

I. Executive Summary

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In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this section of this Draft Environmental Impact Report (EIR) contains a brief summary of the proposed New Beatrice West Project (Project) and its potential environmental effects. More detailed information regarding the Project and its potential environmental effects is provided in the following sections of this Draft EIR. Also included in this section is an overview of the purpose and focus of this Draft EIR, a description of the organization of this Draft EIR, a general description of the Project, a general description of areas of controversy, a description of the public review process for this Draft EIR, a list of the project design features and mitigation measures to be implemented as part of the Project, and a summary of the alternatives to the Project evaluated in this Draft EIR including identification of the Environmentally Superior Alternative.

1. Purpose of this Draft EIR

The Project was previously considered and approved by the City under Case No. CPC-2016-1208-CU-SPR, which was approved by the City Planning Commission on August 18, 2017, and Case No. AA-2017-397-PMEX, which was approved by the Advisory Agency on June 7, 2018. To comply with CEQA, the City prepared and adopted a mitigated negative declaration (Case No. ENV-2016-1209-MND). Two appeals were filed and heard by the City. The appeal of Case No. CPC-2016-1208-CU-SPR was denied by the City Council on February 7, 2018; and the appeal of Case No. AA-2017-397-PMEX was denied by the City Planning Commission on November 19, 2018. Subsequently, two petitions for writ of mandate were filed and consolidated challenging the City's approvals of the Project, on the grounds, among others, that the City's mitigated negative declaration was inadequate under CEQA (*Karney Management v. City of Los Angeles*, Case No. BS172677 [Consolidated with Case No. 18STCP03226]). The Honorable John A. Torribio of the Los Angeles County Superior Court ruled that the mitigated negative declaration was inadequate as to aesthetics, noise, and traffic. On January 21, 2020, the court entered a judgment granting the petition for writ of mandate as to the CEQA cause of action, and denying the remainder of the causes of action. The judgment vacates the City's approval of the mitigated negative declaration and requires that an environmental impact report (EIR) be prepared for the Project. However, the judgment does not invalidate the underlying approvals (i.e., CPC-2016-1208-CU-SPR and AA-2017-397-PMEX) which remain valid.

This EIR is being prepared pursuant to the judgment in *Karney Management v. City of Los Angeles*, Case No. BS172677 (Consolidated with Case No. 18STCP03226). For purposes of this EIR, the Project is analyzed in the context existing prior to the adoption of any Project approvals or entitlements by the City. Thus, all impacts of the Project's discretionary approvals will be considered.

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

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

2. Draft EIR Focus and Effects Found Not to Be Significant

In accordance with Section 15128 of the CEQA Guidelines, an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the Draft EIR. An Initial Study was prepared for the Project and a Notice of Preparation (NOP) was distributed for public comment to the State Clearinghouse, Governor's Office of Planning and Research, responsible agencies, owners and occupants within a 500-foot radius of the Project Site, and other interested parties on December 8, 2020, for a 30-day review period. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City determined through the Initial Study the potential for significant impacts and thus, the need for further analysis of the following environmental issue areas:

- Aesthetics
- Air Quality
- Cultural Resources (Archaeological Resources)

- Energy
- Geology and Soils (Paleontological Resources)
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning
- Noise
- Public Services (Fire Protection and Police Protection)
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems (Water Infrastructure and Energy Infrastructure)

The City determined through the Initial Study that the Project would not have the potential to cause significant impacts related to: aesthetics (scenic resources); agriculture and forestry resources; air quality (odors); biological resources; hydrology and water quality; land use and planning (division of an established community); mineral resources; noise (airport or airstrip-related noise); population and housing; public services (schools, parks, and libraries); recreation; utilities and service systems (water supply, stormwater drainage facilities, wastewater infrastructure, and solid waste); and wildfire. Therefore, these areas were not analyzed further in this Draft EIR. The Initial Study demonstrating that no significant impacts would occur for these issue areas is included in Appendix A of this Draft EIR.

3. Draft EIR Organization

This Draft EIR is comprised of the following sections:

- I. Executive Summary.** This section describes the purpose of this Draft EIR, Draft EIR focus and effects found not to be significant, Draft EIR organization, Project summary, areas of controversy and issues to be resolved, public review process, a summary of environmental impacts and mitigation measures, and a summary of alternatives.
- II. Project Description.** This section describes the Project location, existing conditions, Project objectives, and characteristics of the Project.

