

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/No Build Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives considered.

2. Overview of Selected Alternatives

As set forth in Section II, Project Description, of this Draft EIR, The 1000 Seward Project (Project) would include the development of a ten-story mixed-use office building on a 34,152 square-foot (0.78-acre) site located at 1000 and 1006 Seward Street; 1003, 1007, and 1013 Hudson Avenue; and 6565 Romaine Street (Project Site) in the Hollywood Community Plan Area of the City of Los Angeles (City). The Project would include the development of new office, restaurant, and retail uses totaling 150,600 square feet with a floor area ratio (FAR) of 4.4:1. Specifically, the Project would develop 136,200 square feet of office uses, 12,200 square feet of restaurant uses (of which 6,100 square feet may be used for an entertainment use), and 2,200 square feet of retail uses. The proposed uses would be located within a single ten-story building (with an additional rooftop level for mechanical equipment and a tenant terrace) with a maximum height of 133 feet to the top of the highest occupiable level and a maximum height of 155 feet to the top of the mechanical equipment level. In accordance with the Los Angeles Municipal Code (LAMC), the Project would provide 310 vehicular parking spaces and 58 bicycle parking spaces (36 long-term and 22 short-term) within four subterranean parking levels, one at-grade level, and three fully-enclosed and mechanically ventilated above grade parking levels. In addition, although not required, the Project would provide approximately 34,550 square feet of open space, including but not limited to a ground floor plaza; large, planted terraces; and a rooftop restaurant/entertainment terrace. The existing on-site uses, including 8,442 square feet of media/production space, 2,551 square feet of restaurant space, and a surface parking lot, would be demolished to accommodate the Project. Project approval is anticipated in 2022, with construction to begin thereafter, with completion by 2025. Requested entitlements include a General Plan Amendment, Vesting Zone Change, Height District Change, and Site Plan Review.

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 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 impacts that cannot be feasibly mitigated with respect to on- and off-site construction noise; on-site construction vibration (building damage and human annoyance); and off-site construction vibration (human annoyance). Furthermore, as evaluated in Section IV, Environmental Impact Analysis, the Project would also result in significant and unavoidable impacts related to cumulative off-site construction vibration (human annoyance).

Based on the significant environmental impacts of the Project, the basic objectives established for the Project (refer to Section II, Project Description, of this Draft EIR), and the feasibility of the alternatives considered, the alternatives to the Project listed below were selected for evaluation.

- Alternative 1: No Project/No Build Alternative—Alternative 1 assumes that the Project would not be implemented, 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 remain as they are today.
- Alternative 2: Hollywood Community Plan Update Compliant Alternative—Alternative 2 considers development of the Project Site in accordance with its existing Community Plan land use designation.
- Alternative 3: Zoning Compliant Alternative Use Alternative—Alternative 3 considers the development of the Project Site with an alternative set of land uses in accordance with its existing zoning.

Table V-1 on page V-4 provides a comparison of the Project with the three alternatives being considered. Each of these alternatives is described in the sections that follow. In addition, CEQA Guidelines Section 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible. Such potential alternatives are described below.

**Table V-1
Summary of Development Proposed under Alternatives to the Project^a**

Development Factor	Project	Alternative 1: No Project/No Build^e	Alternative 2: Hollywood Community Plan Update Compliant Alternative	Alternative 3: Existing Zoning Compliant Alternative Use Alternative
Office	136,200 sf	—	92,200 sf	—
Restaurant ^b	12,200 sf	—	8,700 sf	—
Retail	2,200 sf	—	1,550 sf	—
Media Production	—	—	—	51,225 sf
Total New Floor Area	150,600 sf	—	102,450 sf	51,225 sf
Existing Floor Area to be Removed	(10,993) sf^e	—	(10,993) sf^e	(10,993) sf^e
Net Floor Area	139,607 sf	—	91,457 sf	40,232 sf
Project Site Area	0.78 ac	0.78 ac	0.78 ac	0.78 ac
Floor Area Ratio (FAR) ^a	4.4:1	—	3:1	1.5:1
Vehicle Parking	310 sp	—	210	105
Bicycle Parking	58 sp	—	40	15
Open Space	34,550 sf ^d	—	23,494 sf	0 sf
Bldg. Height ^c	155 ft	—	105 ft	30 ft
Above Grade Parking	3 levels	—	3 levels	3 levels
At-Grade Parking	1 level	—	1 level	1 level
Subterranean Parking Levels	4 levels	—	3 levels	2 levels
Maximum Depth of Excavation	45 ft	—	34 ft	23 ft
<hr/> <p><i>ac = acres</i> <i>ft = feet</i> <i>sf = square feet</i> <i>sp = spaces</i></p> <p>^a <i>Square footage is calculated pursuant to the LAMC definition of floor area for the purpose of calculating FAR. In accordance with LAMC Section 12.03, floor area is defined as “[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas.”</i></p> <p>^b <i>6,100 square feet may be used for entertainment uses.</i></p> <p>^c <i>Height to top of rooftop mechanical equipment level.</i></p> <p>^d <i>Would include a 500 sf publicly accessible ground floor plaza.</i></p> <p>^e <i>The existing on-site uses include 8,442 sf of media/production space, 2,551 sf of restaurant space, and a surface parking lot.</i></p> <p><i>Source: Eyestone Environmental, 2022.</i></p>				

3. Alternatives Considered and Rejected as Infeasible

As set forth in CEQA Guidelines Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate an alternative from detailed consideration are the alternative's failure to meet most of the Project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives to the Project that have been considered and rejected include the following:

Alternatives to Eliminate Significant Noise and Vibration Impacts During Construction: An Alternative designed to eliminate the significant construction noise and vibration impacts was considered and rejected since development on the Project Site would not be feasible without demolishing the existing buildings and parking lot. Demolition of these buildings results in a significant and unavoidable noise impacts at the R1 and R2 sensitive receptors.¹ Additionally, impacts at the R1 receptor site would be significant and unavoidable during all phases of construction. Lastly, an alternative that would eliminate the significant noise and vibration impacts of the Project is already evaluated in this section as Alternative 1, No Project/No Build. The discussion below provides further detail on why a build alternative to eliminate significant noise and vibration impacts during construction is infeasible.

As discussed in Section IV.F, Noise, of this Draft EIR, the Project would result in short-term significant unavoidable on-site construction noise (Project-level), off-site construction noise (Project-level), on- and off-site construction vibration pursuant to the threshold for human annoyance (Project-level), on-site construction vibration pursuant to the threshold for building damage (Project-level), and off-site construction vibration pursuant to the threshold for human annoyance (cumulative). The following approaches were considered to substantially reduce or avoid these impacts:

- Approach (a)—Above-grade Parking: An approach where all parking is provided above rather than below grade, thus avoiding much of the excavation and hauling activity required under the Project was reviewed and rejected as infeasible for the following reasons:
 - Although the on-site construction activities would be reduced during site grading due to less excavation, the on-site construction noise levels would be

¹ See Figure IV.F-1 in Section IV.F, Noise, of this Draft EIR for the noise monitoring locations which are also the noise sensitive land uses.

similar to the Project, as the number of and type of construction mix would be similar on a peak day, which is used for the evaluation of impacts. As such, noise impacts from on-site construction activities would be significant, similar to the Project.

- Off-site construction noise levels are dependent on truck volumes, i.e., a reduction of 50 percent in truck volume, would reduce the noise level by 3 dBA (just perceptible). This above-grade parking approach would reduce the total number of haul truck trips due to a lower amount of excavation required. However, grading would still be required and the hauling activities on a peak day would likely be similar to the Project. In order to reduce noise by 3 dBA on a peak hauling day, the number of daily haul truck trips would need to be reduced by 50 percent, which could not be done without extending the duration of construction (discussed further in Approach (b) below).
- Construction equipment utilized under this approach would be similar to the Project (e.g., drill rig and large bulldozer), which would generate similar vibration levels. Therefore, on-site construction vibration impacts (human annoyance) would be significant and similar to the Project, as the vibration impact analysis is based on the peak vibration level generated by individual construction equipment. In addition, off-site construction vibration impacts (human annoyance), due to heavy trucks traveling by sensitive receptors, would also continue to be significant.
- Approach (b)—Extended Construction Duration: An approach that extends the construction period, thus reducing the amount of daily construction activity that would occur under the Project was reviewed and rejected as infeasible for the following reasons:
 - Construction noise levels are dependent on the number of construction equipment (on-site equipment or off-site construction trucks). It is anticipated the number of on-site construction equipment and off-site construction trips would be reduced under this approach. Typically, a reduction of 50 percent in the number of construction equipment or construction traffic (haul and delivery trucks) trips would be required to reduce the construction-related noise levels by 3 dBA (just perceptible). To achieve sufficient reduction to avoid the significant off-site construction noise impacts would require an approximate 90-percent reduction in the number of construction equipment, which would not feasibly allow for construction of the Project. Due to the close proximity of the noise sensitive receptor location R1 (adjacent to the Project Site), even reducing the construction activity to a single piece of construction equipment (e.g., an excavator or a drill rig) would still exceed the significance threshold. The estimated noise levels from a single excavator or drill rig at receptor location R1 would be approximately 87.5 dBA, which would exceed the 5-dBA significance criteria. Therefore, the construction noise levels under this approach would be less than the Project (depending on the amount of reduction) but would still exceed the significance threshold.

In addition, this approach would be inefficient and would increase the number of days that sensitive receptors would be impacted by construction activities.

- The on-site construction vibration impacts (human annoyance) would be significant, similar to the Project, as the vibration impact analysis is based on the peak vibration level generated by individual construction equipment, and the approach would utilize similar construction equipment (e.g., drill rig and large bulldozer). In addition, because an alternative's haul route(s) would be the same as the Project's and vibration impacts are evaluated based on peak vibration levels generated by individual construction equipment (in this case, a haul truck), off-site construction vibration impacts (human annoyance), due to heavy trucks traveling by sensitive receptors, would also continue to be significant similar to the Project.
- Approach (c)—Central Location of Development: An approach where the proposed development is moved closer to the center of the Project Site, thus pulling back the proposed development and associated construction activities from the off-site sensitive receptors, was reviewed and rejected as infeasible 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 attenuate approximately 6 dBA per doubling of distance. The construction noise levels associated with the building phases for the proposed development placed closer to the center of the site would be lower than the Project. However, the noise level reduction, depending on the setback from the property line, would be limited due the size of the Project Site (approximately 150 feet by 275 feet). That is, moving the development to the center of the site (i.e., 75 feet set back from the property line) would only reduce the construction noise at the nearest receptor (receptor location R1) by approximately 13 dBA, which would still exceed the 5-dBA significance threshold. In addition, since the existing improvements are developed up to the property line, 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. As such, the on-site construction noise impacts under this approach would remain significant similar to the Project.
 - Because the haul routes would remain the same, the off-site construction vibration impacts (human annoyance), due to heavy trucks traveling by sensitive receptors, would be significant and similar to the Project.
- Approach (d)—Reduced Development: An approach that reduces the amount of development that would occur under the Project to the extent that the significant construction-related noise and vibration impacts of the Project would be avoided or substantially reduced was also considered and rejected as infeasible:

- As discussed above, construction noise levels can be reduced with a smaller number of on-site construction equipment pieces and with a buffer zone between the sensitive receptors and the construction equipment. However, due to the close proximity of the sensitive receptors (i.e., directly adjacent to the Project Site) and a constrained Project Site that does not have the space to create a meaningful buffer zone, it would not be possible to mitigate the on-site construction noise impacts of the Project, especially at the upper levels of the adjacent apartment buildings.
- The on-site construction vibration impacts (human annoyance) would be significant similar to the Project, as the vibration impact analysis is based on the peak vibration level generated by individual construction equipment pieces that would still be required near the perimeter of the Project Site. In addition, because the haul routes would remain the same for both the Project and any alternative, off-site construction vibration impacts (human annoyance), due to heavy trucks traveling by sensitive receptors, would be significant similar to the Project.

As indicated above, none of the above approaches would substantially reduce or avoid the significant construction-related noise and vibration (human annoyance) impacts of the Project. Furthermore: Approaches (a) through (d) would not achieve the Project's underlying purpose and objectives to the same extent as the Project²; Approach (b) would reduce the number of construction equipment to an impractical extent or would extend the construction period affecting sensitive receptors for a longer period of time, as such, making this approach infeasible; Approaches (a), (c), and (d) would be inconsistent with City land use objectives and requirements for the Project Site, and would meet the Project's underlying objective to a lesser extent than the Project. Therefore, an alternative that includes one or more of these approaches has been rejected from further consideration in this Draft EIR.

