V. Alternatives

V. Alternatives

1. Introduction

The identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process under CEQA. Specifically, Public Resources Code (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, in part, that the purpose of an environmental impact report is to identify the significant effects on the environment of a project, 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 decisionmaking and public participation. An EIR is not required to consider alternatives which are infeasible.*

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

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

Beyond these factors, CEQA Guidelines Section 15126.6(e) requires the analysis of a "no project" alternative and CEQA Guidelines Section 15126.6(f)(2) requires an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives considered. In addition, CEQA Guidelines Section 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible. The alternatives selected for analysis and those rejected as infeasible are described below.

2. Overview of Selected Alternatives

As indicated above, the intent of the alternatives is to avoid or substantially lessen any of the significant effects of a project while still feasibly obtaining most of the basic project objectives. Based on the analyses provided in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant Project-level impacts that cannot be feasibly mitigated with respect to on-site and off-site noise and vibration (pursuant to the significance criteria for human annoyance) during construction. No significant and unavoidable operational or cumulative impacts would occur. Accordingly, the following alternatives to the Project have been selected for evaluation based on the likelihood of the alternatives being able to substantially lessen one or more of the potentially significant impacts of the Project, their ability to partially or fully achieve the underlying purpose of the Project, and CEQA's requirement to consider a reasonable range of alternatives (including the No Project Alternative):

- Alternative 1: No Project Alternative
- Alternative 2: Same FAR/Reduced Height Alternative
- Alternative 3: Reduced Development Intensity Alternative
- Alternative 4: Office and Housing Alternative

Table V-1 on page V-3 provides a comparison of the Project and the four alternatives being considered. Each of these alternatives is described in the sections that follow.

Table V-1
Summary of Development Proposed Under Project Alternatives

	Project	Alternative 1: No Project Alternative	Alternative 2: Same FAR/Reduced Height Alternative	Alternative 3: Reduced Development Intensity Alternative	Alternative 4: Office and Housing Alternative
New Office	196,100 sf	—	283,981 sf	125,155 sf	144,000 sf
New Retail	3,400 sf	—	3,400 sf	2,500 sf	—
New Residential	—	—	—	—	55,500 sf (55 du)
Total New Square Footage	199,500 sf	—	287,381 sf	127,655 sf	199,500 sf
Existing Office and/or Accessory (to be retained)	87,881 sf	118,141 sf	0 sf	87,881 sf	87,881 sf
Total Square Footage	287,381 sf	118,141 sf	287,381 sf	215,536 sf	287,381 sf
Total FAR[a]	1.46:1	0.6:1	1.46:1	1.10:1	1.46:1
Building Heights[b]	135 ft (up to 8 levels)	Up to 26 ft (up to 2 levels)	up to 84 ft (up to 5 levels)	up to 114 ft (up to 7 levels)	114.5 ft (up to 7 levels)
Parking	811 sp (3 above grade and 2 subterranean levels)	224 sp (above grade)	583 sp (2 above grade levels)[c]	447 sp (3 above grade levels)[c]	548 sp (3 above grade levels)[c]
Maximum Depth of Excavation	22 ft	—	8 ft	8 ft	8 ft
Total Excavation	59,000 cyds	—	30,111 cyds	15,696 cyds	15,696 cyds

cyds = cubic yards
du = dwelling units
FAR = floor area ratio
ft = feet
sf = square feet
sp = spaces
[a] *Project Site is 196,643 square feet.*
[b] *Does not include rooftop mechanical penthouse.*
[c] *Including a partially subterranean level built into the slope.*
Source: Eyestone Environmental, 2023.

3. Alternatives Considered and Rejected as Infeasible

As set forth in CEQA Guidelines Section 15126.6(c), the range of potential alternatives to a proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant impacts. As further set forth in CEQA Guidelines Section 15126.6(c), the EIR should briefly describe the rationale for selecting the alternatives to be discussed as well as 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 or substantially lessen one or more of the significant environmental impacts. Based on the CEQA Guidelines, the alternatives to the Project that have been considered and rejected include the following:

Alternatives to Eliminate Significant Noise and Vibration Impacts During Construction: As discussed in Section IV.I, Noise, of this Draft EIR, the Project would result in short-term significant and unavoidable construction-related noise and vibration (human annoyance) impacts. Specifically, Project construction activities would result in significant and unavoidable construction-related noise impacts related to on-site and off-site construction activities, and significant and unavoidable vibration (human annoyance) impacts related to both on-site construction activities and off-site construction traffic. The following potential alternatives were considered to avoid or substantially lessen the Project's significant and unavoidable construction-related noise and vibration impacts:

- Alternative (a)—Extended Construction Duration: This alternative considers extending the construction period, thus reducing the amount of daily construction activity that would occur under the Project. This alternative was evaluated and rejected as follows:

  - Construction noise levels are dependent on the number of construction equipment (on-site equipment or off-site construction trucks). With an extended construction duration, the number of on-site construction equipment and off-site construction trips would be reduced. 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).[1] A 50-percent

[1] *The reference to 3 dBA here and in other parts of the discussion of the noise alternatives 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*
(Footnote continued on next page)

reduction in construction truck trips during site grading/excavation, which is the peak period of construction with the highest number of construction trucks, from 150 to 75 truck trips per hour (refer to Table IV.I-7 in Section IV.I, Noise, of this Draft EIR), would reduce the truck noise along Beatrice Street, Westlawn Avenue, Grosvenor Boulevard, and Jefferson Boulevard to 62.7 dBA L_{eq}, 61.8 dBA L_{eq}, 60.1 dBA L_{eq} and 59.7 dBA L_{eq}, (an approximately 3-dBA reduction as compared to the Project), respectively. However, when accounting for the ambient noise level (i.e., the Project plus ambient noise levels due to off-site construction trucks), the actual noise levels would only be reduced by 2.3 dBA along Beatrice Street and Westlawn Avenue; 2.0 dBA along Grosvenor Boulevard; and 0.2 dBA along Jefferson Boulevard. In addition, a 50 percent reduction in construction truck trips during the mat foundation phase, from 300 to 150 truck trips per hour, would reduce the truck noise along Beatrice Street, Westlawn Avenue, Grosvenor Boulevard, and Jefferson Boulevard to 64.4 dBA L_{eq}, 63.5 dBA L_{eq}, 61.7 dBA L_{eq} and 61.4 dBA L_{eq} (an approximately 3-dBA reduction as compared to the Project). Furthermore, when accounting for the ambient noise level (i.e., the Project plus ambient noise levels due to off-site construction trucks) the actual noise levels would only be reduced by 2.6 dBA along Beatrice Street and Westlawn Avenue; 2.3 dBA along Grosvenor Boulevard; and 0.4 dBA along Jefferson Boulevard. Thus, as analyzed, even with a 50 percent reduction in truck trips, the off-site construction noise plus ambient noise would result in a minimal reduction in noise (i.e., less than the 3 dBA perceptible level) and the off-site noise impacts along Beatrice Street, Westlawn Avenue, and Grosvenor Boulevard would remain significant. This potential alternative would also increase the number of days by approximately 150 percent that sensitive receptors would be impacted by the off-site construction trucks, thereby prolonging the duration of the significant impact.

- With respect to on-site construction, a reduction in the number of pieces of construction equipment would also reduce noise levels compared to the Project (depending on the amount of reduction) but would still exceed the significance threshold. Specifically, reducing the on-site construction equipment during the site grading phase from 9 pieces to 4 pieces of equipment (approximately 55 percent) would reduce the construction noise at the off-site receptors by 3.8 dBA, 4.3 dBA, 4.1 dBA, 4.2 dBA and 3.8 dBA L_{eq} at receptor locations R1, R2, R3, R4 and R5, respectively. The estimated construction noise levels with a 55 percent reduction in the number of construction equipment would still exceed the significance threshold by up to 19.1 dBA L_{eq} and 23.1 dBA L_{eq} at receptor locations R1 and R5, respectively.

fact that a lowering of the number of construction pieces and volume of construction traffic by 50 percent is required to result in an audible reduction in on- and off-site construction noise, respectively. In other words, reducing peak day construction activities by 50 percent would result in a barely audible reduction in construction noise.

Therefore, the construction noise levels (both on- and off-site construction noise) under this approach would be somewhat less than the Project (depending on the amount of reduction) but would still exceed the significance threshold. This approach would also increase the number of days that a sensitive receptor would be impacted by construction activities by at least 150 percent. Furthermore, due to the close proximity of the off-site noise sensitive receptors (e.g., receptor locations R1 and R5 are directly across from the Project site), and the building height (i.e., 4-story residential buildings along Beatrice Street), it would not be practical to reduce the construction noise levels to below the significance threshold as a single piece of equipment would result in noise levels above the significance threshold. As such, the on-site and off-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 (pursuant to the significance criteria for human annoyance) would be significant and unavoidable, similar to the Project, as the vibration impact analysis is based on the peak vibration level generated by individual construction equipment, and under this approach, the same construction equipment would be used. In addition, off-site construction vibration impacts (pursuant to the significance criteria for human annoyance) due to heavy trucks traveling by sensitive receptors would also continue to be significant and unavoidable, similar to the Project, as the trucks would generate the same vibration levels for an extended construction duration.

- Alternative (b)—Central Location of Development: This alternative would involve locating the proposed development closer to the center of the Project site, thus pulling back the proposed development and associated construction activities from the property line, creating more distance between the construction activities and off-site sensitive receptors. This approach was reviewed and rejected for the following reasons:

  - Construction noise levels can be reduced by providing an additional buffer zone between the receptor and the construction equipment. Noise levels from construction equipment would generally attenuate approximately 6 dBA per doubling of distance from the noise source (construction equipment) to the receptor over acoustically “hard” sites (e.g., asphalt and concrete surfaces) and 7.5 dBA per doubling of distance from the noise source to the receptor over acoustically “soft” sites (e.g., soft dirt, grass or scattered bushes and trees. While the on-site construction noise levels associated with the building construction placed closer to the center of the Project site could be reduced compared to the Project, the noise level reduction, depending upon the setback from the property line, would be limited due to the size of the Project site (approximately 250 feet from east to west property lines and 310 feet from north to south property lines). For example, shifting the proposed building approximately 60 feet to the north and east of the property

lines would reduce the construction noise levels (during the building construction phase) by approximately 4.9 dBA and 4.4 dBA at receptor locations R1 and R5, respectively. The construction noise levels during the building phase would still exceed the significance threshold by 13.7 dBA and 18.4 dBA at receptors R1 and R2, respectively. However, noise levels during the site demolition, site preparation and grading would be similar to the Project; as construction activities for these phases would be up to the property line, similar to the Project. As such, the on-site construction noise impacts under this approach would remain significant and unavoidable and similar to the Project.

- Similar to the Project, the on-site construction vibration impacts (pursuant to the significance criteria for human annoyance) of this potential alternative would remain significant, as heavy construction equipment (e.g., drill rig and large bulldozer) used for the site grading would still operate near the property line and adjacent to sensitive uses. Also similar to the Project, the off-site construction vibration impacts (pursuant to the significance criteria for human annoyance) of this potential alternative would remain significant as heavy trucks would similarly travel by sensitive receptors.

Based on the above, neither of the above potential alternatives related to reduced construction activities would avoid or substantially lessen the significant and unavoidable construction-related on-site and off-site noise and vibration (human annoyance) impacts of the Project. This is because the significant and 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. Therefore, none of the above alternatives would avoid or substantially lessen the significant noise and vibration impacts of the Project and thus no further consideration of these approaches in the EIR is required.

Alternative Project site: The Project's underlying purpose and objectives are intimately tied to the concept of improving existing operations on the Project site by creating an integrated office campus. Thus, an alternative location would not meet the underlying purpose of the Project to redevelop the infill Project site with an integrated office campus that would generate new economic opportunities and supporting growing industries located within the Palms–Mar Vista–Del Rey community. Development on an alternative site would result in no changes to existing on-site conditions, which would therefore provide no potential to achieve the basic Project objectives related to the replacement of an older industrial building with a modern commercial building that will respond to the evolving needs of a growing creative office commercial sector. In addition, the Project Applicant already owns the Project site, and it is unlikely that the Applicant would be able to reasonably acquire, control, or have access to an alternative site with similar uses and square footage. Furthermore, it would be expected that if development of the Project were to occur at an alternative site within a similar urban environment where the

site would similarly be located in close proximity to noise and vibration sensitive uses, the significant and unavoidable impacts of the Project would also occur. Furthermore, development of the Project at an alternative site could potentially produce other environmental impacts that would otherwise not occur at the current Project site. Therefore, an alternative site is not considered feasible as it would fail to achieve the underlying purpose and related objectives of the Project. In addition, an alternative site would likely not avoid the Project's significant impacts. Thus, in accordance with Section 15126.6(f) of the State CEQA Guidelines, 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. Furthermore, each alternative is evaluated to determine whether the Project objectives, identified in Section II, Project Description, of this Draft EIR, would be substantially attained by the alternative.[2] The evaluation 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 as the Project.

b. Post-mitigation impacts of the alternative and the Project are compared for each environmental issue as follows:

   - Less: Where the net impact of the alternative would be clearly less adverse or more beneficial than the impact of the Project.

   - Greater: Where the net impact of the alternative would clearly be more adverse or less beneficial than the Project.

   - Similar: Where the impact of the alternative and Project would be roughly equivalent.

c. The comparative analysis of the impacts is followed by a general discussion of whether the underlying purpose and basic Project objectives are feasibly and substantially attained by the alternative.

[2] *State of California, CEQA Guidelines Section 15126.6 (c).*

A summary matrix that compares the impacts of the Project with those of each of the analyzed alternatives is provided in Table V-2 on page V-10. As evaluated in the Initial Study prepared for the Project and included in Appendix A of this Draft EIR, the Project would not result in significant impacts related to: aesthetics (scenic resources within a scenic highway); agriculture and forestry resources; air quality (odors); biological resources; cultural resources (historical resources and human remains); geology and soils (except paleontological resources); hazards and hazardous materials (airport, emergency evacuation plan, wildfires); hydrology and water quality; land use and planning (division of an established community); mineral resources; noise (airport and airstrip noise); population and housing; public services (schools, parks, libraries); recreation; utilities and service systems (except relocation or construction of new or expanded facilities related to water and energy infrastructure); and wildfires. Therefore, no further analysis of these topics in this Draft EIR is required or provided and these topics are not considered with respect to any of the alternatives considered.

Table V-2
Comparison of Impacts Associated with the Alternatives

Impact Area	Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Height and Removal of Existing Uses Alternative	Alternative 3: Reduced Development Intensity Alternative	Alternative 4: Office and Housing Alternative
A. AESTHETICS					
Scenic Vistas	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
Conflict with Applicable Regulations Governing Scenic Quality	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
Visual Character					
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
Operation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
Light and Glare					
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
Operation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Similar (Less Than Significant Impact)
B. AIR QUALITY					
Regional Emissions					
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
Operation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
Localized Emissions					
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
Operation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
Toxic Air Contaminants					
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
Operation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
C. CULTURAL RESOURCES					
Archaeological Resources	Less Than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
D. ENERGY					
Wasteful, inefficient, or unnecessary consumption of Energy Resources					
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Similar (Less Than Significant Impact)

Table V-2 (Continued)
Comparison of Impacts Associated with the Alternatives

Impact Area	Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Height and Removal of Existing Uses Alternative	Alternative 3: Reduced Development Intensity Alternative	Alternative 4: Office and Housing Alternative
Operation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
Conflict with Plans for Renewable Energy or Energy Efficiency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
E. GEOLOGY AND SOILS					
Paleontological Resources	Less Than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
F. GREENHOUSE GAS EMISSIONS					
Greenhouse Gas Emissions	Less Than Significant	Less (No Impact)	Greater (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
G. HAZARDS AND HAZARDOUS MATERIALS					
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
Operation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
H. LAND USE AND PLANNING					
Conflict with Land Use Plans	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Greater (Less Than Significant Impact)
I. NOISE					
Noise					
On-Site Construction Noise	Significant and Unavoidable	Less (No Impact)	Greater (Significant and Unavoidable Impact)	Similar (Significant and Unavoidable Impact)	Similar (Significant and Unavoidable Impact)
Off-Site Construction Noise	Significant and Unavoidable	Less (No Impact)	Greater (Significant and Unavoidable Impact)	Similar (Significant and Unavoidable Impact)	Similar (Significant and Unavoidable Impact)
On-Site Operational Noise	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Greater (Less Than Significant Impact)
Off-Site Operational Noise	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
Vibration					
On-Site Construction Vibration (Building Damage)	Less Than Significant	Less (No Impact)	Greater (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
On-Site Construction Vibration (Human Annoyance)	Significant and Unavoidable	Less (No Impact)	Greater (Significant and Unavoidable Impact)	Similar (Significant and Unavoidable Impact)	Similar (Significant Unavoidable Impact)
Off-Site Construction Vibration (Building Damage)	Less Than Significant	Less (No Impact)	Greater (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
Off-Site Vibration (Human Annoyance)	Significant and Unavoidable	Less (No Impact)	Greater (Significant and Unavoidable Impact)	Similar (Significant and Unavoidable Impact)	Similar (Significant and Unavoidable Impact)
Operational Vibration	Less Than Significant	Less (No Impact)	Greater (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)

Table V-2 (Continued)
Comparison of Impacts Associated with the Alternatives

Impact Area	Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Height and Removal of Existing Uses Alternative	Alternative 3: Reduced Development Intensity Alternative	Alternative 4: Office and Housing Alternative
J. PUBLIC SERVICES					
Fire Protection					
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Greater (Less Than Significant Impact)
Operation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Greater (Less Than Significant Impact)
Police Protection					
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Greater (Less Than Significant Impact)
Operation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Greater (Less Than Significant Impact)
K. TRANSPORTATION					
Conflict with Transportation Plans	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
Vehicle Miles Traveled	Less Than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Greater (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)
Hazards Due to Geometric Design Features	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
Emergency Access	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
L. TRIBAL CULTURAL RESOURCES					
Tribal Cultural Resources	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
M. UTILITIES AND SERVICE SYSTEMS					
Water Infrastructure					
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
Operation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
Energy Infrastructure					
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Similar (Less Than Significant Impact)
Operation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Similar (Less Than Significant Impact)

Source: Eyestone Environmental, 2023.

V. Alternatives

A. Alternative 1: No Project

1. Description of the Alternative

In accordance with the CEQA Guidelines, the No Project 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 Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, Alternative 1, the No Project Alternative, assumes that the Project would not be approved, no new permanent development would occur within the Project site, and the existing environment would be maintained. Thus, the physical conditions of the Project site would generally remain as they are today. Specifically, the 23,072-square-foot office building; two accessory buildings comprised of 5,044 square feet and 2,144 square feet; the 87,881-square-foot office building, and associated surface parking would remain on the Project site, and no new construction would occur.

2. Environmental Impacts

a. Aesthetics

(1) Scenic Vista

Under Alternative 1, the existing uses on the Project site would remain and the Project would not be developed. As such, Alternative 1 would not result in an increase in height or massing of on-site structures and would not impede visual access to, or the visibility of, a particular sight from a given vantage point or corridor. Therefore, Alternative 1 would not have the potential to obstruct a scenic vista. No impacts would occur, and such impacts would be less compared to the less-than-significant impacts of the Project.

(2) Conflict with Applicable Regulations Governing Scenic Quality

Under Alternative 1, no construction activities would occur and the existing buildings and uses would remain. Therefore, Alternative 1 would have no potential to conflict with applicable zoning and other regulations governing scenic quality. No impacts would occur, and such impacts would be less compared to the less-than-significant impacts of the Project.

(3) Visual Character[3]

Under Alternative 1, no construction activities would occur and the existing buildings and uses would remain. As such, Alternative 1 would not require the removal of the existing buildings and surface parking on the as proposed by the Project, and would not introduce new buildings on the Project site. Additionally, Alternative 1 would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, no impacts related to visual character would occur under Alternative 1, and would be less than the less-than-significant impacts of the Project.