- III. Environmental Setting.** This section contains a description of the existing physical and built environment and a list of related projects anticipated to be built in the vicinity of the Project Site.
- IV. Environmental Impact Analysis.** This section contains the environmental setting, Project and cumulative impact analyses, project design features, mitigation measures (where necessary), and conclusions regarding the level of significance after mitigation for each of the following environmental issues: aesthetics; air quality; cultural resources (archaeological resources; energy; geology and soils (paleontological resources); greenhouse gas emissions; hazards and hazardous materials; land use and planning; noise; public services (fire protection and police protection); transportation; tribal cultural resources; and utilities and service systems (water infrastructure, energy infrastructure).
- V. Alternatives.** This section provides an analysis of a reasonable range of alternatives to the Project including: No Project Alternative; Same FAR/Reduced Height Alternative; Reduced Development Intensity Alternative; and Office and Housing Alternative.
- VI. Other CEQA Considerations.** This section provides a discussion of significant unavoidable impacts that would result from the Project and the reasons why the Project is being proposed notwithstanding the significant unavoidable impacts. An analysis of the significant irreversible changes in the environment and potential secondary effects that would result from the Project is also presented here. This section also analyzes potential growth-inducing impacts of the Project and potential secondary effects caused by the implementation of the mitigation measures for the Project. Lastly, a summary of the possible effects of the Project that were determined not to be significant within the Initial Study is provided.
- VII. References.** This section lists the references and sources used in the preparation of this Draft EIR.
- VIII. Acronyms and Abbreviations.** This section provides a list of acronyms and abbreviations used in this Draft EIR.
- IX. List of Preparers.** This section lists the persons, public agencies, and organizations that were consulted or contributed to the preparation of this Draft EIR.

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

- Appendix A Initial Study, NOP, and NOP Comment Letters
 - Appendix A.1 Initial Study
 - Appendix A.2 Notice of Preparation
 - Appendix A.3 NOP Comment Letters and Scoping Meeting Comments
- Appendix B Tree Report
- Appendix C Air Quality and Greenhouse Gas Emissions
 - Appendix C.1 Air Quality and Greenhouse Gas Emissions Methodology
 - Appendix C.2 Air Quality Worksheet and Modeling Output Files
 - Appendix C.3 Greenhouse Gas Worksheets and Modeling Output Files
 - Appendix C.4 Air Quality Modeling Output Files for Alternatives
- Appendix D South Central Coastal Information Center Records Search
- Appendix E Energy Resources Calculations
- Appendix F Natural History Museum of Los Angeles County Paleontological Records Search
- Appendix G Hazards
 - Appendix G.1 Phase I Environmental Site Assessment
 - Appendix G.2 Methane Survey Report
- Appendix H Land Use Tables
- Appendix I Noise Calculation Worksheets
- Appendix J Public Service Provider Response Letters
 - Appendix J.1 Los Angeles Fire Department Letter
 - Appendix J.2 Los Angeles Police Department Letter
- Appendix K Transportation
 - Appendix K.1 Transportation Assessment
 - Appendix K.2 Transportation Analysis Addendum (September 30, 2022)

- Appendix K.3 Transportation Analysis Addendum (July 17, 2023)
- Appendix K.4 Alternatives VMT Summaries
- Appendix L Tribal Cultural Resources
 - Appendix L.1 Tribal Cultural Resources Report
 - Appendix L.2 AB 52 Notification Letters
- Appendix M Utility Infrastructure Technical Report

4. Existing Project Site Conditions

The Project site consists of property located at 12531–12553 W. Beatrice Street, 12565–12575 W. Beatrice Street, and 5410-5454 S. Jandy Place within the Palms–Mar Vista–Del Rey Community Plan area of the City of Los Angeles. The Project site is located within a generally commercial office and industrial area and is bounded by office uses and surface parking immediately to the north, with State Route 90 (SR 90) located further north; office and surface and structure parking immediately to the east with Grosvenor Boulevard located further east; Beatrice Street to the south; and Jandy Place to the west. Across Beatrice Street to the south is a five-story apartment building; across Jandy Place to the west are converted warehouse structures used for office uses and surface parking. Further to the south of the Project site is Jefferson Boulevard, and across Jefferson Boulevard is the large mixed use office, retail and residential community of Playa Vista.

