE GAS EMISSIONS</b>				
<i>GHG Emissions</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Greater (Less Than Significant)
<i>Consistency with GHG Reduction Plans/Policies</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)

**Table V-3 (Continued)**  
**Comparison of Impacts Associated with the Development Alternatives**

<b>Impact Area</b>	<b>Project</b>	<b>Alternative 1: No Project/No Build</b>	<b>Alternative 2: Reduced Density</b>	<b>Alternative 3: Office</b>
<b>F. LAND USE AND PLANNING</b>				
<i>Conflict with Land Use Plans</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar(Less Than Significant)
<b>G. NOISE</b>				
<i>Construction</i>				
<i>On-Site Noise</i>	Significant Unavoidable	Less (No Impact)	Less (Significant Unavoidable)	Less (Significant Unavoidable)
<i>Off-Site Noise</i>	Significant Unavoidable	Less (No Impact)	Similar (Significant Unavoidable)	Similar (Significant Unavoidable)
<i>On-Site Vibration (Building Damage)</i>	Less Than Significant With Mitigation	Less (No Impact)	Similar (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)
<i>On-Site Vibration (Human Annoyance)</i>	Significant Unavoidable	Less (No impact)	Similar (Significant Unavoidable)	Similar (Significant Unavoidable)
<i>Off-Site Vibration (Building Damage)</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Off-Site Vibration (Human Annoyance)</i>	Significant Unavoidable	Less (No Impact)	Similar (Significant Unavoidable)	Similar (Significant Unavoidable)
<i>Operations</i>				
<i>On-Site Noise</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Off-Site Noise</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Vibration</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<b>H. PUBLIC SERVICES</b>				
<i>Fire Protection</i>				
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Greater (Less Than Significant)
<i>Police Protection</i>				
<i>Construction</i>	Less Than Significant	Less (No impact)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No impact)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Libraries</i>				
<i>Construction</i>	Less Than Significant	Less (No impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No impact)	Less (Less Than Significant)	Less (Less Than Significant)

**Table V-3 (Continued)**  
**Comparison of Impacts Associated with the Development Alternatives**

<b>Impact Area</b>	<b>Project</b>	<b>Alternative 1: No Project/No Build</b>	<b>Alternative 2: Reduced Density</b>	<b>Alternative 3: Office</b>
<i>Parks and Recreation</i>				
<i>Construction</i>	Less Than Significant	Less (No impact)	Similar (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No impact)	Less (Less Than Significant)	Less (Less Than Significant)
<b>I. TRANSPORTATION</b>				
<i>Conflict with Plans</i>	Less Than Significant	Less (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Vehicle Miles Traveled</i>	Less Than Significant	Less (No impact)	Less (Less Than Significant)	Greater (Less Than Significant)
<i>Hazardous Design Features or Incompatible Uses</i>	Less Than Significant	Less (No impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Emergency Access</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<b>J. TRIBAL CULTURAL RESOURCES</b>				
<i>Tribal Cultural Resources</i>	Less Than Significant	Less (No impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<b>K. UTILITIES AND SERVICE SYSTEMS</b>				
<i>Water Supply and Infrastructures</i>				
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Wastewater</i>				
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Energy Supply and Infrastructure</i>				
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
<b>Less/Similar/Greater</b>	<b>—</b>	<b>45/0/0</b>	<b>25/20/0</b>	<b>9/29/7</b>
<b>Overall</b>	<b>—</b>	<b>Less</b>	<b>Less</b>	<b>Similar</b>
Source: Eyestone Environmental, 2021.				

## 5. Overview of Proposed Project and Project Objectives

The Project would develop a 25-story mixed-use building comprised of 270 residential dwelling units (including 27 units restricted to Extremely Low-Income households) and 6,790 square feet of ground floor commercial space, including restaurant, and retail uses. The height of the proposed building would be up to 268 feet to the top of the parapet, with additional projections (e.g., stairwell and elevator penthouses and mechanical enclosures) reaching a maximum height of 286 feet. As shown in the Conceptual Site Plan included as Figure II-3 in Section II, Project Description, of this Draft EIR, the Project would replace the surface parking area within the northeast portion of the Project Site (Development Area), while the six existing buildings located in the southern and western portions of the Project Site, containing 33,828 square feet of commercial uses, would be retained. The Project would include up to 320 vehicle parking spaces located in two above-ground and four subterranean parking levels, and 166 bicycle parking spaces. The Project would also include approximately 30,918 square feet of open space and recreational amenities. When including the existing on-site buildings that would be retained, the Project would result in up to 300,996 square feet of floor area with a maximum FAR of up to 4.5:1.

The underlying purpose of the Project is to redevelop the Project Site by constructing a new mixed-use development that provides new multi-family housing opportunities at a range of income levels as well as new neighborhood-focused ground-floor commercial uses that serve the community and promote walkability. As set forth in the CEQA Guidelines, the Project's basic and fundamental objectives are provided below.

- Maximize the provision of high-density, multi-family housing units, including affordable housing units, to support the much-needed demand for housing at a range of income levels.
- Locate residential and commercial uses in a high quality transit area and transit priority area, thereby promoting sustainability and reducing automobile dependency and Vehicle Miles Traveled (VMT).
- Redevelop and improve the visual character of the surface parking portion of the Project Site with a development that is compatible in scale and design with the character of the surrounding area;
- Contribute to economic investment in the Hollywood Community Plan area through the creation of construction and retail/restaurant jobs;
- Create a street-level identity for the Project Site and improve the pedestrian experience through the introduction of active street-level uses;



- Promote sustainable development by incorporating “Green” principles in the design of the Project capable of meeting the standards of LEED® Certified or equivalent green building standards, including an energy-efficient building, a pedestrian- and bicycle-friendly site design, water conservation features, and waste reduction features; and
- Incorporate the best practices for smart growth<sup>5</sup> by providing housing, employment, and retail/restaurant opportunities within an employment hub with walkable streets, a bike-friendly environment, and access to public transit.

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<sup>5</sup> *According to the United States Environmental Protection Agency (USEPA), “smart growth” refers to a range of development and conservation strategies that help protect human health and the natural environment and make communities more attractive, economically stronger, and more socially diverse. These strategies include mixed land uses; compact building design; a range of housing opportunities and choices; walkable neighborhoods; distinctive, attractive communities with a strong sense of place; preservation of open space, farmland, natural beauty, and critical environmental areas; development directed towards existing communities; a variety of transportation choices; predictable, fair, and cost effective development decisions; and community and stakeholder collaboration in development decisions.*

## **V. Alternatives**

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

#### **1. Description of the Alternative**

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states in part that, “in certain instances, the No Project/No Build Alternative means ‘no build’ wherein the existing environmental setting is maintained.” Accordingly, for purposes of this analysis, Alternative 1, the No Project/No Build Alternative, assumes that no new development would occur at the Project Site. The existing conditions on the Project Site, including the surface parking lot and six commercial buildings that would be retained under the Project, would remain. Thus, existing conditions at the Project Site would remain unchanged under Alternative 1.

#### **2. Environmental Impacts**

##### **a. Air Quality**

###### **(1) Consistency with Air Quality Plans**

The No Project/No Build Alternative would not include new development or alter the existing uses at the Project Site. Therefore, Alternative 1 would not result in air quality impacts that could result in a potential conflict with the goals and policies of the South Coast Air Quality Management District’s (SCAQMD’s) Air Quality Management Plan (AQMP) or the City of Los Angeles General Plan. Thus, no impacts would occur, which would be less than the less-than-significant-impacts associated with the Project.

###### **(2) Regional Emissions**

###### *(a) Construction*

Alternative 1 would not include any grading, excavation, building development, painting, or other construction activities, and thus would not generate construction-related fugitive dust, diesel emission from construction-related truck and construction equipment use, gasoline emissions from construction worker traffic, or other forms of construction-

related regional or localized emissions. Thus, no construction-related regional or localized emissions impacts would occur. Therefore, the construction-related regional and localized emissions impacts under Alternative 1 would be less than the less-than-significant impacts of the Project.

*(b) Operation*

Alternative 1 would not result in new development or increased operations that could generate additional operational regional and localized emissions related to vehicular traffic or the consumption of electricity and natural gas beyond what is currently generated by the existing commercial buildings and surface parking area on the Project Site. No new operational regional or localized emissions impacts would occur. Therefore, the operations-related regional emissions impacts under Alternative 1 would be less than the less-than-significant-impacts of the Project.

### (3) Localized Emissions

*(a) Construction*

As previously discussed, Alternative 1 would not result in any construction emissions associated with construction worker and construction truck traffic, fugitive dust from demolition and excavation, or the use of heavy-duty construction equipment. Therefore, construction-related localized air quality impacts would not occur. Thus, impacts related to localized air quality emissions during construction would be less under Alternative 1 when compared to the less-than-significant impacts of the Project.

*(b) Operation*

Alternative 1 would not result in new development or increased operations that could generate additional operational emissions related to vehicular traffic or the consumption of electricity and natural gas beyond what is currently generated by the existing uses. Therefore, no operational air quality impacts associated with localized emissions would occur under Alternative 1, and such impacts would be less than the less-than-significant impacts of the Project.

### (4) Toxic Air Contaminants

*(a) Construction*

Since construction activities would not occur on the Project Site, Alternative 1 would not result in diesel particulate emissions during construction that could generate substantial toxic air contaminants (TACs). As such, no construction-related impacts associated with the release of TACs would occur under Alternative 1. Therefore, the construction-related

TAC impacts under Alternative 1 would be less than the less-than-significant-impacts of the Project.

*(b) Operation*

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

## **b. Cultural Resources**

### **(1) Historical Resources**

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, there are no historical resources on the Project Site. In addition, Alternative 1 would not include any construction activities or new development such that could potentially impact off-site historical resources. No impacts to historical resources would occur. Therefore, the impacts to historical resources under Alternative 1 would be less than the less-than-significant impacts of the Project.

### **(2) Archaeological Resources**

As Alternative 1 would not include any construction activities, it would not have the potential to impact archaeological resources. Thus, no impacts to archaeological resources would occur. Therefore, the impacts to archaeological resources under Alternative 1 would be less than the less-than-significant impacts of the Project.

### **(3) Human Remains**

As Alternative 1 would not include any construction activities, it would not have the potential to impact human remains. No impacts to human remains would occur. Therefore, the impacts to human remains under Alternative 1 would be less than the less-than-significant impacts of the Project.

## **c. Energy**

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

#### *(a) Construction*

Construction activities would not occur under the No Project/No Build Alternative. Therefore, Alternative 1 would not generate a short-term demand for energy during construction, which could result in the wasteful, inefficient, or unnecessary consumption of energy resources. No construction-related energy impacts would occur. Therefore, the construction-related energy impacts of Alternative 1 would be less than the less-than-significant impacts of the Project.

#### *(b) Operation*

The No Project/No Build Alternative would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the long-term energy demand at the Project Site and would have no potential to result in an increase in the wasteful, inefficient, or unnecessary consumption of energy resources. No operations-related energy impacts would occur. Therefore, the operations-related energy impacts of Alternative 1 would be less than the less-than-significant impacts of the Project.

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

Alternative 1 would not include new development or alter the existing uses at the Project Site. Therefore, Alternative 1 would not increase energy use at the Project Site, and thus would have no potential to conflict with plans for renewable energy or energy efficiency. Therefore, no energy impacts would occur under Alternative 1, and the energy impacts of this alternative would be less than the less-than-significant impacts of the Project.

## **d. Geology and Soils (Paleontological Resources)**

As the No Project/No Build Alternative would not include any construction activities, it would not have the potential to impact paleontological resources. No impacts would occur. Therefore, the paleontological resources impacts of Alternative 1 would be less than the less-than-significant (with mitigation) impacts of the Project.

## **e. Greenhouse Gas Emissions**

Alternative 1 would not develop new uses on the Project Site. As such, no new greenhouse gas (GHG) emissions would be generated under Alternative 1 and no GHG

impacts would occur. Therefore, the GHG impacts of Alternative 1 would be less than the less-than-significant GHG impacts of the Project.

## **f. Land Use and Planning**

Under Alternative 1, there would be no changes to the existing physical or operational characteristics of the Project Site. No impacts associated with conflicts with land use plans or regulations, including but not limited to the City of Los Angeles General Plan; Hollywood Community Plan; Hollywood Redevelopment Plan; Hollywood Signage Supplement Use District; Citywide Design Guidelines; and the Los Angeles Municipal Code (LAMC), would occur. Therefore, the land use impacts of Alternative 1 would be less than the less-than-significant impacts of the Project.

## **g. Noise**

### **(1) Noise**

#### *(a) Construction*

No new construction activities would occur under Alternative 1. As such, no construction-related noise would be generated on- or off-site under this alternative, and no construction noise impacts would occur. Therefore, Alternative 1 would eliminate the significant and unavoidable on- and off-site construction noise impacts that would occur under the Project.

#### *(b) Operation*

Alternative 1 would not develop new uses on the Project Site, and no changes to existing site operations would occur. The six existing commercial buildings and the surface parking area would remain, and no changes to existing operations on the Project Site would occur. As such, no new stationary or mobile noise sources (e.g., traffic) would be introduced on or within the vicinity of the Project Site under Alternative 1, and no operational noise impacts would occur. Therefore, the operational on-site and off-site noise impacts of Alternative 1 would be less than the less-than-significant impacts of the Project.

### **(2) Vibration**

#### *(a) Construction*

No new construction activities would occur under Alternative 1. As such, no construction-related vibration would be generated on- or off-site under this alternative, and no construction vibration impacts would occur. Therefore, Alternative 1 construction-

related impacts would be less than the Project and would eliminate the Project's significant and unavoidable on- and off-site construction-related vibration impacts (human annoyance), the less-than-significant (with mitigation) on-site construction-related vibration impacts (building damage), and the less-than-significant off-site construction-related vibration impacts (building damage).

*(b) Operation*

Alternative 1 would not develop any new uses on the Project Site. The six existing commercial buildings and the surface parking area would remain, and no changes to existing operations on the Project Site would occur. As such, no new operations-related vibration sources would be introduced on- or off-site under this alternative, and no operational vibration impacts would occur. Therefore, Alternative 1 would result in less operational vibration impacts than the less-than-significant impacts of the Project.

## **h. Public Services**

### **(1) Fire Protection**

*(a) Construction*

As Alternative 1 would not require construction, this alternative would not result in construction-related demand for Los Angeles Fire Department (LAFD) fire protection facilities or services, construction traffic that could potentially slow emergency response times, or the potential for construction-related obstruction of emergency access. No impact would occur. Therefore, Alternative 1 would result in less construction-related fire protection impacts than the less-than-significant impacts of the Project.

*(b) Operation*

No changes to existing land uses or operations on-site would occur under Alternative 1. Therefore, this alternative would not result in operations-related demand for LAFD fire protection facilities or services, traffic that could potentially slow emergency response times, the potential for obstruction of emergency access, or a demand for fire flow. No impact would occur, and Alternative 1 would result in less operational fire protection impacts than the less-than-significant impacts of the Project.

### **(2) Police Protection**

*(a) Construction*

As Alternative 1 would not require construction, this alternative would not result in construction-related demand for police protection facilities or services from the Los Angeles

Police Department's (LAPD's) Hollywood Community Police Station, construction traffic that could potentially slow emergency response times, or the potential for construction-related obstruction of emergency access. No impact would occur. Therefore, Alternative 1 would result in less construction-related police protection impacts than the less-than-significant impacts of the Project.