(4) Light and Glare

(a) Construction

Alternative 1 would not involve the construction of any new development on-site. Therefore, Alternative 1 would not introduce new light sources associated with construction equipment or construction-related equipment and materials with the potential to cause glare. As such, no impacts related to light and glare associated with construction activities would occur under Alternative 1. Thus, light and glare impacts during construction would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 would not alter the existing uses on the Project site, introduce any new sources of light or glare on the Project site, or otherwise increase the amount of activity occurring on-site. Therefore, Alternative 1 would not change the existing lighting environment on the Project site. No operation-related light and glare impacts would occur under Alternative 1. Thus, impacts related to operational light and glare under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

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[3] *As previously noted, subsequent to the release of the previous MND for the Project, the State CEQA Guidelines Appendix G threshold questions were revised. Prior to the release of the revised thresholds, the substantial degradation of the existing visual character or quality of a site and its surrounding was evaluated under aesthetics. The threshold has since been replaced by a new threshold question that considers whether a project would conflict with applicable zoning and other regulations governing scenic quality. However, in order to ensure that this document thoroughly addresses the judgment in Karney Management v. City of Los Angeles et al., the Project's potential effects related to visual character and quality are also addressed in the EIR.*

b. Air Quality

(1) Regional Emissions

(a) Construction

Alternative 1 would not remove the existing uses or require any construction activities on the Project site. Therefore, Alternative 1 would not result in any construction emissions associated with construction worker and construction truck traffic, fugitive dust from demolition and excavation, or the use of heavy-duty construction equipment. Therefore, construction-related regional air quality impacts would not occur. As such, Alternative 1 would eliminate the less-than-significant impacts of the Project associated with regional emissions during construction. Thus, impacts related to regional 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 regional emissions would occur under Alternative 1, and such impacts would be less when compared to the less-than-significant impacts of the Project.

(2) 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 when compared to the less-than-significant impacts of the Project.

(3) 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). Therefore, no impacts associated with the release of TACs would occur under Alternative 1. As such, TAC impacts under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

As set forth in Section IV.B, Air Quality, of this Draft EIR, the Project would result in some TAC emissions, primarily from mobile sources. Since Alternative 1 would not result in new development or increase the intensity of the existing uses on the Project site, no new increase in mobile source emissions would occur. No operational impacts associated with TACs would occur under Alternative 1, and such impacts would be less when compared to the less-than-significant impacts of the Project.

c. Cultural Resources (Archaeological Resources)

No grading or earthwork activities would occur under Alternative 1. Therefore, there would be no potential for Alternative 1 to uncover previously unknown subsurface archaeological resources. No impacts to archaeological resources would occur. Impacts to archaeological resources under Alternative 1 would be less than the less-than-significant with mitigation impacts of the Project.

d. Energy

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

(a) Construction

Construction activities would not occur under Alternative 1. 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, and no construction-related energy impacts would occur. Therefore, impacts under Alternative 1 would be less than the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 would not include new development or alter the existing uses at the Project site. Therefore, Alternative 1 would not increase long-term operational energy use at the Project site, and thus would have no potential to result in the wasteful, inefficient, or unnecessary consumption of energy resources. Notwithstanding, no operational impacts related to energy would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

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

Under Alternative 1, no construction activities would occur and the existing buildings and uses would remain. As such, Alternative 1 would not have the potential to conflict with plans for renewable energy or energy efficiency. No impacts related to renewable energy or energy efficiency plans would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

e. Geology and Soils (Paleontological Resources)

No grading or earthwork activities would occur under the No Project Alternative. As such, Alternative 1 would not result in the potential discovery of paleontological resources, and no impacts associated with paleontological resources would occur under Alternative 1. Therefore, impacts related to paleontological resources under Alternative 1 would be less than the less-than-significant with mitigation impacts of the Project.

f. Greenhouse Gas Emissions

Under Alternative 1, no construction activities would occur and the existing buildings and uses would remain. Therefore, no new greenhouse gas (GHG) emissions would occur under Alternative 1. However, it is noted that the existing building would not incorporate the latest City Green Building Code and would not support existing and future State and City GHG emissions reduction goals, policies, and objectives to the same extent as the Project. Notwithstanding, impacts associated with GHG emissions under Alternative 1 would be less than the less-than-significant impacts of the Project.

g. Hazards and Hazardous Materials

Alternative 1 would not require demolition, excavation, grading, or other construction activities. Therefore, Alternative 1 would not have the potential to release hazardous materials, uncover subsurface hazards, or generate hazardous waste during construction. In addition, Alternative 1 would not result in new development or increased operations that would use or generate additional hazardous materials on-site. Accordingly, Alternative 1

would result in no hazards and hazardous materials impacts, including those associated with the transportation, use or disposal of hazardous materials; upset and accident conditions involving hazardous materials; the emission of hazardous emissions within 0.25-mile of a school; and the disturbance of listed hazardous materials sites. Therefore, the impacts related to hazards and hazardous materials under Alternative 1 would be less than the less-than-significant impacts of the Project.

h. Land Use and Planning

Under Alternative 1, there would be no changes to the existing physical or operational characteristics of the Project site. No land use approvals or permits would be required, and Alternative 1 would not result in any inconsistencies with existing land use plans and policies adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, Alternative 1 would have no potential to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. No impacts associated with conflicts with land use plans, policies, or regulations would occur, and impacts would be less than the less-than-significant impacts of the Project.

i. Noise

(1) Noise

(a) Construction

No new construction activities would occur under Alternative 1. Therefore, no construction-related noise would be generated on-site or off-site. As such, no on- or off-site construction noise impacts would occur under Alternative 1, and impacts would be less when compared to those of the Project, which would be significant and unavoidable for on- and off-site construction noise. Alternative 1 would eliminate the Project's significant and unavoidable impacts with respect to on- and off-site construction noise.

(b) Operation

Alternative 1 would not develop new uses on the Project site, and no changes to existing site operations would occur. Thus, no new stationary or mobile noise sources would be introduced to the Project site or the vicinity of the Project site. As such, no impacts associated with operational on- and off-site noise would occur under Alternative 1, and such impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

No new construction activities would occur under Alternative 1. Therefore, no construction-related vibration would be generated on-site or off-site. As such, no on- or off-site vibration impacts would occur under Alternative 1, and impacts would be less when compared to those of the Project, which would be less than significant for on- and off-site construction vibration related to building damage and significant and unavoidable for on- and off-site construction vibration related to human annoyance. This alternative would eliminate the Project's significant and unavoidable impacts with respect to on- and off-site construction vibration related to human annoyance.

(b) Operation

Alternative 1 would not develop new uses on the Project site, and no changes to existing site operations would occur. Thus, no new vibration sources would be introduced to the Project site or the vicinity of the Project site. As such, no impacts associated with operational vibration would occur under Alternative 1, and such impacts would be less when compared to the less-than-significant impacts of the Project.

j. Public Services

(1) Fire Protection

(a) Construction

As Alternative 1 would not require construction, it would not have the potential for construction activities to expose people to the risk of fire or explosion related to the use of hazardous materials or to potentially impact the provision of fire protection services in the vicinity of the Project site. Thus, no construction-related fire protection impacts would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

No changes to existing land uses or operations on the Project site would occur under Alternative 1. Therefore, there would be no potential to increase the level of activity on the Project site which could result in increased calls for fire protection services from the Los Angeles Fire Department (LAFD). No impacts to fire protection facilities would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Police Protection

(a) Construction

As Alternative 1 would not require construction, it would not have the potential for construction to create sources of nuisances and hazards or potentially impact police protection services in the vicinity of the Project site. Therefore, Alternative 1 would not result in any police protection impacts due to construction, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

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 that could increase calls for police protection services from the Los Angeles Police Department (LAPD). No impacts to police protection services would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

k. Transportation

Since the No Project Alternative would not develop new or additional land uses on the Project site, Alternative 1 would not generate any construction- or operational-related vehicle trips or alter existing access or circulation within the Project site. Therefore, no impacts would occur with respect to conflicts with programs, plans, ordinances, or policies addressing the circulation system; vehicle miles traveled (VMT); hazardous design features; and emergency access. Overall, impacts under Alternative 1 would be less than the less-than-significant impacts of the Project in terms of conflicts with transportation plans, hazardous design features, and emergency access, and less than the less-than-significant with mitigation impacts of the Project related to VMT.

l. Tribal Cultural Resources

No grading or earthwork activities would occur under Alternative 1. Therefore, there would be no potential for Alternative 1 to uncover subsurface tribal cultural resources, and no impacts to tribal resources would occur. Therefore, the impacts related to tribal cultural resources under Alternative 1 would be less than the less-than-significant impacts of the Project.

m. Utilities and Service Systems

(1) Water Infrastructure

(a) Construction

Construction activities would not occur under Alternative 1. Therefore, Alternative 1 would not generate a short-term demand for water during construction, and construction-related impacts to water infrastructure would not occur. Therefore, the construction-related water infrastructure 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. Therefore, Alternative 1 would not increase the long-term water demand on the Project site. No operational impacts to water infrastructure would occur. Therefore, the operational water infrastructure impacts of Alternative 1 would be less than the less-than-significant impacts of the Project.

(2) Energy Infrastructure

(a) Construction

Construction activities would not occur under Alternative 1. Therefore, Alternative 1 would not generate a short-term demand for energy during construction, and construction-related impacts to energy infrastructure would not occur. Therefore, construction-related energy infrastructure 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. Therefore, Alternative 1 would not increase the long-term energy demand on the Project site. No operational impacts related to energy infrastructure would occur. Therefore, the operational energy infrastructure impacts of Alternative 1 would be less than the less-than-significant impacts of the Project.

3. Comparison of Impacts

Alternative 1 would avoid the Project's significant and unavoidable environmental impacts, including those related to on- and off-site construction noise and vibration (pursuant to the significance criteria for human annoyance). Alternative 1 would also avoid

the Project's less-than-significant impacts as no changes to the existing conditions would occur.

4. Relationship of the Alternative to Project Objectives

Under Alternative 1, no new development would occur on the Project site, and the existing on-site uses would be retained. As such, Alternative 1 would not meet the underlying purpose of the Project which is to redevelop the infill Project site with an integrated office campus that would generate new economic opportunities and supporting growing industries located within the Palms–Mar Vista–Del Rey community. Furthermore, Alternative 1 would not meet any of the Project objectives listed below as it would retain an older industrial building instead of creating an interactive creative office campus that would accommodate a variety of different tenants, would forgo an opportunity to activate and enhance the appearance of the area, develop neighborhood serving retail, and provide significant employment opportunities.

- Support the Community Plan's Goal 2 to build a strong and competitive commercial sector which promotes economic vitality and serves the needs of the community through the redevelopment and replacement of an older industrial building with a modern commercial building that will respond to the evolving needs of a growing creative office commercial sector;

- Promote the Community Plan's Objective 2-1 to provide opportunities for new commercial development and services within existing commercial areas through the development of a commercial project that would strengthen the economic vitality of the area without introducing incompatible uses;

- Create an interactive creative office campus with open space, shared amenities and landscaping while retaining an existing office building on site;

- Activate the property and the neighborhood by providing retail components, including a café, attractive street-level landscaping, bicycle parking, public gathering spaces, and pedestrian amenities;

- Provide significant employment opportunities in office, research, and commercial uses, including media, arts, and design development, which will benefit the community, city, and region;

- Enhance the appearance of the immediate area by providing architecturally interesting and varied design; and

- Offer flexible combinations of spaces to accommodate a variety of different tenants.

V. Alternatives

B. Alternative 2: Same FAR/Reduced Height Alternative

1. Description of the Alternative

Alternative 2, the Same FAR/Reduced Height Alternative, would replace the entirety of the 118,141 square feet of existing office and accessory uses within the Project site with a total of 287,381 square feet of new floor area, including 283,981 square feet of office uses and 3,400 and square feet of ground floor retail space. The new building would cover the entire Project site and would be five stories and approximately 84 feet in height to the top of the parapet (a reduction of 51 feet when compared to the Project's height of 135 feet). The new office uses would be developed in a single three-story office building atop a two-story podium structure that would contain the ground floor commercial uses and approximately 583 parking spaces. Alternative 2 also provides approximately 38,346 square feet of hardscape area and 29,883 square feet of landscape area. Overall, this alternative would remove all existing uses on the Project site resulting in approximately 169,240 square feet of net new floor area, the same amount as the Project. Similar to the Project, the FAR would be 1.46:1. However, the entire Project Site would be rebuilt, the existing office building at 12541 W. Beatrice Street would not be retained, and the new building would be constructed over the entire Project Site, thus reducing the height of the western element of the Project but increasing the height and mass of the eastern element. Excavation for this alternative would extend to a depth of approximately 8 feet. A conceptual site plan of Alternative 2 is provided in Figure V-1 on page V-24.

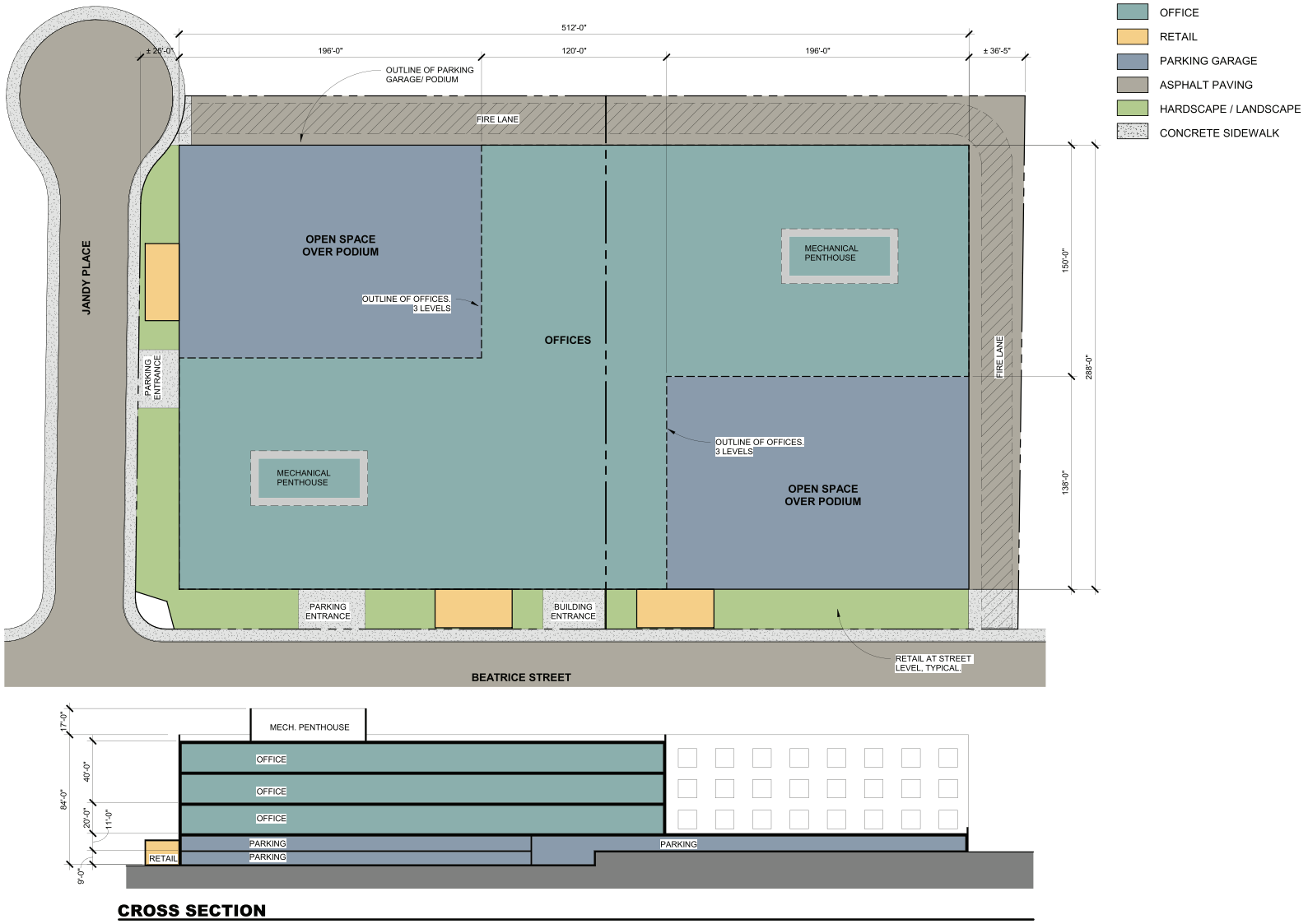

Figure V-1
Alternative 2 Conceptual Site Plan

Source: The Chait Company, Inc. and Gehry Partners, LLP., 2022.

2. Environmental Impacts

a. Aesthetics

(1) Scenic Vistas

As discussed above, Alternative 2 would replace the 118,141 square feet of existing office and accessory uses within the Project site with a total of 287,381 square feet of new floor area. The new building would be five stories and approximately 84 feet in height to the top of the parapet (a reduction of 51 feet when compared to the Project's height of 135 feet). As indicated in Section IV.A, Aesthetics, of this Draft EIR, the Project vicinity is fully developed with a mix of low- to mid-rise office, light industrial, and manufacturing uses with one multi-family residential structure adjacent to the Project site across Beatrice Street and a single-family residential area located across Grosvenor Boulevard further to the east. Due to the highly urbanized and built out surroundings, publicly available scenic vistas of valued visual resources are not available adjacent to the Project site. Therefore, Alternative 2, like the Project, would not block scenic vistas, and the impacts of Alternative 2 would be less than significant and similar to the impacts of the Project.

(2) Conflict with Applicable Regulations Governing Scenic Quality

As discussed in Section IV.A, Aesthetics, of this Draft EIR, a number of local plans, policies, and regulations related to scenic quality are applicable to the Project, including the City of Los Angeles General Plan Framework Element (Framework Element), Los Angeles General Plan Conservation Element (Conservation Element), the Palms–Mar Vista–Del Rey Community Plan (Community Plan), the Citywide Urban Design Guidelines, the Los Angeles Municipal Code (LAMC), and the California Code of Regulations. Since Alternative 2 would be developed within the same Project site as the Project and with similar uses, these same plans and applicable goals, objectives, and policies would be applicable to Alternative 2.

As described above, Alternative 2 would replace the existing on-site office and accessory uses with a new five-story building approximately 84 feet in height to the top of the parapet (a reduction of three stories and 51 feet when compared to the Project's height of eight stories and 135 feet, but an increase compared to the existing 26 feet of the eastern element). As with the Project, the office and commercial uses proposed under Alternative 2 would also complement the uses surrounding the Project site and would be designed consistent with relevant plans related to scenic quality, including promoting pedestrian activity and further activating the streets in the vicinity of the Project site. Similar to the Project, the new building proposed under Alternative 2 would be designed to complement the existing surrounding uses. Overall, with the reduction in height of the western element and the increase in height of the eastern element, Alternative 2 also would

not conflict with the zoning and other regulations governing scenic quality detailed in Section IV.A, Aesthetics, of this Draft EIR. Thus, impacts would be less than significant and similar to those of the Project.

(3) Visual Character

(a) Construction

Similar to the Project, during the construction phase, the visual character of the Project site would be altered due to the removal of all existing structures, site preparation, grading and excavation, building construction, the installation of paving/concrete and landscaping, and the staging of construction equipment and materials. However, like the Project, the appearance of the Project site during construction of Alternative 2 would be typical of construction sites in urban areas. Furthermore, Alternative 2 would also implement similar design features as the Project, such as the installation of temporary construction fencing to screen much of the construction activity from view at the street level and ensuring that no unauthorized materials are posted on any temporary construction barriers or pedestrian walkways that are accessible/visible to the public. Overall, while affecting the visual character of the Project site and vicinity on a temporary basis, construction activities under Alternative 2 would not substantially and adversely alter or degrade the existing visual character or quality of the Project site and surrounding area. Based on the above, impacts related to visual character during construction of Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As indicated in Section IV.A, Aesthetics, of this Draft EIR, the Project vicinity is fully developed with a mix of low- to mid-rise office, light industrial, and manufacturing uses with one multi-family residential structure adjacent to the Project site across Beatrice Street and a single-family residential area located across Grosvenor Boulevard further to the east. Although Alternative 2 would reduce the height of the tallest element of the Project, it would replace the 26-foot building at 12541 Beatrice Street with an 84-foot structure and the overall design of Alternative 2 would be more bulky and less visually interesting than the Project due to the loss of step-backed design elements. Alternative 2 would, however, remove all of the outdated/older buildings on the Project site. As with the Project, the new building under Alternative 2 would be physically and visually integrated with the surrounding area by applying a variety of siting, design, and landscaping elements. Therefore, as with the Project, Alternative 2 would not substantially degrade the existing visual character or quality of the Project site and its surroundings. Therefore, impacts related to visual character would be less than significant and greater to the less-than-significant impacts of the Project.

(4) Light and Glare

(a) Construction

As with the Project, while the majority of construction under Alternative 2 would occur during daylight hours, construction activities could potentially require the use of artificial lighting if construction were to occur in the evening until 9:00 P.M., as permitted per the LAMC.[4] Additionally, artificial lighting may be required during the winter months when daylight is no longer sufficient earlier in the day. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of construction. In addition, construction-related illumination would be used for safety and security purposes only, and, as a project design feature, lighting would be shielded and/or aimed so that no direct beam illumination is provided outside of the Project site boundary. Therefore, similar to the Project, light resulting from construction activities under Alternative 2 would not significantly impact off-site sensitive uses.