The Project site is currently developed with a one-story (20-foot-tall), 23,072-square-foot office building and two single-story accessory buildings comprised of 5,044 square feet and 2,144 square feet at 12575 W. Beatrice Street, and a two-story (26-foot-tall), 87,881-square-foot office building at 12541 W. Beatrice Street as well as surface parking. Vehicular and pedestrian access to the Project site is provided along W. Beatrice Street and along Jandy Place, with one driveway on Jandy Place and four driveways on Beatrice Street. The Project site contains limited to sparse landscaping in the form of non-native/non-protected trees,¹ hedges, and shrubs.

The Project site is located within the Palms–Mar Vista–Del Rey Community Plan area of the City and has a Light Industrial land use designation. The Project site is zoned

¹ *The City of Los Angeles Protected Tree Regulations apply to Oak, Southern California Black Walnut, Western Sycamore, and California Bay tree species that are native to Southern California, and excludes trees grown by a nursery or trees planted or grown as part of a tree planting program. In addition, protected status was expanded to include two species of native shrubs that include Mexican Elderberry and Toyon and excludes shrubs grown or held for sale by a licensed nursery.*

M2-1 (Light Industrial, Height District 1), which also permits M1 or MR2 uses; airport or aircraft landing field; automobile dismantling yard; cemetery; circus quarters; morgue; riding academy or stable; rifle range; curing, composting, and mulching facilities; and cargo container storage yard. Height District 1 within the M2 Zone has no height limit but restricts the maximum Floor Area Ratio (FAR) to 1.5 to 1.

5. Description of the Proposed Project

The Project includes the construction of a new eight-story office building with a total floor area of 199,500 square feet comprised of 196,100 square feet of office space and 3,400 square feet of ground floor commercial space. The height of the proposed eight-story office building would be approximately 135 feet to the top of the roof and 155 feet to the top of the elevator tower. A mechanical penthouse component could extend approximately 20 feet above the roof or parapet height.

As part of the Project, the existing structures at 12575 W. Beatrice Street would be removed while the existing office building at 12541 W. Beatrice Street would be retained. Additionally, the existing property lot lines would be adjusted to accommodate a corner landscaped parcel, a building site for the construction of the proposed new building (at 12575 W. Beatrice Street), and a parcel for the existing building (at 12541 W. Beatrice Street). When the lot line adjustment is complete, the lot at 12575 W. Beatrice Street would contain approximately 103,281 square feet (2.37 acres) and the lot at 12541 W. Beatrice Street would contain approximately 93,182 square feet (2.14 acres). An approximately 389-square-foot lot would also be created at the corner of Jandy Place and Beatrice Street for landscaping and open space purposes.

The Project would provide 811 parking spaces, fulfilling the requirements of the Los Angeles Municipal Code (LAMC). The majority of the parking spaces (791 spaces) would be provided in five levels of structured parking, including three levels above grade and two subterranean levels, with the remaining spaces (20 spaces) provided in a surface parking area. The Project would include landscaped courtyards and walkways to connect and integrate the proposed building with the office building to remain to create an integrated creative office campus. The Project would provide approximately 31,233 square feet of landscaping throughout the Project site.

6. Areas of Controversy

Based on the NOP comment letters provided in Appendix A of this Draft EIR, issues known to be of concern included, but were not limited to, Project impacts associated with aesthetics, air quality, traffic, and utilities. In addition, agencies such as Caltrans, the South Coast Air Quality Management District (SCAQMD), and the Native American

Heritage Commission submitted NOP comment letters that provided input for evaluating the impacts of the Project. Refer to Appendix A of this Draft EIR for copies of the NOP comment letters received during the NOP comment period.

7. Public Review Process

The City prepared an Initial Study and circulated an NOP for public comment to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties on December 8, 2020, for a 30-day review period. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR.