*(b) Operation*

No changes to existing land uses or operations on-site would occur under the No Project/No Build Alternative. Therefore, Alternative 1 would not result in operations-related demand for police protection facilities or services from LAPD's Hollywood Community Police Station, traffic that could potentially slow emergency response times, or the potential for obstruction of emergency access. No impact would occur. Therefore, Alternative 1 would result in less operations-related police protection impacts than the less-than-significant impacts of the Project.

**(3) Libraries**

*(a) Construction*

As Alternative 1 would not require construction activities, Alternative 1 would not have the potential to impact the provision of library services in the vicinity of the Project Site during construction. Thus, no construction-related library impacts would occur under Alternative 1, and impacts would be less than the less-than-significant impacts of the Project.

*(b) Operation*

No changes to existing land uses or operations on-site would occur under Alternative 1. Therefore, there would be no potential to increase the level of activity on the Project Site or increase the service population for the Los Angeles Public Library (LAPL) library branches that serve the Project Site. No impacts to library facilities would occur under Alternative 1, and impacts would be less than the less-than-significant impacts of the Project.

**(4) Parks and Recreation**

*(a) Construction*

The No Project/No Build Alternative would not require construction activities. Thus, Alternative 1 would not have the potential to impact parks and recreation facilities in the vicinity of the Project Site during construction. Thus, no construction-related impacts to



parks and recreation facilities would occur under Alternative 1, and impacts would be less than the less-than-significant impacts of the Project.

*(b) Operation*

No changes to existing land uses or operations on-site would occur under Alternative 1. Therefore, there would be no potential to increase the level of activity on the Project Site or increase the service population for the parks and recreation facilities that serve the Project Site. No impacts to parks and recreation facilities would occur under Alternative 1, and impacts would be less than the less-than-significant impacts of the Project.

## **i. Transportation**

Since the No Project/No Build Alternative would not develop new or additional land uses on the Project Site, Alternative 1 would not generate any additional construction- or operations-related vehicle trips or alter existing access or circulation within the Project Site. Therefore, no impacts would occur with respect to construction and operational traffic, including: conflicts with programs, plans, ordinances, or policies addressing the circulation system; VMT; hazardous design features; and emergency access. However, Alternative 1 would not further many of the goals, objectives and policies of the applicable transportation plans (e.g., transportation portions of the General Plan Framework, Hollywood Community Plan, Hollywood Redevelopment Plan, SCAG's RTP/SCS, etc.) for high-density mixed-use development on urban infill sites in close proximity to transit to increase transit usage and reduce per capita VMT. Nonetheless, the overall transportation impacts of Alternative 1 would be less than the less-than-significant impacts of the Project.

## **j. Tribal Cultural Resources**

As Alternative 1 would not include any construction activities, it would not have the potential to impact tribal cultural resources. Therefore, no impacts to tribal resources would occur under Alternative 1, and the tribal cultural resources impacts of this alternative would be less than the less-than-significant impacts of the Project.

## **k. Utilities and Service Systems**

### **(1) Water Supply and Infrastructure**

*(a) Construction*

Construction activities would not occur under Alternative 1. As such, Alternative 1 would not generate construction-related demand for either water or associated

infrastructure, and no impact would occur. Therefore, water supply and infrastructure impacts under Alternative 1 would be less than the less-than-significant impacts of the Project.

*(b) Operation*

Alternative 1 would not alter the Project Site. Thus, the surface parking area and six existing commercial structures on the Project Site would remain. As such, Alternative 1 would not increase operations-related water demand or the need for associated infrastructure. No operations-related water supply and infrastructure impacts would occur. Therefore, the operations-related water supply and infrastructure impacts of Alternative 1 would be less than the less-than-significant impacts of the Project.

**(2) Wastewater**

*(a) Construction*

Construction activities would not occur under Alternative 1. As such, Alternative 1 would not generate a construction-related demand for wastewater conveyance or treatment infrastructure, and no impact would occur. Therefore, the construction-related wastewater impacts of Alternative 1 would be less than the less-than-significant impacts of the Project.

*(b) Operation*

Alternative 1 would not alter the existing land uses or site operations on the Project Site. As such, Alternative 1 would not generate a long-term demand for wastewater conveyance and treatment infrastructure beyond that which is currently generated on the Project Site, and no operations-related wastewater impacts would occur. Therefore, the operations-related wastewater impacts of Alternative 1 would be less than the less-than-significant impacts of the Project.

**(3) Energy Infrastructure**

*(a) Construction*

Construction activities would not occur under Alternative 1. As such, Alternative 1 would not generate a demand for construction-related infrastructure, and no impact would occur. Therefore, the construction-related energy infrastructure impacts under Alternative 1 would be less than the less-than-significant impacts of the Project.

*(b) Operation*

The existing surface parking area and six commercial structures that currently occupy the Project Site would be retained under Alternative 1. As such, Alternative 1 would not generate additional demand for operations-related energy infrastructure, and no impact would occur. Therefore, the operations-related energy infrastructure impacts of Alternative 1 would be less than the less-than-significant impacts of the Project.

### 3. Comparison of Impacts

As evaluated above, The No Project/No Build Alternative would avoid the significant unavoidable construction-related noise and vibration (human annoyance) impacts of the Project. Furthermore, as indicated in Table V-3 on page V-12, due to a lack of development and potential associated environmental effects, Alternative 1 would result in less impacts than the Project for all of the environmental topics evaluated in the Draft EIR.

### 4. Relationship of the Alternative to Project Objectives

Under Alternative 1, the existing buildings and surface parking areas would remain on the Project Site, and no new development would occur. As such, Alternative 1 would not meet the underlying purpose of the Project which is to redevelop the Project Site by constructing a new mixed-use development that provides new multi-family housing opportunities at a range of income levels as well as new neighborhood-focused ground-floor commercial uses that serve the community and promote walkability. Furthermore, Alternative 1 would not meet any of the Project objectives as listed below:

- Maximize the provision of high-density, multi-family housing units, including affordable housing units, to support the much-needed demand for housing at a range of income levels
- Locate residential and commercial uses in a high quality transit area and transit priority area, thereby promoting sustainability and reducing automobile dependency and Vehicle Miles Traveled (VMT).
- Redevelop and improve the visual character of the surface parking portion of the Project Site with a development that is compatible in scale and design with the character of the surrounding area.
- Contribute to economic investment in the Hollywood Community Plan area through the creation of construction and retail/restaurant jobs.

- Create a street-level identity for the Project Site and improve the pedestrian experience through the introduction of active street-level uses.
- Promote sustainable development by incorporating “Green” principles in the design of the Project capable of meeting the standards of LEED® Certified or equivalent green building standards, including an energy-efficient building, a pedestrian- and bicycle-friendly site design, water conservation features, and waste reduction features.
- Incorporate the best practices for smart growth by providing housing, employment, and retail/restaurant opportunities within an employment hub with walkable streets, a bike-friendly environment, and access to public transit.

## **V. Alternatives**

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### **B. Alternative 2: Reduced Density Alternative**

#### **1. Description of the Alternative**

The Reduced Density Alternative (Alternative 2) would include the same types of uses proposed by the Project while reducing the amount of total new residential units and new commercial floor area by 25 percent. Specifically, as indicated in Table V-1 on page V-4, Alternative 2 would include 203 residential units and 5,093 square feet of ground-floor commercial uses. As with the Project, Alternative 2 would retain the six existing commercial buildings on the Project Site that have a combined floor area of approximately 33,828 square feet, and the 4,000 square feet of floor area within the existing commercial buildings that has been vacant since prior to 2018 is anticipated to be occupied with high-turnover restaurant uses. Alternative 2 would have a total floor area of 234,205 square feet with an overall FAR of 3.5:1. Alternative 2 would also include 23,189 square feet of open space and 252 vehicle parking spaces provided in two above grade and three below grade levels (with a maximum depth of excavation of 40 feet below grade). The building height would be 209 feet, or 19 stories. The site plan under Alternative 2 would be similar to that of the proposed Project.

#### **2. Environmental Impacts**

##### **a. Air Quality**

###### **(1) Consistency with Air Quality Plans**

Alternative 2 would include the same uses as the Project at a 25 percent reduced density. Thus, similar to the Project, Alternative 2 would concentrate new residential and commercial uses within an HQTAs, thereby reducing VMT and related vehicle emissions. As with the Project, Alternative 2 would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for these pollutants, exceed any of the State and federal standards, or delay timely attainment of air quality standards or interim emission reductions specified in the AQMP. Thus, Alternative 2 would be consistent with the goals and policies of the AQMP. In addition, similar to the Project, Alternative 2 would advance the applicable goals of the Air Quality Element of the City's General Plan by located residential and commercial uses within an HQTAs, including bicycle parking, enhancing the pedestrian environment, and providing land uses that are consistent

with the existing land use pattern in a vicinity that concentrates urban density along major arterials and near transit options. Thus, similar to the Project, Alternative 2 would not conflict with or obstruct implementation of the AQMP and would serve to advance applicable policies of the City pertaining to air quality. Impacts under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

## (2) Regional Emissions

### *(a) Construction*

As with the Project, construction of Alternative 2 has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. As with the Project, Alternative 2 would comply with applicable air quality regulations during construction and implement Project Design Feature AIR-PDF-1 requiring the use of existing electrical infrastructure and/or solar generators where available rather than temporary diesel or gasoline generators during the construction period to minimize stationary source construction emissions.

Under Alternative 2, the amount and duration of construction activities would be reduced in comparison to the Project due to the reduction in uses and associated square footage. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar to the Project on peak construction days. Because maximum daily conditions are used for measuring impact significance, regional impacts on these days would be similar to those of the Project. Therefore, the construction-related regional emissions under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

### *(b) Operation*

Similar to the Project, operational regional air pollutant emissions associated with Alternative 2 would be generated by vehicle trips to the Project Site and by the consumption of electricity and natural gas. As previously discussed, the development proposed under Alternative 2 would be reduced by approximately 25 percent compared to the Project. As such, the number of new daily operational vehicle trips generated by Alternative 2 would be less than the number of new daily trips generated by the Project.

Specifically, as provided in Appendix I of this Draft EIR, Alternative 2 would result in a total of 2,138 daily vehicle trips and 13,785 daily VMT, as compared to the Project's 2,479 daily vehicle trips and 15,916 daily VMT.<sup>6</sup> Also, because Alternative 2 would include 25 percent less floor area than the Project, demand for electricity would also be less than the Project. Thus, as regional air pollutant emissions associated with Alternative 2 would be generated by vehicle trips and VMT, which are the largest contributors to operational air pollutant emissions, and to a lesser extent by the consumption of electricity and natural gas, the operational regional emissions of Alternative 2 would be less than those of the Project. Furthermore, the operational regional emissions under both the Project and Alternative 2 would be below the SCAQMD's regional significance thresholds. Therefore, the operational regional air pollutant emissions of Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

### (3) Localized Emissions

#### (a) Construction

On-site construction activities associated with Alternative 2 would be located at similar distances from sensitive receptors as the Project. Although this alternative would result in approximately 25 percent less floor area as compared to the Project, overall construction activities and associated localized emissions from construction of Alternative 2 would be similar to the Project. The intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, localized impacts on these days would be similar to those of the Project. Therefore, as with the Project, localized construction impacts under Alternative 2 would be less than significant and similar to the less than the significant impacts of the Project.

#### (b) Operation

Localized operational impacts are determined primarily by peak-hour intersection traffic volumes. As provided in the Transportation Analysis of Project Alternatives provided in Appendix I of this Draft EIR, Alternative 2 would generate 84 vehicle trips during the A.M. peak hour and 91 trips during the P.M. peak hour, which would be less than the Project's 109 A.M. peak-hour trips and 122 P.M. peak-hour trips. As such, total operational vehicular emissions under Alternative 2 would be less than those of the Project. In addition, with the development of less floor area than the Project, area and stationary sources would also generate less on-site operational air emissions compared to the Project. Also, as with the Project, Alternative 2 would not introduce any major new sources of air pollution within the

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<sup>6</sup> Gibson Transportation Consulting, Inc., *Transportation Analysis of Project Alternatives for the Artisan Hollywood Project*, June 22, 2021. See Appendix I of this Draft EIR.

Project Site. Because the localized impacts analysis from on-site operational activities and the localized Carbon Monoxide (CO) hotspot analysis associated with off-site operational activities for the Project did not result in any significant impacts, localized impacts under Alternative 2 would also be less than significant and less than the less-than-significant impacts of the Project.

#### (4) Toxic Air Contaminants

##### *(a) Construction*

As with the Project, construction of Alternative 2 would generate diesel particulate emissions associated with heavy equipment operations during construction activities. These activities represent the greatest potential for TAC emissions. Overall construction TAC emissions generated by Alternative 2 would be less than those of the Project since Alternative 2 would require less excavation for subterranean parking levels (i.e., reduced from 50 feet below grade to 40 feet below grade under Alternative 2) and less overall building construction. As with the Project, given the short-term nature of construction, Alternative 2 would not result in a long-term source of TAC emissions. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

##### *(b) Operation*

As set forth in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential TACs associated with Project operations would include diesel particulate matter from delivery trucks. Under Alternative 2, the overall increase in the number of deliveries and associated diesel particulate matter emissions would be reduced compared to the Project due to the reduction in floor area for all of the proposed uses. Also, as with the Project, the land uses proposed under Alternative 2 are not considered land uses that generate substantial TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not part of the Project or Alternative 2. Similar to the Project, Alternative 2 would not release substantial amounts of TACs and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Therefore, the operational TAC impacts of Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

### **b. Cultural Resources**

#### (1) Historical Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, there are no historical resources on the Project Site, and no historical resources would be demolished,



destroyed, relocated, or altered under the Project. Similar to the Project, Alternative 2 would include vibration-generating grading and construction activities that could potentially impact historical structures in the Project area (e.g., the Moonglow Records building, which is the closest historical resources, located approximately 50 feet to the north of the Project site). However, this vibration would not be sufficient to result in material damage to the historical resources under the Project, and because the amount of excavation and grading would be slightly reduced under Alternative 2 due to the removal of one subterranean parking level, excavation and grading activities under Alternative 2 would similarly not result in damage to historical resources. Therefore, as with the Project, Alternative 2 would not result in direct impacts to historical resources.

With regard to indirect impacts on historical resources, Alternative 2 would include less floor area, and as such, the height of the building would be reduced. Otherwise, Alternative 2 would incorporate the same site plan and similar architectural and design elements as the Project. Thus, similar to the Project, the height and general character of Alternative 2 would not interfere or conflict with the historic context (i.e., impact the physical characteristics that convey historic significance) of the eight identified designated historical and potentially historical resources in the Project area.

Based on the above, Alternative 2 would result in less-than-significant impacts to historical resources, which would be similar to the less-than-significant impacts of the Project.

## (2) Archaeological Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, no archaeological resources have been documented on-site, although two archaeological resource finds have been documented within a 0.5-mile radius of the Project Site. The Project would include excavation and grading activities that could potentially unearth archaeological resources, if present. However, as the Project Site has been previously graded a part of previous construction activities, encountering archaeological resources is unlikely. Alternative 2 would include the same site plan at the same location as the Project but would require a slightly reduced amount of excavation (due to one less subterranean parking level). Thus, Alternative 2 would have a slightly reduced potential for unearthing archaeological resources, if present. As with the Project, the City's standard archaeological resources Condition of Approval, as outlined in Section IV.B, Cultural Resources, of this Draft EIR, would be applied to address inadvertent discovery or archaeological resources. In accordance with the Condition of Approval, all activities would be conducted in accordance with regulatory requirements as set forth in CEQA Section 21083.2. Thus, Alternative 2 would result in slightly less impacts to archaeological resources as compared to the less-than-significant impacts of the Project.