Alternative to Eliminate Less Than Significant Impact on Historical Resources After Mitigation: As indicated in Section IV.B, Cultural Resources, of this Draft EIR, due to the proximity of the new construction to the adjacent Seward Film Vaults which are a historic resource, including excavation for building foundations and four levels of subterranean parking, the Project would have the potential to impact the structural integrity of the vaults during construction. As further indicated therein, this historical resources impact would be reduced to a less than significant level with implementation of Mitigation Measure CUL-MM-1 requiring the implementation of a shoring plan during construction to reduce the possibility of settlement at the vaults due to the removal of adjacent soil. Other

² *The underlying purpose of the Project referred to here is to provide an infill commercial development for growing retail, hospitality, entertainment, and technology companies looking to locate businesses within the Hollywood community.*

than Alternative 1, No Project/No Build, which is already evaluated in this section, no alternative is available that would avoid this less than significant impact after mitigation because the only way to avoid the impact would be to avoid development of the Project Site. Hence, an alternative that would eliminate the post-mitigation less than significant impact of the Project on historical resources, other than Alternative 1, is infeasible.

Alternative Project Site: The Applicant owns the Project Site, and its location is conducive to the development of a mixed-use project. The Project Site is located in an area of Hollywood characterized by medium to high-density, as well as low- and high-rise commercial and multi-family structures. These uses make the Project Site particularly suitable for a mixed-use development for growing retail, hospitality, entertainment, and technology companies looking to locate businesses within the Hollywood community. The Project Site is also well-served by transit. Furthermore, the Applicant cannot reasonably acquire, control, or access an alternative site in a timely fashion that would result in implementation of a project with similar uses and square footage. Given its urban location, if an alternative site in the Hollywood area that could accommodate the Project could be found, it would be expected that the significant and unavoidable impacts associated with construction noise and on- and off site vibration due to construction would also occur. Additionally, considering the mixes of uses in the Hollywood area where sensitive uses may be located closer, development of the Project at an alternative site could potentially produce other environmental impacts that would otherwise not occur at the current Project Site and result in greater environmental impacts when compared with the Project. Therefore, an alternative site is not considered feasible as the Applicant does not own another suitable site that would achieve the underlying purpose and objectives of the Project, and an alternative site would not likely 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 (and as appropriate, the two development scenarios—the Hollywood Community Plan Update Compliant Alternative and the Zoning Compliant Alternative Use Alternative), as measured against the baseline (existing conditions). Furthermore, each alternative is evaluated to determine whether the Project's basic objectives, identified in Section II, Project

Description, of this Draft EIR, would be substantially attained by the alternative.³ The evaluation of each of the alternatives follows the process described below:

- a. The net environmental impacts of the alternative are determined for each environmental issue area analyzed in Section IV, Environmental Impact Analysis, of this Draft EIR assuming that the alternative would implement the same project design features and mitigation measures identified in Section IV, Environmental Impact Analysis, of this Draft EIR.
- b. Post-mitigation significant and non-significant environmental impacts of the alternative and the Project are compared for each environmental issue area as follows:
 - Less: Where the net impact of the alternative would be clearly less adverse or more beneficial than the impact of the Project, the comparative impact is said to be “less.”
 - Greater: Where the net impact of the alternative would clearly be more adverse or less beneficial than the Project, the comparative impact is said to be “greater.”
 - Similar: Where the impacts of the alternative and Project would be roughly equivalent, the comparative impact is said to be “similar.”
- c. The comparative analysis of the impacts is followed by a general discussion of whether the underlying purpose and Project objectives are feasibly and substantially attained by the alternative.

A summary matrix that compares the impacts associated with the Project with the impacts of each of the analyzed alternatives is provided in Table V-2 on page V-11.

As evaluated in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, the Project would not result in significant impacts related to: aesthetics; agriculture and forestry resources; air quality (odors); biological resources; cultural resources (archaeological resources); geology and soils; hazards and hazardous materials; hydrology and water quality; land use (physically divide an established community); mineral resources; noise (airport/aircraft noise); population and housing; public services (parks and schools); recreation; transportation (hazardous geometric design features and emergency access); utilities (wastewater, solid waste, and telecommunications infrastructure); and wildfire. Additionally, as evaluated in Section VI, Other CEQA Considerations of this Draft EIR, impacts related to libraries were determined to be less than significant. Therefore, no

³ *State of California, CEQA Guidelines Section 15126.6(c).*

**Table V-2
Comparison of Impacts Associated with the Alternatives**

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Hollywood Community Plan Update Compliant Alternative	Alternative 3: Existing Zoning Compliant Alternative Use Alternative
A. AIR QUALITY				
<i>Regional and Localized Emissions</i>				
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Toxic Air Contaminants</i>				
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
B. CULTURAL RESOURCES				
<i>Historical Resources</i>	Less Than Significant with Mitigation ^a	Less (No Impact)	Less (Less Than Significant with Mitigation ^a)	Less (Less Than Significant with Mitigation ^a)
C. ENERGY				
<i>Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources</i>				
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Conflict with Plans for Renewable Energy or Energy Efficiency</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Hollywood Community Plan Update Compliant Alternative	Alternative 3: Existing Zoning Compliant Alternative Use Alternative
D. GREENHOUSE GAS EMISSIONS				
<i>Greenhouse Gas Emissions</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
E. LAND USE AND PLANNING				
<i>Conflict with Land Use Plans</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
F. NOISE				
<i>Construction</i>				
<i>On-Site Noise</i>	Significant Unavoidable	Less (No Impact)	Less (Significant Unavoidable)	Less (Significant Unavoidable)
<i>Off-Site Noise</i>	Significant Unavoidable	Less (No Impact)	Less (Significant Unavoidable)	Less (Significant Unavoidable)
<i>On-Site Vibration (Building Damage)</i>	Significant Unavoidable	Less (No Impact)	Less (Significant Unavoidable)	Less (Significant Unavoidable)
<i>On-Site Vibration (Human Annoyance)</i>	Significant Unavoidable	Less (No Impact)	Less (Significant Unavoidable)	Less (Significant Unavoidable)
<i>Off-Site Vibration (Building Damage)</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Off-Site Vibration (Human Annoyance)</i>	Significant Unavoidable ^a	Less (No Impact)	Less (Significant Unavoidable ^a)	Less (Significant Unavoidable ^a)
<i>Operation</i>				
<i>On-Site Noise</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Off-Site Noise</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Hollywood Community Plan Update Compliant Alternative	Alternative 3: Existing Zoning Compliant Alternative Use Alternative
<i>Vibration</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
G. PUBLIC SERVICES				
<i>Fire Protection</i>				
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Police Protection</i>				
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
H. TRANSPORTATION				
<i>Conflict with Plans</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Vehicle Miles Traveled</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (No Impact)
I. TRIBAL CULTURAL RESOURCES				
<i>Tribal Cultural Resources</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Hollywood Community Plan Update Compliant Alternative	Alternative 3: Existing Zoning Compliant Alternative Use Alternative
J. UTILITIES AND SERVICE SYSTEMS				
<i>Water Supply and Infrastructure</i>				
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Energy Infrastructure</i>				
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
<hr/> <p>^a Both Project-level and cumulative impacts. Source: Eyestone Environmental, 2022.</p>				

further analysis of these topics in this EIR is required or provided and these topics are not considered with respect to any of the alternatives considered as similar analytic conclusions are anticipated.

V. Alternatives

A. Alternative 1: No Project/No Build

1. Description of the Alternative

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states in part that, “in certain instances, the No Project/No Build Alternative means ‘no build’ wherein the existing environmental setting is maintained.” Accordingly, for purposes of this analysis, Alternative 1, the No Project/No Build Alternative, assumes that 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 existing uses at the Project Site (i.e., 8,442 square feet of media/production space, 2,551 square feet of restaurant space, and a surface parking lot) would remain on the Project Site, and no new construction would occur.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

Alternative 1 would not alter 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 traffic, fugitive dust from demolition and excavation, or the use of heavy duty construction equipment. Therefore, no construction-related air quality impacts associated with regional and localized emissions would occur under Alternative 1. Impacts related to regional and localized air quality emissions would be less under Alternative 1 when compared to the less than significant impacts of the Project.

(b) Toxic Air Contaminants

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.

(2) Operation

(a) Regional and Localized Air Quality Impacts

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 on the Project Site. Therefore, no operational air quality impacts associated with regional and localized emissions would occur under Alternative 1, and such operational impacts associated with regional and localized emissions under Alternative 1 would be less when compared to the less than significant impacts of the Project.

(b) Toxic Air Contaminants

Alternative 1 would not result in new development or increase the intensity of the existing uses on the Project Site. Therefore, no new increase in mobile source emissions and their associated TACs 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.

b. Cultural Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, there are no historical resources on the Project Site. In addition, no demolition, grading, or other earthwork activities that could potentially affect adjacent or nearby historical resources would occur under Alternative 1 and Alternative 1 would not introduce new buildings or otherwise change the physical environment that could potentially indirectly affect the historical context of nearby historic resources. Therefore, impacts to historical resources would not occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts with mitigation of the Project.

c. 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. Thus, construction-related impacts to energy would not occur. As such, impacts under Alternative 1 would be less when compared to 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 and would have no potential to result in the wasteful, inefficient, or unnecessary consumption of energy resources. No impact would occur, which is less than the less than significant impacts of the Project. It is noted however that the Project would replace existing older buildings with modern buildings incorporating the latest Title 24 standards and City Green Building Code requirements, thereby improving the energy efficiency of buildings.

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

Alternative 1 would not involve any new development. 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.

d. Greenhouse Gas Emissions

Alternative 1 would not develop new uses on the Project Site. Therefore, no new greenhouse gas (GHG) emissions would occur under Alternative 1 and new impacts associated with GHG emissions would not occur. As such, impacts associated with GHG emissions under Alternative 1 would be less when compared to the less than significant impacts of the Project.

e. Land Use and Planning

Under Alternative 1, there would be no changes to the physical or operational characteristics of the existing Project Site. No impacts associated with conflicts with land use plans or regulations would occur, and impacts would be less when compared to the less than significant impacts of the Project.

f. 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-site or off-site noise impacts would occur under Alternative 1, and impacts would be less when compared to the significant unavoidable on- and off-site construction noise impacts of the Project.

(b) Operation

The Project Site is currently developed with two one-story buildings totaling 10,993 square feet, which include 8,442 square feet of media/production and 2,551 square feet of restaurant uses. 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, which are created from an increase in traffic, would be introduced to the Project Site or the vicinity of the Project Site. As such, no impacts associated with operational on-site 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- or off-site under this alternative. As such, no on-site or off-site construction vibration impacts would occur under Alternative 1, and impacts would be less when compared to those of the Project. Specifically, Alternative 1 would avoid the Project's significant unavoidable on-site construction vibration impacts (both building damage and human annoyance); less than significant off-site construction vibration impacts (building damage); and significant unavoidable off-site construction vibration impacts (human annoyance).

(b) Operation

The Project Site is currently developed with two one-story buildings totaling 10,993 square feet, which include 8,442 square feet of media/production and 2,551 square feet of restaurant uses. Alternative 1 would not develop new uses on the Project Site, and no changes to existing site operations would occur. Thus, no new on-site or off-site vibration sources would be introduced to the Project Site or the vicinity of the Project Site. As such, no impacts associated with operational on-site and off-site vibration would occur under Alternative 1, and impacts would be less when compared to the less than significant impacts of the Project.

g. Public Services**(1) Fire Protection***(a) Construction*

As Alternative 1 would not require construction, Alternative 1 would not have the potential to 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-site would occur under Alternative 1. Therefore, there would be no potential to increase the level of activity on the Project Site or increase the service population for the Los Angeles Fire Department (LAFD) stations that serve the Project Site. 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, Alternative 1 would not potentially increase the need for police protection services to 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 service population

on-site and associated level of activity 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.

h. Transportation

Since the No Project Alternative would not develop new or additional land uses on the Project Site, Alternative 1 would not generate any additional vehicle trips or alter existing access or circulation within or adjacent to the Project Site. Therefore, no impacts would occur with respect to conflicts with programs, plans, ordinances, or policies addressing the circulation system or vehicle miles traveled (VMT). Therefore, impacts under Alternative 1 would be less when compared to the less than significant impacts of the Project.

i. 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. As such, no impacts to tribal cultural resources would occur, and impacts would be less when compared to the less than significant impacts of the Project.

j. Utilities and Service Systems

(1) Water Supply and 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 supply and infrastructure would not occur. As such, impacts under Alternative 1 would be less when compared to 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 supply and water infrastructure would occur under Alternative 1, and impacts would be less when compared to 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. As such, impacts under Alternative 1 would be less when compared to 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 under Alternative 1, and impacts would be less when compared to the less than significant impacts of the Project.