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

8. Summary of Environmental Impacts

Table I-1 on page I-9 summarizes the environmental impacts of the Project evaluated in this Draft EIR. Based on the analysis in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant and unavoidable environmental impacts relative to: on-site and off-site construction noise and on-site and off-site construction vibration impacts related to human annoyance.

**Table I-1
Summary of Impacts Under the Project**

Environmental Topic	Project Impact Determination
A. AESTHETICS	
<i>Scenic Vistas</i>	Less Than Significant
<i>Conflict with Applicable Regulations Governing Scenic Quality</i>	Less Than Significant
<i>Visual Character</i>	Less Than Significant
<i>Light/Glare</i>	Less Than Significant
B. AIR QUALITY	
<i>Regional Emissions</i>	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<i>Localized Emissions</i>	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<i>Toxic Air Contaminants</i>	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
C. Cultural Resources	
<i>Archaeological Resources</i>	Less Than Significant with Mitigation
D. ENERGY	
<i>Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources</i>	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<i>Conflict with Plans for Renewable Energy or Energy Efficiency</i>	Less Than Significant
E. Geology and Soils	
<i>Paleontological Resource</i>	Less Than Significant with Mitigation
<i>Unique Geologic Features</i>	Less Than Significant
F. GREENHOUSE GAS EMISSIONS	
<i>GHG Emissions</i>	Less Than Significant
G. Hazards and Hazardous Materials	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
H. LAND USE AND PLANNING	
<i>Conflict with Land Use Plans</i>	Less Than Significant
I. NOISE	
<i>Construction</i>	
<i>On-Site Noise</i>	Significant and Unavoidable
<i>Off-Site Noise</i>	Significant and Unavoidable

Table I-1 (Continued)
Summary of Impacts Under the Project

Environmental Topic	Project Impact Determination
<i>On-Site Vibration (Building Damage)</i>	Less Than Significant
<i>On-Site Vibration (Human Annoyance)</i>	Significant and Unavoidable
<i>Off-Site Vibration (Building Damage)</i>	Less Than Significant
<i>Off-Site Vibration (Human Annoyance)</i>	Significant and Unavoidable
<i>Operation</i>	
<i>On-Site Noise</i>	Less Than Significant
<i>Off-Site Noise</i>	Less Than Significant
J. PUBLIC SERVICES	
<i>Fire Protection</i>	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<i>Police Protection</i>	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
K. TRANSPORTATION	
<i>Conflict with Transportation Plans</i>	Less Than Significant
<i>Vehicle Miles Traveled</i>	Less Than Significant with Mitigation
<i>Hazardous Geometric Design Features</i>	Less Than Significant
<i>Emergency Access</i>	Less Than Significant
L. TRIBAL CULTURAL RESOURCES	
<i>Tribal Cultural Resources</i>	Less Than Significant
M. UTILITIES AND SERVICE SYSTEMS	
<i>Water Infrastructure</i>	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<i>Energy Infrastructure</i>	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<hr/> Source: <i>Eyestone Environmental, 2023.</i>	

9. Project Design Features

The following project design features would be implemented as part of the Project:

a. Aesthetics

Project Design Feature AES-PDF-1: Temporary construction fencing will be placed along the periphery of the Project site to screen construction activity from view at the street level.

Project Design Feature AES-PDF-2: The Project Applicant will ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public, and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of trash, graffiti, peeling postings and of uniform paint color or graphic treatment) throughout the construction period.

Project Design Feature AES-PDF-3: Outdoor lighting used during construction will be shielded and/or aimed such that the light source cannot be seen from adjacent properties, the public right-of-way, or from above. However, construction lighting shall not be so limited as to compromise the safety of construction workers.

Project Design Feature AES-PDF-4: New on-site utilities that may be required to serve the Project will be installed underground.

Project Design Feature AES-PDF-5: All new outdoor lighting required for the Project will be shielded and directed towards the interior of the Project site such that the light source does not project directly upon any adjacent property or the public right-of-way.

Project Design Feature AES-PDF-6: Glass used in building façades will be anti-reflective or treated with an anti-reflective coating in order to minimize glare (e.g., minimize the use of glass with mirror coatings). Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements will be permitted.