Also similar to the Project, any glare generated within the Project site during construction of Alternative 2 would be transitory and short-term given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities. Furthermore, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Therefore, similar to the Project, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur under Alternative 2.

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

(b) Operation

Similar to the Project, Alternative 2 would increase light levels within the Project site and the surrounding area compared to existing conditions through the introduction of new sources of artificial lighting, including signage lighting, architectural lighting on the building, and landscape lighting.

The proposed lighting sources under Alternative 2 would be similar to other lighting sources in the Project site vicinity and would not generate artificial light levels that are out

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[4] *LAMC Section 41.40 prohibits construction between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, 6:00 P.M. and 8:00 A.M. on Saturday, and at any time on Sunday, unless permission is granted by the Board of Police Commissioners (i.e., construction is allowed Monday through Friday between 7:00 A.M. to 9:00 P.M.; and Saturdays and National Holidays between 8:00 A.M. to 6:00 P.M.).*

of character with the surrounding area. As discussed above, the new building would be five stories and approximately 84 feet in height to the top of the parapet (a reduction of three stories and 51 feet when compared to the Project's height of eight stories and 135 feet for the western element but an increase compared to the 26 feet of the eastern element). While the maximum height of the building would be reduced, the amount of floor area would be similar to that of the Project. As such, Alternative 2 would generate similar sources of light and glare at a reduced elevation. As with the Project, all exterior lights would meet all applicable LAMC lighting standards. Alternative 2, like the Project, would incorporate project design features that direct all exterior light toward the interior of the Project site to avoid light spillover onto adjacent property. Like the Project, Alternative 2 would not include signage with flashing, mechanical, or strobe lights. Project signage would include building identity signage, building and tenant signage, and general ground level and wayfinding pedestrian signage. Exterior lighting for signage would be directed onto signs to avoid creating off-site glare. Illumination used for signage under Alternative 2 would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

With regard to glare, the office building under Alternative 2 would be designed in a contemporary architectural style and would feature various surface materials, which would include tile or stone veneer, storefront windows, aluminum louvers, wood or simulated wood, exterior plaster, and glass railings. Alternative 2 would implement similar design features as the Project that would require the use of non-reflective glass or glass that has been treated with a non-reflective coating in all exterior windows and building surfaces to reduce potential glare from reflected sunlight. Therefore, these materials would not have the potential to produce a substantial degree of glare. In addition, the proposed parking levels would be screened and integrated into the new building's architecture, thereby eliminating the reflection potential from parked cars as viewed from surrounding areas and roadways during the day and night, and would substantially reduce lighting levels from vehicle headlights during the night compared to existing conditions.

Based on the above, lighting and glare associated with operation of Alternative 2 would not result in a new source of substantial light or glare, which would adversely affect day or nighttime views in the area. Therefore, operational light and glare impacts under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

b. Air Quality

(1) 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.B, 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 electricity from power poles and/or solar generators rather than temporary diesel or gasoline generators during the construction period to reduce stationary source construction emissions.

Under Alternative 2, it is anticipated that demolition and construction activities would be increased since all buildings on the Project site would be demolished and replaced with a single building covering the entire site, while excavation activities would be reduced due to the elimination of the subterranean parking proposed by the Project. Nevertheless, the intensity of air emissions and fugitive dust from site preparation and construction activities under Alternative 2 would be similar to the project on peak construction days, which are used for measuring impact significance. Demolition quantities under Alternative 2 would be increased by three times in comparison to the Project. As a result, demolition activities under Alternative 2 would require approximately 150 demolition trucks per day. During Project construction, the maximum daily truck trips would occur during the excavation phase with up to 150 haul trucks per day. As the demolition truck trips under Alternative 2 would be similar to the maximum daily truck trips during Project construction, construction impacts would be similar. Therefore, impacts under Alternative 2 would be less than significant similar to the less-than-significant impacts of the Project.

It is noted however that the duration of the excavation phase under Alternative 2 would be shortened by approximately 49 percent (based on the corresponding 49-percent reduction in excavation quantities). The mat foundation phase under Alternative 2 would be similar in terms of maximum daily truck trips and overall duration. Building construction duration under Alternative 2 would be increased by approximately 44 percent (based on the corresponding 44-percent increase in new building square footage). With the decrease in excavation duration and increase in building construction duration, the total construction duration under Alternative 2 would be similar in comparison to the Project.

(b) Operation

Operational regional air pollutant emissions associated with Alternative 2 would be generated by vehicle trips to the Project site, which are the largest contributors to operational air pollutant emissions, and by the consumption of electricity and natural gas. As previously discussed, Alternative 2 would include the development of 287,381 square feet of new floor area, including 283,981 square feet of office uses and 3,400 square feet of ground floor retail space, like the Project. As vehicular emissions depend on the number of trips, the overall pollutant emissions generated by this alternative would be similar to the emissions generated by the Project because the number of vehicular trips would be the same. Specifically, as provided in Appendix K.4 of this Draft EIR, Alternative 2 would result in a total of 2,537 daily vehicle trips compared to the Project's 2,537 total daily vehicle trips (after mitigation). Therefore, the overall pollutant emissions generated by this alternative would be similar to the emissions generated by the Project because the number of vehicular trips would be similar to the Project. As such, impacts associated with regional air pollutant emissions during operation of Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Localized Emissions

(a) Construction

On-site construction activities under Alternative 2 would be located at similar distances from sensitive receptors as the Project. Since air emissions and fugitive dust from construction activities would be similar to those of the Project on maximum construction activity days, localized emissions under Alternative 2 would also be similar to those of the Project. Although Alternative 2 would result in a reduction in excavation compared to the Project, demolition and construction activities would be increased since all buildings on the Project site would be demolished and replaced with a single building covering the entire site. However, as discussed above, the intensity of construction activities would be similar on days with maximum construction activities, which are used for measuring impact significance. Therefore, impacts under Alternative 2, like the Project, would be less than significant, similar to those of the Project.

(b) Operation

Localized operational impacts are determined primarily by traffic volumes. As discussed above, Alternative 2 would increase the number of vehicular trips to the Project site compared to the Project; therefore, total vehicular emissions would be greater compared to the Project. In addition, area and stationary sources would also generate similar on-site operational air emissions as the Project. Given the increase in localized vehicle emissions, overall localized emissions under this alternative would be greater than

the Project. Therefore, localized air quality impacts under Alternative 2 would remain less than significant, and similar to the Project's less-than-significant impacts.

(3) Toxic Air Contaminants

(a) Construction

As with the Project, construction of Alternative 2 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities and during the mat foundation pour. As discussed in Section IV.B, Air Quality, of this Draft EIR, the Project would result in less than significant impacts with regard to construction TAC emissions. While demolition and construction activities would be increased since all buildings on the Project site would be demolished and replaced with a single building covering the entire site, Alternative 2 would result in a reduction in excavation compared to the Project. Toxic air contaminant impacts are assessed based on the quantity of emissions as well as exposure duration. The grading and excavation activities represent the greatest potential for TAC emissions in terms of total emissions. As discussed above, the excavation phase would be reduced by 49 percent in comparison to the Project due to the reduction total excavation quantity. With this reduction in excavation duration, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 2 would remain less than significant, and such impacts would be less when compared to the Project's less-than-significant impacts.

(b) Operation

As set forth in Section IV.B, Air Quality, of this Draft EIR, the primary sources of potential TAC emissions associated with Project operations would include DPM from delivery trucks. Similar to the Project, the land uses proposed under Alternative 2 are not considered land uses that generate substantial TAC emissions. However, as the daily vehicle trips and daily VMT associated with Alternative 2 would be the same as the Project, the number of deliveries and associated diesel particulate matter emissions would also be similar to the Project. Therefore, Alternative 2 would not release substantial amounts of TACs. Impacts under Alternative 2 would remain less than significant, and similar to the Project's less-than-significant impacts.

c. Cultural Resources (Archaeological Resources)

Alternative 2 would eliminate the subterranean parking levels proposed under the Project; therefore, Alternative 2 would require less excavation (up to 8 feet in depth compared to the 22 feet needed for the Project). Nevertheless, like the Project, Alternative 2 would implement Mitigation Measure CUL-MM-1 in consideration of the potential for archaeological resources to be identified during construction activities. Therefore, impacts

with respect to archaeological resources would be less than significant with mitigation and similar to the less-than-significant with mitigation impacts of the Project.

d. Energy

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

(a) Construction

Similar to the Project, construction activities under Alternative 2 would consume electricity to convey water for dust control and to power lighting, electronic equipment, and other construction activities, and petroleum-based fuels for heavy construction equipment, delivery and haul trucks, and construction worker traffic. Like the Project, construction activities associated with Alternative 2 would not involve the consumption of natural gas. As with the Project, Alternative 2 would also generate a demand for transportation energy associated with on- and off-road vehicles. As previously discussed, although Alternative 2 would result in a reduction in excavation compared to the Project, demolition and construction activities would be increased since all buildings on the Project site would be demolished and replaced with a single building covering the entire site. With the decrease in excavation duration and increase in building construction duration, total construction activities and duration under Alternative 2 would be similar to the Project. Notwithstanding, like the Project, the use of construction equipment/vehicles used during construction of Alternative 2 would comply with Title 24 and other applicable energy conservation requirements, CARB anti-idling and In-Use Off-Road Diesel-Fueled Fleet regulations, federal fuel efficiency standards, and other applicable requirements. Alternative 2 would also implement design features, similar to the Project, to reduce energy usage and fuel consumption during construction. Therefore, as with the Project, Alternative 2 construction would not result in energy that is wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 2 and similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 2 would generate an increased demand for electricity and natural gas. As previously discussed, this alternative would result in a net increase of approximately 169,240 square feet of floor area like the Project; therefore, this alternative would be expected to generate the same operational energy demand as the Project. Additionally, Alternative 2 would result in the same number of daily vehicle trips and daily VMT as the Project. Specifically, as provided in Appendix K.4 of this Draft EIR, Alternative 2 would result in a total of 2,537 daily vehicle trips and 22,146 daily VMT (after mitigation) compared to the Project's 2,537 total daily vehicle trips and 22,146 daily VMT (after mitigation). In addition, Alternative 2 would have a VMT per employee of 10.3 (after

mitigation) which does not exceed the APC VMT threshold of 11.1. Nevertheless, Alternative 2 would implement similar design features as the Project, which would improve energy efficiency and reduce impacts on consumption of energy resources. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 2 would not be wasteful, inefficient, or unnecessary. Therefore, impacts related to energy use under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

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

As discussed in Section IV.D, Energy, of this Draft EIR, the City's current Green Building Code requires compliance with CALGreen and California's Building Energy Efficiency Standards (Title 24). Similar to the Project, Alternative 2 would comply with the City's Green Building Code, as well as be capable of achieving LEED Silver® or equivalent green building standards. Therefore, as with the Project, Alternative 2 would comply with, and incorporate measures that exceed current applicable energy conservation requirements.

With regard to transportation related energy usage, Alternative 2 would also comply with goals of the Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which incorporates VMT targets established by SB 375. As with the Project, the use proposed under Alternative 2 and its proximity to major job centers and public transportation would serve to reduce VMT and associated transportation fuel usage within the region. In addition, vehicle trips generated during Project operations would comply with CAFE fuel economy standards. As with the Project, Alternative 2 would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction.

Based on the above, this alternative would not conflict with plans for renewable energy or energy efficiency. Impacts related to renewable energy or energy efficiency plans would be less than significant under Alternative 2, and impacts would be similar to the less-than-significant impacts of the Project.

e. Geology and Soils (Paleontological Resources)

Alternative 2 would eliminate the subterranean parking levels proposed under the Project; therefore Alternative 2 would require less excavation (up to 8 feet in depth of excavation compared to the 22 feet needed for the Project). Nevertheless, like the Project, Alternative 2 would implement Mitigation Measure GEO-MM-1 in consideration of the potential to uncover subsurface paleontological resources. Therefore, impacts with respect to paleontological resources would be less than significant with mitigation and similar to the less-than-significant with mitigation impacts of the Project.

f. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily vehicle trips generated and associated daily VMT as well as the energy consumption from proposed land uses. As previously discussed, the number of daily trips and daily VMT under Alternative 2 would be the same as the Project. Specifically, as provided in Appendix K.4 of this Draft EIR, Alternative 2 would result in a total of 2,537 daily vehicle trips and 22,146 daily VMT (after mitigation) compared to the Project's 2,537 total daily vehicle trips and 22,146 daily VMT (after mitigation). As previously discussed, this alternative would result in a net increase of approximately 169,240 square feet of floor area like the Project; therefore, the amount of energy and water consumed would be anticipated to be similar to the Project. Thus, the amount of GHG emissions generated by Alternative 2 would be similar to the amount generated by the Project. As with the Project, Alternative 2 would be designed to comply with the requirements of the CALGreen Code and the Los Angeles Green Building Code. Alternative 2 would also incorporate design features to reduce GHG emissions such as the sustainability features required to achieve LEED Silver® or equivalent green building standards and would be designed to comply with the City's Green Building Ordinance, as applicable. Furthermore, as with the Project, Alternative 2 would represent infill development within an urban area, and thus would contribute to an energy efficient land use pattern which would support the goals of the RTP/SCS intended to reduce GHG emissions. With compliance with applicable regulations and with implementation of comparable sustainability features as the Project, Alternative 2 would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans. Finally, unlike the Project, Alternative 2 would demolish all buildings on the Project Site, and would develop all of the uses within a single new building. Although newly constructed buildings are more efficient and thus emit less GHG emissions, the construction of Alternative 2 would result in more GHG emissions than the Project construction. Overall, impacts related to GHG emissions under Alternative 2 would be less than significant and greater than the less-than-significant impacts of the Project.

g. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, would be used and, therefore, would require proper handling and management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases and, subsequently, the exposure of the public to hazardous materials. However, as discussed for the Project in Section IV.G, Hazards and Hazardous Materials, of this Draft EIR, all potentially hazardous

materials under Alternative 2 would be used, stored, and disposed in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use.

Alternative 2 would be constructed within the same Project site as the Project. As discussed in detail in Section IV.G, Hazards and Hazardous Materials, of this Draft EIR, there is no evidence of existing USTs or ASTs within the Project site and no items containing PCBs were observed on-site. Notwithstanding, in the unlikely event that USTs or PCBs are found, suspect materials would be removed in accordance with all applicable federal, state, and local regulations like the Project. Furthermore, based on the extensive remodeling and renovation work complete in 1987, ACMs and LBP are unlikely to be encountered on the Project site. Nevertheless, in the event ACMs or LBP are encountered on-site, such materials would be handled in accordance with all applicable regulations and requirements.

No oil and gas wells within or adjacent to the Project site; however, the Project site is located within a City-designated Methane Zone as defined by the City Methane Ordinance. Although excavation activities under this alternative would be reduced when compared to the Project, demolition activities would increase and excavation footprint would be expanded across the entire Project site. Construction activities within the Project site that involve work in confined spaces on-site could still pose a potential for methane and hydrogen sulfide build-up, resulting in a possible hazardous condition. Therefore, like the Project, adherence to industry-standard construction safety measures, as well as compliance with California Occupational Safety and Health Act safety requirements, would serve to reduce the risk in the event that elevated levels of these soil gases are encountered during grading and construction. As with the Project, Alternative 2 would be designed to comply with the City's Methane Ordinance on the Project site, to ensure potential impacts related to subsurface gases is less than significant.

As with the Project, Alternative 2 is not located within 0.25 mile of an existing or proposed school. The nearest school is Playa Del Rey Elementary School, located at 12221 Juniette Street approximately 0.3 mile east of the Project Site. As with the Project, although Alternative 2 would have the potential to emit and would involve the handling of hazardous materials, particularly during construction activities, all such activities involving the handling and disposal of hazardous materials and wastes would occur in compliance with all applicable federal, State, and local requirements concerning the handling and disposal of hazardous waste. As such, with compliance with relevant regulations and requirements, the Project would not create a significant hazard to nearby schools.

Based on the above, potential construction-related impacts associated with hazards and hazardous materials under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Operation

Similar to the Project, Alternative 2 would not include the use of materials containing ACM, LBP, or PCBs and would not involve the installation of any USTs. Additionally, the operation of Alternative 2 would involve the limited use of potentially hazardous materials typical of those used in office and commercial developments, including cleaning agents, paints, pesticides, and other materials used for landscaping. As with the Project, all hazardous materials on the Project site would be acquired, handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, state, and local requirements. Alternative 2, like the Project, would not include the installation of new oil wells and would comply with the City of Los Angeles' Methane Ordinance.

Based on the above, potential impacts related to hazards and hazardous materials during operation of Alternative 2 would be less than significant, and similar to the Project's less-than-significant impacts.

h. Land Use and Planning

As previously discussed, Alternative 2 would include a similar mix of uses as the Project. Alternative 2 would also require the same discretionary approvals as the Project. Thus, as with the Project, Alternative 2 would not conflict with and would be consistent with the overall intent of applicable policies and objectives in local and regional plans that govern development on the Project site, including the City's General Plan, the Community Plan, the LAMC, and SCAG's RTP/SCS. Therefore, the impacts of Alternative 2 related to potential conflicts with applicable land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant and similar to the less-than-significant impacts of the Project.

i. Noise

(1) Noise

(a) Construction

The types of construction activities under Alternative 2 would be substantially similar to the Project. Although the amount of excavation activities would be reduced under Alternative 2 due to the elimination of subterranean parking, demolition and construction activities would be increased since all buildings on the Project site would be demolished and replaced with a single building covering the entire site. In addition, there would be more construction activity on the western portion of the site closer to two of the nearby sound studios (Receptor R4) and the residential area across Grosvenor Avenue (Receptor R2). Therefore, construction noise levels at receptor locations R2 and R4 under Alternative

2 would be higher than the Project due to the closer distance to the construction activities and the shielding previously provided by the existing building structure. 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. Under Alternative 2, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to that of the Project during maximum activity days, which are used for measuring impact significance. However, the footprint of the construction activity would be expanded bringing it closer to some of the nearby sensitive uses and would be for a longer period, when compared to the Project, due to a longer demolition and construction schedule. Accordingly, noise impacts due to on- and off-site construction activities under Alternative 2 would be greater than those of the Project, especially at receptor locations R2 and R4. Alternative 2 would also implement similar design features and mitigation measures as the Project to reduce noise during construction. Additional mitigation measures, including, temporary noise barrier along the Project eastern boundary would be required to reduce the potential noise impacts at receptor locations R2 and R4. However, similar to the Project, on- and off-site construction noise would be significant and unavoidable under Alternative 2 as the peak construction activities would be greater than the Project.

(b) Operation

As discussed in Section IV.I, Noise, of this Draft EIR, sources of operational noise under the Project include: (a) on-site stationary noise sources, including mechanical equipment, activities within the proposed outdoor spaces, parking facilities, loading areas; and (b) off-site mobile (roadway traffic) noise sources. Alternative 2 would introduce noise from similar on- and off-site noise sources as the Project. The mechanical equipment, parking facilities, and loading areas would located across the entire Project site instead of being isolated in the western portion of the Project site, and closer to some of the nearby sensitive uses. However, the total outdoor common space under Alternative 2 would be reduced compared to the Project. Noise levels associated with mechanical equipment, parking facilities and loading areas would be higher for receptor locations R2 and R4, as the on-site stationary noise sources would be closer to these receptor locations. However, similar to the Project, Alternative 2 would include project design features that comply with the City's Noise Ordinance. Thus, operational on-site noise impacts would be less than significant and similar to the less-than-significant impacts of the Project.

With regard to off-site noise sources, Alternative 2 would result in the same number of daily vehicle trips as the Project. Specifically, as provided in Appendix K.4 of this Draft EIR, Alternative 2 would result in a total of 2,537 daily vehicle trips (after mitigation) compared to the Project's 2,537 total daily vehicle trips (after mitigation). As such, Alternative 2 would result in similar traffic-related noise levels as the Project. Therefore, as

with the Project, off-site noise impacts under Alternative 2 would remain less than significant, and would be similar to the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

As noted above, the types of construction activities (i.e., similar construction equipment mix) under Alternative 2 would be similar to the Project. Although the amount of excavation activities would be reduced under Alternative 2 due to the elimination of subterranean parking, demolition and construction activities would be increased since all buildings on the Project site would be demolished and replaced with a single building covering the entire site. As such, construction activities and duration would be greater under Alternative 2 compared to the Project. 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 excavation activities 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 same construction equipment that would be used during construction of this alternative would be similar to those of the Project. However, the peak vibration levels from the construction activities would be higher at receptor locations R2 and R4. Although vibration levels at receptor location R2 would be higher as compared to the Project, the vibration impacts at receptor location R2 would continue to be less than significant. However, the vibration levels at receptor location R4 could exceed the 65 VdB significance criteria. Accordingly, vibration impacts due to on- and off-site construction activities under Alternative 2 would similarly be less than significant for on- and off-site construction vibration (pursuant to the significance criteria for building damage) and significant and unavoidable for on- and off-site construction vibration (pursuant to the significance criteria for human annoyance). Overall, vibration impacts under Alternative 2 would be greater as compared to the significant and unavoidable impacts of the Project.