### (3) Human Remains

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, the Project Site is located in an urbanized area that has been subject to previous grading and development, and no human remains have been documented on-site. However, the Project would include excavation and grading activities that could potentially unearth human remains, if present. As described above, Alternative 2 would include the same site plan at the same location as the Project and would require a similar, though slightly reduced, amount of excavation (due to one less subterranean parking level). However, as human remains would typically be found at shallow depths (e.g., up to the first 10 feet of excavation), the potential for Alternative 2 to encounter human remains during excavation would be similar to the Project. Thus, Alternative 2 would have a similar potential for unearthing human remains, if present. As with the Project, Alternative 2 would comply with applicable regulatory requirements regarding the inadvertent discovery of human remains. As such, similar to the Project, Alternative 2 would have less-than-significant impacts associated with the disturbance of human remains, including those interred outside of dedicated cemeteries.

#### **c. Energy**

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

###### *(a) Construction*

Similar to the Project, construction activities associated with Alternative 2 would consume electricity to supply and convey water for dust control, power construction site lighting and power other construction equipment, and require diesel and other fuels for construction vehicles, but like the Project, would not consume natural gas. However, as with the Project, this energy use during construction would occur in accordance with applicable energy conservation requirements (e.g., Title 24, CARB anti-idling regulations, In-Use Off-Road Diesel-Fueled Fleet regulations, etc.) such that energy use during construction would not occur in a wasteful, inefficient, or unnecessary manner. In addition, because Alternative 2 would include the development of 25 percent less floor area than the Project, less overall construction activity and associated energy use would occur. Therefore, the construction-related energy impacts of Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

###### *(b) Operation*

As with the Project, operation of Alternative 2 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels. As previously discussed, Alternative 2 would result in a reduction of the uses proposed by the Project as

well as a reduction in the number of daily vehicle trips. Specifically, as provided in Appendix I of this Draft EIR, Alternative 2 would result in a total of 2,138 daily vehicle trips and 13,785 daily VMT as compared to 2,479 daily vehicle trips and 15,916 daily VMT under the Project.<sup>7</sup> As such, the consumption of electricity, natural gas, and petroleum-based fuels would be reduced under Alternative 2. In addition, the Project would represent a high-density mixed-use infill project within an HQTAs near transit and other alternative modes of transportation, which would minimize VMT, and result in associated reductions in motor vehicle-related fuel use. Furthermore, similar to the Project, Alternative 2 would implement Project Design Features to reduce energy usage (e.g., GHG-PDF-1, which requires incorporation of sustainability features that enable the Project to achieve LEED® Certification or equivalent, including the use of light-emitting diode (LED) and other efficient lighting technology; and GHG-PDF-2, which prohibits natural gas-fueled fireplaces), and would comply with the applicable energy conservation requirements of Title 24, the Los Angeles Green Building Code, and CALGreen. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 2 would not be wasteful, inefficient, or unnecessary. The impacts of Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project owing to the reduced energy use associated with the reduced density under this alternative.

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

As discussed in Section IV.C, Energy, of this Draft EIR, the energy conservation policies and plans relevant to the Project include the Title 24 energy standards, the 2019 CALGreen Code, the City of Los Angeles Green Building Code, City of LA Green New Deal, and the 2020–2045 RTP/SCS. Compliance with these policies and plans are mandatory pursuant to the City’s Building Code. As such, and as with the Project, Alternative 2 would not conflict with applicable policies and plans related to renewable energy and energy efficiency. Furthermore, implementation of GHG-PDF-1 would require the Project to improve upon Title 24, Part 6, California Energy Code baseline standard requirements by 10 percent for energy efficiency, based on the 2019 Building Energy Efficiency Standards requirements.

With regard to transportation related energy usage, Alternative 2 would represent urban infill development within a TPA and HQTAs in close proximity to transit which would reduce vehicle trips, VMT, per capita VMT, and associated fuel usage in accordance with the SB 375 and SCAG’s RTP/SCS. As with the Project, Alternative 2 would also be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction which would reduce transportation energy use. Therefore,

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<sup>7</sup> *Gibson Transportation Consulting, Inc., Transportation Analysis of Project Alternatives for the Artisan Hollywood Project, June 22, 2021. See Appendix I of this Draft EIR.*

Alternative 2, like the Project, would not conflict with plans for renewable energy or energy efficiency. The impacts of Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

Based on the above, Alternative 2 would be less than significant, and similar to the less-than-significant impacts of the Project.

#### **d. Geology and Soils (Paleontological Resources)**

As discussed in Section IV.D, Geology and Soils (Paleontological Resources), of this Draft EIR, no previously encountered fossil vertebrate localities have been identified within the Project Site or at the adjacent properties, and the uppermost layers of soil and the overlying younger Quaternary Alluvium deposits at the Project Site are unlikely to yield significant vertebrate fossils. However, deeper excavations into the older deposits have the potential to encounter significant vertebrate fossil remains. Alternative 2 would include the same site plan as the Project but would require reduced maximum excavation depths due to the decreased number of subterranean parking levels. Thus, Alternative 2 would have a slightly reduced potential to impact paleontological resources as compared to the Project. However, as maximum excavation to depths of up to 40 feet would be required, Alternative 2 would implement a mitigation measure to address inadvertent discovery of paleontological resources, similar to the mitigation measure proposed for the Project, as outlined in Section IV.D, Geology and Soils—Paleontological Resources, of this Draft EIR. With adherence to this mitigation measure, impacts related to paleontological resources impacts under Alternative 2 would be less than significant, and slightly less than the less-than-significant (with mitigation) impacts of the Project.

#### **e. Greenhouse Gas Emissions**

##### **(1) GHG Emissions**

As discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, GHG emissions from a development project are determined in large part by energy consumption and the number of daily trips generated and associated VMT resulting from the proposed land uses. The Project would represent high-density mixed-use development on an urban infill site within an HQTAs which would take advantage of alternative modes of traffic and reduce per capita VMT. Furthermore, the Project would be designed to comply with the requirements of Title 24, the CALGreen Code, and the Los Angeles Green Building Code, and would incorporate Project Design Features to reduce GHG emissions (e.g., GHG-PDF-1, which requires the incorporation of sustainability features that enable the Project to achieve LEED® Certification or equivalent, including the use of LED and other efficient lighting technology; and GHG-PDF-2, which prohibits natural gas–fueled fireplaces), and would comply with the applicable energy conservation requirements.

Therefore, the Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Alternative 2 would also represent high-density mixed-use development on an urban infill site within an HQTAs, would reduce per capita VMT, would comply with applicable GHG reduction requirements, and would implement the same GHG-reducing design features as the Project. However, Alternative 2 would include 25 percent less floor area than the Project, and would generate less energy usage, vehicle trips, and VMT, such that GHG emissions would be less under Alternative 2. Therefore, while neither Alternative 2 nor the Project would generate GHG emissions that may have a significant impact on environment, the less-than-significant impacts of Alternative 2 would be less than the less-than-significant impacts of the Project.

## (2) Conflict with GHG Reduction Plans/Policies/Regulations

As indicated above, the Project would represent high-density mixed-use development on an urban infill site within an HQTAs, reduce per capita VMT, comply with Title 24, the CALGreen Code, and the Los Angeles Green Building Code, and incorporate Project Design Features to reduce GHG emissions (e.g., GHG-PDF-1, which requires the incorporation of sustainability features that enable the Project to achieve LEED® Certification or equivalent, including the use of LED and other efficient lighting technology; and GHG-PDF-2, which prohibits natural gas–fueled fireplaces). Therefore, as concluded in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project would not conflict with applicable GHG reduction plans, policies and regulations. Alternative 2 would also represent high-density mixed-use development on an urban infill site within an HQTAs, reduce per capita VMT, comply with applicable GHG reduction requirements, and incorporate the same GHG-reducing design features as the Project. Therefore, Alternative 2 would also not conflict with applicable GHG reduction plans, policies and regulations, and impacts would be less than significant. As Alternative 2 and the Project would both comply with applicable GHG reduction plans, policies and regulations, the level of the impacts would be similar between the two projects.

## f. Land Use and Planning

As previously described, Alternative 2 would include a high-density mixed-use development similar to the Project, but would reduce the amount of total floor area by approximately 25 percent. Specifically, Alternative 2 would develop 40 fewer dwelling units (including 6 fewer affordable units), 1,697 square feet less ground-floor commercial space, 68 fewer parking spaces, and 7,729 square feet less open space than the Project. As with the Project, the uses proposed by Alternative 2 would also not conflict with the surrounding mix of urban uses. In addition, like the Project, this alternative would include high-density mixed-use development on an urban infill site within a TPA and HQTAs and in close proximity to public transit options, thereby reducing vehicle trips and VMT. Thus, as with the Project, Alternative 2 would not conflict with the overall intent of the applicable land use

plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect, including those set forth in the Los Angeles General Plan, Hollywood Community Plan, Hollywood Redevelopment Plan, Hollywood Signage Supplemental Use District, Citywide Design Guidelines, LAMC, and SCAG's 2020–2045 RTP/SCS. Therefore, Alternative 2 would result in less-than-significant land use and planning impacts that are similar to the less-than-significant impacts of the Project.

## **g. Noise**

### **(1) Noise**

#### *(a) Construction*

The types of construction activities under Alternative 2 would be similar to the Project, although the amount of construction activity and the duration of construction under Alternative 2 would be reduced due to the reduction in total floor area (e.g., 25 percent less floor area). As with the Project, construction of Alternative 2 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. It is anticipated that the maximum or peak day of construction activity, which serves as the basis of the construction noise analysis, would be similar between Alternative 2 and the Project. This is because: (1) Alternative 2 would include the same footprint and a similar number of subterranean parking levels; (2) both Alternative 2 and the Project would be developed on the same site, and within the same distances to off-site sensitive receptors; and (3) given that both Alternative 2 and the Project would include high-rise mixed-use development, it is anticipated that they would require the same mix of construction equipment. Nevertheless, the noise analysis is based on assumptions that the on-site construction activities (i.e., construction equipment) and off-site construction trucks would be reduced by approximately 25 percent under Alternative 2.

With respect to the on-site construction, a reduction in the number of on-site pieces of construction equipment would reduce the construction noise, depending on the number and type of equipment. Specifically, reducing the on-site construction equipment during the site grading phase from 17 pieces to 13 pieces (approximately 25-percent reduction) would reduce the construction noise at the off-site receptors by 0.7 dBA  $L_{eq}$  at receptor location R7; 1.1 dBA  $L_{eq}$  at receptor locations R1 and R4; 1.2 dBA  $L_{eq}$  at receptors R2, R3, and R6; and 1.3 dBA  $L_{eq}$  at receptor location R5 (as compared to the Project). The estimated construction noise levels with a 25-percent reduction in the number of pieces of construction equipment would still exceed the significance threshold by up to 20.4 dBA  $L_{eq}$  at receptor location R7 (nearest sensitive receptor).

With respect to off-site construction, reducing the number of construction trucks during the site grading phase from 17 to 13 truck trips per hour (approximately 25-percent

reduction) would reduce the truck noise to 65.6 dBA  $L_{eq}$  along Selma Avenue (between Argyle Avenue and the Project Site), 63.6 dBA  $L_{eq}$  along Argyle Avenue and Gower Street, and to 62.0 dBA  $L_{eq}$  along Selma Avenue (between Gower Street and Argyle Avenue) (a 1.2- to 1.3 dBA reduction). However, when accounting for ambient noise levels, the Alternative 2-generated noise due to construction trucks plus ambient noise levels would only be reduced by 1.1 dBA, 0.3 dBA, 0.3 dBA, and 0.8 dBA along Selma Avenue (between Argyle Avenue and the Project Site), Argyle Avenue, Gower Street, and Selma Avenue (between Gower Street and Argyle Avenue), respectively. In addition, a reduction in the number of construction trucks during the mat foundation phase from 21 to 16 truck trips per hour (approximately 25 percent) would reduce the truck noise level along Selma Avenue (between Argyle Avenue and the Project Site) from 68.0 dBA  $L_{eq}$  to 66.8 dBA  $L_{eq}$  (1.1-dBA reduction). However, when accounting for ambient noise levels, the Alternative 2-generated noise due to construction trucks plus ambient noise levels would only be reduced by 1.0 dBA, which would increase the ambient by 7.9 dBA. Nevertheless, the maximum (or peak day) daily truck trips would likely be similar to the Project. Thus, impacts related to off-site construction noise would be similar to the Project.

As with the Project, Alternative 2 would implement the same construction-related Project Design Features, including NOI-PDF-1 (using construction equipment equipped with state-of-the-art noise shielding and muffling devices) and NOI-PDF-3 (prohibition on the use of impact driven pile systems); and both projects would implement Mitigation Measure NOI-MM-1 (temporary impermeably sound barrier at specified locations during the construction period). Implementation of Mitigation Measure NOI-MM-1 would reduce the noise impacts at receptor locations R2 and R6 to less than significant. However, noise impacts at receptor locations R1 and R7 would remain significant. In addition, the temporary sound barriers would not be effective in reducing the construction-related noise levels at receptor location R1 due to the height of the residential building (a five-story building). Thus, like the Project, on-site and off-site construction noise would be significant and unavoidable under Alternative 2 even with the application of Project Design Features and mitigation measures. Overall, on-site construction noise impacts would be less than the significant unavoidable impacts of the Project and off-site construction noise impacts would be similar to the significant unavoidable impacts of the Project. In addition, cumulative on- and off-site noise impacts during construction of Alternative 2 would be significant and unavoidable, similar to the Project.

### *(b) Operation*

As discussed in Section IV.G, Noise, of this Draft EIR, sources of operational noise under the Project would include: (1) on-site stationary noise sources, including mechanical equipment, activities within the proposed outdoor spaces, parking areas, loading dock and trash collection areas; and (2) off-site mobile source (e.g., traffic) noise sources. Alternative 2 would introduce noise from similar on-site and off-site noise sources as the

Project. The proposed parking, loading dock, and trash collection areas for Alternative 2 would also be located in enclosed areas, similar to the Project, such that parking, loading dock, and trash collection area noise under Alternative 2 would be minimal, similar to the Project. The Project and Alternative 2 would also have the same types of land uses, and similar operating hours. Lastly, Alternative 2 would implement the same operations-related Project Design Features as the Project, including NOI-PDF-2 (acoustically screening mechanical equipment) and NOI-PDF-4 (limiting noise from outdoor amplified sound systems to specific maximum levels). It is anticipated that with the 25-percent reduction in floor area under Alternative 2, the noise levels from on-site mechanical equipment and outdoor spaces would be reduced. Alternative 2 would also comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA.

With regard to off-site noise sources, Alternative 2 would result in 2,138 daily vehicle trips, versus 2,479 daily vehicle trips under the Project,<sup>8</sup> such that off-site mobile source noise under this alternative would also be reduced. Therefore, both Alternative 2 and the Project would result in less-than-significant operational on- and off-site project-level noise impacts (including composite noise), and less-than-significant cumulative operational on-site and off-site noise impacts, with the degree of these impacts less under Alternative 2.

## (2) Vibration

### (a) Construction

As noted above, the types of construction activities under Alternative 2 would be similar to the Project, although the amount and duration of construction activities would be reduced. As with the Project, construction of Alternative 2 would generate vibration from the use of heavy-duty construction equipment as well as from truck trips. While the overall amount of construction would be reduced, on- and off-site construction activities and the associated construction vibration levels would be expected to be similar to those of the Project, as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment. As such, peak vibration levels generated by the construction equipment would be similar to those of the Project. That is, the vibration levels associated with Alternative 2 on-site construction activities would be up to 0.523 PPV at the single-story commercial building to the northwest, which would exceed the 0.5 PPV building damage criteria. Alternative 2 would implement

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<sup>8</sup> Gibson Transportation Consulting, Inc., *Transportation Analysis of Project Alternatives for the Artisan Hollywood Project*, June 22, 2021. See Appendix I of this Draft EIR.