3. Comparison of Impacts

Alternative 1 would eliminate all of the Project's significant unavoidable Project-level impacts, which include: on-site and off-site construction noise; on-site construction vibration (building damage); and on- and off-site construction vibration (human annoyance). Alternative 1 would also avoid all of the Project's significant unavoidable cumulative impact related to off-site construction vibration (human annoyance). Alternative 1 would also avoid most of the Project's less than significant and less than significant with mitigation impacts as no changes to the existing conditions would occur.

4. Relationship of the Alternative to Project Objectives

Under Alternative 1, the existing buildings and surface parking would remain on the Project Site, and no new development would occur. As such, Alternative 1 would not meet the underlying purpose of the Project which is to provide an infill commercial development for growing retail, hospitality, entertainment, and technology companies looking to locate businesses within the Hollywood community. Furthermore, Alternative 1 would not meet any of the Project's basic objectives, including:

- To support the Hollywood Community Plan's Objective 1 to further the development of Hollywood as a major center of population, employment, retail services, and entertainment and create a dynamic and economically viable

project with sufficient office square footage and density to facilitate a healthy job–housing balance in the Hollywood area.

- To support the Hollywood Community Plan’s Objective 4(a) to promote economic well-being and public convenience through allocating and distributing commercial lands for retail, service, and office facilities in quantities and patterns based on accepted planning principles and standards and activate the Hollywood area with commercial opportunities serving local employees, generate local tax revenue, and provide jobs for residents in support of local business.
- To create a pedestrian-friendly project by creating a street-level identity for the Project Site and improving the pedestrian experience through the introduction of retail and restaurant uses on the ground level.
- Provide a sustainable building design that allows for the use of energy-efficient technology, thereby reducing the overall reliance on energy for lighting and cooling.
- Promote local, regional, and State land use and mobility objectives and reduce vehicle miles traveled (VMT) through infill development and providing jobs in proximity to transit and transportation infrastructure to encourage pedestrian activity.
- Support the growth of the City’s economic base by creating a significant number of construction and permanent jobs.

V. Alternatives

B. Alternative 2: Hollywood Community Plan Update Compliant Alternative

1. Description of the Alternative

Alternative 2, the Hollywood Community Plan Update Compliant Alternative, considers development of the Project Site in accordance with the Hollywood Community Plan Update's proposed Limited Industrial land use designation of the western half of the Project Site, which would be applied to the entire Project Site. Specifically, this alternative would replace the 10,993 square feet of existing development on the Project Site with 102,450 square feet of new land uses, including 92,200 square feet of media office, 8,700 square feet of ground-floor restaurant, and 1,550 square feet of ground-floor retail. As with the Project, this development would be accommodated in a single building up to 105 feet in height (inclusive of an un-occupied mechanical equipment level), which is less than the Project's maximum height of 155 feet to the top of the mechanical equipment level. This alternative would also include 210 vehicle parking spaces and 40 bicycle parking spaces within three subterranean levels, one at-grade level, and in two fully-enclosed and mechanically ventilated above grade parking levels, compared to 310 vehicle parking spaces and 58 bicycle parking spaces within four subterranean levels, one at-grade level, and in three fully-enclosed and mechanically ventilated above grade parking levels with the Project. Alternative 2 would provide 23,494 square feet of open space with similar amenities to the Project, compared to 34,550 square feet of open space under the Project. Upon completion, Alternative 2 would result in an FAR of 3:1 compared to 4.4:1 with the Project.

Until the Hollywood Community Plan Update is adopted, to allow for this development, Alternative 2 would require a General Plan Amendment (GPA) to change the existing Medium Residential land use designation of the eastern half of the Project Site to Limited Industrial, and a Zone Change to change the existing R3 and MR1-1⁴ zoning of the Project Site to [Q]M1-2D.⁵ While this alternative would include a GPA and Zone Change

⁴ The MR1-1 zone has a maximum FAR of 1.5:1 and permits CM (commercial manufacturing) uses, including limited commercial and manufacturing, clinics, media production, limited machine shops, animal hospitals, and kennels. The Height District 1 designation in conjunction with the MR1-1 zone does not impose a maximum building height limit, but does impose a maximum FAR).

⁵ The [Q]M1-2D zone has a maximum FAR of 3:1 and permits commercial services, retail sales, rentals, limited manufacturing and assembly, office, etc. (residential, some institutions, and schools are prohibited). (Footnote continued on next page)

like the Project, it would more closely reflect the current Hollywood Community Plan's permitted FAR and height.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

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

Under Alternative 2, construction activities would be reduced in comparison to the Project due to the reduction in development (i.e., 102,450 square feet for Alternative 2 as compared to 150,600 square feet for the Project). This alternative would also include one less level of subterranean parking and thus require less excavation. The overall phasing of construction would result in similar overlapping construction activities as the Project. Thus, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities, although the duration of construction may be reduced. Because maximum daily conditions are used for measuring impact significance, regional and localized impacts on these days would be similar to the less than significant impacts of the Project.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 2 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation

The Q condition prohibits residential uses and requires that retail/restaurant uses be limited to the ground floor and that individual premises not exceed 20,000 square feet. The Height District 2 designation in conjunction with the [Q]M1-2D zone does not impose a maximum building height limit (e.g., the height limit is restricted by the FAR).

activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less than significant impacts with regard to construction TAC emissions. Overall construction TAC emissions generated by Alternative 2 would be less than those of the Project because, while grading activities would cover roughly the same area under both the Project and Alternative 2, the depth of excavation and associated use of heavy construction equipment would be less under this alternative as one less level of subterranean parking would be constructed (i.e., three under this alternative versus four under the Project). Additionally, Alternative 2 would result in a reduction in total floor area (i.e., 91,457 net square feet under Alternative 2 versus 139,607 net square feet under the Project). Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 2 would be less than significant and less when compared to the less than significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Similar to the Project, operational regional air pollutant emissions associated with Alternative 2 would be generated by vehicle trips to the Project Site and the consumption of electricity and natural gas. The development proposed under Alternative 2 would be reduced compared to the Project (i.e., 91,457 net square feet under Alternative 2 versus 139,607 net square feet under the Project), but otherwise the types of uses would be similar. As such, the number of new daily trips generated by Alternative 2 would be less than the number of new daily trips generated by the Project. Specifically, as provided in Appendix N of this Draft EIR, Alternative 2 would result in a total of 1,064 post-TDM daily vehicle trips and 8,064 post-TDM daily VMT as compared to the Project's 1,542 post-TDM daily vehicle trips and 11,717 post-TDM daily VMT.⁶ As vehicular emissions depend on the number of trips, vehicular sources would result in a smaller increase in air emissions compared to the Project. In addition, because the overall square footage would be reduced when compared to the Project, demand for electricity and natural gas would be less than the Project. Therefore, impacts associated with regional operational emissions under Alternative 2 would be less than significant and less when compared to the less than significant impacts of the Project.

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 2 would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, localized impacts from on-site

⁶ Gibson Transportation Consulting, Inc., *Transportation Analysis of Project Alternatives for the 1000 Seward Mixed-Use Development Project*, January 6, 2022. See Appendix N of this Draft EIR.

emission sources associated with Alternative 2 would also be less than significant. Such impacts would be less than those of the Project due to the overall decrease development. Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. As discussed further above, the number of daily trips generated with Alternative 2 would be less than the Project, and the number of peak-hour trips would also be reduced. Therefore, localized and stationary source impacts under Alternative 2 would be less than significant and less when compared to the Project's less than significant impacts.

(b) Toxic Air Contaminants

As set forth in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential TAC emissions associated with Project operations would include diesel particular matter (DPM) from delivery trucks. Alternative 2 would include less development than the Project but otherwise includes the same types of uses, and thus would require reduced operational truck deliveries and associated DPM emissions. Therefore, Alternative 2 would result in less than significant operational TAC emission impacts which would be less when compared to the less than significant impacts of the Project.

b. Cultural Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, there are no historical resources on the Project Site. Hence, like the Project, Alternative 2 would not result in direct impacts to historical resources. Additionally, like the Project, Alternative 2 would not result in indirect impacts to the Hollywood Center Studios which is a historic resource located across Seward Street from the Project Site, as the height and general character of the development under Alternative 2 would not interfere or conflict with the historic context (i.e., impair the ability to convey significance) of the Hollywood Center Studios. However, like the Project, Alternative 2 would include excavation activities immediately south of the Seward Film Vaults which are a historic resource, and as with the Project, these excavation activities would have the potential to impact the structural integrity of the vaults. Alternative 2 would also implement Mitigation Measure CUL-MM-1 (i.e., implementation of a shoring plan) to reduce this impact to a less than significant level. Because Alternative 2 would require less excavation and a less extensive shoring plan, owing to fewer subterranean parking levels under this alternative (i.e., three levels under Alternative 2 as compared to four levels under the Project), impacts under Alternative 2 would be less when compared to the Project, which are less than significant with mitigation.

c. 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. However, as with the Project, the use of construction equipment/vehicles under Alternative 2 would comply with California's Building Energy Efficiency Standards (Title 24 standards) 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 which together would minimize energy use during construction. Furthermore, energy use during construction would be temporary. Therefore, as with the Project, construction activities under Alternative 2 would not involve the wasteful, inefficient, or unnecessary consumption of energy resources. As such, Alternative 2 would result in less than significant impacts to energy resources during construction and impacts under Alternative 2 would be less when compared to the Project, which are less than significant because less construction would occur.

(b) Operation

As with the Project, operation of Alternative 2 would generate an increased consumption of electricity and natural gas relative to existing conditions. When compared to the Project, Alternative 2 would include less development (i.e., 102,450 square feet versus 150,600 square feet under the Project) but would otherwise include the same types of uses as the Project, and thus would be expected to generate lower operational energy demand than the Project. Furthermore, as provided in Appendix N of this Draft EIR, Alternative 2 would result in a total of 1,064 post-TDM daily vehicle trips and 8,064 post-TDM daily VMT as compared to the Project's 1,542 post-TDM daily vehicle trips and 11,717 post-TDM daily VMT, and thus would consume less operation-related petroleum-based fuels than the Project.⁷ At the same time, similar to the Project, Alternative 2 would comply with applicable emergency conservation requirements during operation including California's Building Energy Efficiency Standards (Title 24 standards), CALGreen Code, and the Green Building Code, and like the Project would implement Project Design Features GHG-PDF-1 requiring the incorporation of sustainability features

⁷ Gibson Transportation Consulting, Inc., *Transportation Analysis of Project Alternatives for the 1000 Seward Mixed-Use Development Project*, January 6, 2022. See Appendix N of this Draft EIR.

and WAT-PDF-1 requiring the use of energy efficient appliances, which together would minimize electricity and natural gas consumption. Furthermore, the Project Site is located in close proximity to transit which would encourage the use of alternative more efficient modes of transportation and minimize fuel consumption. Therefore, as with the Project, operation of Alternative 2 would not involve the wasteful, inefficient, or unnecessary consumption of energy resources. As such, Alternative 2 would result in less than significant impacts during operation and impacts under Alternative 2 would be less when compared to the Project, which are less than significant because less development is proposed.