(b) Operation

As described in Section IV.I, Noise, of this Draft EIR, the primary sources of vibration related to operation of the Project would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under Alternative 2, and the operational vibration intensity would be similar because Alternative 2 and the Project provide the same amount of office and retail uses. As with the Project, vehicular-induced vibration from Alternative 2, including vehicle circulation within the parking levels, would not generate perceptible vibration levels at off-site sensitive uses. In addition, like the Project, building mechanical equipment installed

as part of Alternative 2 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration transmission such that the vibration would not be perceptible at the off-site sensitive receptors. Therefore, as with the Project, operation of Alternative 2 would not increase the existing vibration levels in the immediate vicinity of the Project site. As such, vibration impacts associated with operation of Alternative 2 would also be less than significant. However, such impacts would be greater than, and similar to those of the Project due to the slight increase in vehicle (truck) trips.

j. Public Services

(1) Fire Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 2 would be similar to those of the Project, with reduced excavation activities and increased demolition and construction activities. Overall, construction activities and duration of Alternative 2 would be similar compared to the Project. Similar to the Project, the demand for fire protection services during construction of Alternative 2 would be offset by the removal of the existing commercial uses on the Project site. Also like the Project, construction managers and personnel would be trained in emergency response and fire safety operations and fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.

Alternative 2 could also have the potential to affect fire protection services by adding construction activity onsite and traffic to the street network and by necessitating partial lane closures during street improvements and utility installations, similar to the Project. However, as with the Project, Alternative 2 would implement a Construction Traffic Management Plan, which would include provisions for maintaining emergency access and minimizing delays in emergency response during construction. Furthermore, emergency vehicles have the ability to partially avoid traffic delays through the use of sirens to clear paths of travel in accordance with the California Vehicle Code Section 21806. Overall, construction-related impacts related to fire protection services under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

Alternative 2, like the Project, would result in a total of 287,381 square feet of new floor area, including 283,981 square feet of office uses and 3,400 square feet of ground floor retail (restaurant) space. Therefore, like the Project, Alternative 2 would not generate a new residential population in the service area of Fire Station No. 67 that would generate a direct demand for fire protection services provided by the LAFD. Based on the

generation rates provided by the City of Los Angeles VMT Calculator Documentation, Alternative 2 would generate approximately 677 net new employees, which would be seven more employees when compared to the Project's estimated number of employees.[5,6] As such, this alternative would generate a similar demand for LAFD fire protection services on a daily basis when 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, fire flow, storage and management of hazardous materials, alarm and communications systems, life safety features, and would undergo LAFD fire/life safety plan review to ensure compliance with the above, which would reduce the demand for fire protection and EMS and also ensure adequate emergency access. Furthermore, 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. Under Alternative 2, while no driveways would differ from the Project, the fire lane would wrap around the entire unified building. Further, the driveways and internal circulation under Alternative 2 would also be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. As with the Project, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for Alternative 2. Therefore, impacts related to fire protection services under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project due to the slight increase in service population.

(2) Police Protection

(a) Construction

As discussed above, the types of construction activities under Alternative 2 would be similar to those of the Project, with reduced excavation activities and increased demolition and construction activities. Overall, construction activities and duration would be similar under Alternative 2 compared to the Project. Similar to the Project, the demand for police protection services during construction of Alternative 2 would be offset by the removal of

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[5] *Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. The existing office uses to be removed produces 473 employees (118,141 square feet X 0.004 = 473). Alternative 2 would produce 1,150 new employees (office 283,981 square feet X 0.004 = 1,136) + (retail 3,400 square feet X 0.004 = 14). Therefore, Alternative 2 would produce 677 new net employees.*

[6] *Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. The existing office uses to be removed produces 121 employees (30,260 square feet X 0.004 = 121). The Project would produce 791 employees (office 196,100 square feet X 0.004 = 784) + (retail 3,400 square feet X 0.002 = 7). Therefore, the Project would produce 670 new net employees.*

the existing commercial uses on the Project site. Alternative 2 would also implement similar project design features as the Project, which includes temporary security measures such as security fencing, lighting, and locked entry to secure the Project site during construction, thereby reducing demand for police services.

Construction activities under Alternative 2 could also potentially affect LAPD emergency response times and interfere with emergency access during the construction period through temporary lane closures, etc. However, similar to the Project, Alternative 2 would be required to implement a Construction Management Plan to ensure that adequate and safe access is available within and near the Project site during construction activities. Lastly, emergency vehicles have the ability to avoid traffic by using their sirens to clear a path of travel or driving in the lanes of opposing traffic.

Based on the above, construction-related impacts to police protection services under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

Alternative 2 would construct a total of 287,381 square feet of new floor area, including 283,981 square feet of office uses and 3,400 square feet of ground floor retail space; therefore, like the Project, Alternative 2 would not generate a new residential population requiring police protection services. Based on the generation rates provided by the City of Los Angeles VMT Calculator Documentation, Alternative 2 would generate approximately 677 net new employees, which would be greater when compared to the Project's service population.[7,8] As such, the increase in new employees at the Project site compared to existing conditions would be similar to the Project. Alternative 2 would implement project design features similar to the Project, which would help reduce the demand for police services. Thus, as with 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. Therefore,

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[7] *Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. The existing office uses to be removed produces 473 employees (118,141 square feet X 0.004 = 473). The Project would produce 1,150 new employees (office 283,981 square feet X 0.004 = 1,136) + (retail 3,400 square feet X 0.004 = 14). Therefore, Alternative 2 would produce 677 new net employees.*

[8] *Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. The existing office uses to be removed produces 121 employees (30,260 square feet X 0.004 = 121). The Project would produce 791 employees (office 196,100 square feet X 0.004 = 784) + (retail 3,400 square feet X 0.002 = 7). Therefore, the Project would produce 670 new net employees.*

impacts to police protection services during operation under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

k. Transportation

As previously described, Alternative 2 would be developed within the same Project site as the Project. As such, the plans, policies, and programs applicable to the Project would also apply to Alternative 2. Like the Project, this alternative would ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment; prioritize safety and access for all individuals utilizing the site by complying with all American with Disabilities Act (ADA) requirements as required by the LAMC; and include sidewalk and driveway design, vehicular parking, bicycle parking, etc., in accordance with LAMC requirements. Alternative 2 would support these transportation plans for the same reasons as the Project (e.g., would include similar roadway and sidewalk improvements, would comply with LAMC driveway and parking standards, etc.). Furthermore, Alternative 2 would implement similar measures as the Project and would promote alternative modes of transportation and reduce VMT through the implementation of the same TDM measures as the Project (pursuant to Mitigation Measure TR-MM-1). Therefore, like the Project, Alternative 2 would not conflict with a program, plan, ordinance, or policy addressing the circulation system. Therefore, impacts would be less than significant and similar to the impacts of the Project.

With respect to VMT, Alternative 2 does not include residential uses and would not result in any household VMT per capita. Based on the VMT calculator assumptions, this alternative would result in an estimated daily work VMT per employee of 12.4 prior to mitigation, which would be above the work VMT per employee significance threshold for the West Los Angeles APC of 11.1. As with the Project, Alternative 2 would be required to implement a TDM program similar to that described in Mitigation Measure TR-MM-1, which would reduce the daily work VMT per employee. With implementation of a similar mitigation as Mitigation Measure TR-MM-1, the average work VMT per employee would be reduced to a less than significant level. Specifically, with implementation of Mitigation Measure TR-MM-1, Alternative 2 would result in a daily work VMT per employee of 10.3, which would be the same as the daily work VMT per employee of 10.3 generated by the Project. Therefore, impacts with respect to VMT would be less-than-significant with mitigation and similar to the less-than-significant with mitigation impacts of the Project.

Similar to the Project, Alternative 2 would include implementation of additional left-turn lanes on the southbound approaches of the Westlawn Avenue/Jefferson Boulevard and Grosvenor Boulevard/Jefferson Boulevard intersections (Project Condition No. 28.a and 28.b). With incorporation of these previously approved improvements, Alternative 2's weekday A.M. and P.M. peak hour traffic volumes would not cause or substantially extend vehicle queuing at the study intersections analyzed and therefore would not cause any

constraint on access. Additionally, this alternative would implement the same design feature as the Project, which would require the Jandy Place driveway be closed between 12:30 P.M. and 1:30 P.M. so as to enhance pedestrian safety during lunchtime hours. Therefore, similar to the Project, Alternative 2 would not substantially increase hazards due to a geometric design feature or incompatible use, and impacts would be less than significant and similar to the Project's less-than-significant impacts.

Similar to the Project, Alternative 2 would not interfere with emergency access. Alternative 2 would be required to implement a Construction Traffic Management Plan to ensure that adequate and safe access remains available within and near the Project site during construction activities. With regard to operation, Alternative 2 provides the same driveway access as the Project, however, because the building at 12541 Beatrice Street would not be retained the fire lane would wrap around the entire unified building. Similar to the Project, driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Therefore, similar to the Project, Alternative 2 would result in less than significant emergency access impacts that would be similar to the less than significant impacts of the Project.

l. Tribal Cultural Resources

As previously discussed, Alternative 2 would eliminate the subterranean parking levels proposed under the Project, and would require less excavation (up to 8 feet in depth compared to the 22 feet needed for the Project). Therefore, the potential for Alternative 2 to uncover subsurface tribal cultural resources would be similar when compared to that of the Project. As discussed in Section IV.L, Tribal Cultural Resources, of this Draft EIR, no tribal cultural resources have been previously recorded at the Project site, nor did the consultations with the applicable California Native American Tribes conducted in accordance with AB 52 identify any tribal cultural resources on the Project site. Therefore, impacts to tribal cultural resources would be less-than-significant and similar to the Project's less-than-significant impacts.

m. Utilities and Service Systems

(1) Water Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 2 would generate a short-term demand for water. As evaluated in Section IV.M.1, Utilities and Service Systems—Water Infrastructure, of this Draft EIR, based on the temporary nature of construction activities, as well as the limited construction phases requiring the use of water,

Project construction water demand would be anticipated to be less than the operational water demand of the existing buildings. Although Alternative 2 would result in a reduction in excavation compared to the Project, demolition and construction activities would be increased since all buildings on the Project site would be demolished and replaced with a single building covering the entire site. However, during construction under Alternative 2, the current operational water usage would cease, offsetting the demand associated with construction activities. . Therefore, the existing water infrastructure would have adequate capacity to meet Project construction-related water demand. As such, Alternative 2 would not result in construction activities that require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental impacts. Therefore, impacts on water infrastructure associated with short-term construction activities under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

Alternative 2 would result in the same increase in long-term water demand as the Project as it would result in the same overall square footage in office and retail area within the Project Site. It should be noted that this is a conservative calculation as it does not account for water conservation measures such as the mandatory indoor water reduction rates required by the City of Los Angeles Green Building Code. Accordingly, as with the Project, Alternative 2 would implement Project Design Feature WAT-PDF-1 which would construct the necessary on site water infrastructure improvements and off site connections to the LADWP water system pursuant to applicable City requirements to accommodate the new development. Therefore, impacts to water infrastructure under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Energy Infrastructure

(a) Construction

As previously noted, although Alternative 2 would result in a reduction in excavation compared to the Project, demolition and construction activities would be increased since all buildings on the Project site would be demolished and replaced with a single building covering the entire Project site. With the decrease in excavation duration and increase in building construction duration, the total construction duration under Alternative 2 would be similar in comparison to the Project. As such, construction activities and duration would be similar under Alternative 2 compared to the Project. Alternative 2, like the Project, would implement design features to reduce energy usage during construction. During construction under Alternative 2, the current operational energy usage would cease, offsetting the demand associated with construction activities. As discussed further below, the existing energy infrastructure would be adequate to meet Project operational demand. Therefore, the existing energy infrastructure would have adequate capacity to meet Project

construction-related energy demand. As such, the existing infrastructure in the Project area would similarly have the capacity to serve Alternative 2. Therefore, impacts on infrastructure capacity associated with short-term construction activities under Alternative 2 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 2 would generate an increased consumption of electricity and natural gas relative to existing conditions. Based on the uses and proposed floor area, the total energy consumption of Alternative 2 would be the same as the total energy demand of the Project. Nevertheless, Alternative 2's energy demand would be served by existing facilities in the vicinity of the Project site. Impacts to energy infrastructure capacity under Alternative 2 would be less than significant, and similar to the less-than-significant impacts of the Project.

3. Comparison of Impacts

Alternative 2 would not avoid the Project's significant and unavoidable on-site and off-site noise and vibration impacts (pursuant to the significance criteria for human annoyance), and actually could result in greater construction noise impacts. Similar to the Project, no significant and unavoidable cumulative impacts would occur. Alternative 2 would reduce the Project's less-than-significant toxic air contaminants impacts while increasing the Project's operational GHG emissions, although such impacts would remain less than significant. All other impacts would be similar to those of the Project. Finally, as a general note, Alternative 2 involves demolition of all structures currently on the Project site and 287,381 square feet of new construction and thus is generally more wasteful than the Project, which would retain the building at 12541 Beatrice Street and integrate it into a new campus with 199,500 square feet of new construction.

4. Relationship of the Alternative to Project Objectives

Alternative 2 would provide a total of 287,381 square feet of new floor area, including 283,981 square feet of office uses and 3,400 square feet of ground floor retail space. Overall, Alternative 2 would not meet the underlying purpose of the Project which is to redevelop the infill Project site by creating an office campus which integrates an existing creative studio use. With the same mix of uses and similar design elements, Alternative 2 would meet the following Project objectives.

- Support the Community Plan's Goal 2 to build a strong and competitive commercial sector which promotes economic vitality and serves the needs of the community through the redevelopment and replacement of an older industrial

building with a modern commercial building that will respond to the evolving needs of a growing creative office commercial sector;

- Promote the Community Plan's Objective 2-1 to provide opportunities for new commercial development and services within existing commercial areas through the development of a commercial project that would strengthen the economic vitality of the area without introducing incompatible uses;

- Activate the property and the neighborhood by providing retail components, including a café, attractive street-level landscaping, bicycle parking, public gathering spaces, and pedestrian amenities;

- Provide significant employment opportunities in office, research, and creative development uses, which will benefit the community, city, and region; and

- Offer flexible combinations of spaces to accommodate a variety of different tenants.

Alternative 2 would not meet the following Project objectives due to the demolition of the existing building at 12541 Beatrice Street under this alternative.

- Create an interactive creative office campus with open space, shared amenities and landscaping while retaining an existing office building on site; and

- Enhance the appearance of the immediate area by providing architecturally interesting and varied design.

V. Alternatives

C. Alternative 3: Reduced Development Intensity Alternative

1. Description of the Alternative

Alternative 3, the Reduced Development Intensity Alternative, would reduce the new floor area proposed under the Project by 25 percent. Specifically, like the Project, Alternative 3 would retain the existing 87,881-square-foot office building on the eastern portion of the Project site, and would replace the existing office building and accessory structures on the western portion of the Project site with a total of 127,655 square feet of new floor area, including 125,155 square feet of office uses and 2,500 square feet of ground floor retail space. The new building would be seven stories and approximately 114 feet in height to the top of the parapet (a reduction of one story and 21 feet when compared to the Project's height of eight stories and 135 feet). The new office uses would be developed in four floors (three full and one partial) atop a three-story podium structure that would contain the ground floor commercial uses and approximately 447 parking spaces. Alternative 3 also provides approximately 46,293 square feet of hardscape area and 33,307 square feet landscape area. Overall, this alternative would result in approximately 103,100 square feet of net floor area compared to the Project's 169,240 square feet of net floor area and would result in a FAR of 1.10:1. Excavation for this alternative would extend to a depth of approximately 8 feet. The conceptual site plan of Alternative 3 is provided in Figure V-2 on page V-48.

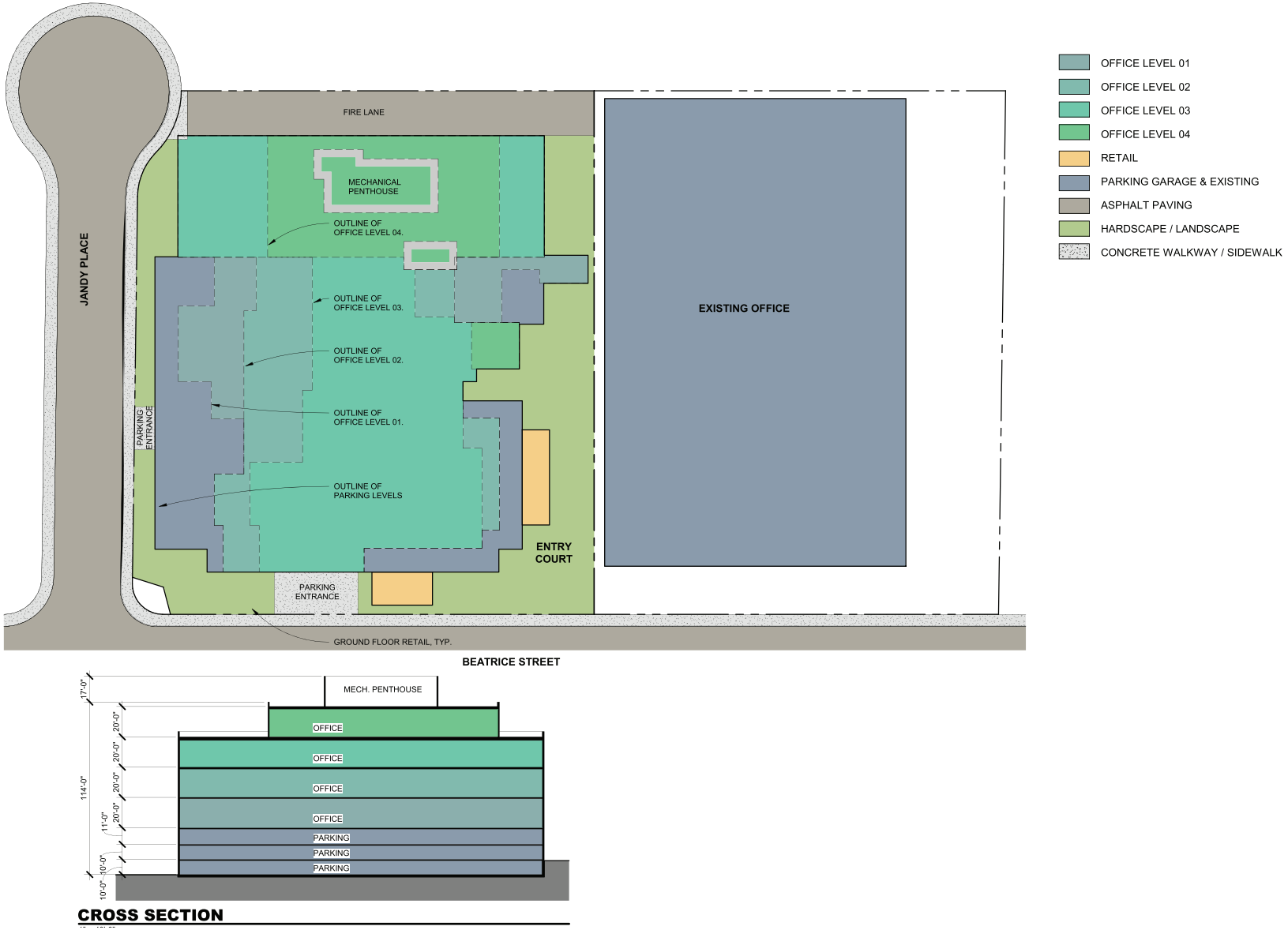

Figure V-2
Alternative 3 Conceptual Site Plan

Source: The Chait Company, Inc. and Gehry Partners, LLP., 2022.