Mitigation Measure NOI-MM-2 (vibration monitoring), which would reduce the on-site construction vibration impacts associated with building damage to a less-than-significant level. Like the Project, vibration impacts associated with building damage due to off-site construction activities under Alternative 2 would be less than significant. The estimated ground-borne vibration levels would be up to 78 VdB at the Sound Factory (receptor location R5) due on-site construction equipment (as provided in Table IV.G-22 of Section IV.G, Noise, of this Draft EIR), which would exceed the 65-VdB significance criteria. In addition, the estimated vibration from construction trucks along the haul routes could reach 72 VdB, which would exceed the 65-VdB significance criteria for recording studio use and would be at the 72-VdB significance criteria for residential and hotel uses. Like the Project, there are no feasible mitigation measures to reduce the vibration human annoyance impacts. As such, vibration impacts associated with human annoyance from on- and off-site construction would be significant and unavoidable, similar to the Project. Overall, vibration impacts under Alternative 2 would be similar to the impacts of the Project.

*(b) Operation*

Similar to the Project, sources of vibration related to operation of Alternative 2 would include vehicle circulation, delivery trucks, and building mechanical equipment. Vehicular-induced vibration, including vehicle circulation within the parking structure, would not generate perceptible vibration levels at off-site sensitive uses. Building mechanical equipment installed as part of Alternative 2 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration transmission so vibration would not be perceptible at the off-site sensitive receptors. Therefore, operation of Alternative 2 would not result in the generation of excessive ground-borne vibration levels that would be perceptible in the vicinity of the Project Site. As such, vibration impacts during operation of Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

## **h. Public Services**

### **(1) Fire Protection**

*(a) Construction*

As previously described, the types of construction activities required for Alternative 2 would be similar to that of the Project, although the overall amount of construction activities and duration of construction would be reduced due to the 25-percent reduction in development. As with the Project, construction activities under Alternative 2 would occur in compliance with all applicable federal, state, and local requirements concerning fire prevention and the handling, disposal, use, storage, and management of hazardous waste (e.g., OSHA, LAFD requirements, etc.). In addition, as with the Project, construction

activities for Alternative 2 have the potential to affect fire protection services by adding construction traffic to the street network and by necessitating partial lane closures during street improvements and utility installations. Alternative 2 would implement a Construction Traffic Management Plan, similar to the Project and as outlined in Project Design Feature TR-PDF-2 in Section IV.I, Transportation, of this Draft EIR, which would ensure that adequate and safe access remains available within and near the Project Site during construction. Therefore, construction of Alternative 2 would not result in the need for new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 2 would be less than significant and, due to the shorter construction duration required under Alternative 2, would be less than the less-than-significant impacts of the Project.

*(b) Operation*

Alternative 2 would include 230 multi-family residential units (including 21 Extremely Low-Income units) and up to 5,093 square feet of ground floor commercial space, including restaurant and retail uses. In addition, as with the Project, Alternative 2 assumes that 4,000 square feet of space within the existing commercial uses that has been vacant since prior to 2018 would be occupied by a high-turnover restaurant. Based on a 2.25 persons per household rate for multi-family residential, a 3.14 persons per household rate for affordable housing (family), and a 4 persons per 1,000 square feet for high-turnover restaurant uses provided by the City of Los Angeles VMT Calculator Documentation Guide, the Project would generate approximately 475 residents and 36 employees, which is less than the 632 residents and 43 employees that would be generated with the Project.<sup>9,10</sup> As such, Alternative 2 would generate less demand for LAFD fire protection services as compared to the Project. Similar to the Project, Alternative 2 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, clearances, fire hydrants, fire flow, storage and management of hazardous materials, alarm and communications systems, and building sprinkler systems. Alternative 2 would also include all applicable additional life safety elements outlined in Fire Prevention Bureau (FPB) Requirement No. 10, including automatic fire sprinklers with quick response sprinkler heads, a video camera surveillance system, egress stairways with capacity minimums, fire service access elevators, stairways

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<sup>9</sup> *City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020.*

<sup>10</sup> *As with the Project, this analysis conservatively assumes that all of the proposed commercial space and the existing commercial space that has been vacant since prior to 2018 would be occupied by high-turnover restaurant uses.*

with roof access, enclosed elevator lobbies, and escalator openings or stairways that are protected by automatic shutters.<sup>11</sup>

With regard to emergency access, like the Project, traffic generated by Alternative 2 would not significantly impact emergency vehicle response to the Project Site and surrounding area as the drivers of emergency vehicles have the ability to bypass traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Alternative 2 would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access.

Additionally, as with the Project, LADWP would be able to supply sufficient flow and pressure to comply with the fire flow requirements pursuant to LAMC Section 57.507.3 for Alternative 2 given its reduced size compared to the Project (the completed Information and Fire Flow Availability Report (IFFAR) is included as Exhibit 2 of Appendix K.1 of this Draft EIR).

Based on the above, operation of Alternative 2 would not require new or physically altered fire protection facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. As such, impacts under Alternative 2 would be less than significant, and due to the reduced size (and thus, reduced demand for fire protection services), would be less than the less-than-significant impacts of the Project.

## (2) Police Protection

### (a) Construction

As described above, construction activities under Alternative 2 would be reduced as compared to the Project due to the reduced size of this alternative. Similar to the Project, construction of Alternative 2 could generate a slight temporary demand for police services within LAPD's Hollywood Division. This demand could be related to the site itself or to the surrounding roadways. With regard to the site, Alternative 2 would include temporary security measures, similar to the Project and as outlined in Project Design Feature POL-PDF-1 in Section IV.H.2, Public Services—Police Protection, of this Draft EIR, including security fencing, lighting, and locked entry, which would reduce potential impacts associated with theft and vandalism on the site during construction. With regard to the

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<sup>11</sup> *Fire Prevention and Public Safety Bureau, Requirement #10, Emergency Helicopter Landing Facilities Requirements, Revised February 26, 2020, <https://issuu.com/lafd/docs/ehlf-requirements?e=17034503/31362470>, accessed April 2, 2021.*

surrounding roadways, similar to the Project, construction of Alternative 2 could affect LAPD police protection services and response times due to temporary lane closures, roadway/access improvement, utility line construction, and the generation of traffic from construction equipment movement, hauling of soil and construction materials to and from the site, and construction worker traffic. As previously discussed, Alternative 2 would implement a Construction Traffic Management Plan pursuant to Project Design Feature TR-PDF-2 to ensure that adequate and safe access is available within and near the Project Site during construction of Alternative 2. Furthermore, similar to the Project, construction-related traffic generated by Alternative 2 would not significantly impede the ability of LAPD to respond to emergencies in the vicinity, as emergency vehicles have a variety of options for avoiding traffic, pursuant to CVC Section 21806. Thus, like the Project, construction of Alternative 2 would not result in the need for new or altered government facilities (i.e., police stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 2 would be less than significant and, because Alternative 2 would include less overall construction activity and a shorter construction period, the degree of the impacts would be less than the Project.

*(b) Operation*

As previously discussed, Alternative 2 would include similar uses as the Project, but at a 25 percent reduced density. Accordingly, Alternative 2 would include 230 multi-family residential units (including 21 Extremely Low-Income units) and up to 5,093 square feet of ground floor commercial space, including restaurant and retail uses. In addition, as with the Project, Alternative 2 assumes that 4,000 square feet of space within the existing commercial uses that has been vacant since prior to 2018 would be occupied by a high-turnover restaurant. Based on a 2.25 persons per household rate for multi-family residential, a 3.14 persons per household rate for affordable housing (family), and a 4 persons per 1,000 square feet rate for high-turnover restaurant uses provided by the City of Los Angeles VMT Calculator Documentation Guide, the Project would generate approximately 475 residents and 36 employees, which is less than the 632 residents and 43 employees that would be generated with the Project.<sup>12,13</sup> As such, Alternative 2 would generate less demand for police protection services as compared to the Project. Thus, as the Project would not cause a substantial change in the officer-to-resident ratio for the Hollywood Division, the same conclusion can be made for Alternative 2. Furthermore, similar to the Project, Alternative 2 would include numerous operational design features to enhance safety within and immediately surrounding the Project Site, as outlined in Project

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<sup>12</sup> *City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020.*

<sup>13</sup> *As with the Project, this analysis conservatively assumes that all of the proposed commercial space and the existing commercial space that has been vacant since prior to 2018 would be occupied by high-turnover restaurant uses.*

Design Features POL-PDF-2 through POL-PDF-6 in Section IV.H.2, Public Services—Police Protection, of this Draft EIR, which would help offset the increase in demand for police services. In addition, like the Project, Alternative 2 would generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate.

With regard to impacts on police emergency response times, both the Project and Alternative 2 would generate additional traffic in the Project vicinity that could have the potential to increase LAPD emergency response times. However, neither project would close existing streets or include barriers that could impede emergency access. Also, in accordance with CVC Section 21806, drivers of police emergency vehicles have the ability to avoid traffic by using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Accordingly, as with the Project, operation of Alternative 2 would not cause a substantial increase in LAPD emergency response times due to traffic congestion.

Based on the above, as with operation of the Project, Alternative 2 would not result in the need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service, and impacts would be less than significant. The degree of these impacts would be less under Alternative 2 due to the reduced amount of development and residents under this alternative.

### (3) Libraries

#### *(a) Construction*

Similar to the Project, construction of Alternative 2 would result in a temporary increase of construction workers on the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of Project construction. Therefore, construction employment generated by Alternative 2 would not result in a notable increase in the resident population or a corresponding demand for library services in the vicinity of the Project Site. In addition, it is unlikely that construction workers would visit Project-area libraries on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Therefore, any increase in usage of the libraries by construction

workers is anticipated to be negligible. As such, impacts to library facilities and services during construction of Alternative 2 would be less than significant and similar to the Project's less-than-significant impacts.

*(b) Operation*

Alternative 2 would develop the same mix of uses as the Project, but total development would be reduced by 25 percent. Therefore, the resulting increase in library service population would be reduced by a similar margin when compared to the Project. Specifically, Alternative 2 would result in a residential library service population of 475 persons compared to 632 persons with the Project. Thus, impacts to libraries would be reduced under Alternative 2 compared to the Project. As such, the demand for library services under Alternative 2 would be less than the less-than-significant impacts of the Project.

**(4) Parks and Recreation**

*(a) Construction*

Similar to the Project, construction of Alternative 2 would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, the likelihood that construction workers would relocate their households as a consequence of working on the Project is negligible. Therefore, the construction workers associated with Alternative 2 would not result in a notable increase in the residential population of the Project vicinity, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site.

As with the Project, during construction of Alternative 2, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. Furthermore, while there is a potential for construction workers to spend their lunch breaks at the parks and recreational facilities near the Project Site, lunch breaks typically are not long enough for workers to take advantage of such facilities and return to work within the allotted time (e.g., 30 to 60 minutes). Therefore, it is unlikely that construction workers would utilize any parks and recreational facilities near the Project Site during the construction of Alternative 2.

In addition, as with the Project, construction of Alternative 2 would not be expected to result in access restrictions to City parks and recreation facilities in the vicinity of the Project Site, nor would it interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity.

Based on the above analysis, construction of Alternative 2 would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services or interfere with existing park usage. Therefore, impacts on parks and recreational facilities during construction of Alternative 2 would be less than significant and similar to the Project's less-than-significant impacts

*(b) Operation*

Based on the 25-percent reduction in residential units, Alternative 2 would be required to provide less open space than the Project. Specifically, per LAMC Section 12.21 G, Alternative 2 would provide approximately 23,189 square feet of open space. Thus, Alternative 2 would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities. Similar to the Project, while it is possible that employees of Alternative 2 may utilize local parks and recreational facilities, the increased demand would be negligible as it is anticipated that employees and visitors would also primarily utilize on-site open space during their time spent at the Project Site. Also similar to the Project, under Alternative 2 the applicant would be required to pay parks and recreation fees to the City that could be used to add or improve park facilities in the Project vicinity. Therefore, impacts to park and recreation facilities would be less than significant under Alternative 2, and less than the less-than-significant impacts of the Project.

## **i. Transportation**

As discussed above, Alternative 2 would develop the same mix of uses as the Project but all development would be reduced by 25 percent. Specifically, Alternative 2 would develop 203 residential units and 5,093 square feet of ground-floor commercial uses. As with the Project, Alternative 2 would retain the six existing commercial buildings on the Project Site that have a combined floor area of approximately 33,828 square feet, and the 4,000 square feet of floor area within the existing commercial buildings that has been vacant since prior to 2018 is anticipated to be occupied with high-turnover restaurant uses. Alternative 2 would be developed on the same site as the Project and would be subject to the same transportation-related programs, plans, ordinances, and policies as the Project (e.g., Mobility Plan 2035, Plan for a Healthy Los Angeles, Hollywood Community Plan, Hollywood Redevelopment Plan, LAMC, Vision Zero, Citywide Design Guidelines, and SCAG's RTP/SCS). Consistent with the Project, Alternative 2 would be designed to generally conform with the applicable programs, plans, ordinances, and policies identified in LADOT's Transportation Assessment Guidelines (TAG) related to the circulation system, including transit, roadways, bicycles, and pedestrian facilities, and Alternative 2 would not preclude the City from implementing future improvements to serve the long-term mobility needs of the City. Like the Project, Alternative 2 would be located in a highly urbanized area and designated HQTAs and TPAs that are well-served by public transit. Alternative 2

would also include streetscape improvements and pedestrian amenities, including street-level commercial uses (albeit to a lesser degree than the Project) and would include short- and long-term bicycle parking spaces. Thus, Alternative 2 would coordinate land use and circulation and would promote opportunities for the use of alternative modes of transportation pursuant to the 2020–2045 RTP/SCS, Hollywood Community Plan, and Mobility Plan. In addition, Alternative 2 would prioritize safety and access for all individuals utilizing the Project Site by complying with all American with Disabilities Act (ADA) requirements; include sidewalk and driveway design, vehicular parking, and bicycle parking, etc., in accordance with LAMC requirements; and support healthy lifestyles by locating housing near transit, providing bicycle amenities, enhancing the pedestrian environment, and providing attainable opportunities for social mobility through the inclusion of affordable housing pursuant to the Plan for a Healthy Los Angeles. In addition, as with the Project, Alternative 2 would remove one vehicular driveway along Selma Avenue, which is identified as a High Injury Network (HIN) corridor per Vision Zero, thereby reducing potential conflicts between vehicles and pedestrians. Additionally, as discussed further below, Alternative 2 would reduce daily household VMT, including through the implementation of transportation demand management (TDM) measures as called for by the Mobility Plan, Hollywood Community Plan, 2020–2045 RTP/SCS, and the City's TDM Ordinance. Therefore, Alternative 2 would not conflict with a program, plan, ordinance, or policy addressing the circulation system. Impacts would be similar to the Project and less than significant.

With respect to VMT, Alternative 2 would result in 2,138 daily vehicle trips and a total daily VMT of 13,785, resulting in a total daily household VMT of 3.8, which would be below the Central APC significance threshold of 6.0 Daily Household VMT per capita and slightly below the Project's projected VMT per capita of 3.9.<sup>14</sup> As with the Project, the commercial space included under Alternative 2 would primarily be local-serving (e.g., less than 50,000 square feet) and, per the TAG, would result in less-than-significant VMT impacts. Overall, the degree of the impacts would be less than significant under Alternative 2 and slightly less than the Project due to the reduced VMT per capita under this alternative compared to the Project.