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

As discussed in Section IV.C, Energy, of this Draft EIR, the current City Green Building Code requires compliance with Title 24 standards and the CalGreen Code. Like the Project, Alternative 2 would comply with the City's Green Building Code and thus with Title 24 standards and the CalGreen Code. Therefore, similar to the Project, Alternative 2 would incorporate measures that are beyond current State and City energy conservation requirements. Also similar to the Project, Alternative 2 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. Lastly, as discussed previously, Alternative 2, like the Project, would implement project design features requiring additional sustainability measures and the use of energy efficient appliances. With regard to transportation related energy usage, Alternative 2 would also comply with goals of the SCAG's RTP/SCS which incorporates VMT targets established by SB 375. As with the Project, the uses proposed under Alternative 2 and their proximity to major job centers and public transportation would serve to reduce VMT and associated transportation fuel usage within the region.⁸ 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. Therefore, Alternative 2, like the Project, would not conflict with plans for renewable energy or energy efficiency. The impacts of Alternative 2 would be less than significant and similar to the less than significant impacts of the Project.

d. Greenhouse Gas Emissions

As discussed in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, GHG emissions from a development project are determined in large part by the number of daily

⁸ As indicated in the VMT Calculator runs for the alternatives, included as Appendix N of this Draft EIR, Alternative 2 would result in a per capita work VMT per employee of 7.5 versus the significance threshold for the Central APC of 7.6.

vehicle trips generated and associated VMT, as well as by energy consumption from proposed land uses. The number of daily trips and daily VMT under Alternative 2 would be reduced compared to the Project. Specifically, as provided in Appendix N of this Draft EIR, Alternative 2 would result in a total of 1,064 post-TDM daily vehicle trips and 8,064 post-TDM daily VMT as compared to the Project's 1,542 post-TDM daily vehicle trips and 11,717 post-TDM daily VMT.⁹ In addition, energy and water consumption from proposed land uses would be reduced compared to the Project due to the reduction in development (i.e., 102,450 square feet under Alternative 2 as compared to net 150,600 square feet under the Project). Thus, the amount of GHG emissions generated by Alternative 2 would be less than the amount generated by the Project. At the same time, as with the Project, Alternative 2 would be designed to comply with the requirements of the CALGreen Code and the City's Green Building Code. Like the Project, Alternative 2 would also incorporate design features to reduce GHG emissions (such as the sustainability features required by Project Design Feature GHG-PDF-1) and would be designed to comply with the City's Green Building Ordinance, as applicable. With compliance with the CALGreen Code and the City's Green Building Code, and with the 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. Thus, impacts related to GHG emissions under Alternative 2 would be less than significant, and less when compared to the less than significant impacts of the Project.

e. Land Use and Planning

Alternative 2, the Hollywood Community Plan Update Compliant Alternative, considers development of the Project Site in accordance with the parameters set forth by the proposed Hollywood Community Plan Update's Limited Industrial land use designation of the western half of the Project Site. Specifically, Alternative 2 would: (1) re-designate the entire Project Site to the proposed Hollywood Community Plan Updates Limited Industrial land use designation; (2) rezone the entire Project Site to [Q]M1-2D; and (3) replace the existing on-site development with 102,450 square feet of office, retail and restaurant uses, resulting in an FAR of 3:1. Like the Project, following approval of the GPA and zone change, Alternative 2 would be generally consistent with the overall intent of the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site and that were adopted to avoid or mitigate an environmental effect, including SCAG's regional plans, the General Plan Framework Element, the Hollywood Community Plan, and the LAMC. Therefore, impacts related to

⁹ *Gibson Transportation Consulting, Inc., Transportation Analysis of Project Alternatives for the 1000 Seward Mixed-Use Development Project, January 6, 2022. See Appendix N of this Draft EIR.*

land use consistency would be less than significant and similar to the less-than-significant impacts of the Project.

f. Noise

(1) Noise

(a) Construction

The types of construction activities under Alternative 2 would be substantially similar to the Project, although the amount of construction activities and duration would be reduced due to the reduction in total floor area (i.e., 102,450 square feet under Alternative 2 as compared to 150,600 square feet under the Project) and the reduction in required excavation depth due to the reduction in subterranean parking levels under the alternative (i.e., three levels under Alternative 2 as compared to four levels under the Project). 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 since the overall amount and duration, but not the daily intensity of construction activities, would decrease under Alternative 2 when compared to the Project. As such, noise levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Also, as with the Project, Alternative 2 would implement Project Design Features NOI-PDF-1 (requiring muffling of equipment) and NOI-PDF-2 (prohibition on the use of driven [impact] pile systems), as well as Mitigation Measure NOI-MM-1 (requiring temporary sound barriers around the construction site), which would minimize construction noise. Still, similar to the Project, on-site and off-site construction noise would be significant and unavoidable under Alternative 2 and cumulative impacts would be less than significant. However, the overall amount/duration of construction activities and associated noise would be less than the Project.

(b) Operation

As discussed in Section IV.F, Noise, of this Draft EIR, sources of operational noise under the Project would include: (a) on-site stationary noise sources, including mechanical equipment, activities within the proposed outdoor spaces (i.e., outdoor dining and terraces), parking facilities, loading dock and trash compactor areas; and (b) off-site mobile (roadway traffic) noise sources. Regarding on-site operational noise, Alternative 2 would introduce noise from similar on-site noise sources. However, it is anticipated that with the overall reduction in total floor area and uses under this alternative (i.e., 102,450 square feet under Alternative 2 as compared to 150,600 square feet under the Project), the noise levels from building mechanical equipment, outdoor spaces, and parking facilities would be reduced. In addition, similar to the Project, Alternative 2 would implement Project Design Features

similar to NOI-PDF-3 (acoustic screening of loading areas from off-site noise receptors), NOI-PDF-4 (controls on amplified sound), and NOI-PDF-5 (outdoor terrace hours) which would minimize on-site operational noise. Like the Project, Alternative 2 would also comply with the regulations under LAMC Section 112.02 which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. Thus, operational on-site noise impacts under Alternative 2 would be less than significant and less as compared to the less than significant impacts of the Project.

With regard to operational off-site (i.e., traffic) noise, Alternative 2 would generate less operational traffic than the Project (i.e., 1,064 post-TDM daily trips versus 1,542 post-TDM daily trips under the Project).¹⁰ The reduction in vehicle trips would result in a decrease in off-site operational traffic-related noise levels under Alternative 2. Therefore, off-site noise impacts under Alternative 2 would be less than the less than significant impacts of the Project.

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 2 would be similar to the Project, although the amount and duration of construction activities would be reduced. As with the Project, construction of Alternative 2 would generate on- and off-site vibration from the use of heavy-duty construction equipment and from truck trips. Also as with the Project, Alternative 2 would implement Mitigation Measures NOI-MM-2 (i.e., construction vibration monitoring and control program) and CUL-MM-1 (shoring plan) to minimize construction vibration impacts on the existing adjacent Seward Film Vaults which are a historical resource. While the overall amount and duration of construction activities (including excavation) would be reduced under Alternative 2, on- and off-site construction activities and the associated construction on- and off-site vibration levels would 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 construction equipment and construction truck trips under Alternative 2 would be similar to those of the Project. Accordingly, like the Project, construction activities under Alternative 2 would result in significant unavoidable on-site vibration impacts (both building damage and human annoyance), significant unavoidable off-site vibration impacts (human annoyance), and less than significant off-site vibration impacts (building damage). Like the Project, Alternative 2 would also result in

¹⁰ Gibson Transportation Consulting, Inc., *Transportation Analysis of Project Alternatives for the 1000 Seward Mixed-Use Development Project*, January 6, 2022. See Appendix N of this Draft EIR.

cumulative impacts with respect to off-site construction vibration (human annoyance). However, the overall amount/duration of construction activities and associated vibration would be less than the Project.

(b) Operation

As described in Section IV.F, Noise, of this Draft EIR, 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. As with the Project, vehicular-induced vibration from Alternative 2, including vehicle circulation within the subterranean parking area, 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 less than those of the Project due to the reduction in vehicle trips (i.e., 1,064 post-TDM daily trips versus 1,542 post-TDM daily trips under the Project)¹¹ and floor area (102,450 square feet under Alternative 2 as compared to 150,600 square feet under the Project) under this alternative.

g. Public Services

(1) Fire Protection

(a) Construction

The types of construction activities required for Alternative 2 would be similar to those of the Project, although the amount of development would be reduced. As with the Project as discussed in Section IV.G.1, Public Services-Fire Protection, of this Draft EIR, construction under Alternative 2 would occur in compliance with all applicable federal, state, and local requirements concerning fire prevention and hazardous materials which would effectively reduce the potential for construction-related fire and explosion. Additionally, similar to the Project, construction activities under Alternative 2 could restrict access to the Project Site and surrounding properties and would generate temporary construction traffic which could slow LAFD emergency response times. However, as with

¹¹ *Gibson Transportation Consulting, Inc., Transportation Analysis of Project Alternatives for the 1000 Seward Mixed-Use Development Project, January 6, 2022. See Appendix N of this Draft EIR.*

the Project, Alternative 2 would implement Project Design Feature TR-PDF-2, 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 (CVC) Section 21806, and construction hauling activities and construction worker trips would occur outside the typical weekday commuter A.M. and P.M. peak periods to the extent feasible under both the Project and Alternative 2, thereby reducing the potential for traffic-related conflicts. Therefore, based on the above, construction of Alternative 2, like the Project, would not result in the need for new or altered government facilities (i.e., fire stations). Impacts under Alternative 2 would be less than significant and less as compared to the less than significant impacts of the Project.

(b) Operation

As discussed in Section IV.G.1, Public Services—Fire Protection, of this Draft EIR, the Project Site would be served by Fire Station No. 27, the “first-in” station, as well as Fire Station Nos. 41, 52, and 82, and LAFD considers fire protection for the Project to be adequate. The same would be true under Alternative 2. In addition, 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, etc., which would reduce the demand for fire protection and emergency medical services. At the same time, Alternative 2 would result in less development than the Project, thus resulting in a smaller service population and a lower net increase in demand for fire protection and emergency medical services than the Project. Alternative 2 would also result in fewer daily vehicle trips such that the potential for impacts to LAFD emergency response times would also be reduced.

As with the Project, domestic and fire water service to the Project Site under Alternative 2 would continue to be supplied by Los Angeles Department of Water and Power (LADWP). As discussed in Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Fire Flow Availability Report (IFFAR) indicates that adequate hydrant pressure and flow is not currently available at the Project Site to serve the Project. However, similar to the Project, fire hydrant F-35522 which is currently connected to the 6-inch water main on Eleanor Avenue would be connected to the 8-inch water main on Seward Street per LADWP’s recommendation. With this connection, fire flow would be adequate to serve the Project Site. As the amount of development under Alternative 2 would be less than the Project, and as Alternative 2 would not include land uses that require higher fire flows than those of the Project, fire flows would also be adequate to serve Alternative 2. Like the Project, Alternative 2 would also provide all applicable life safety features, including but not limited to automatic fire sprinklers.

Based on the above, operation of Alternative 2, like the Project, would not result in the need for new or altered government facilities (i.e., fire stations). Impacts under Alternative 2 would be less than significant and less as compared to the less than significant impacts of the Project.

(2) Police Protection

(a) Construction

Similar to the Project, construction of Alternative 2 could result in a temporary demand for police services within LAPD's Hollywood Division during the construction period. However, as with the Project, Alternative 2 would incorporate Project Design Feature POL-PDF-1 to implement temporary security measures, including security fencing, lighting, and locked entry to secure the Project Site during construction which would reduce service demand. Also like the Project, construction activities under Alternative 2 could potentially slow LAPD emergency response times and interfere with emergency access during the construction period through temporary lane closures, etc. However, while peak daily and peak-hour construction traffic would be the same between Alternative 2 and the Project, the duration of construction activities would be less under Alternative 2 owing to less development under this alternative. Also, both the Project and Alternative 2 would remove the existing development at the Project Site which currently generates some service demand from the LAPD which would offset some or all of the service demand associated with construction activities. Furthermore, both the Project and Alternative 2 would implement the required Construction Traffic Management Plan (Project Design Feature TR-PDF-2 in Section IV.H, Transportation, of this Draft EIR) that would ensure continued provision of emergency access during construction. Lastly, emergency vehicles normally have a variety of options for dealing with traffic pursuant to CVC Section 21806, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, like the Project, construction of Alternative 2 would not result in the need for new or altered government facilities (i.e., police stations). Impacts under Alternative 2 would be less than significant and less as compared to the less than significant impacts of the Project.

(b) Operation

As discussed in Section IV.G.2, Public Services—Police Protection, of this Draft EIR, the Project Site would be served by the Hollywood Community Police Station. The same would be true under Alternative 2. Both the Project and Alternative 2 would generate an on-site employee population that would generate some demand for service from the LAPD, although this demand would be less under Alternative 2 owing to less development under this alternative. However, because neither project would include residential uses, neither would affect the Hollywood Division's residential service population or existing officer to population ratio. Also, similar to the Project, Alternative 2 would implement

Project Design Features POL-PDF-2 through POL-PDF-6 which require: security camera systems and keycard entry into buildings; proper lighting of building entrances, walkways and parking areas; secure design that maximizes visibility; and provision to the LAPD of a diagram showing access routes and additional information to facilitate police response. These project design features would help reduce the increase in demand for police services under both the Project and Alternative 2, and both the Project and Alternative 2 would generate General Fund tax revenues for the City which could be used to expand law enforcement resources in the Hollywood Division. Furthermore, while both the Project and Alternative 2 would result in an increase in demand for police protection services, such demand would be reduced under Alternative 2 due to the reduction in development. Lastly, while both the Project and Alternative 2 would increase the number of daily vehicle trips, the increase under Alternative 2 would be less than the Project and this increase would not substantially reduce LAPD emergency response times as the LAPD has a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. Therefore, operation of Alternative 2, like the Project, would not result in the need for new or altered government facilities (i.e., police stations). Impacts under Alternative 2 would be less than significant and less when compared to the less than significant impacts of the Project.

h. Transportation

Similar to the Project, Alternative 2 would generally support applicable transportation plans (Mobility Plan 2035, Plan for a Healthy Los Angeles, Hollywood Community Plan, Vision Zero, LAMC, SCAG's RTP/SCS, etc.) and multimodal transportation options. For example, like the Project, Alternative 2 would: include design in accordance with the mobility-enhanced networks of the Mobility Plan; not interfere with the complete streets balanced transportation network (i.e., Transit-Enhanced Network, Bicycle Enhanced Network, and Pedestrian-Enhanced Districts) concept of the Mobility Plan; enhance pedestrian access within and around the Project Site as called for by the Mobility Plan, Plan for a Healthy Los Angeles, and the Hollywood Community Plan; prioritize safety and access for all individuals utilizing the site by complying with all Americans with Disabilities Act (ADA) requirements, and provide direct connections to pedestrian amenities, as called for by the Plan for a Healthy Los Angeles; represent urban infill development in close proximity to transit which would encourage alternative transportation use as called for by the Mobility Plan and RTP/SCS; and include sidewalk and driveway design, vehicular parking, bicycle parking, etc., in accordance with LAMC requirements. Both the Project and Alternative 2 would also reduce per capita VMT, including through the implementation of transportation demand management (TDM) measures under Project Design Feature TR-PDF-1 as called for by the Mobility Plan, Hollywood Community Plan, SCAG's RTP/SCS, and the City's

TDM Ordinance.¹² Furthermore, while none of the streets surrounding the Project Site are listed in Vision Zero's High Injury Network, neither project would preclude future Vision Zero safety improvements by the City. Lastly, based on the trip generation estimates and traffic distribution pattern for the Project, neither project would add 25 or more peak-hour trips to any freeway off-ramp such that no freeway on/off-ramp safety analysis is required. Like the Project, Alternative 2 would not conflict with the applicable transportation plans because Alternative 2 would include similar types of land uses. Therefore, like the Project, Alternative 2 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be less than significant. The degree of the impacts would be similar between the two projects as neither project would conflict with the applicable transportation plans.