2. Environmental Impacts

a. Aesthetics

(1) Scenic Vistas

As discussed above, similar to the Project, Alternative 3 would replace the existing office building and accessory structures at 12575 W. Beatrice Street with a new 7-story mixed-use commercial office building with ground floor retail. Alternative 3, like the Project, would retain the existing 87,881-square-foot office building on the eastern portion of the Project site. The new building would be approximately 114 feet in height to the top of the parapet (a reduction of 21 feet when compared to the Project's height of 135 feet). As indicated in Section IV.A, Aesthetics, of this Draft EIR, the Project site vicinity is fully developed with a mix of low- to mid-rise office, light industrial, and manufacturing uses with one multi-family residential structure adjacent to the Project site across Beatrice Street and a single-family residential area located across Grosvenor Boulevard further to the east. Due to the highly urbanized and built out surroundings, publicly available scenic vistas of valued visual resources are not available adjacent to the Project site. Alternative 3, like the Project, would not block scenic vistas, and the impacts of Alternative 3 would be less than significant and similar to the impacts of the Project.

(2) Conflict with Applicable Regulations Governing Scenic Quality

As discussed in Section IV.A, Aesthetics, of this Draft EIR, a number of local plans, policies, and regulations related to scenic quality are applicable to the Project site, including the Framework Element, Conservation Element, the Community Plan, the Citywide Urban Design Guidelines, the LAMC, and the California Code of Regulations. Since Alternative 3 would be developed within the same Project site as the Project and with similar uses, these same plans and applicable goals, objectives, and policies would be applicable to Alternative 3.

Like the Project, the office and commercial uses proposed under this alternative would complement the uses surrounding the Project site and would be designed consistent with relevant plans related to scenic quality, including promoting pedestrian activity and further activating the streets in the vicinity of the Project site. Similar to the Project, the new building proposed under Alternative 3 would be designed to create a visually unified site with the new building designed to complement the existing surrounding uses. Overall, similar to the Project, Alternative 3 would not conflict with regulations governing scenic quality detailed in Section IV.A, Aesthetics, of this Draft EIR. Thus, impacts would be less than significant and similar to those of the Project.

(3) Visual Character

(a) Construction

Similar to the Project, during the construction phase, the visual character of the Project site would be altered due to the removal of the existing structures, site preparation, grading and excavation, building construction, the installation of paving/concrete and landscaping, and the staging of construction equipment and materials. However, like the Project, the appearance of the Project site during construction of Alternative 3 would be typical of construction sites in urban areas. Furthermore, Alternative 3 would also implement similar design features as the Project, such as the installation of temporary construction fencing to screen much of the construction activity from view at the street level and ensuring that no unauthorized materials are posted on any temporary construction barriers or pedestrian walkways that are accessible/visible to the public.

Overall, while affecting the visual character of the Project site and vicinity on a temporary basis, construction activities under Alternative 3 would not substantially and adversely alter or degrade the existing visual character or quality of the Project site and surrounding area. Based on the above, impacts related to visual character during construction of Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As indicated in Section IV.A, Aesthetics, of this Draft EIR, the Project vicinity is fully developed with a mix of low- to mid-rise office, light industrial, and manufacturing uses with one multi-family residential structure adjacent to the Project site across Beatrice Street and a single-family residential area located across Grosvenor Boulevard further to the east. As discussed above, similar to the Project, Alternative 3 would replace the existing structures at 12575 W. Beatrice Street (totaling approximately 30,260 square feet) with a new mixed-use commercial office building with ground floor commercial (retail) uses. Alternative 3, like the Project, would retain the existing 87,881-square-foot office building at 12541 Beatrice Street. The new building would be seven stories and approximately 114 feet in height to the top of the parapet (a reduction of one story and 21 feet when compared to the Project's height of eight stories and 135 feet). The new uses would be physically and visually integrated with the surrounding area by applying a variety of siting, design, and landscaping elements. Alternative 3 would features similar design elements as the Project, including landscaped terraces, wall planes, varying rooftop design, complementary surface materials that would vary the mass and scale of the building. This alternative would also feature similar project design features as the Project. Accordingly, as with the Project, Alternative 3 would not substantially degrade the existing visual character or quality of the Project site and its surroundings. Therefore, impacts related to

visual character would be less than significant and less than the less-than-significant impacts of the Project due to the reduction in overall building height.

(4) Light and Glare

(a) Construction

As with the Project, while the majority of construction under Alternative 3 would occur during daylight hours, construction activities could potentially require the use of artificial lighting if construction were to occur in the evening until 9:00 P.M., as permitted per the LAMC. Additionally, artificial lighting may be required during the winter months when daylight is no longer sufficient earlier in the day. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of construction. In addition, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements, and lighting would be shielded and/or aimed so that no direct beam illumination is provided outside of the Project site boundary.

Also similar to the Project, any glare generated within the Project site during construction of Alternative 3 would be transitory and short-term given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities. Furthermore, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Therefore, similar to the Project, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur under Alternative 3.

Based on the above, impacts related to light and glare during construction of Alternative 3 would be less than significant and similar to less the less-than-significant impacts of the Project.

(b) Operation

Similar to the Project, the Reduced Density Alternative would increase light levels within the Project site and the surrounding area compared to existing conditions through the introduction of new sources of artificial lighting, including signage lighting, architectural lighting on the building, and landscape lighting. Similar to the Project, Alternative 3 would replace a portion of the existing on-site uses as well as parking areas.

The proposed lighting sources under Alternative 3 would be similar to other lighting sources in the Project site vicinity and would not generate artificial light levels that are out of character with the surrounding area. As discussed above, the new building would be reduced in size and in height. As such, Alternative 3 would be anticipated to generate

lower light levels than the Project. In addition, Alternative 3, like the Project, would incorporate project design features that direct all exterior lights toward the interior of the Project site to avoid light spillover onto adjacent property. Lighting under Alternative 3 would also meet all applicable LAMC lighting standards.

Alternative 3 would also not include signage with flashing, mechanical, or strobe lights. Signage on the Project site would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off-site glare. Illumination used for signage under Alternative 3 would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

With regard to glare, the office building under Alternative 3 would be designed in a contemporary architectural style and would feature various surface materials, which would include tile or stone veneer, storefront windows, aluminum louvers, wood or simulated wood, exterior plaster, and glass railings. Alternative 3 would implement similar design features as the Project that would require the use of non-reflective glass or glass that has been treated with a non-reflective coating in all exterior windows and building surfaces to reduce potential glare from reflected sunlight. Therefore, these materials would not have the potential to produce a substantial degree of glare. In addition, the proposed parking levels would be screened and integrated into the new building's architecture, thereby eliminating the reflection potential from parked cars as viewed from surrounding areas and roadways during the day and night, and would substantially reduce lighting levels from vehicle headlights during the night compared to existing conditions.

Based on the above, operational light and glare impacts under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in building height.

b. Air Quality

(1) Regional Emissions

(a) Construction

As with the Project, construction of Alternative 3 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.B, 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 3

would comply with applicable air quality regulations during construction and implement Project Design Feature AIR-PDF-1 requiring the use of existing electricity from power poles where available and/or solar generators rather than temporary diesel or gasoline generators during the construction period to reduce stationary source construction emissions.

Under Alternative 3, it is anticipated that overall construction duration would be less than the Project with the reduction in total floor area and the elimination of subterranean parking. However, the intensity of air emissions and fugitive dust from site preparation and construction activities under Alternative 3 would be similar to the Project on days with maximum (peak) construction activities, and Alternative 3 would not decrease the daily intensity of construction activities when compared to the Project. As such, air emissions during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Therefore, as with the Project, Alternative 3 would result in regional construction emissions impacts that would be less than significant, and such impacts would be similar to those of the Project.

It is noted however that with the reduced excavation, the duration of the excavation phase under Alternative 3 would be shortened by approximately 73 percent (based on the corresponding 73-percent reduction in excavation quantities). The mat foundation phase under Alternative 3 would be similar in terms of maximum daily truck trips and overall duration. Building construction duration under Alternative 3 would be reduced by approximately 36 percent (based on the corresponding 36-percent decrease in new building square footage in comparison to the Project). Thus, the duration of the Project's regional construction air emissions would be less under Alternative 3.

(b) Operation

Operational regional air pollutant emissions associated with Alternative 3 would be generated by vehicle trips and daily VMT to the Project site, which are the largest contributors to operational air pollutant emissions, and by the consumption of electricity and natural gas. As previously discussed, Alternative 3 would reduce the overall development proposed on the Project site. As such, the number of daily vehicle trips and daily VMT generated by Alternative 3 would be less than the daily vehicle trips generated by the Project. Specifically, as provided in Appendix K.4 of this Draft EIR, Alternative 3 would result in a total of 2,021 daily vehicle trips with mitigation compared to the Project's 2,537 total daily vehicle trips with mitigation. Since the amount of vehicular emissions is based on the number of trips generated, the overall pollutant emissions generated by Alternative 3 would be less than the emissions generated by the Project. With the reduction in total floor area and elimination of subterranean parking, both area sources and stationary sources would also generate less on-site operational air emissions compared to the Project. Therefore, under Alternative 3, total contributions to regional air pollutant emissions during

operation would be less than the Project's contribution. Thus, impacts to regional air quality under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(2) Localized Emissions

(a) Construction

On-site construction activities under Alternative 3 would be located at similar distances from sensitive receptors as the Project. Since air emissions and fugitive dust from construction activities would be similar to those of the Project on maximum construction activity days, localized emissions under Alternative 3 would also be similar to those of the Project. Although Alternative 3 would result in a reduction in total floor area and excavation compared to the Project, as discussed above, the intensity of construction activities would be similar on days with maximum construction activities, which are used for measuring impact significance. Therefore, impacts under Alternative 3 would be less than significant, and similar to the Project.

(b) Operation

Localized operational impacts are determined primarily by traffic volumes. As discussed above, Alternative 3 would generate less daily trips to the Project site when compared to the Project; therefore, total vehicular emissions would be less compared to the Project. In addition, with the reduction in total floor area and elimination of subterranean parking, area and stationary sources would generate less on-site operational air emissions compared to the Project. Overall, total contributions to localized air pollutant emissions during operation of Alternative 3 would be less than the Project's contribution. Accordingly, localized air quality impacts under Alternative 3 would be less than significant, and less than the less-than-significant impacts of the Project.

(3) Toxic Air Contaminants

(a) Construction

As with the Project, construction of Alternative 3 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. As discussed in Section IV.B, Air Quality, of this Draft EIR, the Project would result in less than significant impacts with regard to construction TAC emissions. Alternative 3 would result in a reduction in excavation compared to the Project due to the elimination of subterranean parking. Because grading and excavation activities represent the greatest potential for TAC emissions, construction TAC emissions generated by Alternative 3 would be less than those of the Project due to the reduction in excavation activities. Thus, impacts due to TAC emissions and the corresponding individual cancer

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

(b) Operation

As set forth in Section IV.B, Air Quality, of this Draft EIR, the primary sources of potential TAC emissions associated with Project operations would include DPM from delivery trucks. Under Alternative 3, the vehicle trips would be reduced in comparison to the Project. The CalEEMod fleet mix is based on Los Angeles County vehicle registration data which assumes a percentage of Project vehicle trips would be delivery trucks. As the overall increase in the number of deliveries and associated diesel particulate matter emissions would be reduced when compared to the Project due to the reduction in trips generated, Alternative 3 would result in less operational truck deliveries. Furthermore, similar to the Project, the land uses proposed under Alternative 3 are not considered land uses that generate substantial TAC emissions. Therefore, Alternative 3 would not release substantial amounts of TACs. Impacts under Alternative 3 would be less than significant, and less than the less-than-significant impacts of the Project.

c. Cultural Resources (Archaeological Resources)

Alternative 3 would eliminate the subterranean parking levels proposed under the Project; therefore, Alternative 3 would require less excavation (up to 8 feet in depth compared to the 22 feet needed for the Project). Nevertheless, like the Project, Alternative 3 would implement Mitigation Measure CUL-MM-1 in consideration of the potential for archaeological resources to be identified during construction activities. Therefore, impacts with respect to archaeological resources would be less than significant with mitigation and similar to the less-than-significant with mitigation impacts of the Project.

d. Energy

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

(a) Construction

Similar to the Project, construction activities under Alternative 3 would consume electricity to convey water for dust control and to power lighting, electronic equipment, and other construction activities, and petroleum-based fuels for heavy construction equipment, delivery and haul trucks, and construction worker traffic. Like the Project, construction activities associated with Alternative 3 would not involve the consumption of natural gas. As with the Project, Alternative 3 would also generate a demand for transportation energy associated with on- and off-road vehicles. However, the energy consumed during construction of Alternative 3 would be reduced compared to the Project due to the

reduction in total floor area and elimination of subterranean parking. Like the Project, the use of construction equipment/vehicles used during construction of Alternative 3 would comply with all applicable energy conservation requirements, including CARB anti-idling and In-Use Off-Road Diesel-Fueled Fleet regulations, federal fuel efficiency standards, and other applicable requirements. Alternative 3 would also implement design features, similar to the Project, to reduce energy usage and fuel consumption during construction. Therefore, as with the Project, Alternative 3 construction activities would require energy demand that is not wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 3 and less than the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 3 would generate an increased demand for electricity and natural gas. When compared to the Project, Alternative 3 would include less development and thus would be expected to generate lower operational energy demand than the Project. Furthermore, as previously discussed, Alternative 3 would result in less daily vehicle trips and daily VMT as compared to the Project. Specifically, as provided in Appendix K.4 of this Draft EIR, Alternative 3 would result in a total of 2,021 daily vehicle trips and 17,660 daily VMT compared to the Project's 2,537 total daily vehicle trips and 22,146 daily VMT. In addition, Alternative 3 would have a VMT per employee of 11.1 which does not exceed the APC VMT threshold of 11.1. Furthermore, Alternative 3 would implement similar project design features as the Project, which would improve energy efficiency and reduce impacts on consumption of energy resources. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 3 would not be wasteful, inefficient, or unnecessary. Therefore, impacts related to energy use under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

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

As discussed in Section IV.D, Energy, of this Draft EIR, the current City of LA Green Building Code requires compliance with CALGreen and Title 24. Similar to the Project, Alternative 3 would comply with the City's Green Building Code, as well as be capable of achieving LEED Silver® or equivalent green building standards. Therefore, as with 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.

With regard to transportation related energy usage, Alternative 3 would also comply with goals of SCAG's RTP/SCS which incorporates VMT targets established by SB 375. As with the Project, the use proposed under Alternative 3 and its proximity to major job centers and public transportation would serve to reduce VMT and associated transportation fuel usage within the region. As with the Project, Alternative 3 would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction.

Based on the above, this alternative would not conflict with plans for renewable energy or energy efficiency. Impacts related to renewable energy or energy efficiency plans would be less than significant under Alternative 3, and impacts would be similar to the less-than-significant impacts of the Project.

e. Geology and Soils (Paleontological Resources)

Alternative 3 would eliminate the subterranean parking levels proposed under the Project; therefore Alternative 2 would require less excavation (up to 8 feet in depth of excavation compared to the 22 feet needed for the Project). Nevertheless, like the Project, Alternative 3 would implement Mitigation Measure GEO-MM-1 in consideration of the potential to uncover subsurface paleontological resources. Therefore, impacts with respect to paleontological resources would be less than significant with mitigation and similar to less-than-significant with mitigation impacts of the Project.

f. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily vehicle trips generated and associated VMT as well as the energy and water consumption from proposed land uses. As previously discussed, the number of daily trips and daily VMT under Alternative 3 would be reduced compared to the Project. Specifically, as provided in Appendix K.4 of this Draft EIR, Alternative 3 would result in a total of 2,021 daily vehicle trips and 17,660 daily VMT (after mitigation) compared to the Project's 2,537 total daily vehicle trips and 22,146 daily VMT (after mitigation). Additionally, the amount of energy and water consumed would be anticipated to be less when compared to the Project. Thus, the amount of GHG emissions generated by Alternative 3 would be less than the amount generated by the Project. As with the Project, Alternative 3 would also be designed to comply with the requirements of the CALGreen Code and the Los Angeles Green Building Code. In addition, Alternative 3 would incorporate design features to reduce GHG emissions such as the sustainability features required to achieve LEED Silver® or equivalent green building standards and would be designed to comply with the City's Green Building Ordinance, as applicable. Furthermore, as with the Project, Alternative 3 would represent infill development within an urban area, and thus would contribute to an energy efficient land use pattern which would support the goals of the

RTP/SCS intended to reduce GHG emissions. With compliance with applicable regulations and with implementation of comparable sustainability features as the Project, Alternative 3 would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

g. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, would be used and, therefore, would require proper handling and management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases and, subsequently, the exposure of the public to hazardous materials. However, as discussed for the Project in Section IV.G, Hazards and Hazardous Materials, of this Draft EIR, all potentially hazardous materials under Alternative 3 would be used, stored, and disposed in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use.

Alternative 3 would be constructed within the same footprint and same Project site as the Project. As discussed in detail in Section IV.G, Hazards and Hazardous Materials, of this Draft EIR, there is no evidence of existing USTs or ASTs within the Project site and no items containing PCBs were observed on-site. Notwithstanding, in the unlikely event that USTs or PCBs are found, suspect materials would be removed in accordance with all applicable federal, state, and local regulations like the Project. Furthermore, based on the extensive remodeling and renovation work completed in 1987, ACMs and LBP are unlikely to be encountered on the Project site. Nevertheless, in the event ACMs or LBPs are encountered on-site, such materials would be handled in accordance with all applicable regulations and requirements.

No oil and gas wells are located within or adjacent to the Project site; however, the Project site is located within a City-designated Methane Zone as defined by the City Methane Ordinance. Although excavation activities under this alternative would be reduced when compared to the Project, they would occur within the same footprint as the Project. Further, construction activities that involve work in confined spaces on-site could still pose a potential for methane and hydrogen sulfide build-up, resulting in a possible hazardous condition. Therefore, like the Project, adherence to industry-standard construction safety measures, as well as compliance with California Occupational Safety and Health Act safety requirements, would serve to reduce the risk in the event that

elevated levels of these soil gases are encountered during grading and construction. In addition, as with the Project, Alternative 3 would be designed to comply with the City's Methane Ordinance, to ensure potential impacts related to subsurface gases is less than significant.

As with the Project, Alternative 3 is not located within 0.25 mile of an existing or proposed school. The nearest school is Playa Del Rey Elementary School, located at 12221 Juniette Street approximately 0.3 mile east of the Project Site. As with the Project, although Alternative 3 would have the potential to emit and would involve the handling of hazardous materials, particularly during construction activities, all such activities involving the handling and disposal of hazardous materials and wastes would occur in compliance with all applicable federal, State, and local requirements concerning the handling and disposal of hazardous waste. As such, with compliance with relevant regulations and requirements, the Project would not create a significant hazard to nearby schools.

Based on the above, potential construction-related impacts associated with hazards and hazardous materials under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Operation

Similar to the Project, Alternative 3 would not include the use of materials containing ACM, LBP, or PCBs and would not involve the installation of any USTs. Additionally, the operation of Alternative 3 would involve the limited use of potentially hazardous materials typical of those used in office and commercial developments, including cleaning agents, paints, pesticides, and other materials used for landscaping. As with the Project, all hazardous materials on the Project site would be acquired, handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, state, and local requirements. Alternative 3, like the Project, would not include the installation of new oil wells and would comply with the City's Methane Ordinance.

Based on the above, potential impacts related to hazards and hazardous materials during operation of Alternative 3 would be less than significant and such impacts would be similar to the Project's less-than-significant impacts based on the similar uses proposed on-site.

h. Land Use and Planning

As previously described, Alternative 3 would include a mix of uses similar to the Project but would reduce the amount of total floor area by approximately 25 percent. Specifically, when compared to the Project, Alternative 3 would reduce the office square footage by 70,945 square feet and reduce the commercial footage by 900 square feet.

Alternative 3 would also require the same discretionary approvals as the Project. Thus, as with the Project, Alternative 3 would not conflict with and would be consistent with the overall intent of applicable policies and objectives in local and regional plans that govern development on the Project site, including the City's General Plan, the Community Plan, the LAMC, and SCAG's RTP/SCS. Therefore, the impacts of Alternative 3 related to potential conflicts with applicable land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant and similar to the less-than-significant impacts of the Project.

i. Noise

(1) Noise

(a) Construction

The types of construction activities and equipment used to construct Alternative 3 would be substantially similar to the Project, although the amount of construction activities would be reduced due to the reduction in total floor area and elimination of subterranean parking. 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. Under Alternative 3, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to that of the Project during maximum activity days, which are used for measuring impact significance. Accordingly, noise impacts due to on- and off-site construction activities under Alternative 3 would be similar to those of the Project. Alternative 3 would also implement similar design features and mitigation measures as the Project to reduce noise during construction. However, similar to the Project, on- and off-site construction noise would be significant and unavoidable under Alternative 3 as the peak construction activities during maximum activity days, including the number of haul trips that could occur during a maximum activity day, would be similar to the Project. It is noted that the duration of the noise impacts under Alternative 3 would be shorter than the Project due to the shorter construction period.