Furthermore, vehicular access to the Project Site would be the same under Alternative 2 as the Project and would not introduce hazardous design features. Thus, impacts would be less than significant and similar to the Project. Lastly, similar to the Project, Alternative 2 would include a Construction Traffic Management Plan to ensure that emergency access would be maintained throughout construction of the Project. In addition, Alternative 2 would comply with all applicable City Building and Fire Code requirements

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<sup>14</sup> Gibson Transportation Consulting, Inc., *Transportation Analysis of Project Alternatives for the Artisan Hollywood Project*, June 22, 2021. See Appendix I of this Draft EIR.



regarding site access and would not otherwise impede emergency vehicle access. Thus, impacts associated with emergency access would be less than significant and similar to the Project.

## **j. Tribal Cultural Resources**

Like the Project, Alternative 2 would replace the surface parking area within the northeast portion of the Project Site to construct a mixed-use development similar to the Project but at a reduced density. Alternative 2 would construct three subterranean parking levels, which is one level less than the Project. However, as tribal cultural resources are typically found in the first six to ten feet of excavation, the potential for Alternative 2 to uncover subsurface tribal cultural resources would be similar compared to that of the Project. Accordingly, impacts to tribal cultural resources would be less than significant and similar to the less-than-significant impacts of the Project.

## **k. Utilities and Service Systems**

### **(1) Water Supply and Infrastructure**

#### *(a) Construction*

Similar to the Project, construction activities associated with Alternative 2 would generate a short-term demand for water. This demand would be less than the Project due to the reduction in construction activities and duration that would be required under Alternative 2. As evaluated in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of construction. Since the water demand for construction activities would be reduced under Alternative 2, the temporary and intermittent demand for water during construction under Alternative 2 would also be expected to be met by the City's available water supplies. Similarly, the existing LADWP water infrastructure would be adequate to provide the water flow necessary to serve Alternative 2. Furthermore, as with the Project, the design and installation of new service connections under Alternative 2 would be required to meet applicable City standards. Therefore, impacts on water supply and infrastructure associated with short-term construction activities would be less than significant under Alternative 2, and would be less than the less-than-significant impacts of the Project.

#### *(b) Operation*

Alternative 2 would develop the same mix of uses as the Project, but total development would be reduced by 25 percent. Based on sewage generation factors provided by LASAN (2012), as outlined in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, Alternative 2 would result in a net

increase in demand of 64,038 gallons per day (gpd), which is less than the Project's net increase in demand of 83,949 gpd.<sup>15</sup> The estimated net water demand under Alternative 2 would also be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040. In addition, the existing water distribution infrastructure would be adequate to serve Alternative 2 since the water demand would be lower than the Project. Furthermore, similar to the Project, the Applicant would construct the necessary on-site water infrastructure and off-site connections to the LADWP water system pursuant to applicable City requirements under Alternative 2 to accommodate the new building. Thus, impacts to water supply under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

## (2) Wastewater

### (a) Construction

Similar to the Project, construction of Alternative 2 would generate wastewater from construction workers on-site at levels that would be temporary and nominal. As such, wastewater generation from construction activities associated with Alternative 2 would not cause a measurable increase in wastewater flows. The average daily demand based on LASAN's Sewage Generation Factors (2012)

Additionally, as with the Project, Alternative 2 may include construction activities associated with the installation of new or relocated sewer connections. Such activities would primarily be confined to trenching in order to place the sewer lines below surface and would be limited to the on-site wastewater conveyance infrastructure and minor off-site work associated with connections to the City's sewer lines in the streets adjacent to the Project Site. Similar to the Project, a Construction Traffic Management Plan would be implemented during the construction of Alternative 2 to reduce impacts to pedestrian and traffic flow, including emergency vehicle access, which could occur due to temporary off-site utility work. Therefore, construction-related impacts to the wastewater system under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

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<sup>15</sup> Average daily water demand for Alternative 2 is based on a 25-percent reduction in all unit types and amenities within the residential area (resulting in 69 bachelor units, 70 one-bedroom units, 56 two-bedroom units, and 8 three-bedroom units), and a 25-percent reduction in new ground-floor commercial space (which, as with the Project, is assumed to be occupied by a high-turnover restaurant in order to analyze worst-case). Project water demand for Alternative 2 also assumes that the 4,000 square feet of currently vacant commercial space is occupied by high-turnover restaurant uses.

### *(b) Operation*

Alternative 2 would develop the same mix of uses as the Project, but total development would be reduced by 25 percent. Alternative 2 would result in a net increase of 64,038 gpd of wastewater from the Project Site, which is less than the net increase of 83,949 gpd from the Project.<sup>16</sup> Similar to the Project, the wastewater generated by Alternative 2 would be accommodated by the existing capacity of the Hyperion Water Reclamation Plant (HWRP) and impacts with respect to treatment capacity would be less than significant.

As with the Project, sewer service for Alternative 2 would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site. Given that Alternative 2 would result in a net decrease in total average daily wastewater compared to that of the Project, it is anticipated that there would be sufficient capacity within these sewer lines to serve the wastewater flows of Alternative 2. Furthermore, additional detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for Alternative 2 during the permitting process. All related sanitary sewer connections and on-site infrastructure under Alternative 2 would be designed and constructed in accordance with applicable standards.

Thus, based on the above, impacts with regard to wastewater generation and infrastructure capacity under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

## **(3) Energy Infrastructure**

### *(a) Construction*

Similar to the Project, construction activities associated with Alternative 2 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount and duration of construction, and could be provided via LADWP's existing electrical infrastructure. In addition, as with the Project,

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<sup>16</sup> Average daily wastewater generation for Alternative 2 is based on a 25-percent reduction in all unit types and amenities within the residential area (resulting in 69 bachelor units, 70 one-bedroom units, 56 two-bedroom units, and 8 three-bedroom units), and a 25-percent reduction in new ground-floor commercial space (which, as with the Project, is assumed to be occupied by a high-turnover restaurant in order to analyze worst-case). Project water demand for Alternative 2 also assumes that the 4,000 square feet of currently vacant commercial space is occupied by high-turnover restaurant uses.

coordination with LADWP would be required under Alternative 2 to ensure that service disruptions and potential impacts would be minimized. Therefore, impacts on energy infrastructure associated with short-term construction activities would be less than significant under Alternative 2 and less than the less-than-significant impacts of the Project.

*(b) Operation*

As with the Project, operation of Alternative 2 would generate an increased consumption of electricity and natural gas relative to existing conditions. However, the consumption of electricity and natural gas under Alternative 2 would be less than the Project because of the reduced amount of new development, and the corresponding impact on energy infrastructure would be less than the Project. Therefore, operation of Alternative 2 would not result in an increase in demand for electricity or natural gas that would exceed the available supply or distribution infrastructure capabilities. Impacts to energy infrastructure under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

### **3. Comparison of Impacts**

Alternative 2 would not eliminate any of the Project's significant and unavoidable impacts. Specifically, the Project's significant and unavoidable impacts related to noise from on-site and off-site construction, and vibration from on-site and off-site construction with respect to human annoyance would remain with the development of Alternative 2. All other impacts would be similar to, or less than, those of the Project.

### **4. Relationship of the Alternative to Project Objectives**

With a similar mix of residential and commercial uses as the Project, Alternative 2 would meet the underlying purpose of the Project to redevelop the Project Site by constructing a new mixed-use development that provides new multi-family housing opportunities at a range of income levels as well as new neighborhood-focused ground-floor commercial uses that serve the community and promote walkability. However, Alternative 2 would not meet the following objective, because, although it would provide housing, the amount of housing would not be maximized pursuant to the allowable density for the Project Site:

- Maximize the provision of high-density, multi-family housing units, including affordable housing units, to support the much-needed demand for housing at a range of income levels.

In addition, Alternative 2 would achieve the following Project objectives, albeit some to a lesser degree than the Project, as follows:

- Locate residential and commercial uses in a high quality transit area and transit priority area, thereby promoting sustainability and reducing automobile dependency and Vehicle Miles Traveled (VMT).
- Redevelop and improve the visual character of the surface parking portion of the Project Site with a development that is compatible in scale and design with the character of the surrounding area.
- Contribute to economic investment in the Hollywood Community Plan area through the creation of construction and retail/restaurant jobs.
- Create a street-level identity for the Project Site and improve the pedestrian experience through the introduction of active street-level uses.
- Promote sustainable development by incorporating “Green” principles in the design of the Project capable of meeting the standards of LEED® Certified or equivalent green building standards, including an energy-efficient building, a pedestrian- and bicycle-friendly site design, water conservation features, and waste reduction features.
- Incorporate the best practices for smart growth by providing housing, employment, and retail/restaurant opportunities within an employment hub with walkable streets, a bike-friendly environment, and access to public transit.

## **V. Alternatives**

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### **C. Alternative 3: Office**

#### **1. Description of the Alternative**

Similar to the Project, the Office Alternative (Alternative 3) would be consistent with the uses permitted on the Project Site by the Framework Element, Hollywood Community Plan, and the LAMC. However, the mix of uses would vary from the Project. Specifically, Alternative 3 would include the development of office uses instead of the residential uses proposed under the Project. As detailed in Table V-1 on page V-4, Alternative 3 would develop 160,070 square feet of office uses and 6,790 square feet of ground-floor commercial uses. As with the Project, Alternative 3 would retain the six existing commercial buildings on the Project Site that have a combined floor area of approximately 33,828 square feet, and the 4,000 square feet of floor area within the existing commercial buildings that has been vacant since prior to 2018 is anticipated to be occupied with high-turnover restaurant uses. Alternative 3 would have a total floor area of 200,688 square feet with an overall FAR of 3:1. Alternative 3 would include 402 vehicle parking spaces in two above grade levels and five below grade levels, with a maximum depth of excavation of 60 feet below grade. The height of building under Alternative 3 would reach 155 feet, or 10 stories. The site plan under Alternative 3 would be the similar as under the Project.

#### **2. Environmental Impacts**

##### **a. Air Quality**

###### **(1) Consistency with Air Quality Plans**

As outlined below, like the Project, Alternative 3 would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for these pollutants, exceed any of the State and federal standards, or delay timely attainment of air quality standards or interim emission reductions specified in the AQMP. Thus, Alternative 3 would be consistent with the goals and policies of the AQMP. In addition, while residential uses would not be included as part of Alternative 3, Alternative 3 would nonetheless advance the applicable goals of the Air Quality Element of the City's General Plan by locating commercial uses within an HQTAs, including bicycle parking, enhancing the pedestrian environment, and providing land uses that are consistent with the existing land use pattern in a vicinity that concentrates urban density along major arterials and near

transit options. Thus, similar to the Project, Alternative 3 would not conflict with or obstruct implementation of the AQMP and would serve to advance applicable policies of the City pertaining to air quality. Impacts under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

## (2) Regional Emissions

### *(a) Construction*

As with the Project, construction of Alternative 3 has the potential to generate construction-related regional air emissions through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from excavation and grading activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. Under Alternative 3, construction activities would be generally the same as those of the Project with the exception that Alternative 3 would result in more total grading and excavation activities since the depth of excavation would increase from 50 feet below grade with the Project to 60 feet below grade under Alternative 3. Also, building construction activities and duration would be slightly reduced under Alternative 3 due to the reduced floor area and height. Nevertheless, the maximum peak daily construction activity under Alternative 3 would generally be the same as the Project, such that intensity of construction-related regional air and fugitive dust emissions from site preparation and construction activities would be the same. Thus, as the construction-related regional emissions of the Project would be less than significant, so too would the construction-related regional construction emissions of Alternative 3. The degree of the impacts would be similar between Alternative 3 and the Project.

### *(b) Operation*

As previously discussed, the development proposed under Alternative 3 would include office and commercial uses with an overall decrease in floor area as compared to the Project. However, similar to the Project, operational and localized air pollutant emissions would be generated by vehicle trips to the Project Site and by the consumption of electricity and natural gas. Office uses on a square footage basis would result in a reduction in operational regional emissions associated with the consumption of electricity and natural gas in comparison to residential uses under the Project. However, with regard to vehicle trips, as provided in Appendix I of this Draft EIR, Alternative 3 would result in a total of 2,625 daily vehicle trips and 18,334 daily VMT, as compared to the Project's

2,479 daily vehicle trips and 15,916 daily VMT.<sup>17</sup> As such, Alternative 3 would result in a 15 percent increase in traffic-related operational air emissions as compared to the Project, which is the primary contributor to regional operational emissions. As an example, regional emissions of nitrogen oxides (NO<sub>x</sub>) would be expected to increase by approximately 2 pounds, or a total of 19 pounds per day. However, as with the Project, regional operational emissions under Alternative 3 would be below SCAQMD's regional significance thresholds (e.g., regional NO<sub>x</sub> operational threshold is 55 pounds per day). As such, the operational regional air pollutant emissions of Alternative 3 would be less than significant and slightly more than the less-than-significant impacts of the Project.

### (3) Localized Emissions

#### (a) Construction

On-site construction activities associated with Alternative 3 would be located at similar distances from sensitive receptors as the Project, and the maximum peak daily construction activity would generally be the same between the Alternative 3 and the Project. As such, localized regional air emissions and fugitive dust emissions from site preparation and construction activities would be the same. Therefore, as with the Project, localized construction emissions impacts under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

#### (b) Operation

Localized operational impacts are determined primarily by peak-hour intersection traffic volumes. As provided in Appendix I of this Draft EIR, Alternative 3 would generate 177 vehicle trips during the A.M. peak hour and 181 trips during the P.M. peak hour, which would be more than the Project's 109 A.M. peak-hour trips and 122 P.M. peak-hour trips. As such, total operational vehicular emissions under Alternative 3 would be slightly more than those of the Project. As discussed in Section IV, Air Quality, of this Draft EIR, the 2003 AQMP estimated that the most stringent 1-hour CO standard (20.0 parts per million) would likely not be exceeded until the daily traffic at an intersection exceeded more than 400,000 vehicles per day. At buildout of Alternative 3, the highest average daily trips at an intersection would be approximately 44,080 (Project results in 43,400 trips) at the Sunset Boulevard and Ivar Avenue intersection, which is significantly below the daily traffic volumes that would be expected to generate CO exceedances as evaluated in the 2003 AQMP. In addition, with the development of less floor area than the Project, area and stationary sources would also generate less on-site operational air emissions compared to the Project. Also, as with the Project, Alternative 3 would not introduce any major new

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<sup>17</sup> *Gibson Transportation Consulting, Inc., Transportation Analysis of Project Alternatives for the Artisan Hollywood Project, June 22, 2021. See Appendix I of this Draft EIR.*



sources of air pollution within the Project Site. Thus, based on the above, localized impacts under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

#### (4) Toxic Air Contaminants

##### (a) Construction

As with the Project, construction of Alternative 3 would generate diesel particulate emissions associated with heavy equipment operations during construction activities. These activities represent the greatest potential for TAC emissions. Alternative 3 would result in an increase in the depth of excavation (e.g., increased from 50 feet below grade to 60 feet below grade) due to the additional subterranean parking level, but would result in less overall building construction due to the reduced floor area under Alternative 3. Thus, construction TAC emissions generated by Alternative 3 would be similar to the Project. As with the Project, given the short-term nature of construction activities, Alternative 3 would not result in a long-term source of TAC emissions. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

##### (b) Operation

As with the Project, the land uses proposed under Alternative 3 are not considered land uses that generate substantial TAC emissions (e.g., industrial manufacturing). As set forth in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential TACs associated with Project operations would include diesel particulate matter from delivery trucks. Under Alternative 3, the overall increase in the number of deliveries and associated diesel particulate matter emissions would be expected to increase compared to the Project because: (1) the number of overall daily vehicle trips would be more (e.g., 2,625 daily vehicle trips under Alternative 3 versus 2,479 under the Project;<sup>18</sup> and (2) Alternative 3 would include office and no residential uses when compared with the Project, and thus would be expected to result in more daily commercial delivery truck traffic. The change to office uses under Alternative 3 is expected to result in approximately six additional daily truck trips.<sup>19</sup> As with the Project, this alternative is not considered to be a substantial source of diesel particulate matter warranting a refined HRA since daily truck trips to the

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<sup>18</sup> *Gibson Transportation Consulting, Inc., Transportation Assessment for the Alternatives to the Angels Landing Project, May 2020. See Appendix J.1 of this Draft EIR.*

<sup>19</sup> *National Cooperative Highway Research Program (NCHRP) Synthesis 298 Truck Trip Generation Data, 2001, [http://onlinepubs.trb.org/onlinepubs/nchrp/nchrp\\_syn\\_298.pdf](http://onlinepubs.trb.org/onlinepubs/nchrp/nchrp_syn_298.pdf). Table D-2d of the NCHRP data (Trip Generation Summary—Daily Commercial Vehicle Trips per 1,000 sf of Building Space for Office and Services) provides an average of 0.039 truck trips per 1,000 sf.*

Project Site would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units and is consistent with the recommendations regarding the siting of new sensitive land uses near potential sources of TAC emissions provided in the SCAQMD *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Therefore, the operational TACs impacts of Alternative 3 would be less than significant and slightly more than the less-than-significant impacts of the Project.