With respect to VMT, both Alternative 2 and the Project would result in an average post-TDM work VMT per employee of 7.5.^{13,14} This is compared to the Central Area Planning Commission (APC) threshold of 7.6 VMT per employee. Additionally, neither project would include any residential uses and, therefore, would not result in a household VMT impact. Therefore, impacts would be less than significant and similar to the less than significant impacts of the Project.

i. Tribal Cultural Resources

Similar to the Project, Alternative 2 would require excavation and grading for building foundations and subterranean parking. As discussed in Section IV.I, Tribal Cultural Resources, of this Draft EIR and in the Tribal Cultural Resources Report included as Appendix L, while the Project Site is located near tar pits, water sources, and roads that may have provided important resources to prehistoric and protohistoric populations, no known TCRs have been previously recorded on the Project Site or within the search radius of the South Central Coastal Information Center (SCCIC) records search. In addition, the consultations with the applicable California Native American Tribes conducted in accordance with Assembly Bill (AB) 52 did not identify any TCRs on the Project Site. Furthermore, like the Project, Alternative 2 would implement the City's standard condition of approval (COA) for the inadvertent discovery of TCRs which would mitigate impacts to any TCRs that may be encountered on the Project Site during construction. Therefore,

¹² Per the VMT Calculator runs for the alternatives included as Appendix N of this Draft EIR, Alternative 2 would result in 1,064 daily post-TDM vehicle trips and 8,064 post-TDM VMT, versus the Project which would result in 1,542 daily post-TDM daily vehicle trips and 11,717 post-TDM daily VMT,

¹³ From the VMT Calculator runs for the alternatives included as Appendix N of this Draft EIR.

¹⁴ Per the VMT Calculator runs for the alternatives, included as Appendix N of this Draft EIR, Alternative 2 would generate 407 employees, 1,064 daily post-TDM vehicle trips, and 8,064 post-TDM VMT, versus the Project's 598 employees, 1,542 post-TDM daily vehicle trips, and 11,717 post-TDM VMT.

Alternative 2 would result in less than significant impacts that would be similar to the less than significant impacts of the Project.

j. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities for Alternative 2 would result in a temporary demand for dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. As indicated in Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, a conservative estimate of Project water use during construction is 1,000 to 2,000 gallons per day (gpd). Construction-related water use under Alternative 2 would be slightly less owing to the reduced amount of development, including the reduced number of subterranean parking levels, under this alternative. Furthermore, both the Project and Alternative 2 would require trenching for the required on-site water distribution system, and connection to the existing water mains in the adjacent streets. However: (1) the environmental effects associated with these activities are already subsumed in the impact analysis in the other sections of this Draft EIR and would be limited and temporary; and (2) both the Project and Alternative 2 would implement Project Design Feature TR-PDF-2, Construction Traffic Management Plan, to ensure the safe flow of pedestrian, bicycle and vehicular traffic around the construction sites during construction. As such, neither the Project nor Alternative 2 would 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. Alternative 2 would result in less than significant impacts that are less when compared to the less than significant impacts of the Project.

(b) Operation

Like the Project, Alternative 2 would result in an increase in long-term water demand. As discussed in Section IV.J.1, the Project would generate a net increase in water demand of 28,847 gpd which it would obtain via connection to the existing 8-inch water main in Romaine Street for which the approved Service Advisory Requests (SARs) included in the Utility Report (Appendix M of this Draft EIR) confirm has sufficient capacity to serve the Project. Furthermore, Section IV.J.1 confirms that LADWP water supplies are adequate to serve the Project. Because Alternative 2 would include less development than the Project (i.e., 102,450 square feet under Alternative 2 as compared to 150,600 square feet under the Project) but would otherwise include the same types of land uses, operational water demand would be less under this alternative. In addition, like the Project, Alternative 2 would connect to the existing water main in Romaine Street, would comply with applicable water conservation requirements, and would implement the additional water

conservation measures outlined in Project Design Feature WAT-PDF-1. Therefore, as with the Project, existing water infrastructure and water supplies would be adequate to serve Alternative 2.

Regarding fire flow, as discussed in Section IV.J.1, the IFFAR for the Project included in the Utility Report indicates that the Project would have adequate fire flow to demonstrate compliance with City fire flow requirements following the relocation of the connection to fire hydrant F-35522. Alternative 2, as discussed above, would result in less operational water demand than the Project. Also, the fire flow requirements under Alternative 2 would be no greater than they are for the Project (i.e., would fall within the LAMC's High Density Industrial and Commercial category) owing to the same types of general configuration of land uses as the Project. Furthermore, like the Project, Alternative 2 would incorporate a fire sprinkler suppression system to reduce or eliminate the public hydrant demand. Therefore, existing fire flow capacity would be adequate to serve Alternative 2.

Based on the above, operation of Alternative 2, as with the Project, would not require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects. As such, Alternative 2 would result in less than significant impacts which would be less as compared to the less than significant impacts of the Project.

(2) Energy Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 2 would consume minor quantities of electricity (construction activities do not typically involve the consumption of natural gas). As indicated in Section IV.J.2, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR, Project construction activities would generate only a fraction of the electricity demand of Project operations, and since existing electricity infrastructure and supplies are adequate to serve Project operation, they would also be adequate to serve Project construction. The same would be true of Alternative 2, except that this alternative would consume even less electricity during construction owing to the reduced amount of development and associated construction activities under this alternative. Also, since the Project Site is an urban infill site that is already served by electricity and natural gas infrastructure, neither the Project nor Alternative 2 would require extensive off-site infrastructure improvements. Lastly, as with the Project, Alternative 2 would be required to coordinate energy infrastructure improvements with LADWP and SoCalGas to minimize potential service disruptions, and to develop on-site energy infrastructure and connections to the existing off-site energy infrastructure in accordance with applicable requirements. Hence, similar to the Project, construction activities under

Alternative 2 would not result in an increase in energy demand that exceeds available supplies or distribution infrastructure capabilities that would require the construction of new or expanded energy facilities, the construction or relocation of which could cause significant environmental effects. Construction impacts under Alternative 2 would thus be less than significant and less as compared 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. Also, because Alternative 2 operation would result in less electricity and natural gas consumption than the Project owing to less development under this alternative, and because the existing electricity and natural gas infrastructure would be adequate to serve Project operation, so too would this infrastructure be adequate to serve Alternative 2 operation. Furthermore, as with the Project, Alternative 2 would be developed in accordance with applicable energy conservation requirements, including those in Title 24 standards, CALGreen Code, and the Green Building Code, and like the Project would implement Project Design Features GHG-PDF-1 requiring the incorporation of sustainability features and WAT-PDF-1 requiring the use of energy efficient appliances, which together would minimize electricity and natural gas consumption. Therefore, as with the Project, Alternative 2 operation would not result in an increase in energy demand that exceeds available supplies or distribution infrastructure capabilities that would require the construction of new or expanded energy facilities, the construction or relocation of which could cause significant environmental effects. Operational impacts under Alternative 2 would thus be less than significant and less as compared to the less than significant impacts of the Project.

3. Comparison of Impacts

Alternative 2 would not avoid any of the significant unavoidable impacts of the Project (i.e., on-site and off-site construction noise; on-site construction vibration [building damage]; and on- and off-site construction vibration [human annoyance]). Alternative 2 would also not avoid the Project's significant unavoidable cumulative impact with respect to off-site construction vibration [human annoyance]). However, Alternative 2 would reduce these impacts owing to the reduced amount of development and associated construction activities, operational activities, and construction and operational vehicle trips under this alternative. Furthermore, Alternative 2 would reduce the majority of the Project's less than significant impacts and impacts that would be less than significant with mitigation.

4. Relationship of the Alternative to Project Objectives

Under Alternative 2, the similar land uses (i.e., office, restaurant, and retail) would be developed at the Project Site as under the Project, but at a reduced square footage to meet the 3:1 FAR permitted under the proposed Hollywood Community Plan Update (i.e., 102,450 square feet total versus 150,600 square feet under the Project). As such, Alternative 2 would meet the underlying purpose of the Project, which is to provide an infill commercial development for growing retail, hospitality, entertainment, and technology companies looking to locate businesses within the Hollywood community, to a lesser extent than the Project.

Regarding the Project objectives, Alternative 2 would meet the following Project objectives to the same degree as the Project as it would include similar types of land uses and building design, and would implement the same energy conservation and sustainability features:

- Provide a sustainable building design that allows for the use of energy-efficient technology, thereby reducing the overall reliance on energy for lighting and cooling.

Alternative 2 would meet the following Project objectives, although to a lesser extent than the Project the Project due to the reduction in development:

- To create a pedestrian-friendly project by creating a street-level identity for the Project Site and improving the pedestrian experience through the introduction of retail and restaurant uses on the ground level.
- To support the Hollywood Community Plan's Objective 1 to further the development of Hollywood as a major center of population, employment, retail services, and entertainment and create a dynamic and economically viable project with sufficient office square footage and density to facilitate a healthy job-housing balance in the Hollywood area.
- Promote local, regional, and State land use and mobility objectives and reduce vehicle miles traveled (VMT) through infill development and providing jobs in proximity to transit and transportation infrastructure to encourage pedestrian activity.
- To support the Hollywood Community Plan's Objective 4(a) to promote economic well-being and public convenience through allocating and distributing commercial lands for retail, service, and office facilities in quantities and patterns based on accepted planning principles and standards and activate the Hollywood area with

commercial opportunities serving local employees, generate local tax revenue, and provide jobs for residents in support of local business.

- Support the growth of the City's economic base by creating a significant number of construction and permanent jobs.

V. Alternatives

C. Alternative 3: Existing Zoning Compliant Alternative Use Alternative

1. Description of the Alternative

Alternative 3, the Existing Zoning Compliant Alternative Use Alternative, considers development of the Project Site in accordance with the existing zoning of the western half Project Site, which would be applied to the entire Project Site. Specifically, this alternative would replace the 10,993 square feet of existing development on the Project Site with 51,225 square feet of new media production use, with no restaurant or retail uses. As with the Project, this development would be accommodated in a single building up to 30 feet in height (including an unoccupied mechanical equipment level), compared to 155 feet with the Project. This alternative would also include 105 vehicle parking and 15 bicycle parking spaces within two levels of subterranean parking compared to 310 vehicle parking spaces and 58 bicycle parking spaces within four subterranean levels, one at-grade level, and in three fully-enclosed and mechanically ventilated above grade parking levels with the Project. Based on the proposed use and commercial zoning, no open space would be provided compared to 34,550 square feet with the Project. However, Alternative 3 would still include new landscaping similar to the Project. Upon completion, Alternative 3 would result in an FAR of 1.5:1 compared to 4.4:1 with the Project.

To allow for this development, Alternative 3 would include a GPA to change the existing Medium Residential land use designation of the eastern half of the Project Site to Limited Manufacturing, and a Zone Change to change the existing R3 zoning of the eastern half of the Project Site to MR1-1¹⁵ similar to the existing zoning in the western portion of the site.