(b) Operation

As discussed in Section IV.I, Noise, of this Draft EIR, sources of operational noise under the Project include: (a) on-site stationary noise sources, including mechanical equipment, activities within the proposed outdoor spaces, parking facilities, and loading areas; and (b) off-site mobile (roadway traffic) noise sources. Alternative 3 would introduce similar on- and off-site noise sources as the Project. However, it is anticipated that the noise levels from building mechanical equipment, outdoor spaces, parking facilities and loading areas would be reduced under Alternative 3 due to the overall reduction in total floor area and outdoor spaces, and the elimination of subterranean parking. In addition, similar to the Project, Alternative 3 would include project design features that comply with

the City's Noise Ordinance. Thus, operational on-site noise impacts would be less than significant and less than the less-than-significant impacts of the Project.

With regard to off-site noise sources, Alternative 3 would result in a reduction in daily vehicle trips compared to the Project. Specifically, as provided in Appendix K.4 of this Draft EIR, Alternative 3 would result in a total of 2,021 daily vehicle trips (after mitigation) compared to the Project's 2,537 total daily vehicle trips. The reduction in vehicle trips would result in a decrease in off-site traffic-related noise levels under Alternative 3. Therefore, as with the Project, off-site noise impacts under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

As noted above, the types of construction activities and equipment used to construct Alternative 3 would be similar to the Project, although the amount and duration of construction activities would be reduced due to the reduction in total floor area and elimination of the subterranean parking. 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, the maximum (peak) vibration levels generated by construction of Alternative 3, including from equipment and truck trips, would be expected to be similar to those of the Project. Accordingly, vibration impacts due to on- and off-site construction activities under Alternative 3 would similarly be less than significant for on- and off-site construction vibration (building damage) and significant and unavoidable for on- and off-site construction vibration (human annoyance). Overall, vibration impacts under Alternative 3 would be similar to the impacts of the Project.

(b) Operation

As described in Section IV.I, Noise, of this Draft EIR, the primary sources of vibration related to operation of the Project would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under Alternative 3. As with the Project, vehicular-induced vibration from Alternative 3, including vehicle circulation within the parking podium, would not generate perceptible vibration levels at off-site sensitive uses. In addition, like the Project, building mechanical equipment installed as part of Alternative 3 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration transmission such that the vibration would not be perceptible at the off-site sensitive receptors. Therefore, as with the Project, operation of Alternative 3 would not increase the existing vibration levels in the immediate vicinity of the Project site. As such, vibration impacts

associated with operation of Alternative 3 would also be less than significant and would be less than those of the Project due to the reduction in vehicle trips.

j. Public Services

(1) Fire Protection

(a) Construction

The types of construction activities required for Alternative 3 would be similar to those of the Project, although the amount of construction activities would be reduced due to the reduction in total floor area and elimination of subterranean parking. Like the Project, construction managers and personnel would be trained in emergency response and fire safety operations, and fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.

Alternative 3 could also have the potential to affect fire protection services by adding construction traffic to the street network and by necessitating partial land closures during street improvements and utility installations, similar to the Project. However, as with the Project, Alternative 3 would implement a Construction Traffic Management Plan, which would include provisions for maintaining emergency access and minimizing delays in emergency response during construction. Furthermore, emergency vehicles have the ability to partially avoid traffic delays through the use of sirens to clear paths of travel in accordance with California Vehicle Code Section 21806. Therefore, construction impacts related to fire protection services under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

(b) Operation

Alternative 3 would construct a total of 127,655 square feet of new floor area, including 125,155 square feet of office uses and 2,500 square feet of ground floor retail space. Therefore, Alternative 3 would not generate a new residential population in the service area of Fire Station No. 67 that would result in a direct demand for fire protection services provided by the LAFD. Based on the generation rates provided by the City's VMT Calculator Documentation, Alternative 3 would generate approximately 390 net new employees, which would be less when compared to the Project's service population of 670 net new employees.[9,10] Thus, Alternative 3 would result in a lower service population

[9] *Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. The existing office uses to be removed produces 121 employees (30,260 square feet X 0.004 = 121). Alternative 3 would produce 551 new*

(Footnote continued on next page)

when compared to the Project. As such, this alternative would generate a lower demand for LAFD fire protection services on a daily basis when 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, fire flow, storage and management of hazardous materials, alarm and communications systems, life safety features, and would undergo LAFD fire/life safety plan review to ensure compliance with the above, which would reduce the demand for fire protection and EMS and also ensure adequate emergency access. Furthermore, 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. The driveways and internal circulation under Alternative 3 would also be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. As with the Project, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for Alternative 3. Therefore, impacts related to fire protection services under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in the service population.

(2) Police Protection

(a) Construction

As discussed above, construction activities under Alternative 3 would be similar to those of the Project; however, the overall amount of construction activities of construction would be reduced compared to the Project due to the reduction in total floor area and elimination of subterranean parking. Similar to the Project, the demand for police protection services during construction of Alternative 3 would be offset by the removal of the existing office building at 12575 Beatrice Street. Alternative 3 would also implement similar project design features as the Project, which includes temporary security measures such as security fencing, lighting, and locked entry to secure the Project site during construction, thereby reducing demand for police services.

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employees (office 125,155 square feet X 0.004 = 501) + (retail 2,500 square feet X 0.004 = 10). Therefore, Alternative 3 would produce 390 new net employees.

[10] *Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. The existing office uses to be removed produces 121 employees (30,260 square feet X 0.004 = 121). The Project would produce 791 employees (office 196,100 square feet X 0.004 = 784) + (retail 3,400 square feet X 0.002 = 7). Therefore, the Project would produce 670 new net employees.*

Construction activities under Alternative 3 could also potentially affect LAPD emergency response times and interfere with emergency access during the construction period through temporary lane closures, etc. However, similar to the Project, Alternative 3 would be required to implement a Construction Management Plan to ensure that adequate and safe access is available within and near the Project site during construction activities. Lastly, emergency vehicles have the ability to use their sirens to clear a path of travel or drive in the lanes of opposing traffic when dealing with traffic. Therefore, construction-related impacts to police protection services under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project due to the reduced construction activities.

(b) Operation

As previously discussed, Alternative 3 would construct a total of 127,655 square feet of new floor area, including 125,155 square feet of office uses and 2,500 square feet of ground floor retail space; therefore, Alternative 3 would not generate a new residential population requiring police protection services. Based on the generation rates provided by the City's VMT Calculator Documentation, Alternative 3 would generate approximately 385 new employees, which would be less when compared to the Project's service population of 670 employees.[11,12] As such, the increase in new employees at the Project site compared to existing conditions would be less than the Project. Alternative 3 would implement project design features similar to the Project, which would help reduce the demand for police services. Moreover, 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. Thus, as with 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. Therefore, impacts to police protection services during operation under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project due to the reduction in service population.

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[11] *Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. The existing office uses to be removed produces 121 employees (30,260 square feet X 0.004 = 121). Alternative 3 would produce 551 new employees (office 125,155 square feet X 0.004 = 501) + (retail 2,500 square feet X 0.004 = 10). Therefore, Alternative 3 would produce 390 new net employees.*

[12] *Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. The existing office uses to be removed produces 121 employees (30,260 square feet X 0.004 = 121). The Project would produce 791 employees (office 196,100 square feet X 0.004 = 784) + (retail 3,400 square feet X 0.002 = 7). Therefore, the Project would produce 670 new net employees.*

k. Transportation

As previously described, Alternative 3 would be developed within the same site as the Project. As such, the plans, policies, and programs applicable to the Project would also apply to Alternative 3. Like the Project, this alternative would ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment; prioritize safety and access for all individuals utilizing the site by complying with all ADA requirements as required by the LAMC; and include sidewalk and driveway design, vehicular parking, bicycle parking, etc., in accordance with LAMC requirements. Alternative 3 would support these transportation plans for the same reasons as the Project (e.g., would include similar roadway and sidewalk improvements, would comply with LAMC driveway and parking standards, etc.). Furthermore, Alternative 3 would implement similar project design features as the Project and would promote alternative modes of transportation and reduce VMT through the implementation of TDM measures (pursuant to Mitigation Measure TR-MM-1). Therefore, like the Project, Alternative 3 would not conflict with a program, plan, ordinance, or policy addressing the circulation system. Therefore, impacts would be less than significant and similar to the impacts of the Project.

With respect to VMT, similar to the Project, Alternative 3 does not include residential uses and would not result in any household VMT per capita. Based on the service population assumptions, this alternative would result in an estimated daily work VMT per employee of 13.3 (prior to mitigation), which would be above the work VMT per employee significance threshold for the West Los Angeles APC of 11.1. Similar to the Project, Alternative 3 would be required to implement a TDM program similar to Mitigation Measure TR-MM-1 for the Project, which would reduce the daily work VMT per employee. With implementation of a similar mitigation as Mitigation Measure TR-MM-1 for the Project, the average work VMT per employee would be reduced to a less than significant level. Specifically, Alternative 3 would result in a daily work VMT per employee of 11.1, which would be greater than the daily work VMT per employee of 10.3 generated by the Project after mitigation. Therefore, impacts with respect to VMT would be less-than-significant with mitigation and greater than the less-than-significant with mitigation impacts of the Project.

Similar to the Project, Alternative 3 would include implementation of additional left-turn lanes on the southbound approaches of the Westlawn Avenue/Jefferson Boulevard and Grosvenor Boulevard/Jefferson Boulevard intersections (Project Condition No. 28.a and 28.b). With incorporation of these previously approved improvements, Alternative 3's weekday A.M. and P.M. peak hour traffic volumes would not cause or substantially extend vehicle queuing at the study intersections analyzed and therefore would not cause any constraint on access. Additionally, this alternative would implement the same design feature as the Project, which would require the Jandy Place driveway be closed between 12:30 P.M. and 1:30 P.M. so as to enhance pedestrian safety during lunchtime hours.

Therefore, Alternative 3 would not substantially increase hazards due to a geometric design feature or incompatible use, and impacts would be less than significant and similar to the less-than-significant impacts of the Project.

Similar to the Project, Alternative 3 would not interfere with emergency access. Similar to the Project, Alternative 3 would be required to implement a Construction Traffic Management Plan to ensure that adequate and safe access remains available within and near the Project site during construction activities. With regard to operation, Alternative 3 would have the same access plan as the Project. Specifically, as with the Project, Alternative 3 would include two different access points around the Project site. Similar to the Project, driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Therefore, Alternative 3 would result in less than significant emergency access impacts that would be similar to the less than significant impacts of the Project.

l. Tribal Cultural Resources

As previously discussed, Alternative 3 would eliminate the subterranean parking proposed under the Project (up to 8 feet in depth of excavation compared to the 22 feet needed for the Project); therefore, the potential for Alternative 3 to uncover subsurface tribal cultural resources would be reduced compared to that of the Project. As discussed in Section IV.L, Tribal Cultural Resources, of this Draft EIR, no tribal cultural resources have been previously recorded at the Project site, nor did the consultations with the applicable California Native American Tribes conducted in accordance with AB 52 identify any tribal cultural resources on the Project site. Therefore, Alternative 3 would result in less than significant tribal cultural resource impacts that would be similar to the less-than-significant impacts of the Project.

m. Utilities and Service Systems

(1) Water Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 3 would generate a short-term demand for water. Construction-related water use under Alternative 3 would be less due to the reduction in total floor area and elimination of subterranean parking. As evaluated in Section IV.M.1, Utilities and Service Systems—Water Infrastructure, of this Draft EIR, based on the temporary nature of construction activities, as well as the limited construction phases requiring the use of water, Project construction water demand would be anticipated to be less than the operational water demand of the

existing building. Further, because the water demand for construction activities for Alternative 3 would be reduced, the temporary and intermittent demand for water during construction would also be expected to be met by the existing infrastructure. During construction under Alternative 3, the current operational water usage would cease, offsetting the demand associated with construction activities. Therefore, the existing water infrastructure would have adequate capacity to meet construction-related water demand for Alternative 3. As such, Alternative 3 would not result in construction activities that require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental impacts. Therefore, impacts on water infrastructure associated with short-term construction activities under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in the overall amount of construction activities and elimination of the subterranean parking.

(b) Operation

Like the Project, Alternative 3 would result in an increase in long-term water demand. However, based on the reduction in total development as compared to the Project, water demand for Alternative 3 would be less than the Project's estimated increase in water demand. However, as with the Project, Alternative 3 would implement Project Design Feature WAT-PDF-1 which would construct the necessary on site water infrastructure and off site connections to the LADWP water system pursuant to applicable City requirements to accommodate the new development. Thus, impacts to water infrastructure under Alternative 3 would be less than significant, and less than the less-than-significant impacts of the Project.

(2) Energy Infrastructure

(a) Construction

As previously noted, the energy consumed by Alternative 3 would be reduced compared to the Project due to the reduction in the overall amount of construction activities and elimination of the subterranean parking. Therefore, impacts on infrastructure capacity associated with short-term construction activities under Alternative 3 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 3 would generate an increased consumption of electricity and natural gas relative to existing conditions. However, based on the uses and the reduced amount of total floor area proposed under Alternative 3, the total energy consumption of Alternative 3 would be less than the total energy consumption

of the Project. Therefore, impacts to infrastructure capacity 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 avoid the Project's significant and unavoidable on-site and off-site noise and vibration impacts (pursuant to the significance criteria for human annoyance). Similar to the Project, no significant and unavoidable cumulative impacts would occur. In addition, this alternative would result in greater VMT impacts compared to the Project. Alternative 3 would reduce some of the less than significant impacts associated with the Project (i.e., visual character during operation, light and glare during operation, construction related toxic air contaminants, operational air quality and GHG emissions, cultural resources, energy efficiency, paleontological resources, operational noise and vibration, public services, tribal cultural resources, and utilities). All other impacts would be similar to those of the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 3 would include the same uses proposed by the Project while reducing the amount of total new floor area by approximately 25 percent. Alternative 3 would partially meet the underlying purpose of the Project which is to redevelop the infill Project site with an integrated office campus that would generate new economic opportunities and supporting growing industries located within the Palms–Mar Vista–Del Rey community.

Alternative 3 would also meet the following Project objectives, although it would not do so as effectively or to the same degree as the Project owing to the reduced amount of development under this alternative.

- Support the Community Plan's Goal 2 to build a strong and competitive commercial sector which promotes economic vitality and serves the needs of the community through the redevelopment and replacement of an older industrial building with a modern commercial building that will respond to the evolving needs of a growing creative office commercial sector;

- Promote the Community Plan's Objective 2-1 to provide opportunities for new commercial development and services within existing commercial areas through the development of a commercial project that would strengthen the economic vitality of the area without introducing incompatible uses;

- Create an interactive creative office campus with open space, shared amenities and landscaping while retaining an existing office building on site;

- Activate the property and the neighborhood by providing retail components, including a café, attractive street-level landscaping, bicycle parking, public gathering spaces, and pedestrian amenities;

- Provide significant employment opportunities in office, research, and creative development uses, which will benefit the community, city, and region;

- Enhance the appearance of the immediate area by providing architecturally interesting and varied design; and

- Offer flexible combinations of spaces to accommodate a variety of different tenants.

V. Alternatives

D. Alternative 4: Mixed-Use Office and Housing Alternative

1. Description of the Alternative

Alternative 4, the Mixed-Use Office and Housing Alternative, would develop the Project site with a mix of office and residential uses. Specifically, Alternative 4, like the Project, would retain the existing 87,881-square-foot office building on the eastern portion of the Project site, and would replace the existing office building and accessory structures at 12575 Beatrice Street. The new building would include a total of 199,500 square feet of floor area, the same floor area proposed by the Project, including 144,000 square feet of office uses on three levels and 55,500 square feet (55 units) of residential uses on a single top floor level. The office and residential uses would be developed atop three above-grade levels of parking. With regard to vehicular parking, Alternative 4 would provide a total of 548 parking spaces. Alternative 4 would also provide 31,373 square feet of hardscape area and 15,672 square feet of landscaped and open space area (of which approximately 5,500-9,625 square feet would be dedicated to usable open space for the residential component pursuant to LAMC 12.21.G). The new building would be seven stories and approximately 114.5 feet in height to the top of the parapet (a reduction of one story and 20.5 feet when compared to the Project's height of eight stories and 135 feet). Overall, Alternative 4 would construct 199,500 square feet of new floor area within the Project site, similar to the Project, and would result in a FAR of 1.46:1, as with the Project. Excavation for this alternative would extend to a depth of approximately 8 feet. The conceptual site plan for Alternative 4 is provided in Figure V-3 on page V-71.

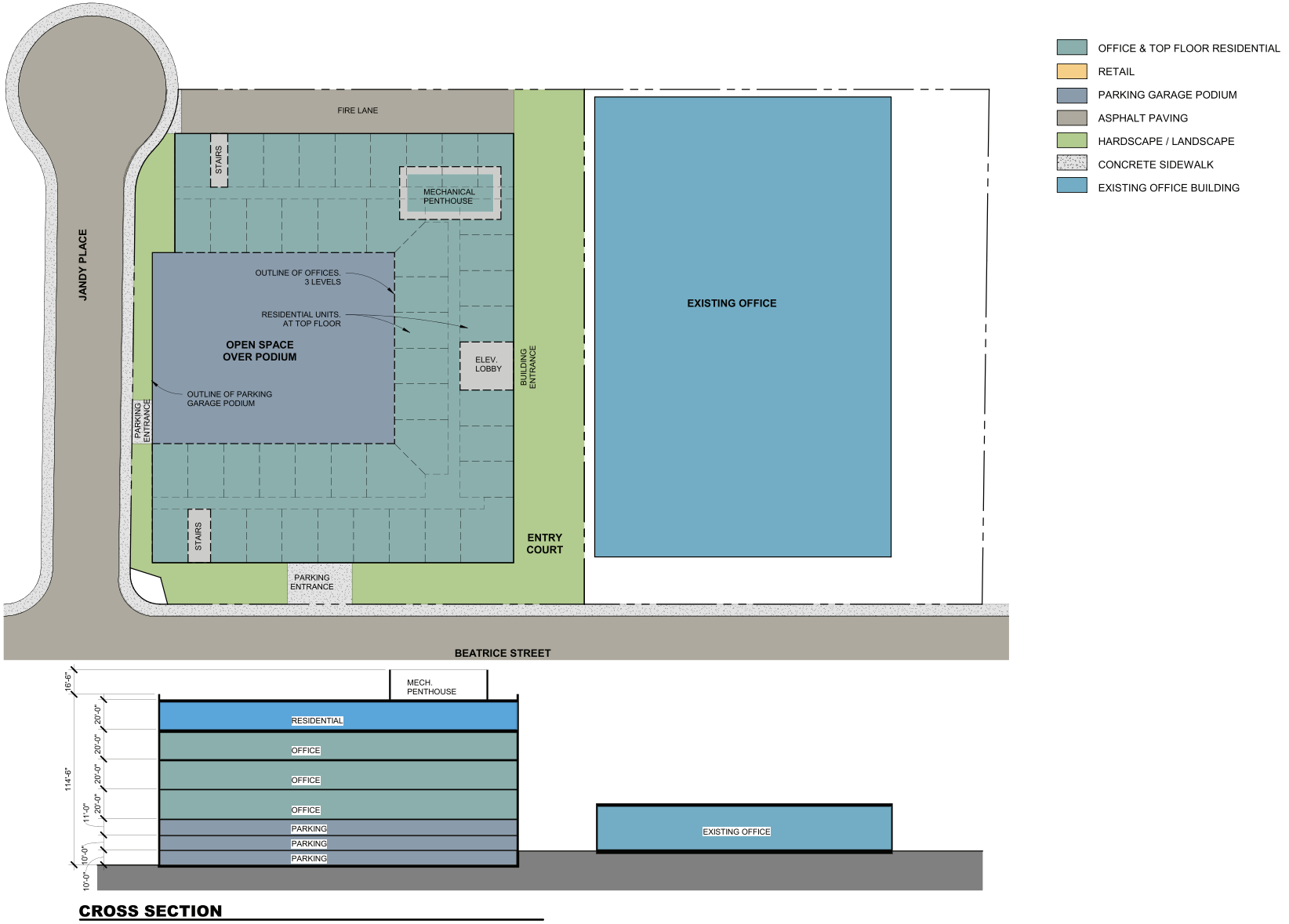

Figure V-3
Alternative 4 Conceptual Site Plan

Source: The Chait Company, Inc. and Gehry Partners, LLP., 2022.