## **b. Cultural Resources**

### **(1) Historical Resources**

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, there are no historical resources on the Project Site, and no historical resources would be demolished, destroyed, relocated, or altered as a result of development on the Project Site. Similar to the Project, Alternative 3 would include vibration-generating grading and construction activities that could potentially impact historical structures in the Project area (e.g., the Moonglow Records building, which is the closest historical resources, located approximately 50 feet to the north of the Project Site). However, although the amount of excavation would be slightly increased under Alternative 3 due to the addition of one subterranean parking level, this vibration would not be sufficient to result in material damage to the historical resources, as impacts under the Project would be well below the 0.12 peak particle velocity (PPV) significance criteria for historic structures (as outlined in Section IV.G, Noise, of this Draft EIR, the maximum vibration velocity level under the Project is 0.032 PPV). Therefore, as with the Project, Alternative 3 would not result in direct impacts to historical resources.

With regard to indirect impacts on historical resources, Alternative 3 would include less floor area than the Project, and as such, the height of the building would be reduced. Also, Alternative 3 would generally incorporate the same site plan and, although the architectural and design elements would be modified to reflect a more appropriate design for commercial uses, these elements would be consistent with the surrounding area. Thus, similar to the Project, the height and general character of Alternative 3 would not interfere or conflict with the historic context (i.e., impact the physical characteristics that convey historic significance) of the eight identified designated historical and potentially historical resources in the Project area.

Based on the above, Alternative 3 would result in less-than-significant impacts to historical resources, which would be similar to the less-than-significant impacts of the Project.

## (2) Archaeological Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, no archaeological resources have been documented on-site, although two archaeological resource finds have been documented within a 0.5-mile radius of the Project Site. The Project would include excavation and grading activities that could potentially unearth archaeological resources, if present. However, as the Project Site has been previously graded as part of previous construction activities, encountering archaeological resources is unlikely. Alternative 3 would include the same site plan at the same location as the Project but would require a slightly greater amount of excavation (due to one extra subterranean parking level), and thus, would have a slightly greater potential for unearthing archaeological resources, if present. As with the Project, the City's standard archaeological resources Condition of Approval, as outlined in Section IV.B, Cultural Resources, of this Draft EIR, would be applied to address inadvertent discovery or archaeological resources. In accordance with the Condition of Approval, all activities would be conducted in accordance with regulatory requirements as set forth in CEQA Section 21083.2. Thus, Alternative 3 would result in slightly greater impacts to archaeological resources than the Project, but impacts would remain less than significant.

## (3) Human Remains

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, the Project Site is located in an urbanized area that has been subject to previous grading and development, and no human remains have been documented on-site. However, the Project would include excavation and grading activities that could potentially unearth human remains, if present. As described above, Alternative 3 would include the same site plan at the same location as the Project but would require a slightly greater amount of excavation (due to one extra subterranean parking level). However, human remains would typically be found at shallow depths (e.g., up to the first 10 feet of excavation). Thus, the potential for Alternative 3 to unearth human remains, if present, would be similar to the Project. As with the Project, Alternative 3 would comply with applicable regulatory requirements regarding the inadvertent discovery of human remains. As such, Alternative 3 would result in a similar impact to the less-than-significant impact to human remains by the Project.

### **c. Energy**

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

##### *(a) Construction*

Similar to the Project, construction activities associated with Alternative 3 would consume electricity to supply and convey water for dust control, power construction site

lighting and power other construction equipment, and require diesel and other fuels for construction vehicles, but like the Project, would not consume natural gas. However, as with the Project, this energy use during construction would occur in accordance with applicable energy conservation requirements (e.g., Title 24, CARB anti-idling regulations, In-Use Off-Road Diesel-Fueled Fleet regulations, etc.) such that energy use during construction would not occur in a wasteful, inefficient, or unnecessary manner. As Alternative 3 would include more excavation than the Project but less overall building construction, the level of construction activities and associated energy use would be similar to the Project. Therefore, the construction-related energy impacts of Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

*(b) Operation*

As with the Project, operation of Alternative 3 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels. The electricity and natural gas consumption rates for office uses are lower than for residential uses, and as such, Alternative 3 would result in less operations-related consumption of electricity and natural gas than the Project. Also, as provided in Appendix I of this Draft EIR, Alternative 3 would result in a total of 2,625 daily vehicle trips and 18,334 daily VMT as compared to 2,479 daily trips and 15,916 daily VMT under the Project;<sup>20</sup> as such, the consumption of petroleum-based fuels would increase under Alternative 3 as compared to the Project. In addition, Alternative 3 would not include a residential component and thus, would not represent a high-density mixed-use project. However, Alternative 3 would still develop high-density uses that would be located on an infill site within an HQTAs near existing transit and other alternative modes of transportation, thereby minimizing VMT, and resulting in associated reductions in motor vehicle-related fuel use, although likely not to the degree of the Project. Similar to the Project, Alternative 3 would be designed to reduce vehicular trips to the Project Site through various TDM strategies (e.g., bicycle infrastructure) as set forth in Section IV.I, Transportation, and would implement Project Design Feature GHG-PDF-1, which requires incorporation of sustainability features that enable the Project to achieve LEED® Certification or equivalent, including the use of LED and other efficient lighting technology. Alternative 3 would also comply with the applicable energy conservation requirements of Title 24, the Los Angeles Green Building Code, and CALGreen. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels during operation of Alternative 3 would not be wasteful, inefficient, or unnecessary, and impacts would be less than significant. As Alternative 3 would result in a decrease in electricity and natural gas consumption and an increase in petroleum-based fuels consumption, the degree of impacts would be similar to the Project.

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<sup>20</sup> Gibson Transportation Consulting, Inc., *Transportation Analysis of Project Alternatives for the Artisan Hollywood Project*, June 22, 2021. See Appendix I of this Draft EIR.

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

As discussed in Section IV.C, Energy, of this Draft EIR, the current City of LA Green Building Code requires compliance with CalGreen and California's Building Energy Efficiency Standards (Title 24). Like the Project, Alternative 3 would comply with the City's Green Building Code and Project Design Features GHG-PDF-1 and GHG-PDF-2. Therefore, similar to the Project, Alternative 3 would incorporate measures that are beyond current State and City energy conservation requirements. Also similar to the Project, Alternative 3 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2019 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code. Furthermore, implementation of GHG-PDF-1 would require the Project to improve upon Title 24, Part 6, California Energy Code baseline standard requirements by 10 percent for energy efficiency, based on the 2019 Building Energy Efficiency Standards requirements.

With regard to transportation related energy usage, Alternative 3, like the Project, would comply with goals of the SCAG's 2016 RTP/SCS which incorporate VMT targets established by SB 375 and would comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction. In addition, although Alternative 3 would not include a mix of residential and commercial uses, it would provide high-density office and retail/restaurant uses near transit within an HQTAs, which would serve to reduce per capita VMT and associated transportation fuel usage.

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

### **d. Geology and Soils (Paleontological Resources)**

As discussed in Section IV.D, Geology and Soils (Paleontological Resources), of this Draft EIR, no previously encountered fossil vertebrate localities have been identified within the Project Site or at the adjacent properties, and the uppermost layers of soil and the overlying younger Quaternary Alluvium deposits at the Project Site are unlikely to yield significant vertebrate fossils. However, deeper excavations into the older deposits have the potential to encounter significant vertebrate fossil remains. Alternative 3 would include the same site plan as the Project but would require a slightly greater maximum excavation depths due to the additional subterranean parking level. Thus, Alternative 3 would have a slightly greater potential to impact paleontological resources as compared to the Project. As with the Project, Alternative 3 would implement a mitigation measure to address inadvertent discoveries of paleontological resources, as outlined in Section IV.D, Geology and Soils—Paleontological Resources, of this Draft EIR. With implementation of this

mitigation measure, impacts related to paleontological resources impacts under Alternative 3 would be less than significant, and slightly greater than the less-than-significant (with mitigation) impacts of the Project.

## **e. Greenhouse Gas Emissions**

### **(1) GHG Emissions**

Both the Project and Alternative 3 would include new development that would generate GHG emissions associated with both construction (the operation of construction equipment, truck and construction worker traffic, etc.) and operation (lighting, HVAC systems, heating, automobile and truck traffic, etc.). However, Alternative 3 would not include a residential component and thus, would not represent a high-density mixed-use development. However, Alternative 3 would still develop high-density uses that would be located on an urban infill site near transit within an HQTAs, which would reduce daily vehicle trips and per capita VMT, although likely not to the degree of the Project. Similar to the Project, Alternative 3 would be designed to comply with the requirements of Title 24, the CALGreen Code, and the Los Angeles Green Building Code, and would incorporate Project Design Feature GHG-PDF-1, which requires the incorporation of sustainability features that enable the Project to achieve LEED® Certification or equivalent, including the use of LED and other efficient lighting technology. Alternative 3 would result in a slight increase in GHG emissions during construction with the increase in excavation from 50 feet below grade to 60 feet below grade. Alternative 3 would also result in the following: (1) less operational electricity and natural gas usage than the Project owing to the change in land use from residential to office uses under this alternative; and (2) more petroleum-based fuels consumption during operation due to the slight increase in daily vehicle trips and daily VMT. Therefore, while neither Alternative 3 nor the Project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, the less-than-significant impacts of Alternative 3 would be slightly greater than the less-than-significant impacts of the Project.

### **(2) Conflict with GHG Reduction Plans/Policies/Regulations**

As indicated above, Alternative 3 would not include residential uses so it would not be a high-density mixed-use development. However, Alternative 3 would still develop high-density uses on an urban infill site within an HQTAs, resulting in reduced per capita VMT. Alternative 3 would comply with Title 24, the CALGreen Code, and the Los Angeles Green Building Code, and would incorporate Project Design Feature GHG-PDF-1, which requires the incorporation of sustainability features that enable the Project to achieve LEED® Certification or equivalent, including the use of LED and other efficient lighting technology. Therefore, Alternative 3, like the Project, would not conflict with applicable GHG reduction plans, policies, and regulations. Alternative 3 would result in

less-than-significant impacts, which would be similar to the less-than-significant impacts of the Project.

## **f. Land Use and Planning**

As previously described, Alternative 3 would replace the Project's proposed residential uses with office uses. Specifically, Alternative 3 would include 160,070 square feet of office uses and 6,790 square feet of ground-floor commercial uses. As with the Project, Alternative 3 would retain the six existing commercial buildings on the Project Site that have a combined floor area of approximately 33,828 square feet, and the 4,000 square feet of floor area within the existing commercial buildings that has been vacant since prior to 2018 is anticipated to be occupied with high-turnover restaurant uses. Alternative 3 would have a total floor area of 200,688 square feet with an overall FAR of 3:1, in conformance with the Project Site's applicable D limitation. As with the Project, Alternative 3 would be consistent with the uses permitted on the Project Site by the Framework Element, Hollywood Community Plan, and the LAMC. Office uses would be consistent with the types of uses and at the intensity and height envisioned for a Regional Center in the General Plan Framework Element's Long Range Land Use Diagram for the City's Metro area. Furthermore, the uses proposed by Alternative 3 would not conflict with the surrounding mix of urban uses and would include commercial development on an urban infill site within a TPA and HQTAs and in close proximity to public transit options, thereby reducing vehicle trips and VMT. Alternative 3 would not include any open space, as office uses do not have open space requirements. Nonetheless, as with the Project, Alternative 3 would not conflict with the overall intent of the applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect, including those set forth in the Los Angeles General Plan, Hollywood Community Plan, Hollywood Redevelopment Plan, Hollywood Signage Supplemental Use District, Citywide Design Guidelines, LAMC, and SCAG's 2020–2045 RTP/SCS. Therefore, Alternative 3 would result in less-than-significant land use and planning impacts that are similar to the Project.

## **g. Noise**

### **(1) Noise**

#### *(a) Construction*

The types of construction activities under Alternative 3 would be similar to the Project, although the amount of construction activity and the duration of construction under Alternative 3 would be reduced due to the reduction in total floor area, from 300,996 square feet to 200,688 square feet (approximately 33 percent less floor area). However, the amount of excavation would be slightly increased due to the addition of one subterranean parking level. As with the Project, construction of Alternative 3 would generate noise from

the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. It is anticipated that the maximum or peak day of construction activity, which serves as the basis of the construction noise analysis, would be similar between Alternative 3 and the Project. This is because: (1) Alternative 3 would include the same footprint and a similar number of subterranean parking levels; (2) both Alternative 3 and the Project would be developed on the same site, and within the same distances to off-site sensitive receptors; and (3) given that both Alternative 3 and the Project would include high-rise development and would require the same mix of construction equipment. Nevertheless, the noise analysis for Alternative 3 was based on the assumption that, consistent with the reduction in floor area, on-site construction activities (i.e., construction equipment) and off-site construction trucks (with the exception of truck trips associated with excavation), would be reduced by approximately 33 percent.

With respect to the on-site construction, a reduction in the number of pieces of on-site construction equipment would reduce the construction noise, depending on the number and type of equipment. Specifically, reducing the on-site construction equipment during the site grading phase from 17 pieces to 11 pieces (approximately 35-percent reduction) would reduce the construction noise at the off-site receptors by 0.8 dBA  $L_{eq}$  at receptor location R7, 1.3 dBA  $L_{eq}$  at receptor location R1, 1.4 dBA  $L_{eq}$  at receptors R2, R4, 1.5 dBA  $L_{eq}$  at receptor locations R3 and R6, and 1.6 dBA  $L_{eq}$  at receptor location R5 (as compared to the Project). The estimated construction noise levels with a 35-percent reduction in the number of pieces of construction equipment would still exceed the significance threshold by up to 20.3 dBA  $L_{eq}$  at the receptor location R7 (nearest sensitive receptor). Thus, on-site construction noise impacts would be slightly less than the Project.