¹⁵ The MR1-1 zone has a maximum FAR of 1.5:1 and permits CM (commercial manufacturing) uses, including limited commercial and manufacturing, clinics, media production, limited machine shops, animal hospitals, and kennels. The Height District 1 designation in conjunction with the MR1-1 zone does not impose a maximum building height limit but is restricted by the FAR.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

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.A, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. As with the Project, Alternative 3 would implement Project Design Feature AIR-PDF-1 requiring use of existing electrical infrastructure and/or solar generators rather than temporary diesel or gasoline generators during construction to minimize stationary source construction emissions.

Under Alternative 3, construction activities would be reduced in comparison to the Project due to the reduction in development (i.e., 51,225 square feet under Alternative 3 as compared to 150,600 square feet under the Project). This alternative would also include only two levels of subterranean parking as compared four subterranean levels under the Project and thus less excavation. The overall phasing of construction would result in similar overlapping construction activities as the Project. Thus, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities, although the duration of construction may be reduced. Therefore, regional and localized impacts on these days would be similar to the less than significant impacts of the Project.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 3 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less than significant impacts with regard to construction TAC emissions. Overall construction TAC emissions generated by Alternative 3 would be less than those of the Project because, while grading activities would cover roughly the same area under both the Project and Alternative 3, the depth of excavation and associated use of heavy construction equipment would be less under this alternative owing to fewer subterranean parking levels (i.e., only two levels of subterranean parking under Alternative 3 as compared four subterranean levels under the Project). Thus, impacts due to TAC emissions and the corresponding

individual cancer risk under Alternative 3 would be less than significant and less when compared to the less than significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Similar to the Project, operational regional air pollutant emissions associated with Alternative 2 would be generated by vehicle trips to the Project Site and the consumption of electricity and natural gas. The development proposed under Alternative 3 would be reduced compared to the Project (i.e., 51,225 square feet under Alternative 3 as compared to 150,600 square feet under the Project). Furthermore, media production rather than office, restaurant, and retail uses would be developed under this alternative. This would result in the generation of fewer daily operational vehicle trips and VMT under Alternative 3 than under the Project. Specifically, as provided in Appendix N of this Draft EIR, Alternative 3 would result in a total of 376 post-TDM daily vehicle trips and 3,010 post-TDM daily VMT as compared to the Project's 1,542 post-TDM daily vehicle trips and 11,717 post-TDM daily VMT.¹⁶ As vehicular emissions depend on the number of trips, vehicular sources would result in a smaller increase in air emissions compared to the Project. In addition, because the overall square footage would be reduced when compared to the Project, demand for electricity and natural gas would be less than the Project. Therefore, impacts associated with regional operational emissions would be less than significant and less when compared to the less than significant impacts of the Project.

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 3 would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, localized impacts from on-site emission sources associated with Alternative 3 would also be less than significant. Such impacts would be less than those of the Project due to the overall decrease in construction. Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. As discussed further above, the number of daily trips generated with Alternative 3 would be less than the Project, and the number of peak-hour trips would also be reduced. Therefore, impacts would be less than significant and less when compared to the Project's less than significant impacts.

¹⁶ *Gibson Transportation Consulting, Inc., Transportation Analysis of Project Alternatives for the 1000 Seward Mixed-Use Development Project, January 6, 2022. See Appendix N of this Draft EIR.*

(b) Toxic Air Contaminants

As set forth in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential TAC emissions associated with Project operations would include DPM from delivery trucks. Alternative 3 would include less development than the Project and less operational truck deliveries and associated DPM emissions. Therefore, Alternative 3 would result in less than significant operational TAC emission impacts which would be less when compared to the less than significant impacts of the Project.

b. Cultural Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, there are no historical resources on the Project Site. Hence, like the Project, Alternative 3 would not result in direct impacts to historical resources. Additionally, like the Project, Alternative 3 would also not result in indirect impacts to the Hollywood Center Studios which is a historic resource located across Seward Street from the Project Site, as the height and general character of the development under Alternative 3 would not interfere or conflict with the historic context (i.e., impair the ability to convey significance) of the Hollywood Center Studios. However, like with the Project, Alternative 3 would include excavation activities immediately south of the Seward Film Vaults which are a historic resource, and like the Project, these excavation activities would have the potential to impact the structural integrity of the vaults. Similar to the Project, Alternative 3 would implement Mitigation Measure CUL-MM-1 (i.e., implementation of a shoring plan) to reduce this impact to a less than significant level. Because Alternative 3 would require less excavation and a less extensive shoring plan, owing to fewer subterranean parking levels under this alternative (i.e., two levels under Alternative 3, as compared to four levels under the Project), impacts would be less than the Project, which are less than significant with mitigation.

c. 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. However, as with the Project, the use of construction equipment/vehicles under Alternative 3 would comply with Title 24 standards 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 which together would minimize energy use during

construction. Furthermore, energy use during construction would be temporary. Therefore, as with the Project, construction activities under Alternative 3 would not involve the wasteful, inefficient, or unnecessary consumption of energy resources. As such, Alternative 3 would result in less than significant impacts to energy resources during construction and impacts under Alternative 3 would be less when compared to the Project, which are less than significant because less construction would occur.

(b) Operation

As with the Project, operation of Alternative 3 would generate an increased consumption of electricity and natural gas relative to existing conditions. When compared to the Project, Alternative 3 would include less development (i.e., 51,225 square feet under Alternative 3, as compared to 150,600 square feet under the Project), including no retail or restaurant uses, and thus would be expected to generate lower operational energy demand than the Project. Furthermore, as provided in Appendix N of this Draft EIR, Alternative 3 would result in a total of 376 post-TDM daily vehicle trips and 3,010 post-TDM daily VMT as compared to the Project's 1,542 post-TDM daily vehicle trips and 11,717 post-TDM daily VMT, and thus would consume less operation-related petroleum-based fuels than the Project.¹⁷ At the same time, similar to the Project, Alternative 3 would comply with applicable emergency conservation requirements during operation including California's Building Energy Efficiency Standards (Title 24 standards), CALGreen Code, and the Green Building Code, and like the Project would implement Project Design Features GHG-PDF-1 requiring the incorporation of sustainability features and WAT-PDF-1 requiring the use of energy efficient appliances, which together would minimize electricity and natural gas consumption. Furthermore, the Project Site is within close proximity to transit which would encourage the use of alternative more efficient modes of transportation and minimize fuel consumption. Therefore, as with the Project, operation of Alternative 3 would not involve the wasteful, inefficient, or unnecessary consumption of energy resources. As such, Alternative 3 would result in less than significant impacts and impacts under Alternative 3 would be less when compared to the Project, which are less than significant because less development is proposed.

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

As discussed in Section IV.C, Energy, of this Draft EIR, the current City Green Building Code requires compliance with Title 24 standards and CalGreen Code. Like the Project, Alternative 3 would comply with the City's Green Building Code and thus with the Title 24 standards and the CalGreen Code. Therefore, similar to the Project, Alternative 3

¹⁷ *Gibson Transportation Consulting, Inc., Transportation Analysis of Project Alternatives for the 1000 Seward Mixed-Use Development Project, January 6, 2022. See Appendix N of this Draft EIR.*

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. Lastly, as discussed previously, Alternative 3, like the Project, would implement project design features requiring additional sustainability measures and energy the use of energy efficient appliances. With regard to transportation related energy usage, Alternative 3 would also comply with goals of the SCAG's RTP/SCS which incorporates VMT targets established by SB 375. As with the Project, Alternative 3 would also not result in significant per capita VMT impacts.¹⁸ 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. Therefore, Alternative 3, like the Project, would not conflict with plans for renewable energy or energy efficiency. The impacts of Alternative 3 would be less than significant and similar to the less than significant impacts of the Project.

d. Greenhouse Gas Emissions

As discussed in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, 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 by energy consumption from proposed land uses. The number of daily trips and daily VMT under Alternative 3 would be reduced compared to the Project. Specifically, as provided in Appendix N of this Draft EIR, Alternative 3 would result in a total of 376 post-TDM daily vehicle trips and 3,010 post-TDM daily VMT as compared to the Project's 1,542 post-TDM daily vehicle trips and 11,717 post-TDM daily VMT.¹⁹ In addition, energy and water consumption from proposed land uses would be reduced under Alternative 3 as compared to the Project due to the reduction in development (i.e., 51,225 square feet under Alternative 3 as compared to 150,600 square feet under the Project) including no retail or restaurant uses. Thus, the amount of GHG emissions generated by Alternative 3 would be less than the amount generated by the Project. At the same time, as with the Project, Alternative 3 would be designed to comply with the requirements of the CALGreen Code and the City's Green

¹⁸ *Alternative 3 would fall below the daily net increase in vehicle trips required to prepare VMT analysis per the screening criteria developed by the City and described in LADOT's Transportation Assessment Guidelines (TAG) and referenced in the City of Los Angeles VMT Calculator Guide, May 2020. Specifically, as indicated in the VMT Calculator run for Alternative 3 included as Appendix N of this Draft EIR, Alternative 3 would generate an estimated 187 net increase in daily motor vehicle trips which would fall below the 250 daily trip screening criteria for preparing a VMT analysis. Hence, Alternative 3 would not result in VMT impacts.*

¹⁹ *Gibson Transportation Consulting, Inc., Transportation Analysis of Project Alternatives for the 1000 Seward Mixed-Use Development Project, January 6, 2022. See Appendix N of this Draft EIR.*

Building Code. Alternative 3 would also incorporate design features to reduce GHG emissions (such as the sustainability features required by Project Design Feature GHG-PDF-1), and would be designed to comply with the City's Green Building Ordinance, as applicable. With compliance with the CALGreen Code and the City's Green Building Code, and with the 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.

e. Land Use and Planning

Alternative 3, the Existing Zoning Compliant Alternative Use Alternative, considers development of the Project Site in accordance the existing zoning of the western half Project Site, which would be applied to the entire Project Site. Specifically, this alternative would replace the 10,993 square feet of existing development on the Project Site with 51,225 square feet of new media production use, with no restaurant or retail uses, in accordance with the existing MR1-1 zoning on the western portion of the Project Site, resulting in an FAR of 1.5:1. To allow for this development, Alternative 3 would include a GPA to change the existing Medium Residential land use designation of the eastern half of the Project Site to Limited Manufacturing, and a Zone Change to change the existing R3 zoning of the eastern half of the Project Site to MR1-1. Like the Project, following approval of the GPA and Zone Change, Alternative 3 would be generally consistent with the overall intent of the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site and that were adopted to avoid or mitigate an environmental effect, including SCAG's regional plans, the General Plan Framework Element, the Hollywood Community Plan, and the LAMC. Therefore, impacts related to land use consistency would be less than significant and similar to the less-than-significant impacts of the Project.

f. Noise

(1) Noise

(a) Construction

The types of construction activities under Alternative 3 would be substantially similar to the Project, although the amount of construction activities and duration would be reduced due to the reduction in total floor area (i.e., 51,225 square feet under Alternative 3 as compared to 150,600 square feet under the Project) and the reduction in required excavation depths due to the reduction in subterranean parking levels under this alternative (i.e., two levels under Alternative 3 as compared to four levels under the Project). 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 since the overall amount and duration, but not the daily intensity of construction activities, would decrease under Alternative 3 when compared to the Project. As such, noise levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Also, as with the Project, Alternative 3 would implement Project Design Features NOI-PDF-1 (requiring muffling of equipment) and NOI-PDF-2 (prohibition on the use of driven [impact] pile systems), and Mitigation Measure NOI-MM-1 (requiring temporary sound barriers around the construction site), which would minimize construction noise. Still, similar to the Project, on- and off-site construction noise would be significant and unavoidable and cumulative impacts would be less than significant. However, the overall amount/duration of construction activities and associated noise would be less than the Project.

(b) Operation

As discussed in Section IV.F, Noise, of this Draft EIR, sources of operational noise under the Project would include: (a) on-site stationary noise sources, including mechanical equipment, activities within the proposed outdoor spaces (i.e., outdoor dining and terraces), parking facilities, loading dock and trash compactor areas; and (b) off-site mobile (roadway traffic) noise sources. Regarding on-site operational noise, Alternative 3 would introduce similar on-site noise sources, except that it would not include outdoor dining or amplified sound. Also, it is anticipated that with the overall reduction in development under this alternative (i.e., 51,225 square feet under Alternative 3 as compared to 150,600 square feet under the Project), the amount of on-site noise sources and associated noise would be reduced from that of the Project. In addition, similar to the Project, Alternative 3 would implement a Project Design Feature similar to NOI-PDF-3 (acoustic screening of loading areas from off-site noise receptors) which would minimize on-site operational noise from this noise source. Because no outdoor areas are proposed, Project Design Features NOI-PDF-4 and NOI-PDF-5 would not be required. Like the Project, Alternative 3 would also comply with the regulations under LAMC Section 112.02 which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. Thus, operational on-site noise impacts under Alternative 3 would be less than significant and less when compared to the less than significant impacts of the Project.