2. Environmental Impacts

a. Aesthetics

(1) Scenic Vistas

As discussed above, Alternative 4 would replace the existing office building at 12575 Beatrice Street with a total of 199,500 square feet of floor area, the same floor area proposed by the Project. The new building would be seven stories and approximately 114.5 feet in height to the top of the parapet (a reduction of one story and 20.5 feet when compared to the Project's height of eight stories and 135 feet). As indicated in Section IV.A, Aesthetics, of this Draft EIR, the Project vicinity is fully developed with a mix of low- to mid-rise office, light industrial, and manufacturing uses with one multi-family residential structure adjoining the Project site and a single-family residential area located across Grosvenor Boulevard further to the east. Due to the highly urbanized and built out surroundings, publicly available scenic vistas of valued visual resources are not available adjacent to the Project site. Alternative 4, like the Project, would not block scenic vistas, and the impacts of Alternative 4 would be less than significant and similar to the impacts of the Project.

(2) Conflict with Applicable Regulations Governing Scenic Quality

As discussed in Section IV.A, Aesthetics, of this Draft EIR, a number of local plans, policies, and regulations related to scenic quality are applicable to the Project, including the Framework Element, Conservation Element, the Community Plan, the Citywide Urban Design Guidelines, the LAMC, and the California Code of Regulations.

Like the Project, the office and residential uses proposed under Alternative 4 would complement the uses surrounding the Project site and would be designed consistent with relevant plans related to scenic quality, including promoting pedestrian activity and further activating the streets in the vicinity of the Project site. Similar to the Project, the new building proposed under Alternative 4 would be designed to create a visually unified site with the new building designed to complement the existing surrounding uses. Overall, similar to the Project, Alternative 4 also would not conflict with the zoning and other regulations governing scenic quality detailed in Section IV.A, Aesthetics, of this Draft EIR. Thus, impacts would be less than significant and similar to those of the Project.

(3) Visual Character

(a) Construction

Similar to the Project, during the construction phase, the visual character of the Project site would be altered due to the removal of the existing structures, site preparation,

grading and excavation, building construction, the installation of paving/concrete and landscaping, and the staging of construction equipment and materials. Although Alternative 4 would reduce excavation, it involves similar demolition and construction activities as the Project. However, due to the buildout of the residential units, the duration of construction of Alternative 4 would be greater than the Project. Like the Project, the appearance of the Project site during construction of Alternative 4 would be typical of construction sites in urban areas. Furthermore, Alternative 4 would also implement similar design features as the Project, such as the installation of temporary construction fencing to screen much of the construction activity from view at the street level and ensuring that no unauthorized materials are posted on any temporary construction barriers or pedestrian walkways that are accessible/visible to the public.

Overall, while affecting the visual character of the Project site and vicinity on a temporary basis, construction activities under Alternative 4 would not substantially and adversely alter or degrade the existing visual character or quality of the Project site and surrounding area. Based on the above, impacts related to visual character during construction of Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As indicated in Section IV.A, Aesthetics, of this Draft EIR, the Project vicinity is fully developed with a mix of low- to mid-rise office, light industrial, and manufacturing uses with one multi-family residential structure adjacent to the Project site across Beatrice Street and a single-family residential area located across Grosvenor Boulevard further to the east. Alternative 4 would replace the existing structures at 12575 W. Beatrice Street (totaling approximately 30,260 square feet) with a total of 199,500 square feet of floor area, including 144,000 square feet of office uses and 55,500 square feet (55 units) of residential uses. The new building would be seven stories and approximately 114.5 feet in height to the top of the parapet (a reduction of one story and 20.5 feet when compared to the Project's height of eight stories and 135 feet). Alternative 4 is shorter in height with same amount of floor area as the Project but would lack the design elements that the Project provides, such as landscaped terraces and modulating floor plates that would vary the mass and scale of the building. Despite being more bulky than the Project, Alternative 4 would still exemplify high-quality architectural design and would be physically and visually integrated with the surrounding area by applying a variety of siting, design, and landscaping elements. Accordingly, as with the Project, Alternative 4 would not substantially degrade the existing visual character or quality of the Project site and its surroundings. Therefore, impacts to visual character would be less than significant and less than the less-than-significant impacts of the Project due to the reduction in building height.

(4) Light and Glare

(a) Construction

Although Alternative 4 would reduce excavation, it involves similar demolition and construction activities as the Project. However, due to the buildout of the residential units, the duration of construction of Alternative 4 would be greater than the Project. As with the Project, while the majority of construction under Alternative 4 would occur during daylight hours, construction activities could potentially require the use of artificial lighting if construction were to occur in the evening until 9:00 P.M., as permitted per the LAMC. Additionally, artificial lighting may be required during the winter months when daylight is no longer sufficient earlier in the day. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of construction. In addition, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements, and lighting would be shielded and/or aimed so that no direct beam illumination is provided outside of the Project site boundary. Therefore, similar to the Project, light resulting from construction activities under Alternative 4 would not significantly impact off-site sensitive uses, substantially alter the character of off-site areas surrounding the construction area, adversely impact day or nighttime views in the area, or substantially interfere with the performance of an off-site activity.

Also similar to the Project, any glare generated within the Project site during construction of Alternative 4 would be transitory and short-term given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities. Furthermore, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Therefore, similar to the Project, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur under Alternative 4.

Based on the above, light and glare associated with construction of Alternative 4 would not substantially alter the character of off-site areas surrounding the Project Site or adversely impact day or nighttime views in the area. Impacts related to light and glare during construction of Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

Similar to the Project, Alternative 4 would increase light levels within the Project site and the surrounding area compared to existing conditions through the introduction of new sources of artificial lighting, including signage lighting, architectural lighting on the building, and landscape lighting.

The proposed lighting sources under Alternative 4 would be similar to other lighting sources in the Project site vicinity and would not generate artificial light levels that are out of character with the surrounding area. As discussed above, the new building would be seven stories and approximately 114.5 feet in height to the top of the parapet (a reduction of one story and 20.5 feet when compared to the Project's height of eight stories and 135 feet). With a similar floor area as the Project, Alternative 4 would be anticipated to generate similar light levels as the Project. In addition, Alternative 4, like the Project, would incorporate project design features that direct all exterior lights toward the interior of the Project site to avoid light spillover onto adjacent properties. Lighting under Alternative 4 would also meet all applicable LAMC lighting standards.

Alternative 4 would also not include signage with flashing, mechanical, or strobe lights. Signage on the Project site would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off-site glare. Illumination used for signage under Alternative 4 would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

With regard to glare, the building under Alternative 4 would be designed in a contemporary architectural style and would feature various surface materials, which would include tile or stone veneer, storefront windows, aluminum louvers, wood or simulated wood, exterior plaster, and glass railings. Alternative 4 would implement similar design features as the Project that would require the use of non-reflective glass or glass that has been treated with a non-reflective coating in all exterior windows and building surfaces to reduce potential glare from reflected sunlight. Therefore, these materials would not have the potential to produce a substantial degree of glare. In addition, the proposed parking garage levels would be screened and integrated into the new building's architecture, thereby eliminating the reflection potential from parked cars as viewed from surrounding areas and roadways during the day and night, and would substantially reduce lighting levels from vehicle headlights during the night compared to existing conditions.

Based on the above, lighting and glare associated with operation of Alternative 4 would not result in a new source of substantial light or glare, which would adversely affect day or nighttime views in the area. Therefore, operational light and glare impacts under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

b. Air Quality

(1) Regional

(a) Construction

As with the Project, construction of Alternative 4 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.B, 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 4 would comply with applicable air quality regulations during construction and implement Project Design Feature AIR-PDF-1 requiring the use of existing electricity from power poles and/or solar generators where available, rather than temporary diesel or gasoline generators during the construction period to reduce stationary source construction emissions.

Under Alternative 4, it is anticipated that overall construction activities and construction duration would be similar to the Project, although the amount of excavation activities would be reduced due to the reduction in subterranean parking and the duration of construction of Alternative 4 would be similar to the Project as Alternative 4 would construct 199,500 square feet of new floor area within the Project site, similar to the Project, However, the intensity of air emissions and fugitive dust from site preparation and construction activities under Alternative 4 would be similar to the Project on days with maximum (peak) construction activities because while the overall amount excavation activities would decrease, Alternative 4 would not decrease the daily intensity of construction activities when compared to the Project. As such, air emissions during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Therefore, as with the Project, Alternative 4 would result in regional construction emissions impacts that would be less than significant, and such impacts would be similar to those of the Project.

It is noted however that with the reduced excavation, the duration of the excavation phase under Alternative 4 would be shortened by approximately 73 percent (based on the corresponding 73-percent reduction in excavation quantities). The mat foundation phase under Alternative 4 would be similar in terms of maximum daily truck trips and overall duration. Thus, the duration of the Project's regional construction air emissions would be less under Alternative 4.

(b) Operation

Operational regional air pollutant emissions associated with Alternative 4 would be generated by vehicle trips to the Project site, which are the largest contributors to operational air pollutant emissions, and by the consumption of electricity and natural gas. As previously discussed, Alternative 4 would include the development of 199,500 square feet of floor area, including 144,000 square feet of office uses and 55,500 square feet (55 units) of residential uses. As vehicular emissions depend on the number of trips and associated daily VMT, the overall pollutant emissions generated by this alternative would be less than the emissions generated by the Project because the number of vehicular trips would decrease. Specifically, as provided in Appendix K.4 of this Draft EIR, Alternative 4 would result in a total of 2,079 daily vehicle trips (after mitigation) compared to the Project's 2,537 total daily vehicle trips. Therefore, the overall pollutant emissions generated by this alternative would be less than the emissions generated by the Project because the number of vehicular trips would decrease. As such, impacts associated with regional air pollutant emissions during operation of Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project.

(2) Localized Emissions

(a) Construction

On-site construction activities under Alternative 4 would be located at similar distances from sensitive receptors as the Project. Although Alternative 4 would result in a reduction in excavation activities when compared to the Project, the intensity of construction activities would be similar on days with maximum construction activities, which are used for measuring impact significance. Therefore, impacts under Alternative 4 would remain less than significant, and similar to that of the Project.

(b) Operation

Localized operational impacts are determined primarily by traffic volumes. As discussed above, Alternative 4 would generate less daily trips when compared to the Project; therefore, total vehicular emissions would be less compared to the Project. In addition, area and stationary sources would generate similar on-site operational air emissions as the Project. Nevertheless, with the decrease in localized vehicle emissions, overall localized emissions under Alternative 4 would be less than the Project. As such, under Alternative 4, total contributions to localized air pollutant emissions during operation would be less than the Project's contribution. Accordingly, localized air quality impacts under Alternative 4 would be less than significant, and less than the less-than-significant impacts of the Project.

(3) Toxic Air Contaminants

(a) Construction

As with the Project, construction of Alternative 4 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. As discussed in Section IV.B, Air Quality, of this Draft EIR, the Project would result in less than significant impacts with regard to construction TAC emissions. Because grading and excavation activities represent the greatest potential for TAC emissions, overall construction TAC emissions generated by Alternative 4 would be less than those of the Project due to the reduction in excavation activities. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project.

(b) Operation

As set forth in Section IV.B, Air Quality, of this Draft EIR, the primary sources of potential TAC emissions associated with Project operations would include DPM from delivery trucks. Under Alternative 4, the vehicle trips would be reduced in comparison to the Project. The CalEEMod fleet mix is based on Los Angeles County vehicle registration data which assumes a percentage of Project vehicle trips would be delivery trucks. As the overall increase in the number of deliveries and associated diesel particulate matter emissions would be reduced when compared to the Project due to the reduction in trips generated, Alternative 4 would result in less operational truck deliveries. Furthermore, similar to the Project, the land uses proposed under Alternative 4 are not considered land uses that generate substantial TAC emissions. Therefore, Alternative 4 would not release substantial amounts of TACs. Impacts under Alternative 4 would be less than significant, and less than the less-than-significant impacts of the Project.

c. Cultural Resources (Archaeological Resources)

Alternative 4 would result in fewer subterranean parking levels when compared to the Project; therefore, Alternative 4 would require less excavation (up to 8 feet in depth of excavation compared to the 22 feet needed for the Project). Nevertheless, like the Project, Alternative 4 would implement Mitigation Measure CUL-MM-1 in consideration of the potential for an archaeological site to be identified during construction activities. Therefore, impacts with respect to archaeological resources would be less than significant with mitigation and similar to the less-than-significant with mitigation impacts of the Project.

d. Energy

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

(a) Construction

Similar to the Project, construction activities under Alternative 4 would consume electricity to convey water for dust control and to power lighting, electronic equipment, and other construction activities, and petroleum-based fuels for heavy construction equipment, delivery and haul trucks, and construction worker traffic. Like the Project, construction activities associated with Alternative 4 would not involve the consumption of natural gas. As with the Project, Alternative 4 would also generate a demand for transportation energy associated with on- and off-road vehicles. Although Alternative 4 would reduce excavation, it involves similar demolition and construction activities as the Project. Like the Project, the use of construction equipment/vehicles used during construction of Alternative 4 would comply with applicable energy conservation requirements, including CARB anti-idling and In-Use Off-Road Diesel-Fueled Fleet regulations, federal fuel efficiency standards, and other applicable requirements. Alternative 4 would also implement design features, similar to the Project, to reduce energy usage and fuel consumption during construction. Therefore, as with the Project, Alternative 4 construction activities would not result in energy that is wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 4 and similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 4 would generate an increased demand for electricity and natural gas. As previously discussed, Alternative 4 would construct 199,500 square feet of floor area, including 144,000 square feet of office space and 55,500 square feet (55 units) of residential uses, and would be expected to generate lower operational energy demand than the Project due to the residential uses. Additionally, as previously discussed, Alternative 4 would result in less daily vehicle trips and daily VMT as compared to the Project. Specifically, as provided in Appendix K.4 of this Draft EIR, Alternative 4 would result in a total of 2,079 daily vehicle trips and 18,075 daily VMT with mitigation compared to the Project's 2,537 total daily vehicle trips and 22,146 daily VMT with mitigation. In addition, Alternative 4 would result in a VMT per employee of 10.5 which does not exceed the APC VMT employee threshold of 11.1 and would result in a VMT per resident of 5.3 which does not exceed the APC VMT resident threshold of 7.4. Furthermore, Alternative 4 would implement similar project design features as the Project, which would improve energy efficiency and reduce impacts on consumption of energy resources. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 4 would not be wasteful, inefficient, or

unnecessary. Therefore, impacts related to energy use under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project.

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

As discussed in Section IV.D, Energy, of this Draft EIR, the current City of LA Green Building Code requires compliance with CALGreen and Title 24. Similar to the Project, Alternative 4 would comply with the City's Green Building Code, as well as be capable of achieving LEED Silver® or equivalent green building standards. Therefore, as with the Project, Alternative 4 would incorporate measures that are beyond current State and City energy conservation requirements. Also similar to the Project, Alternative 4 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2019 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code.

With regard to transportation related energy usage, Alternative 4 would also comply with goals of the SCAG RTP/SCS which incorporates VMT targets established by SB 375. As with the Project, the use proposed under Alternative 4 and its proximity to major job centers and public transportation would serve to reduce VMT and associated transportation fuel usage within the region. In addition, vehicle trips generated during Project operations would comply with CAFE fuel economy standards. As with the Project, Alternative 4 would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction.

Based on the above, this alternative would not conflict with plans for renewable energy or energy efficiency. No impacts related to renewable energy or energy efficiency plans would occur under Alternative 4, and impacts would be similar to the less-than-significant impacts of the Project.

e. Geology and Soils (Paleontological Resources)

Alternative 4 would result in fewer subterranean parking levels when compared to the Project; therefore, Alternative 4 would require less excavation due to the elimination of the subterranean parking (up to 8 feet in depth of excavation compared to the 22 feet needed for the Project). Nevertheless, like the Project, Alternative 4 would implement Mitigation Measure GEO-MM-1 in consideration of the potential to uncover subsurface paleontological resources. Overall, as with the Project, potential impacts to paleontological resources would be less than significant with mitigation, and similar to the less-than-significant with mitigation impacts of the Project.

f. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily vehicle trips generated and associated daily VMT as well as the energy and water consumption from proposed land uses. As previously discussed, the number of daily trips and daily VMT under Alternative 4 would be reduced compared to the Project. Specifically, as provided in Appendix K.4 of this Draft EIR, Alternative 4 would result in a total of 2,079 daily vehicle trips and 18,075 daily VMT with mitigation compared to the Project's 2,537 total daily vehicle trips and 22,146 daily VMT with mitigation. Additionally, the amount of energy consumed would be anticipated to be similar, and the amount of water consumed would be anticipated to be greater when compared to the Project. Overall, the amount of GHG emissions generated by Alternative 4 would be less than the amount generated by the Project due in large part to the reduction in vehicle trips. As with the Project, Alternative 4 would be designed to comply with the requirements of the CALGreen Code and the Los Angeles Green Building Code. Alternative 4 would also incorporate design features to reduce GHG emissions such as the sustainability features required to achieve LEED Silver® or equivalent green building standards and would be designed to comply with the City's Green Building Ordinance, as applicable. Furthermore, as with the Project, Alternative 4 would represent infill development within an urban area, and thus would contribute to an energy efficiency land use pattern which would support the goals of the RTP/SCS intended to reduce GHG emissions. With compliance with applicable regulations and with implementation of comparable sustainability features as the Project, Alternative 4 would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project.

g. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, would be used and, therefore, would require proper handling and management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases and, subsequently, the exposure of the public to hazardous materials. However, as discussed for the Project in Section IV.G, Hazards and Hazardous Materials, of this Draft EIR, all potentially hazardous materials under Alternative 4 would be used, stored, and disposed in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use.

Alternative 4 would be constructed within the same footprint within the same site as the Project. As discussed in detail in Section IV.G, Hazards and Hazardous Materials, of this Draft EIR, there is no evidence of existing USTs or ASTs within the Project site and no items containing PCBs were observed on-site. Notwithstanding, in the unlikely event that USTs or PCBs are found, suspect materials would be removed in accordance with all applicable federal, state, and local regulations like the Project. Furthermore, based on the extensive remodeling and renovation work completed in 1987, ACMs and LBPs are unlikely to be encountered on the Project site. Nevertheless, in the event ACMs or LBP are encountered on-site, such materials would be handled in accordance with all applicable regulations and requirements.

No oil and gas wells are located within or adjacent to the Project site; however, the Project site is located within a City-designated Methane Zone as defined by the City Methane Ordinance. Although excavation activities under this alternative would be reduced when compared to the Project, excavation and construction activities within the Project site that involve work in confined spaces on-site could still pose a potential for methane and hydrogen sulfide build-up, resulting in a possible hazardous condition. Therefore, like the Project, adherence to industry-standard construction safety measures, as well as compliance with California Occupational Safety and Health Act safety requirements, would serve to reduce the risk in the event that elevated levels of these soil gases are encountered during grading and construction. In addition, as with the Project, Alternative 4 would be designed to comply with the City Methane Ordinance to ensure potential impacts related to subsurface gases is less than significant.

As with the Project, Alternative 4 is not located within 0.25 mile of an existing or proposed school. The nearest school is Playa Del Rey Elementary School, located at 12221 Juniette Street approximately 0.3 mile east of the Project Site. As with the Project, although Alternative 4 would have the potential to emit and would involve the handling of hazardous materials, particularly during construction activities, all such activities involving the handling and disposal of hazardous materials and wastes would occur in compliance with all applicable federal, State, and local requirements concerning the handling and disposal of hazardous waste. As such, with compliance with relevant regulations and requirements, the Project would not create a significant hazard to nearby schools.

Based on the above, potential construction-related impacts associated with hazards and hazardous materials under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Operation

Similar to the Project, Alternative 4 would not include the use of materials containing ACM, LBP, or PCBs and would not involve the installation of any USTs. Additionally, the

operation of Alternative 4 would involve the limited use of potentially hazardous materials typical of those used in office and residential developments, including cleaning agents, paints, pesticides, and other materials used for landscaping. As with the Project, all hazardous materials on the Project site would be acquired, handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, state, and local requirements. Alternative 4, like the Project, would not include the installation of new oil wells and would comply with the City's Methane Ordinance.

Based on the above, potential impacts related to hazards and hazardous materials during operation of Alternative 4 would be less than significant and similar than the Project's less-than-significant impacts.

h. Land Use and Planning

As previously described, Alternative 4 would include the development of 199,500 square feet of floor area, including 144,000 square feet of office uses and 55,500 square feet (55 units) of residential uses. The new building would be seven stories and approximately 114.5 feet in height to the top of the parapet (a reduction of one story and 20.5 feet when compared to the Project's height of eight stories and 135 feet). When compared to the Project, Alternative 4 would add a 55,500 square-foot residential component, reduce the office square footage by 52,100 square feet and eliminate the 3,400 square feet of commercial space proposed under the Project. Overall, the FAR and density under Alternative 4 would be the same when compared to the Project.