With respect to off-site construction, the number of construction haul trucks during the site grading phase would be greater than the Project, as Alternative 3 would have up to 60 feet of excavation versus 50 feet of excavation under the Project. However, it is anticipated that the number of daily truck trips would be similar under Alternative 3. Thus, noise impacts associated with off-site construction under Alternative 3 would be similar to those of the Project.

Alternative 3 would implement the same construction-related Project Design Features as the Project, including NOI-PDF-1 (using construction equipment equipped with state-of-the-art noise shielding and muffling devices) and NOI-PDF-3 (prohibition on the use of impact driven pile systems); and both Alternative 3 and the Project would implement Mitigation Measure NOI-MM-1 (temporary impermeably sound barrier at specified locations during the construction period). Implementation of Mitigation Measure NOI-MM-1 would reduce the noise impacts at receptor locations R2 and R6 to less than significant. However, noise impacts at receptor locations R1 and R7 would remain significant. In addition, the temporary sound barriers would not be effective in reducing the construction-related noise levels at receptor location R1 due to the height of the residential building (a



five-story building). Thus, like the Project, on-site and off-site construction noise would be significant and unavoidable under Alternative 3 even with the application of Project Design Features and mitigation measures. In summary, Alternative 3's on-site construction noise impacts would be less than the significant unavoidable impacts of the Project and off-site construction noise impacts would be similar to the significant and unavoidable impacts of the Project. In addition, cumulative on- and off-site noise impacts during construction of Alternative 3 would also be significant and unavoidable and similar to the Project.

*(b) Operation*

As discussed in Section IV.G, Noise, of this Draft EIR, sources of operational noise under the Project would include: (1) on-site stationary noise sources, including mechanical equipment, activities within the proposed outdoor spaces, parking areas, loading dock and trash collection areas; and (2) off-site mobile source (e.g., traffic) noise sources. Alternative 3 would introduce noise from similar on-site (however, with no outdoor spaces) and off-site noise sources as the Project. The proposed parking, loading dock, and trash collection areas for Alternative 3 would also be located in enclosed areas, similar to the Project, such that parking, loading dock, and trash collection area noise under Alternative 3 would be minimal, similar to the Project. Alternative 3 would implement the same operations-related Project Design Features as the Project, including NOI-PDF-2 (acoustically screening mechanical equipment). However, Alternative 3 would not require NOI-PDF-4 (limiting noise from outdoor amplified sound systems to specific maximum levels), as no outdoor common area spaces are required for office uses. It is anticipated that with the 33-percent reduction in floor area under Alternative 3, the noise levels from on-site mechanical equipment and outdoor spaces would be reduced. Alternative 3 would also comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. Thus, on-site noise impacts during operation of Alternative 3 would be less than the less-than-significant impacts of the Project.

With regard to off-site noise sources, Alternative 3 would result in an increase in the daily trips, from 2,479 daily vehicle trips under the Project to 2,625 daily vehicle trips under Alternative 3 (5.9 percent increase). Typically, a doubling of traffic volumes would result in an increase of 3 dBA. The 5.9 percent increase in the daily trips under Alternative 3 would have no measurable changes (i.e., less than 0.1 dBA) in noise as compared to the Project. Therefore, impacts from off-site noise during operation of Alternative 3 would be less than significant and similar when compared to the less-than-significant impacts of the Project. In addition, like the Project, composite noise level impacts due to operation of Alternative 3 would be less than significant. Cumulative operational on- and off-site noise impacts would be less than significant, with the degree of on-site sources impacts less under Alternative 3 when compared to the less-than-significant impacts of the Project.

## (2) Vibration

### *(a) Construction*

As noted above, the types of construction activities under Alternative 3 would be similar to the Project, although the amount and duration of construction activities would be reduced and the amount of excavation would be increased. As with the Project, construction of Alternative 3 would generate vibration from the use of heavy-duty construction equipment as well as from truck trips. While the overall amount of construction would be reduced, on- and off-site construction activities and the associated construction vibration levels would be expected to be similar to those of the Project, as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment. As such, peak vibration levels generated by the construction equipment would be similar to those of the Project. That is, the vibration levels associated with Alternative 3 on-site construction activities would be up to 0.523 PPV at the single-story commercial building to the northwest, which would exceed the 0.5 PPV building damage criteria. Alternative 3 would implement Mitigation Measure NOI-MM-2 (vibration monitoring), which would reduce the on-site construction vibration impacts associated with building damage to a less-than-significant level. Like the Project, vibration impacts associated with building damage due to off-site construction activities under Alternative 3 would be less than significant. The estimated ground-borne vibration levels would be up to 78 VdB at the Sound Factory (receptor location R5) due on-site construction equipment (as provided in Table IV.G-22 of Section IV.G, Noise, of this Draft EIR), which would exceed the 65-VdB significance criteria. In addition, the estimated vibration from construction trucks along the haul routes could reach 72 VdB, which would exceed the 65-VdB significance criteria for recording studio use and would be at the 72-VdB significance criteria for residential and hotel uses. Like the Project, there are no feasible mitigation measures to reduce the vibration human annoyance impacts. As such, vibration impacts associated with human annoyance from on- and off-site construction would be significant and unavoidable. Overall, on-site vibration impacts (building damage) under Alternative 3 would be similar to the Project and would be less than significant with mitigation; off-site vibration impacts (building damage) would be similar to the Project and would be less than significant; and on-site and off-site vibration impacts (human annoyance) would be similar to the Project and would be significant and unavoidable.

### *(b) Operation*

Similar to the Project, sources of vibration related to operation of Alternative 3 would include vehicle circulation, delivery trucks, and building mechanical equipment. Vehicular-induced vibration, including vehicle circulation within the subterranean parking levels, would not generate perceptible vibration levels at off-site sensitive uses. Building mechanical equipment installed as part of Alternative 3 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof

level), that would include vibration-attenuation mounts to reduce vibration transmission so vibration would not be perceptible at the off-site sensitive receptors. Therefore, operation of Alternative 3 would not result in the generation of excessive ground-borne vibration levels that would be perceptible in the vicinity of the Project Site. As such, vibration impacts during operation of Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

## **h. Public Services**

### **(1) Fire Protection**

#### *(a) Construction*

As previously described, the types of construction activities required for Alternative 3 would be similar to that of the Project, although the amount of excavation would be increased due to the addition of one subterranean parking level and the overall amount of building construction would be reduced due to the decreased floor area. As with the Project, construction activities under Alternative 3 would occur in compliance with all applicable federal, state, and local requirements concerning fire prevention and the handling, disposal, use, storage, and management of hazardous waste (e.g., OSHA, LAFD requirements, etc.). In addition, as with the Project, construction activities for Alternative 3 have the potential to affect fire protection services by adding construction traffic to the street network and by necessitating partial lane closures during street improvements and utility installations. Alternative 3 would implement a Construction Traffic Management Plan, similar to the Project and as outlined in Project Design Feature TR-PDF-2 in Section IV.I, Transportation, of this Draft EIR, which would ensure that adequate and safe access remains available within and near the Project Site during construction. Therefore, construction of Alternative 3 would not result in the need for new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

#### *(b) Operation*

Alternative 3 would include 160,070 square feet of office uses and 6,790 square feet of ground-floor commercial uses. As with the Project, Alternative 3 would retain the six existing commercial buildings on the Project Site that have a combined floor area of approximately 33,828 square feet, and the 4,000 square feet of floor area within the existing commercial buildings that has been vacant since prior to 2018 is anticipated to be occupied with high-turnover restaurant uses. Based on a ratio of 4 persons per 1,000 square feet for high-turnover restaurant uses and 4 persons per 1,000 square feet for office uses provided by the City of Los Angeles VMT Calculator Documentation Guide, Alternative 3 would generate approximately 683 employees, which is more than the

43 employees that would be generated with the Project.<sup>21,22</sup> As previously mentioned, Alternative 3 would replace the proposed residential uses with office uses and, as such, Alternative 3 would not generate any residents. Therefore, the total resident and employee population at the Project Site under Alternative 3 would be 683 persons, which is slightly more than the Project's total population of 675 persons. As such, this alternative would generate a slightly higher demand for LAFD fire protection services as compared to the Project. Similar to the Project, Alternative 3 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, clearances, fire hydrants, fire flow, storage and management of hazardous materials, alarm and communications systems, and building sprinkler systems. Alternative 3 would also include all applicable additional life safety elements outlined in Fire Prevention Bureau (FPB) Requirement No. 10, including automatic fire sprinklers with quick response sprinkler heads, a video camera surveillance system, egress stairways with capacity minimums, fire service access elevators, stairways with roof access, enclosed elevator lobbies, and escalator openings or stairways that are protected by automatic shutters.<sup>23</sup>

With regard to emergency access, like the Project, traffic generated by Alternative 3 would not significantly impact emergency vehicle response to the Project Site and surrounding area as the drivers of emergency vehicles have the ability to bypass traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Alternative 3 would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access.

Additionally, as with the Project, it is expected that LADWP would be able to supply sufficient flow and pressure to comply with the fire flow requirements pursuant to LAMC Section 57.507.3 for Alternative 3. As outlined in the Information of Fire Flow Availability Report (IFFAR) for the Project (included as Exhibit 2 of Appendix K.1 of this Draft EIR), LADWP has indicated that each of the six existing fire hydrants in the vicinity of the Project Site can provide 1,500 gallons per minute (gpm), for a total of 9,000 gpm flowing simultaneously, with a residual pressure ranging from 71 to 75 pounds per square inch (psi). This meets the required fire flow for land uses within the Industrial and Commercial category, as outlined in LAMC Section 57.507.3. As Alternative 3 would represent a similar

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<sup>21</sup> *City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020.*

<sup>22</sup> *As with the Project, this analysis conservatively assumes that all of the proposed ground-floor retail space and the existing commercial space that has been vacant since prior to 2018 would be occupied by high-turnover restaurant uses.*

<sup>23</sup> *Fire Prevention and Public Safety Bureau, Requirement #10, Emergency Helicopter Landing Facilities Requirements, Revised February 26, 2020, <https://issuu.com/lafd/docs/ehlf-requirements?e=17034503/31362470>, accessed April 2, 2021.*

intensity of development as the Project, it would likely fall under the same category, and there would therefore also be adequate fire flow to accommodate Alternative 3.

Based on the above, operation of Alternative 3 would not require new or physically altered fire protection facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. As such, impacts under Alternative 3 would be less than significant, and due to the slight increase of the daytime population (and thus, slightly increase demand for fire protection services), would be slightly greater than the less-than-significant impacts of the Project.

## (2) Police Protection

### *(a) Construction*

As described above, the types of construction activities required for Alternative 3 would be similar to the Project, but the amount of excavation would increase while the overall amount of building construction would decrease. Similar to the Project, construction of Alternative 3 could generate a slight temporary demand for police services within LAPD's Hollywood Division. This demand could be related to the site itself or to the surrounding roadways. With regard to the site, Alternative 3 would include temporary security measures, similar to the Project and as outlined in Project Design Feature POL-PDF-1 in Section IV.H.2, Public Services—Police Protection, of this Draft EIR, including security fencing, lighting, and locked entry, which would reduce potential impacts associated with theft and vandalism on the site during construction. With regard to the surrounding roadways, similar to the Project, construction of Alternative 3 could affect LAPD police protection services and response times due to temporary lane closures, roadway/access improvement, utility line construction, and the generation of traffic from construction equipment movement, hauling of soil and construction materials to and from the site, and construction worker traffic. As previously discussed, Alternative 3 would implement a Construction Traffic Management Plan pursuant to Project Design Feature TR-PDF-2 to ensure that adequate and safe access is available within and near the Project Site during construction of Alternative 3. Furthermore, similar to the Project, construction-related traffic generated by Alternative 3 would not significantly impede the ability of LAPD to respond to emergencies in the vicinity, as emergency vehicles have a variety of options for avoiding traffic, pursuant to CVC Section 21806. Thus, like the Project, construction of Alternative 3 would not result in the need for new or altered government facilities (i.e., police stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

*(b) Operation*

As previously discussed, in lieu of the Project's proposed residential uses, Alternative 3 would develop office uses that are compliant with the existing zoning regulations. Accordingly, Alternative 3 would develop 160,070 square feet of office uses and 6,790 square feet of ground floor commercial uses. As with the Project, Alternative 3 would retain the six existing commercial buildings on the Project Site, and the 4,000 square feet of floor area within the existing commercial buildings that has been vacant since prior to 2018 is anticipated to be occupied with high-turnover restaurant uses. The LAPD considers the residential population within their service area to evaluate service capacity. However, the analysis included in Section IV.H.2, Public Services—Police Protection, of this Draft EIR also considers the Project's daytime employee population to provide a conservative analysis. Based on a 4 persons per 1,000 square feet for high-turnover restaurant uses and 4 persons per 1,000 square feet for office uses provided by the City of Los Angeles VMT Calculator Documentation Guide, Alternative 3 would generate approximately 683 employees.<sup>24,25</sup> As previously mentioned, Alternative 3 would not include any residential uses, so the total population of residents and employees at the Project Site under Alternative 3 would be 683 persons, which is higher than the Project's total population of 675 persons. However, if only considering the residential population, Alternative 3 would generate less demand for police protection services as compared to the Project. If including daytime employees in the analysis, demand for police protection services would be slightly greater. Thus, as the Project would not cause a substantial change in the officer-to-resident ratio for the Hollywood Division, the same conclusion can be made for Alternative 3. Furthermore, similar to the Project, Alternative 3 would include numerous project design features to enhance safety within and immediately surrounding the Project Site, as outlined in Project Design Features POL-PDF-2 through POL-PDF-6 in Section IV.H.2, Public Services—Police Protection, of this Draft EIR, which would be modified, as appropriate, to accommodate office uses. In addition, like the Project, Alternative 3 would generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate.

With regard to impacts on police emergency response times, both the Project and Alternative 3 would generate additional traffic in the Project vicinity that could have the potential to increase LAPD emergency response times. However, neither project would close existing streets or include barriers that could impede emergency access. Also, in

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<sup>24</sup> *City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020.*

<sup>25</sup> *As with the Project, this analysis conservatively assumes that all of the proposed commercial space and the existing commercial space that has been vacant since prior to 2018 would be occupied by high-turnover restaurant uses.*

accordance with CVC Section 21806, drivers of police emergency vehicles have the ability to avoid traffic by using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Accordingly, as with the Project, operation of Alternative 3 would not cause a substantial increase in LAPD emergency response times due to traffic congestion.

Based on the above, as with operation of the Project, Alternative 3 would not result in the need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service, and impacts would be less than significant. As such, impacts under Alternative 3 would be less than significant, and less than the less-than-significant impacts of the Project, as this alternative would not generate a demand for police protection services from residential uses.

### (3) Libraries

#### *(a) Construction*

Similar to the Project, construction of Alternative 3 would result in a temporary increase of construction workers on the Project Site. Due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of Project construction. Therefore, construction employment generated by Alternative 3 would not result in a notable increase in the resident population or a corresponding demand for library services in the vicinity of the Project Site. In addition, it is unlikely that construction workers would visit Project-area libraries on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. As such, impacts to library facilities and services during construction of Alternative 3 would be less than significant and similar to the Project's less-than-significant impacts.