With regard to operational off-site (i.e., traffic) noise, Alternative 3 would generate less operational traffic than the Project (i.e., 376 post-TDM daily vehicle trips versus

1,542 post-TDM daily vehicle trips under the Project).²⁰ The reduction in vehicle trips would result in a decrease in off-site operational traffic-related noise levels under Alternative 3. Therefore, off-site noise impacts under Alternative 3 would be less than significant and less when compared to the less than significant impacts of the Project.

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 3 would be similar to the Project, although the amount and duration of construction activities would be reduced. As with the Project, construction of Alternative 3 would generate on- and off-site vibration from the use of heavy-duty construction equipment and from truck trips. Also as with the Project, Alternative 3 would implement Mitigation Measures NOI-MM-2 (i.e., construction vibration monitoring and control program) and CUL-MM-1 (shoring plan) to minimize construction vibration impacts on the existing adjacent Seward Film Vaults which are a historical resource. While the overall amount and duration of construction activities (including excavation) would be reduced under Alternative 3, on- and off-site construction activities and the associated construction on- and off-site 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 construction equipment and construction truck trips under Alternative 3 would be similar to those of the Project. Accordingly, like the Project, construction activities under Alternative 3 would result in significant unavoidable on-site vibration impacts (both building damage and human annoyance), significant unavoidable off-site vibration impacts (human annoyance), and less than significant off-site vibration impacts (building damage). Like the Project, Alternative 3 would also result in cumulative impacts with respect to off-site construction vibration (human annoyance). However, the overall amount/duration of construction activities and associated vibration would be less than the Project.

(b) Operation

As described in Section IV.F, Noise, of this Draft EIR, 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 subterranean parking area, would not generate perceptible vibration levels at off-site sensitive uses. In addition, like the Project, building mechanical

²⁰ Gibson Transportation Consulting, Inc., *Transportation Analysis of Project Alternatives for the 1000 Seward Mixed-Use Development Project*, January 6, 2022. See Appendix N of this Draft EIR.

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. However, such impacts would be less than those of the Project due to the reduction in vehicle trips (i.e., 376 post-TDM daily vehicle trips versus 1,542 post-TDM daily vehicle trips under the Project)²¹ and floor area (i.e., 51,225 square feet versus 150,600 square feet under the Project) under this alternative.

g. Public Services

(1) Fire Protection

(a) Construction

The types of construction activities required for Alternative 3 would be similar to those of the Project, but the amount of construction would be significantly reduced. As with the Project as discussed in Section IV.G.1, Public Services-Fire Protection, of this Draft EIR, construction under Alternative 3 would occur in compliance with all applicable federal, State, and local requirements concerning fire prevention and hazardous materials which would effectively reduce the potential for construction-related fire and explosion. Additionally, similar to the Project, construction activities under Alternative 3 could restrict access to the Project Site and surrounding properties and would generate temporary construction traffic which could slow LAFD emergency response times. However, as with the Project, Alternative 3 would implement Project Design Feature TR-PDF-2, 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 CVC Section 21806, and construction hauling activities and construction worker trips would occur outside the typical weekday commuter A.M. and P.M. peak periods to the extent feasible under both the Project and Alternative 3, thereby reducing the potential for traffic-related conflicts. Therefore, construction of Alternative 3, like the Project, would not result in the need for new or altered government facilities (i.e., fire stations). Impacts under Alternative 3 would be less than significant and less (due to a reduced amount of excavation activities) when compared to the less than significant impacts of the Project.

²¹ Gibson Transportation Consulting, Inc., *Transportation Analysis of Project Alternatives for the 1000 Seward Mixed-Use Development Project*, January 6, 2022. See Appendix N of this Draft EIR.

(b) Operation

As discussed in Section IV.G.1, Public Services—Fire Protection, of this Draft EIR, the Project Site would be served by Fire Station No. 27, the “first-in” station, as well as Fire Station Nos. 41, 52, and 82, under the Project LAFD, and LAFD considers fire protection to be adequate. The same would be true under Alternative 3. In addition, 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, etc., which would reduce the demand for fire protection and emergency medical services. At the same time, while Alternative 3 would include indoor media uses that could potentially involve the greater use of flammable materials (paints, paint thinners, etc.) than the Project’s office, retail, and restaurant uses, such materials would be used in accordance with applicable regulations as indicated above, and because Alternative 3 would result in significantly less development than the Project, it would result in a smaller service population and a lower net increase in demand for fire protection and emergency medical services than the Project. Alternative 3 would also result in fewer daily vehicle trips such that the potential for impacts to LAFD emergency response times would also be reduced.

As with the Project, domestic and fire water service to the Project Site under Alternative 3 would continue to be supplied by LADWP. As discussed in Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the IFFAR indicates that adequate hydrant pressure and flow is not currently available at the Project Site to serve the Project. However, similar to the Project, fire hydrant F-35522 which is currently connected to the 6-inch water main on Eleanor Avenue would be connected to the 8-inch water main on Seward Street per LADWP’s recommendation. With this connection, fire flow would be adequate to serve the Project Site. As the amount of development under Alternative 3 would be approximately 71 percent less than the Project, and as Alternative 3 would not include land uses that require higher fire flows than those of the Project, existing fire flows would also be adequate to serve Alternative 3.²² Like the Project, Alternative 3 would also provide all applicable life safety features, including but not limited to automatic fire sprinklers.

²² According to Section IV.G.1, Public Services—Fire Protection, of this Draft EIR, the Project falls within the High Density Industrial and Commercial Category which, per LAMC Section 57.507.3.1, requires a fire flow of 12,000 gallons per minute (GPM). With the development of indoor media uses under Alternative 3 instead of the office, retail and restaurant uses of the Project, it is anticipated that Alternative 3 would remain within the High Density Industrial and Commercial Category (although it is possible that it would fall within the Industrial and Commercial Category requiring a lower fire flow [e.g., 6,000-9,000 GPM] owing to the reduced density and height of development under this alternative). Regardless, the fire flow requirements for Alternative 3 would not be greater than those for the Project.

Based on the above, operation of Alternative 3, like the Project, would not result in the need for new or altered government facilities (i.e., fire stations). Impacts under Alternative 3 would be less than significant and less when compared to the less than significant impacts of the Project.

(2) Police Protection

(a) Construction

Similar to the Project, construction of Alternative 3 could create a small temporary demand for police services within LAPD's Hollywood Division during the construction period. However, as with the Project, Alternative 3 would incorporate Project Design Feature POL-PDF-1 to implement temporary security measures, including security fencing, lighting, and locked entry to secure the Project Site during construction which would service reduce demand. Also like the Project, construction activities under Alternative 3 could potentially slow LAPD emergency response times and interfere with emergency access during the construction period through temporary lane closures, etc. However, while peak daily and peak-hour construction traffic would be the same between Alternative 3 and the Project, the duration of construction activities would be less under Alternative 3 owing to less development under this alternative. Also, both the Project and Alternative 3 would remove the existing development at the Project Site which currently generates some service demand from the LAPD which would offset some or all of the service demand associated with construction activities. Furthermore, both the Project and Alternative 3 would implement the required Construction Traffic Management Plan (Project Design Feature TR-PDF-2 in Section IV.H, Transportation, of this Draft EIR) that would ensure continued provision of emergency access during construction. Lastly, emergency vehicles normally have a variety of options for dealing with traffic pursuant to CVC Section 21806, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, like the Project, construction of Alternative 3 would not result in the need for new or altered government facilities (i.e., police stations). Impacts under Alternative 3 would be less than significant and less when compared to the less than significant impacts of the Project.

(b) Operation

As discussed in Section IV.G.2, Public Services—Police Protection, of this Draft EIR, the Project Site would be served by the Hollywood Community Police Station under the Project. The same would be true under Alternative 3. Both the Project and Alternative 3 would generate an on-site employee population that would generate some demand for service from the LAPD, although this demand would be less under Alternative 3 owing to less development under this alternative. However, because neither project would include residential uses, neither would affect the Hollywood Division's residential service population or existing officer to population ratio. Also, similar to the Project, Alternative 3 would

implement Project Design Features POL-PDF-2 through POL-PDF-6 which require: security camera systems and keycard entry into buildings; proper lighting of building entrances, walkways and parking areas; secure design that maximizes visibility; and provision to the LAPD of a diagram showing access routes and additional information to facilitate police response. These project design features would help reduce the increase in demand for police services under both the Project and Alternative 3, and both the Project and Alternative 3 would generate General Fund tax revenues for the City which could be used to expand law enforcement resources in the Hollywood Division. Furthermore, while both the Project and Alternative 3 would result in an increase in demand for police protection services, such demand would be reduced under Alternative 3 due to the reduction in development. Lastly, while both the Project and Alternative 3 would increase the number of daily vehicle trips, the increase under Alternative 3 would be less than the Project and this increase would not substantially reduce LAPD emergency response times as the LAPD has a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. Therefore, operation of Alternative 3, like the Project, would not result in the need for new or altered government facilities (i.e., police stations). Impacts under Alternative 3 would be less than significant and less than the less than significant impacts of the Project.

h. Transportation

Similar to the Project, Alternative 3 would generally support applicable transportation plans (Mobility Plan 2035, Plan for a Healthy Los Angeles, Hollywood Community Plan, Vision Zero, LAMC, SCAG's RTP/SCS, etc.) and multimodal transportation options. For example, like the Project, Alternative 3 would: include design in accordance with the mobility-enhanced networks of the Mobility Plan; not interfere with the complete streets balanced transportation network (i.e., Transit-Enhanced Network, Bicycle Enhanced Network, and Pedestrian-Enhanced Districts) concept of the Mobility Plan; enhance pedestrian access within and around the Project Site as called for by the Mobility Plan, Plan for a Healthy Los Angeles, and the Hollywood Community Plan; prioritize safety and access for all individuals utilizing the site by complying with all ADA requirements, and provide direct connections to pedestrian amenities, as called by the Plan for a Health Los Angeles; represent urban infill development in close proximity to transit which would encourage alternative transportation use as called for by the Mobility Plan and RTP/SCS; and include sidewalk and driveway design, vehicular parking, bicycle parking, etc., in accordance with LAMC requirements. Both the Project and Alternative 3 would also reduce per capita VMT, including through the implement of TDM measures under Project Design Feature TR-PDF-1 as called for by the Mobility Plan, Hollywood Community Plan, SCAG's RTP/SCS, and the City's TDM Ordinance. Furthermore, while none of the streets surrounding the Project Site are listed in Vision Zero's High Injury Network, neither Project would preclude future Vision Zero safety improvements by the City. Lastly, based on the

trip generation estimates and traffic distribution pattern for the Project, neither project would add 25 or more peak-hour trips to any freeway off-ramp such that no freeway on/off-ramp safety analysis is required. Therefore, like the Project Alternative 3 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be less than significant. The degree of the impacts would be similar between the two projects as neither project would conflict with the applicable transportation plans.

With respect to VMT, Alternative 3 would generate a net increase in daily operational motor vehicle trips which would fall below the daily net increase in vehicle trips required to prepare VMT analysis per the screening criteria developed by the City and described in LADOT's Transportation Assessment Guidelines (TAG) and referenced in the City of Los Angeles VMT Calculator Guide, May 2020. Specifically, as indicated in the VMT Calculator run for Alternative 3 included as Appendix N of this Draft EIR, Alternative 3 would generate an estimated 187 net increase in daily motor vehicle trips which would fall below the 250 daily trip screening criteria for preparing a VMT analysis. Hence, Alternative 3 would not result in VMT impacts. This is compared to the less than significant VMT impacts of the Project (i.e., the Project would result in an average post-TDM work VMT per employee of 7.5 as compared to the Central APC threshold of 7.6 VMT per employee).²³ Additionally, neither project would include any residential uses and, therefore, would not result in a household VMT impact. Overall, Alternative 3 would result in no VMT impact which would be less than the less than significant impacts of the Project.

i. Tribal Cultural Resources

Similar to the Project, Alternative 3 would require excavation and grading for building foundations and subterranean parking. As discussed in Section IV.I, Tribal Cultural Resources, of this Draft EIR and in the Tribal Cultural Resources Report included as Appendix L, while the Project Site is located near tar pits, water sources, and roads that may have provided important resources to prehistoric and protohistoric populations, no known TCRs have been previously recorded on the Project Site or within the search radius of the SCCIC records search. In addition, the consultations with the applicable California Native American Tribes conducted in accordance with AB 52 did not identify any TCRs on the Project Site. Furthermore, like the Project, Alternative 3 would implement the City's standard COA for the inadvertent discovery of TCRs which would mitigate impacts to any TCRs that may be encountered on the Project Site during construction. Therefore, Alternative 3 would result in less than significant impacts that would be similar to the less than significant impacts of the Project.