Alternative 4 would provide a mixed-use development on an infill Project site and would require approval of discretionary actions and implementation of design features comparable to those of the Project. The Project site is zoned as M2, which does not permit residential uses. Thus, Alternative 4 would require a General Plan Amendment and Zone Change, while the Project only requires Site Plan Review and a Conditional Use Permit. With approval of the Zone Change and General Plan Amendment, Alternative 4 not conflict with and would be consistent with the overall intent of applicable policies and objectives in local plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. Thus, impacts related to land use consistency would be less than significant, but greater than the less-than-significant impacts of the Project due to the introduction of potentially incompatible residential uses.

i. Noise

(1) Noise

(a) Construction

The types of construction activities under Alternative 4 would be substantially similar to the Project, although the amount of excavation activities would be reduced due to the elimination of subterranean parking and construction duration would be increased due to the build out of the residential units. As with the Project, construction of Alternative 4 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Under Alternative 4, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to that of the Project during maximum activity days, which are used to measure impact significance. Similarly, while overall haul truck trips would be reduced, the number of haul trips that could occur during a maximum activity day would be similar to the Project. Accordingly, noise impacts due to on- and off-site construction activities under Alternative 4 would be similar to those of the Project. Alternative 4 would also implement similar design features and mitigation measures as the Project to reduce noise during construction. However, similar to the Project, on- and off-site construction noise would be significant and unavoidable under Alternative 4 as the peak construction activities would be similar to the Project. The duration of the noise impacts under Alternative 4 would be shorter than the Project due to the shorter construction period.

(b) Operation

As discussed in Section IV.I, Noise, of this Draft EIR, sources of operational noise under the Project include: (a) on-site stationary noise sources, including mechanical equipment, activities within the proposed outdoor spaces, parking facilities, and loading areas; and (b) off-site mobile (roadway traffic) noise sources. Alternative 4 would introduce noise from similar on- and off-site noise sources as the Project. Regarding on-site operational noise, Alternative 4 would introduce noise from similar on-site noise sources, including outdoor spaces. Based on LAMC requirements for open space for residential uses, and the likely greater use by residents of outdoor space as compared to office tenants, it is anticipated that noise generated from outdoor areas could increase compared to the Project. Nevertheless, similar to the Project, Alternative 4 would include design features (i.e., noise limits on amplified sound system) that comply with the City's Noise Ordinance, so as not to increase the ambient noise levels by 5 dBA. Noise levels from building mechanical equipment and parking facilities would be similar to the Project. Overall, operational on-site noise impacts would be less than significant and greater than the less-than-significant impacts of the Project.

With regard to off-site noise sources, Alternative 4 would result in a reduction in daily vehicle trips compared to the Project. Specifically, as provided in Appendix K.4 of this Draft EIR, Alternative 4 would result in a total of 2,079 daily vehicle trips (with mitigation) compared to the Project's 2,537 total daily vehicle trips (with mitigation). The reduction in vehicle trips would result in a decrease in off-site traffic-related noise levels under Alternative 4. Therefore, as with the Project, off-site noise impacts under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 4 would be similar to the Project, although the amount of excavation activities would be reduced due to the reduction in excavation activities and the construction duration would be increased due to the build out of the residential units. As with the Project, construction of Alternative 4 would generate vibration from the use of heavy-duty construction equipment as well as from truck trips. While the overall amount of construction would be reduced, on- and off-site construction activities and the associated construction vibration levels would be expected to be similar to those of the Project, as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment, which are used to measure impact significance. As such, peak vibration levels generated by the construction equipment would be similar to those of the Project. Accordingly, vibration impacts due to on- and off-site construction activities under Alternative 4 would similarly be less than significant for on- and off-site construction vibration (building damage) and significant and unavoidable for on- and off-site construction vibration (human annoyance). Overall, vibration impacts under Alternative 4 would be similar to the impacts of the Project.

(b) Operation

As described in Section IV.I, Noise, of this Draft EIR, the primary sources of vibration related to operation of the Project would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under Alternative 4. However, as previously described, Alternative 4 would result in a total of 2,079 daily vehicle trips compared to the Project's 2,537 total daily vehicle trips. The reduction in vehicle trips would result in a decrease in traffic-related vibration levels under Alternative 4. In addition, as with the Project, vehicular-induced vibration from Alternative 4, including vehicle circulation within the parking levels, would not generate perceptible vibration levels at off-site sensitive uses. Also like the Project, building mechanical equipment installed as part of Alternative 4 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration

transmission such that the vibration would not be perceptible at the off-site sensitive receptors. Therefore, as with the Project, operation of Alternative 4 would not increase the existing vibration levels in the immediate vicinity of the Project site. As such, vibration impacts associated with operation of Alternative 4 would also be less than significant and would be less than those of the Project due to the reduction in vehicle trips.

j. Public Services

(1) Fire Protection

(a) Construction

The types of construction activities required for the Alternative 4 would be similar to those of the Project, although the amount of excavation activities would be reduced due to the elimination of the subterranean parking and construction duration would be increased due to the build out of the residential units. Like the Project, construction managers and personnel would be trained in emergency response and fire safety operations and fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.

Alternative 4 could also have the potential to affect fire protection services by adding construction traffic to the street network and by necessitating partial land closures during street improvements and utility installations, similar to the Project. However, as with the Project, Alternative 4 would implement a Construction Traffic Management Plan, which would include provisions for maintaining emergency access and minimizing delays in emergency response during construction. Furthermore, emergency vehicles have the ability to partially avoid traffic delays through the use of sirens to clear paths of travel in accordance with the CVC Section 21806. Therefore, construction-related impacts related to fire protection services under Alternative 4 would be less than significant and greater than the less-than-significant impacts of the Project due to the increase in construction duration.

(b) Operation

Alternative 4 would construct a total of 199,500 square feet of floor area, including 144,000 square feet of office space and 55,500 square feet (55 units) of residential uses. Therefore, unlike the Project, Alternative 4 would generate a new residential population, as well as a new visitor and employee population in the service area of Fire Station No. 67 that would create a direct demand for fire protection services provided by the LAFD. Alternative 4 would result in a greater residential service population when compared to the Project since no residential uses are proposed as part of the Project. Based on the generation rates provided by the City of Los Angeles VMT Calculator Documentation, Alternative 4 would generate approximately 124 new residents and 455 net new

employees, creating a total new service population of 579 which is less than the Project's service population of 670 net new employees.[13]

While Alternative 4 would result in a lower service population when compared to the Project, residential uses tend to generate increased calls for fire protection services compared to office uses.

Similar to the Project, Alternative 4 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, life safety features, and would undergo LAFD fire/life safety plan review to ensure compliance with the above, which would reduce the demand for fire protection and EMS and also ensure adequate emergency access. Furthermore, like the Project, traffic generated by Alternative 4 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. The driveways and internal circulation under Alternative 4 would also be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. As with the Project, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for Alternative 4. Therefore, impacts related to fire protection services under Alternative 4 would be less than significant and greater than the less-than-significant impacts of the Project due to the new residential service population.

(2) Police Protection

(a) Construction

As discussed above, construction activities under Alternative 4 would be similar to those of the Project, although the amount of excavation activities would be slightly reduced due to the elimination of the subterranean parking and construction duration would be increased due to the build out of the residential units. Alternative 4 would also implement similar project design features as the Project, which includes temporary security measures

[13] *Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. The existing office uses to be removed produces 121 employees (30,260 square feet x 0.004 = 121). Based on the "Multi-Family Residential" rate of 2.25 persons per unit applied to the proposed 55 units and the "General Office" employee generation rate of 4 employees per 1,000 square feet applied to the proposed (144,000 square feet) office uses. Therefore, Alternative 4 would produce 124 new residents and 455 new net employees.*

such as security fencing, lighting, and locked entry to secure the Project site during construction, thereby reducing demand for police services.

Construction activities under Alternative 4 could also potentially affect LAPD emergency response times and interfere with emergency access during the construction period through temporary lane closures, etc. However, similar to the Project, Alternative 4 would be required to implement a Construction Management Plan to ensure that adequate and safe access is available within and near the Project site during construction activities. Lastly, emergency vehicles have the ability to bypass traffic by using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, construction-related impacts to police protection services under Alternative 4 would be less than significant and greater than the less-than-significant impacts of the Project due to the increase in construction duration.

(b) Operation

As discussed above, Alternative 4 would generate a new residential population as well as a new visitor and employee population on the Project site that would contribute to an increased demand for police protection services. Specifically, based on the generation rates provided by the City of Los Angeles VMT Calculator Documentation, Alternative 4 would generate approximately 124 new residents and 455 net new employees, creating a total new service population of 579, which is less than the Project's service population of 670 net new employees.[14] Due to the introduction of residential uses, Alternative 4 would generate a greater overall demand on LAPD services when compared to the Project since LAPD evaluates demand on police protection services based on a resident to police officer ratio. Similar to the Project, Alternative 4 would implement project design features similar to the Project, which would help reduce the demand for police services. Moreover, drivers of police emergency vehicles have the ability to bypass traffic by using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Thus, as with the Project, Alternative 4 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. Therefore, impacts to police protection services during operation under Alternative 4 would be less than significant and greater than the less-than-significant impacts of the Project due to the new residential service population.

[14] *Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. The existing office uses to be removed produces 121 employees (30,260 square feet X 0.004 = 121). Based on the "Multi-Family Residential" rate of 2.25 persons per unit applied to the proposed 55 units and the "General Office" employee generation rate of 4 employees per 1,000 square feet applied to the proposed (144,000 square feet) office uses. Therefore, Alternative 4 would produce 124 new residents and 455 new net employees.*

k. Transportation

As previously described, the Alternative 4 would be developed within the same Project site as the Project. As such, the plans, policies, and programs applicable to the Project would also apply to Alternative 4. Like the Project, this alternative would ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment; prioritize safety and access for all individuals utilizing the site by complying with all ADA requirements as required by the LAMC; and include sidewalk and driveway design, vehicular parking, bicycle parking, etc., in accordance with LAMC requirements. Alternative 4 would support these transportation plans for the same reasons as the Project (e.g., would include similar roadway and sidewalk improvements, would comply with LAMC driveway and parking standards, etc.). Furthermore, Alternative 4 would implement similar project design features as the Project and would promote alternative modes of transportation and reduce VMT through the implementation of TDM measures. Therefore, like the Project, Alternative 4 would not conflict with a program, plan, ordinance, or policy addressing the circulation system. Therefore, impacts would be less than significant and similar to the less-than-significant impacts of the Project.

With respect to VMT, based on the population assumptions, Alternative 4 would generate an average daily household VMT of 6.1 per capita and an average daily work VMT of 12.7 per capita prior to mitigation, which would be below the average daily household VMT per capita significance threshold for the West Los Angeles APC of 7.4 and above the average daily work VMT per capita significance threshold for the West Los Angeles APC of 11.1. Similar to the Project, Alternative 4 would be required to implement a TDM program substantially similar to Mitigation Measure TR-MM-1, which would reduce the daily work VMT per employee. With implementation of Mitigation Measure TR-MM-1, the average work VMT per employee would be reduced to a less than significant level. Specifically, with implementation of Mitigation Measure TR-MM-1, Alternative 4 would result in a daily work VMT per employee of 10.5, which would be substantially similar to the daily work VMT per employee of 10.3 generated by the Project. Therefore, impacts with respect to VMT would be less-than-significant with mitigation and less than the less-than-significant with mitigation impacts of the Project.

Similar to the Project, this alternative would include implementation of additional left-turn lanes on the southbound approaches of the Westlawn Avenue/Jefferson Boulevard and Grosvenor Boulevard/Jefferson Boulevard intersections (Project Condition No. 28.a and 28.b). With incorporation of these previously approved improvements, Alternative 4's weekday A.M. and P.M. peak hour traffic volumes would not cause or substantially extend vehicle queuing at the study intersections analyzed and therefore would not cause any constraint on access. Additionally, this alternative would implement the same design feature as the Project, which would require the Jandy Place driveway be closed between

12:30 P.M. and 1:30 P.M. so as to enhance pedestrian safety during lunchtime hours. Therefore, Alternative 4 would not substantially increase hazards due to a geometric design feature or incompatible use, and impacts would be less than significant and similar to the less than significant Project impacts.

Similar to the Project, Alternative 4 would not interfere with emergency access. Alternative 4 would be required to implement a Construction Traffic Management Plan to ensure that adequate and safe access remains available within and near the Project site during construction activities. With regard to operation, Alternative 4 would have the same access plan as the Project. Specifically, as with the Project, Alternative 4 would include two different access points around the Project site. Similar to the Project, driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Therefore, similar to the Project, impacts would be less than significant. Lastly, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, Alternative 4 would result in less than significant emergency access impacts that would be similar to the less than significant impacts of the Project.

l. Tribal Cultural Resources

As previously discussed, Alternative 4 would eliminate the subterranean parking levels proposed under the Project, and would require less excavation (up to 8 feet in depth compared to the 22 feet needed for the Project). As discussed in Section IV.L, Tribal Cultural Resources, of this Draft EIR, no tribal cultural resources have been previously recorded at the Project site, nor did the consultations with the applicable California Native American Tribes conducted in accordance with AB 52 identify any tribal cultural resources on the Project site. Therefore, impacts to tribal cultural resources would be less than significant and similar to the less-than-significant impacts of the Project.

m. Utilities and Service Systems

(1) Water Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 4 would generate a short-term demand for water. Construction-related water use under Alternative 4 would be less due to the reduction in excavation activities compared to the Project. As evaluated in Section IV.M.1, Utilities and Service Systems—Water Infrastructure, of this Draft EIR, based on the temporary nature of construction activities, as well as the limited

construction phases requiring the use of water, Project construction water demand would be anticipated to be less than the operational water demand of the existing building. Further, because Alternative 4 would not result in construction activities that require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental impacts. Therefore, impacts on water infrastructure associated with short-term construction activities under Alternative 4 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Operation

Like the Project, Alternative 4 would result in an increase in long-term water demand. However, based on the proposed land uses, water demand under Alternative 4 would be less than the Project's estimated increase in water demand. As shown in Table V-3 on page V-92, based on rates provided by LASAN, Alternative 4 would result in a water demand of approximately 25,530 gpd, which would be less than the water demand of 40,388 gpd for the Project. It should be noted that this is a conservative calculation as it does not account for water conservation measures such as the mandatory indoor water reduction rates required by the City of Los Angeles Green Building Code.

Nevertheless, it is anticipated that the estimated water demand under Alternative 4 would similarly be met by the available water infrastructure in the vicinity of the Project site. However, as with the Project, Alternative 4 would implement Project Design Feature WAT-PDF-1 which would construct the necessary on site water infrastructure and off site connections to the LADWP water system pursuant to applicable City requirements to accommodate the new development. Thus, impacts to water infrastructure under Alternative 4 would be less than significant, and less than the less-than-significant impacts of the Project.

(2) Energy Infrastructure

(a) Construction

As previously noted, the energy consumed by Alternative 4 would be similar compared to the Project. Therefore, impacts on infrastructure capacity associated with short-term construction activities under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project due to the reduction in excavation activities.

Table V-3
Estimated Water Consumption Generation for Alternative 4

Land Use	Area	Generation Factor[a]	Total Water Demand/ Wastewater Generation (gpd)
Existing to be Removed			
Office	30,260 sf	120 gpd/1,000 sf	3,631
Subtotal			*3,631*
Proposed			
Residential	55,500 sf (55 du)	150 gpd/du	8,250
Office	144,000 sf	120 gpd/1,000 sf	17,280
Subtotal			*25,530*
Total Net Water Demand/ Wastewater Generation			**21,899**

gpd = gallons per day

sf = square feet

du = dwelling unit

[a] *Sewage generation calculations are based on generation factors provided by City of Los Angeles Bureau of Sanitation (LASAN).*

Source: Eyestone Environmental, 2022.

(b) Operation

As with the Project, operation of Alternative 4 would generate an increased consumption of electricity and natural gas relative to existing conditions. While Alternative 4 would develop the same total floor area as the Project, the types of uses would differ as Alternative 4 would develop residential uses instead of commercial office and retail uses. Residential uses typically require less electricity compared to office uses but require more natural gas consumption than office uses.[15] Therefore, it is assumed that the total energy consumption of Alternative 4 would be generally similar to the total energy consumption of the Project. As such, Alternative 4's electricity demand would be served by existing facilities in the vicinity of the Project site. Therefore, impacts to infrastructure capacity under Alternative 4 would be less than significant, and similar to the less-than-significant impacts of the Project.

[15] *CalEEMod Users Guide. Appendix D: Default Data Tables. Table 8.1 Energy Use by Climate Zone and Land Use Type.*

3. Comparison of Impacts

Alternative 4 would not avoid the Project's significant and unavoidable noise and vibration impacts (human annoyance). Similar to the Project, no significant and unavoidable cumulative impacts would occur. Alternative 4 would reduce several of the less than significant and less than significant with mitigation impacts associated with the Project (i.e., visual character during operation, construction related toxic air contaminants, operational air quality and GHG emissions, cultural resources, paleontological resources, VMT, energy efficiency during operation, operational vibration, tribal cultural resources, and water infrastructure). However, Alternative 4 would result in greater impacts associated with land use, operational outdoor noise, and public services during operation compared to the Project; however, these impacts would remain less than significant. All other impacts would be similar to those of the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 4 would provide a total of 199,500 square feet of floor area, including 144,000 square feet of office use on three levels and 55,500 square feet (55 units) of residential use on one level. Alternative 4 would add a residential component, eliminate the 3,400 square feet of ground floor commercial space proposed under the Project, and would reduce the office uses proposed by the Project. Therefore, Alternative 4 would not meet the underlying purpose of the Project, which is to redevelop the infill Project site with an integrated office campus that would generate new economic opportunities and supporting growing industries located within the Palms–Mar Vista–Del Rey community.

Alternative 4 also would not meet the following Project objectives to the same extent as the Project owing to the reduced amount of office space, the introduction of a residential element, and the elimination of ground floor commercial space proposed under the Project.

- Support the Community Plan's Goal 2 to build a strong and competitive commercial sector which promotes economic vitality and serves the needs of the community through the redevelopment and replacement of an older industrial building with a modern commercial building that will respond to the evolving needs of a growing creative office commercial sector;
- Provide significant employment opportunities in office, research, and creative development uses, which will benefit the community, city, and region;
- Enhance the appearance of the immediate area by providing architecturally interesting and varied design; and

- Offer flexible combinations of spaces to accommodate a variety of different tenants.

Alternative 4 would not meet the following Project objectives owing to the elimination of ground floor commercial space proposed under the Project and the addition of the residential component, a potentially incompatible use.

- Create an interactive creative office campus with open space, shared amenities and landscaping while retaining an existing office building on site;

- Promote the Community Plan's Objective 2-1 to provide opportunities for new commercial development and services within existing commercial areas through the development of a commercial project that would strengthen the economic vitality of the area without introducing incompatible uses;

- Activate the property and the neighborhood by providing retail components, including a café, attractive street-level landscaping, bicycle parking, public gathering spaces, and pedestrian amenities.

V. Alternatives

E. Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that the No Project 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 includes: Alternative 1, the No Project Alternative; Alternative 2, the Same FAR/Reduced Height Alternative; Alternative 3, the Reduced Density Alternative; and Alternative 4, the Mixed-Use Office and Housing Alternative. Table V-2 on page V-10 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.

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project Alternative would avoid all of the Project's significant environmental impacts, including the Project's significant and unavoidable impacts related to on- and off-site construction noise and vibration (human annoyance). Alternative 1 would also avoid the Project's remaining less than significant and less than significant with mitigation impacts as no changes to the existing conditions would occur.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative 3, the Reduced Density Alternative, would be the Environmentally Superior Alternative. As discussed above, Alternative 3 would provide a total of 127,655 square feet of new floor area, including 125,155 square feet of office and 2,500 square feet of ground floor commercial (retail) uses. Although Alternative 3 would not eliminate the Project's significant and unavoidable noise and vibration impacts and would result in greater transportation impacts compared to the Project, this alternative would reduce several of the less than significant and less than significant with mitigation impacts associated with the Project (i.e., visual character during operation, light and glare during operation, construction related toxic air contaminants, operational air quality and

GHG emissions, energy efficiency, operational noise and vibration, public services during operation, and utilities). All other impacts would be similar to those of the Project. Thus, of the range of alternatives analyzed, Alternative 3, the Reduced Development Intensity Alternative, would be the Environmentally Superior Alternative.

While Alternative 3 would be the Environmentally Superior Alternative, it is noted that with the reduction in uses, this alternative would only partially meet the underlying purpose of the Project and the associated Project objectives.