#### *(b) Operation*

Alternative 3 would replace the proposed residential uses with 160,070 square feet of office uses, and would also include 6,790 square feet of ground floor commercial uses. As with the Project, Alternative 3 would retain the six existing commercial buildings on the Project Site, and the 4,000 square feet of floor area within the existing commercial buildings that has been vacant since prior to 2018 is anticipated to be occupied with

high-turnover restaurant uses. These proposed uses under Alternative 3 would include a range of full-time and part-time positions that are typically filled by persons already residing in the vicinity of their workplace, and who already generate a demand for the libraries in the vicinity of the Project Site. In addition, other employees generated by Alternative 3 not currently residing in the vicinity of the Project Site would be more likely to use library facilities near their homes during non-work hours. Furthermore, any new employees generated by the Alternative 3 who would move to the Project Site area would fill existing vacant units already accounted for in library service boundaries. As such, any indirect or direct new demand for library services generated by employees of the proposed office and neighborhood-serving commercial uses would be negligible. As Alternative 3 would not include any residential units, the residential library service population, and hence, the demand for library services, would be reduced when compared to the Project, which would have a residential library service population of 632 persons. Thus, impacts to libraries would be less than significant under Alternative 3 and would be less than the less-than-significant impacts of the Project.

#### (4) Parks and Recreation

##### *(a) Construction*

Similar to the Project, construction of Alternative 3 would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, the likelihood that construction workers would relocate their households as a consequence of working on the Project is negligible. Therefore, the construction workers associated with Alternative 3 would not result in a notable increase in the residential population of the Project vicinity, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site.

As with the Project, during construction of Alternative 3, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. Furthermore, while there is a potential for construction workers to spend their lunch breaks at the parks and recreational facilities near the Project Site, lunch breaks typically are not long enough for workers to take advantage of such facilities and return to work within the allotted time (e.g., 30 to 60 minutes). Therefore, it is unlikely that construction workers would utilize any parks and recreational facilities near the Project Site during the construction of Alternative 3.

In addition, as with the Project, construction of Alternative 3 would not be expected to result in access restrictions to City parks and recreation facilities in the vicinity of the



Project Site, nor would it interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity.

Based on the above analysis, construction of Alternative 3 would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services or interfere with existing park usage. Therefore, impacts on parks and recreational facilities during construction of Alternative 3 would be less than significant and similar to the Project's less-than-significant impacts.

### *(b) Operation*

As previously described, Alternative 3 would include the development of office uses. New residential uses, which typically create a greater demand for parks and recreational facilities, would not be developed under Alternative 3. Thus, Alternative 3 would not result in on-site residents who would utilize nearby parks and recreational facilities, and the demand for parks and recreational facilities in the vicinity of the Project Site would be reduced under Alternative 3. While some of the 683 new employees that would be generated by Alternative 3 may utilize local parks and recreational facilities during lunch breaks and before and after work, this increased demand would be much less than the demand generated by the 632 residents and 43 employees under the Project. Additionally, the new employment opportunities that would be generated by Alternative 3 may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, while employment opportunities associated with Alternative 3 could have the potential to indirectly increase the population in the vicinity of the Project Site, new demand for public parks and recreational facilities associated with development of Alternative 3 would be limited and less than the Project. As such, impacts to park and recreation facilities would be less than significant under Alternative 3, and less than the less-than-significant impacts of the Project.

## **i. Transportation**

As discussed above, Alternative 3 would include 160,070 square feet of office uses and 6,790 square feet of ground-floor commercial uses. As with the Project, Alternative 3 would retain the six existing commercial buildings on the Project Site that have a combined floor area of approximately 33,828 square feet, and the 4,000 square feet of floor area within the existing commercial buildings that has been vacant since prior to 2018 is anticipated to be occupied with high-turnover restaurant uses. Alternative 3 would be developed on the same site as the Project and would be designed to generally conform with the applicable transportation-related programs, plans, ordinances, and policies identified in the TAG. In addition, because Alternative 3 would involve the development of more than 25,000 square feet of new non-residential floor area, it would be required to comply with the trip-reduction provisions of the City's TDM ordinance (LAMC Section 12.26

J). Furthermore, Alternative 3 would not preclude the City from implementing future improvements to serve the long-term mobility needs of the City. As with the Project, Alternative 3 would be located in a highly urbanized area and designated HQTAs and TPAs that are well-served by public transit. Alternative 3 would also include streetscape improvements and pedestrian amenities, including street-level commercial uses and would include bicycle parking spaces per LAMC requirements. Thus, Alternative 3 would coordinate land use and circulation and would promote opportunities for the use of alternative modes of transportation pursuant to the 2020–2045 RTP/SCS, Hollywood Community Plan, and Mobility Plan. In addition, as with the Project, Alternative 3 would prioritize safety and access for all individuals utilizing the Project Site by complying with all ADA requirements; include sidewalk and driveway design, vehicular parking, and bicycle parking, etc., in accordance with LAMC requirements; and support healthy lifestyles by providing bicycle amenities and enhancing the pedestrian environment. In addition, as with the Project, Alternative 3 would not increase potential conflicts between vehicles and pedestrians, per Vision Zero. Additionally, as discussed further below, impacts with respect to VMT would be less than significant, albeit greater than the Project. Therefore, Alternative 3 would not conflict with a program, plan, ordinance, or policy addressing the circulation system. Impacts would be less than significant and similar to the Project's less-than-significant impacts.

With respect to VMT, Alternative 3 would result in 2,625 daily vehicle trips and a total daily VMT of 18,334, resulting in a total Work VMT of 7.0, which would be below the Central APC significance threshold of 7.6 Work VMT per employee.<sup>26</sup> Due to the absence of residential uses, this alternative would not generate any Daily Household VMT. As VMT would increase under Alternative 3, impacts would be greater than the Project but impacts would remain less than significant.

Furthermore, Alternative 3 would not introduce hazardous design features, so like the Project, impacts would be less than significant. Lastly, similar to the Project, Alternative 3 would include a Construction Traffic Management Plan to ensure that emergency access would be maintained throughout construction of the Project. In addition, Alternative 3 would comply with all applicable City Building and Fire Code requirements regarding site access and would not otherwise impede emergency vehicle access. Thus, impacts associated with emergency access and impacts would be less than significant and similar to the Project.

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<sup>26</sup> *Gibson Transportation Consulting, Inc., Transportation Analysis of Project Alternatives for the Artisan Hollywood Project, June 22, 2021. See Appendix I of this Draft EIR.*

## **j. Tribal Cultural Resources**

Alternative 3 would replace the surface parking area within the northeast portion of the Project Site to construct a commercial development that would feature office and ground floor retail/restaurant uses. Alternative 3 would construct five subterranean parking levels, which is one more level than the Project. However, as tribal cultural resources are typically found in the first six to ten feet of excavation, the potential for Alternative 3 to uncover subsurface tribal cultural resources would be similar as compared to that of the Project. As such, impacts to tribal cultural resources would be similar to the less than significant impacts of the Project.

## **k. Utilities and Service Systems**

### **(1) Water Supply and Infrastructure**

#### *(a) Construction*

Similar to the Project, construction activities associated with Alternative 3 would generate a short-term demand for water. This demand would be similar to the Project, as the overall amount of building construction would decrease because of the reduced size, but the amount of excavation would increase due to the additional subterranean parking level. As evaluated in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of construction. Since the water demand for construction activities under Alternative 3 would be similar to the Project, the temporary and intermittent demand for water during construction under Alternative 3 would also be expected to be met by the City's available water supplies. Similarly, the existing LADWP water infrastructure would be adequate to provide the water flow necessary to serve Alternative 3. Furthermore, as with the Project, the design and installation of new service connections under Alternative 3 would be required to meet applicable City standards. Therefore, impacts on water supply and infrastructure associated with short-term construction activities would be less than significant under Alternative 3, and would be similar to the less-than-significant impacts of the Project.

#### *(b) Operation*

As previously mentioned, Alternative 3 would replace the proposed residential uses with office uses. Specifically, Alternative 3 would include 160,070 square feet of office uses and 6,790 square feet of ground-floor commercial uses. Based on sewage generation factors provided by LASAN (2012), as outlined in Section IV.K.1, Utilities and Service Systems-Water Supply and Infrastructure, of this Draft EIR, Alternative 3 would result in a net increase in demand of 30,008 gpd, which is less than the Project's net increase in

demand of 83,949 gpd.<sup>27</sup> The estimated net water demand under Alternative 3 would also be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040. In addition, the existing water distribution infrastructure would be adequate to serve Alternative 3 since the water demand would be lower than the Project. Furthermore, similar to the Project, the Applicant would construct the necessary on-site water infrastructure and off-site connections to the LADWP water system pursuant to applicable City requirements under Alternative 3 to accommodate the new building. Thus, impacts to water supply under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

## (2) Wastewater

### (a) Construction

Similar to the Project, construction of Alternative 3 would generate wastewater from construction workers on-site at levels that would be temporary and nominal. As such, wastewater generation from construction activities associated with Alternative 3 would not cause a measurable increase in wastewater flows.

Additionally, as with the Project, Alternative 3 may include construction activities associated with the installation of new or relocated sewer connections. Such activities would primarily be confined to trenching in order to place the sewer lines below surface and would be limited to the on-site wastewater conveyance infrastructure and minor off-site work associated with connections to the City's sewer lines in the streets adjacent to the Project Site. Similar to the Project, a Construction Traffic Management Plan would be implemented during the construction of Alternative 3 to reduce impacts to pedestrian and traffic flow, including emergency vehicle access, which could occur due to temporary off-site utility work. Therefore, construction-related impacts to the wastewater system under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

### (b) Operation

Alternative 3 would replace the proposed residential uses with office uses. Specifically, Alternative 3 would include 160,070 square feet of office uses and 6,790 square feet of ground-floor commercial uses. Alternative 3 would result in a net increase of 30,008 gpd of wastewater from the Project Site.<sup>28</sup> This is less than the net

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<sup>27</sup> Average daily water demand for Alternative 3 includes the 4,000 square feet of currently vacant commercial space is assumed to be occupied by high-turnover restaurant uses.

<sup>28</sup> Average daily wastewater generation for Alternative 2 includes the 4,000 square feet of currently vacant commercial space that is assumed to be occupied by high-turnover restaurant uses.

increase of 83,949 gpd from the Project. Similar to the Project, the wastewater generated by Alternative 3 would be accommodated by the existing capacity of the HWRP and impacts with respect to treatment capacity would be less than significant.

As with the Project, sewer service for Alternative 3 would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site. Given that Alternative 3 would result in a net decrease in total average daily wastewater compared to that of the Project, it is anticipated that there would be sufficient capacity within these sewer lines to serve the wastewater flows of Alternative 3. Furthermore, additional detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for Alternative 3 during the permitting process. All related sanitary sewer connections and on-site infrastructure under Alternative 3 would be designed and constructed in accordance with applicable standards.

Thus, based on the above, impacts with regard to wastewater generation and infrastructure capacity under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

### (3) Energy Infrastructure

#### *(a) Construction*

Similar to the Project, construction activities associated with Alternative 3 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be similar to the Project, as the amount of building construction would decrease due to the reduction in floor area, but the amount of excavation would increase due to the additional subterranean parking level. Thus, as with the Project, this demand for energy could be provided via LADWP's existing electrical infrastructure. Additionally, like the Project, coordination with LADWP would be required under Alternative 3 to ensure that service disruptions and potential impacts would be minimized. Therefore, impacts on energy infrastructure associated with short-term construction activities would be less than significant under Alternative 3 and similar to the less-than-significant impacts of the Project.

#### *(b) Operation*

As with the Project, operation of Alternative 3 would generate an increased consumption of electricity and natural gas relative to existing conditions. However, the consumption of electricity and natural gas under Alternative 3 would be less than the Project because of the reduced amount of new development, and the corresponding impact

on energy infrastructure would be less than the Project. Therefore, impacts to energy infrastructure under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

### **3. Comparison of Impacts**

Alternative 3 would not eliminate any the Project's significant and unavoidable impacts. Specifically, the Project's significant and unavoidable impacts related to noise from on-site and off-site construction, and vibration from on-site and off-site construction with respect to human annoyance would remain with the development of Alternative 3. In total, most other impacts would be similar to, or greater than, those of the Project, while some would be less than the Project.

### **4. Relationship of the Alternative to Project Objectives**

Alternative 3 would not meet the underlying purpose of the Project, which is to redevelop the Project Site by construction a new mixed-use development that provides new multi-family housing opportunities at a range of income levels as well as new neighborhood-focused ground-floor commercial uses that serve the community and promote walkability. This is because Alternative 3 would not include residential uses.

Furthermore, Alternative 3 would not meet the following Project objective due to the lack of a residential development:

- Maximize the provision of high-density, multi-family housing units, including affordable housing units, to support the much-needed demand for housing at a range of income levels

Alternative 3 would partially meet the following Project objectives because, while Alternative 3 would not include a residential component, it would include a mix of office and retail/restaurant in an area that would provide benefits related to sustainability and smart growth:

- Locate residential and commercial uses in a high quality transit area and transit priority area, thereby promoting sustainability and reducing automobile dependency and Vehicle Miles Traveled (VMT).
- Incorporate the best practices for smart growth by providing housing, employment, and retail/restaurant opportunities within an employment hub with walkable streets, a bike-friendly environment, and access to public transit.

Alternative 3 would meet the following Project objectives, in part because the site plan would remain substantially the same as the Project, and thus, it would offer similar pedestrian and transit-oriented design:

- Redevelop and improve the visual character of the surface parking portion of the Project Site with a development that is compatible in scale and design with the character of the surrounding area.
- Contribute to economic investment in the Hollywood Community Plan area through the creation of construction and retail/restaurant jobs.
- Create a street-level identity for the Project Site and improve the pedestrian experience through the introduction of active street-level uses.
- Promote sustainable development capable of meeting the standards of LEED® Certified or equivalent green building standards, by incorporating “Green” principles in the design of the Project, including an energy-efficient building, a pedestrian- and bicycle-friendly site design, water conservation features, and waste reduction features.

## **V. Alternatives**

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### **D. Environmentally Superior Alternative**

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

With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible alternatives evaluated in this section includes Alternative 1 (No Project/No Build Alternative), Alternative 2 (Reduced Density Alternative), and Alternative 3 (Office Alternative). Table V-3 on page V-12 provides a comparative summary of the environmental impacts anticipated under each alternative with the environmental impacts associated with the Project. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to “avoid or substantially lessen one or more of the significant effects” of the Project.

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

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project/No Build Alternative, a comparative evaluation of the remaining alternatives, as summarized in Table V-3, indicates that Alternative 2, the Reduced Density Alternative, would be less impactful than both the Project and Alternative 3. While Alternative 2 would not avoid or substantially reduce the significant unavoidable impacts of the Project, it would result in less impacts than the



Project for the following environmental topics: operational air quality regional emissions; construction and operational air quality localized emissions; construction and operational TACs; wasteful, inefficient, or unnecessary consumption of energy resources during construction and operation; geology and soils (paleontological resources); GHG emissions; on- and off-site construction and operational noise; fire and police (construction and operational); libraries and parks and recreation (operational); transportation (VMT); and utilities (water supply/infrastructure, wastewater, and energy infrastructure). In addition, Alternative 2 would not result in greater impacts than the Project for any of the other environmental issues. Thus, of the alternatives analyzed, Alternative 2 would be the Environmentally Superior Alternative. As detailed above, while Alternative 2 would meet the underlying purpose and objectives of the Project, it would be less effective than the Project in achieving the purpose and objectives due to the reduced density. For example, Alternative 2 would not maximize the provision of high-density, multi-family housing units, including affordable housing units, to support the much-needed demand for housing at a range of income levels. In addition, opportunities to locate residential and commercial uses in a HQTAs and TPAs would not be maximized, nor would the principles of smart growth.