Project Design Feature AES-PDF-7: Above-grade parking will be fully integrated into the building design utilizing extensive glazing so that it is free of blank walls and open screening, to the satisfaction of the Director or Planning.

Project Design Feature AES-PDF-8: The applicant will plant clinging vines along the screening of the parking levels to create a green wall, to the satisfaction of the Director of Planning.

b. Air Quality

Project Design Feature AIR-PDF-1: Where power poles are available, electricity from power poles and/or solar powered generators rather than

temporary diesel or gasoline generators shall be used during construction.

c. Greenhouse Gas Emissions

Project Design Feature GHG-PDF-1: The design of the new buildings will incorporate features of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) program to be capable of meeting the standards of LEED Silver® or equivalent green building standards. These include energy conservation, water conservation, and waste reduction features to support and promote environmental sustainability, including, but not limited to, Energy Star appliances, plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) that comply with the performance requirements specified in the City of Los Angeles Green Building Code, weather-based irrigation system, and water-efficient landscaping.

d. Noise

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

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

e. Public Services—Police Protection

Project Design Feature POL-PDF-1: During construction, the Applicant will implement temporary security measures, including security fencing, lighting, locked entry, and regular security patrols during non-construction hours.

Project Design Feature POL-PDF-2: The Project will include security measures for entry into the building and parking area, including a keycard system.

Project Design Feature POL-PDF-3: The Project will provide proper lighting of the building and walkways to provide for pedestrian orientation and clearly

identify a secure route between parking areas and points of entry into the building.

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

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

Project Design Feature POL-PDF-6: The Applicant will consult with LAPD regarding the incorporation of additional feasible crime prevention features into the building design and operation. Upon completion of construction of the Project and prior to the issuance of a certificate of occupancy, the Applicant will submit a diagram of the Project site to the LAPD's Pacific Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

f. Transportation

Project Design Feature TR-PDF-1: Prior to the start of construction, a Construction Traffic Management Plan will be prepared and submitted to LADOT for review and approval. The Construction Traffic Management Plan will include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. Furthermore, the Construction Traffic Management Plan and Worksite Traffic Control Plan will include, but not be limited to, the following measures:

- As parking lane and/or sidewalk closures are anticipated, the Worksite Traffic Control Plan, approved by the City of Los Angeles, will route vehicular traffic, bicyclists, and pedestrians around any such closures;
- Ensure that access will remain unobstructed for land uses in proximity to the Project site during construction;
- Parking for construction workers will be provided either on-site or at off-site, off-street locations. Parking shall be prohibited on streets in the vicinity of the Project site; and
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project site and neighboring businesses and residences.

Project Design Feature TR-PDF-2: In order to enhance safety for pedestrians on Jandy Place, during the 60-minute lunch time period between 12:30 P.M. and 1:30 P.M., Monday through Friday, the ingress and egress to

the Project site from Jandy Place will be closed, and the only available ingress and egress will be via Beatrice Street.

Within the Project's first year of 80-percent occupancy, the Project will submit an analysis of operations of the Jandy Place driveways to determine if any restrictions should be imposed during the A.M. peak and P.M. peak hours to ensure that project driveway operations do not cause a significant impact to traffic flow on Jandy Place at peak hours. This analysis may also review and recommend changes to the 60-minute lunch time Jandy Place driveway restrictions outlined above. The analysis will be submitted to LADOT for review. If deemed warranted by LADOT, the Project will implement additional driveway restrictions and/or make changes to the lunch time driveway restrictions.

g. Utilities and Service Systems—Water Infrastructure

Project Design Feature WAT-PDF-1: The Project will replace the existing 8-inch diameter water mains in Beatrice Street and Jandy Place and add fire hydrants in the area to increase fire flow protection based on either a 12,000 gpm fire flow or a 9,000 gpm fire flow as determined necessary by LADWP. The specific improvements based on either a 12,000 gpm fire flow or a 9,000 gpm fire flow are as follows:

- **12,000 gpm fire flow:** Approximately 865 linear feet of 16-inch diameter ductile iron pipe, 600 linear feet of 12-inch ductile iron pipe and 4 new fire hydrants would be installed (8 total fire hydrants, including existing, with a flow of 1,500 gpm per hydrant). The new 16-inch pipe will extend in Beatrice Street from Jandy Place to Grosvenor Boulevard. The new 12-inch pipe will be constructed in Jandy Place from the cul-de-sac end to Beatrice Street, and extend westerly on Beatrice Street approximately 200 linear feet, replacing the existing 8-inch water main in those streets.
- **9,000 gpm fire flow:** Approximately 550 linear feet of 16-inch diameter ductile iron pipe, 325 linear feet of 12-inch ductile iron pipe and 2 new fire hydrants would be installed (8 total fire hydrants, including existing, with a flow of 1,500 gpm per hydrant). The new 16-inch pipe will extend in Beatrice Street from Westlawn Avenue to Grosvenor Boulevard, replacing the existing 8-inch water main. The new 12-inch pipe will be constructed in Beatrice Street from Jandy Place to Westlawn Avenue, replacing the existing 8-inch water main.

10. Mitigation Measures

The following mitigation measures would be implemented as part of the Project:

a. Cultural Resources (Archaeological Resources)

Mitigation Measure CUL-MM-1: A qualified archaeologist shall be retained by the Applicant to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the archaeologist and shall depend on the rate of excavation and grading activities and the materials being excavated. If paleontological materials are encountered, the archaeologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The archaeologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum and the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist.

b. Geology and Soils (Paleontological Resources)

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

c. Noise

Mitigation Measure NOI-MM-1: Temporary and impermeable sound barriers shall be erected at the locations listed below. At plan check, building plans

shall include documentation prepared by a noise consultant verifying compliance with this measure.

- Along the southern property line of the Project site between the construction areas and receptor locations R1 and R3. The temporary sound barrier shall be designed to provide a minimum 15-dBA noise reduction at the ground level of receptor locations R1 and 5-dBA at receptor location R3.
- Along the western property line of the Project site between the construction areas and the receptor location R5. The temporary sound barrier shall be designed to provide a minimum 15-dBA noise reduction at the ground level of receptor location R5.

d. Transportation

Mitigation Measure TR-MM-1: The Project shall prepare a TDM Plan. The City of Los Angeles requires that the TDM plan be prepared during construction, with the final TDM plan approved by LADOT prior to the City's issuance of the certificate of occupancy for the Project. Implementation of the TDM plan occurs after building occupancy.

The following TDM elements shall be included in the Project:

- Price Workplace Parking—implement workplace parking pricing for employees as specified in the Transportation Assessment.
- Voluntary Travel Behavior Change Program—assign a staff person who will serve as the transportation management coordinator for purposes of developing a transportation program and informing Project employees of available travel options.
- Bike parking per LAMC, including short-term and long-term parking facilities, to support safe and comfortable bicycle travel.
- Include secure bike parking, with its own access point, and bike facilities, such as showers and a repair station, to support safe and comfortable bicycle travel by providing end-of-trip amenities.
- Pedestrian Network Improvements—provide pedestrian access points directly to sidewalks on the adjacent streets, including Jandy Place and Beatrice Street.
- Transit Subsidies—provide a daily transit subsidy as specified in the Transportation Assessment for every employee who requests the transit subsidy, presents evidence of use of transit, and does not request on-site parking.

11. Summary of Alternatives

This Draft EIR examined four alternatives to the Project, including the No Project Alternative, the Same FAR/Reduced Height Alternative, the Reduced Development Intensity Alternative, and the Office and Housing Alternative. A general description of these alternatives is provided below. Refer to Section V, Alternatives, of this Draft EIR for a more detailed description of these alternatives, a comparative analysis of the impacts of these alternatives with those of the Project, and a description of the alternatives considered but rejected as infeasible.

a. Alternative 1: No Project 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, 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. 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.

Alternative 1 would avoid the Project’s significant 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.

b. Alternative 2: Same FAR/Reduced Height 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 eight feet.

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.

c. Alternative 3: Reduced Development Intensity 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 eight feet.

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.

d. Alternative 4: Mixed Use Office and Housing 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 eight feet.

Alternative 4 would not avoid the Project's significant and unavoidable construction-related 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; nonetheless, these impacts would remain less than significant. All other impacts would be similar to those of the Project.

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 Office and Housing Alternative. 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.