²³ *Gibson Transportation Consulting, Inc., Transportation Analysis of Project Alternatives for the 1000 Seward Mixed-Use Development Project, January 6, 2022. See Appendix N of this Draft EIR.*

j. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities for Alternative 3 would result in a temporary demand for dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. As indicated in Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, a conservative estimate of Project water use during construction is 1,000 to 2,000 gpd. Construction-related water use under Alternative 3 would be less owing to less development under this alternative, including the reduced number of subterranean parking levels (i.e., two levels under Alternative 3 as compared to four levels under the Project). Furthermore, while both the Project and Alternative 3 would require trenching for the required on-site water distribution system, and connection to the existing water mains in the adjacent streets: (1) the environmental effects associated with these activities are already subsumed in the impact analysis in the other sections of this Draft EIR and would be limited and temporary; and (2) both the Project and Alternative 3 would implement Project Design Feature TR-PDF-2, Construction Traffic Management Plan, to ensure the safe flow of pedestrian, bicycle and vehicular traffic around the construction sites during construction. As such, neither the Project nor Alternative 3 would 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. Alternative 3 would result in less than significant impacts that are less when compared the less than significant impacts of the Project.

(b) Operation

Like the Project, Alternative 3 would result in an increase in long-term water demand. As discussed in Section IV.J.1, the Project would generate a net increase in water demand of 28,847 gpd which it would obtain via connection to the existing 8-inch water main in Romaine Street for which the approved SARs included in the Utility Report (Appendix M of this Draft EIR) confirm has sufficient capacity to serve the Project. Furthermore, Section IV.J.1 confirms that LADWP water supplies are adequate to serve the Project. Because Alternative 3 would include less development than the Project (i.e., 51,225 square feet under Alternative 3 as compared to 150,600 square feet under the Project), including no restaurant uses which are a particularly high water user, operational water demand would be less under this alternative. In addition, like the Project, Alternative 3 would connect to the existing water main in Romaine Street, would comply with applicable water conservation requirements, and would implement the additional water conservation measures outlined in Project Design Feature WAT-PDF-1. Therefore, as with the Project, existing water infrastructure and water supplies would be adequate to serve Alternative 3.

Regarding fire flow, as discussed in Section IV.J.1, the IFFAR for the Project included in the Utility Report indicates that the Project would have adequate fire flow to demonstrate compliance with City fire flow requirements following the relocation of the connection to fire hydrant F-35522. Alternative 3, as discussed above, would result in less operational water demand than the Project. Also, as discussed previously, the fire flow requirements under Alternative 3 would be no greater than they are for the Project (i.e., would fall within the LAMC's High Density Industrial and Commercial category or a lower category). Furthermore, like the Project, Alternative 3 would incorporate a fire sprinkler suppression system to reduce or eliminate the public hydrant demand. Therefore, existing fire flow capacity would be adequate to serve Alternative 3.

Based on the above, operation of Alternative 3, like the Project, would not require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects. As such, Alternative 3 would result in less than significant impacts which would be less when compared to the less than significant impacts of the Project.

(2) Energy Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 3 would consume minor quantities of electricity (construction activities do not typically involve the consumption of natural gas). As indicated in Section IV.J.2, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR, Project construction activities would generate only a fraction of the electricity demand of Project operations, and since existing electricity infrastructure and supplies are adequate to serve Project operation, they would also be adequate to serve Project construction. The same would be true of Alternative 3, except that this alternative would consume even less electricity during construction owing to the reduction in development and associated construction activities under this alternative. Also, since the Project Site is an urban infill site that is already served by electricity and natural infrastructure, it is not anticipated that either project would require extensive off-site infrastructure improvements. Lastly, like the Project, Alternative 3 would be required to coordinate energy infrastructure improvements with LADWP and SoCalGas to minimize potential service disruptions, and to develop on-site energy infrastructure and connections to the existing off-site energy infrastructure in accordance with applicable requirements. Hence, like the Project, construction activities under Alternative 3 would not result in an increase in energy demand that exceeds available supplies or distribution infrastructure capabilities that would require the construction of new or expanded energy facilities, the construction or relocation of which could cause significant environmental effects. Construction impacts under Alternative 3 would thus be less than significant and less when compared to the less than significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 3 would generate an increased consumption of electricity and natural gas relative to existing conditions which would be miniscule when compared to existing energy supplies and peak energy flows in the local infrastructure. Also, because Alternative 3 operation would result in less electricity and natural gas consumption than the Project owing to less development under this alternative, and because the existing electricity and natural gas infrastructure would be adequate to serve Project operation, so too would this infrastructure be adequate to serve Alternative 3 operation. Furthermore, as with the Project, Alternative 3 would be developed in accordance with applicable energy conservation requirements, including those in Title 24, CALGreen, and the Green Building Code, and like the Project would implement Project Design Features GHG-PDF-1 requiring the incorporation of sustainability features and WAT-PDF-1 requiring the use of energy efficient appliances, which together would minimize electricity and natural gas consumption. Therefore, as with the Project, Alternative 3 operation would not result in an increase in energy demand that exceeds available supplies or distribution infrastructure capabilities that would require the construction of new or expanded energy facilities, the construction or relocation of which could cause significant environmental effects. Operational impacts under Alternative 3 would thus be less than significant and less when compared to the less than significant impacts of the Project.

3. Comparison of Impacts

Alternative 3 would not avoid any of the significant unavoidable impacts of the Project (i.e., on-site and off-site construction noise; on-site construction vibration [building damage]; and on- and off-site construction vibration [human annoyance]). Alternative 3 would also not avoid the Project's significant unavoidable cumulative impact with respect to off-site construction vibration [human annoyance]). However, Alternative 3 would reduce these impacts owing to the reduced amount of development and associated construction activities, operational activities, and construction and operational vehicle trips under this alternative. Furthermore, Alternative 3 would reduce the majority of the Project's less than significant impacts and impacts that would be less than significant with mitigation.

4. Relationship of the Alternative to Project Objectives

Under Alternative 3, 51,225 square feet of media production uses would be developed at the Project Site instead of the 150,600 square feet of office, retail and restaurant uses proposed under the Project. As such, Alternative 3 would meet the underlying purpose of the Project which is to provide an infill commercial development for

growing retail, hospitality, entertainment, and technology companies looking to locate businesses within the Hollywood community.

Regarding the Project objectives, Alternative 3 would meet the following Project objective to the same extent as the Project as it would design and construction the proposed improvements in accordance with the latest energy conservation requirements and would implement the same energy conservation and sustainability features:

- Provide a sustainable building design that allows for the use of energy-efficient technology, thereby reducing the overall reliance on energy for lighting and cooling.

Alternative 3 would also meet the following Project objectives, to a lesser extent than the Project as a result of reduced development and single use:

- To support the Hollywood Community Plan's Objective 1 to further the development of Hollywood as a major center of population, employment, retail services, and entertainment and create a dynamic and economically viable project with sufficient office square footage and density to facilitate a healthy job-housing balance in the Hollywood area.
- Promote local, regional, and State land use and mobility objectives and reduce vehicle miles traveled (VMT) through infill development and providing jobs in proximity to transit and transportation infrastructure to encourage pedestrian activity.
- To support the Hollywood Community Plan's Objective 4(a) to promote economic well-being and public convenience through allocating and distributing commercial lands for retail, service, and office facilities in quantities and patterns based on accepted planning principles and standards and activate the Hollywood area with commercial opportunities serving local employees, generate local tax revenue, and provide jobs for residents in support of local business.
- Support the growth of the City's economic base by creating a significant number of construction and permanent jobs.

Lastly, Alternative 3 would not meet the following Project objective because no retail and restaurant uses are proposed:

- To create a pedestrian-friendly project by creating a street-level identity for the Project Site and improving the pedestrian experience through the introduction of retail and restaurant uses on the ground level.

V. Alternatives

D. Environmentally Superior Alternative

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

Table V-2 on page V-11 provides a summary matrix that compares the impacts associated with the Project with the impacts of each of the analyzed alternatives. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to CEQA Guidelines Section 15126.6(c), the analysis below addresses the ability of the Alternatives to “avoid or substantially lessen one or more of the significant effects” of the Project. As indicated therein, all three alternatives would be less impacting than the Project.

Alternative 1, the No Project/No Building Alternative, would be the Environmentally Superior Alternative. This alternative would retain the existing on-site uses and would not include the development of new uses at the Project Site. Alternative 1 would avoid all of the Project’s significant unavoidable Project-level impacts, including its significant unavoidable: on-site and off-site construction noise; on-site construction vibration (building damage); and on- and off-site construction vibration (human annoyance). Alternative 1 would also avoid the Project’s significant unavoidable cumulative impact with respect to cumulative off-site construction vibration (human annoyance). Alternative 1 would also avoid most of the Project’s remaining less than significant and less than significant with mitigation impacts as no changes to the existing conditions would occur. However, as Alternative 1 would not replace the existing old buildings on the Project Site with new buildings, it would not incorporate the latest energy efficient design and features, and thus would result in a greater impact with respect to the wasteful, inefficient or unnecessary consumption of energy resources.

Further, Alternative 1 would not meet the underlying purpose of the Project which is to provide an infill commercial development for growing retail, hospitality, entertainment, and technology companies looking to locate businesses within the Hollywood community. Alternative 1 would also not meet any of the Project’s basic objectives.

As stated above, the CEQA Guidelines require the identification of an Environmentally Superior Alternative other than a No Project Alternative. As such, in accordance with the CEQA Guidelines, a comparative evaluation of the remaining alternatives indicates that Alternative 3, the Existing Zoning Compliant Alternative Use Alternative, would be the Environmental Superior Alternative. Under Alternative 3, 51,225 square feet of media production uses would be developed at the Project Site instead of the 150,600 square feet of office, retail and restaurant uses proposed under the Project. Alternative 3 would not avoid any of the significant unavoidable impacts of the Project (i.e., on-site and off-site construction noise; on-site construction vibration [building damage]; and on- and off-site construction vibration [human annoyance]). Alternative 3 would also not avoid the Project's significant unavoidable cumulative impact with respect to off-site construction vibration [human annoyance]). However, Alternative 3 would reduce these impacts as a result of the reduced amount of development and associated construction activities, operational activities, and construction and operational vehicle trips under this alternative. Furthermore, Alternative 3 would reduce the majority of the Project's less than significant impacts and impacts that would be less than significant with mitigation.²⁴

Alternative 3 would be the Environmentally Superior Alternative and would meet the underlying purpose of the Project which is to provide a mixed-use development for growing retail, hospitality, entertainment, and technology companies looking to locate businesses within the Hollywood community. Regarding the Project objectives, Alternative 3 would fully meet the following Project objective:

- Provide a sustainable building design that allows for the use of energy-efficient technology, thereby reducing the overall reliance on energy for lighting and cooling.

Alternative 3 would also meet the following Project objectives, although to a lesser extent than the Project:

- To support the Hollywood Community Plan's Objective 1 to further the development of Hollywood as a major center of population, employment, retail services, and entertainment and create a dynamic and economically viable project with sufficient office square footage and density to facilitate a healthy job-housing balance in the Hollywood area.

²⁴ While Alternatives 2 and 3 would result in the same number of impacts that would be less, similar to, and greater than the Project, the overall impacts of Alternative 3 would be less than those of Alternative 2 as a result of the reduced amount of development under Alternative 3. Hence, Alternative 3 would be less impactful than Alternative 2.

- Promote local, regional, and State land use and mobility objectives and reduce vehicle miles traveled (VMT) through infill development and providing jobs in proximity to transit and transportation infrastructure to encourage pedestrian activity.
- To support the Hollywood Community Plan's Objective 4(a) to promote economic well-being and public convenience through allocating and distributing commercial lands for retail, service, and office facilities in quantities and patterns based on accepted planning principles and standards and activate the Hollywood area with commercial opportunities serving local employees, generate local tax revenue, and provide jobs for residents in support of local business.
- Support the growth of the City's economic base by creating a significant number of construction and permanent jobs.

Lastly, Alternative 3 would not meet the following Project objective because no retail and restaurant uses are proposed:

- To create a pedestrian-friendly project by creating a street-level identity for the Project Site and improving the pedestrian experience through the introduction of retail and restaurant uses on the ground level.

Although Alternative 3 would be the Environmentally Superior Alternative, as stated above, it would meet most of the Project's objectives to a lesser extent than the Project and would not meet the objective related to creating a pedestrian-friendly project. Specifically, because only 51,225 square feet of new uses would be provided compared to 150,600 square feet with the Project, Alternative 3 would not further Hollywood's development as a major employment center to the same extent; would not provide as many jobs near transit; would not provide as many commercial opportunities serving local employees and generating local tax revenue; and would not create the same number of construction and permanent jobs as the Project. Furthermore, no ground-level retail or restaurant uses which would enhance the pedestrian experience are proposed.