

I. Executive Summary

I. Executive Summary

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this section of this Draft Environmental Impact Report (EIR) contains a brief summary of the Violet Street Creative Office Campus Project (Project) and its potential environmental effects. More detailed information regarding the Project and its potential environmental effects is provided in the following sections of this Draft EIR. Also included in this section are an overview of the purpose and focus of this Draft EIR, a description of the organization of this Draft EIR, a general description of the Project and proposed entitlements, a general description of areas of controversy, a description of the public review process for this Draft EIR, and a summary of the alternatives to the Project evaluated in this Draft EIR, including identification of the Environmentally Superior Alternative.

1. Purpose of this Draft EIR

As described in CEQA Guidelines Section 15121, an EIR is an informational document that will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. Therefore, the purpose of this Draft EIR is to focus the discussion on the Project's potential environmental effects that the City of Los Angeles (City), as the Lead Agency, has determined to be, or potentially may be, significant. In addition, feasible mitigation measures are recommended, when applicable, that could reduce or avoid the Project's significant environmental impacts.

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

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

In accordance with CEQA Guidelines Section 15128, an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were

determined not to be significant and not discussed in detail in the Draft EIR. An Initial Study was prepared for the Project, and a Notice of Preparation (NOP) was distributed for public comment to the State Clearinghouse, Governor's Office of Planning and Research (OPR), responsible agencies, and other interested parties on November 5, 2021, for a 30-day review period. In addition, an online public scoping meeting for the Project was held on November 18, 2021. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City determined through the Initial Study the potential for significant impacts in the following environmental issue areas:

- Air Quality
- Cultural Resources
- Energy
- Greenhouse Gas Emissions
- Land Use and Planning
- Noise
- Public Services (fire protection and police protection)
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems (water supply/infrastructure and energy infrastructure)

The City determined through the Initial Study that the Project would not have the potential to cause significant impacts related to aesthetics; agriculture/forestry resources; air quality (odors); biological resources; cultural resources (human remains); geology and soils (including paleontological resources); hazards and hazardous materials; hydrology and water quality; land use and planning (division of an established community); mineral resources; noise (airport/airstrip noise); population and housing; public services (schools, parks, and libraries); recreation; transportation (hazardous design features, emergency access); utilities and service systems (wastewater, stormwater, telecommunications, solid waste); and wildfires. Therefore, these areas were not analyzed further in this Draft EIR. The Initial Study, which demonstrated that no significant impacts would occur for these issue areas, is included in Appendix A.1 of this Draft EIR.

3. Draft EIR Organization

This Draft EIR is comprised of the following sections:

- I. **Executive Summary.** This section describes the purpose of this Draft EIR, Draft EIR focus, and effects found not to be significant, Draft EIR organization, Project summary, areas of controversy and issues to be resolved, public review process, a summary of environmental impacts and mitigation measures, and a summary of alternatives.
- II. **Project Description.** This section describes the Project location, existing conditions, Project objectives, characteristics of the Project, and requested permits and approvals.
- III. **Environmental Setting.** This section contains a description of the existing physical and built environment and a list of related Projects anticipated to be built in the vicinity of the Project Site.
- IV. **Environmental Impact Analysis.** This section contains a description of regulations and policies applicable to the Project, environmental setting, project design features, Project and cumulative impact analyses, mitigation measures (where necessary), and conclusions regarding the level of significance after mitigation (where necessary) for each of the following environmental issues: air quality; cultural resources; energy; geology and soils; greenhouse gas emissions; land use and planning; noise; public services (fire protection and police protection); transportation; tribal cultural resources; and utilities and service systems (water supply/infrastructure and energy infrastructure).
- V. **Alternatives.** This section provides an analysis of a reasonable range of alternatives to the Project, including Alternative 1: No Project/No Build Alternative; Alternative 2: Reduced Density Alternative; Alternative 2: Reduced Density Alternate Use Alternative; and Alternative 4: Office with Hotel Future Campus Expansion Phase Alternative.
- VI. **Other CEQA Considerations.** This section provides a discussion of significant unavoidable impacts that would result from the Project and the reasons why the Project is being proposed notwithstanding the significant unavoidable impacts. An analysis of the significant irreversible changes in the environment and potential secondary effects that would result from the Project is also presented. This section also analyzes potential growth-inducing impacts of the Project and potential secondary effects caused by the implementation of the mitigation measures for the Project. Lastly, a summary of the possible effects of the Project that were determined not to be significant

within the Initial Study is provided.

VII. References. This section lists the references and sources used in the preparation of this Draft EIR.

VIII. Acronyms and Abbreviations. This section provides a list of acronyms and abbreviations used in this Draft EIR.

IX. List of Preparers. This section lists the persons, public agencies, and organizations that were consulted or contributed to the preparation of this Draft EIR.

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

- Appendix A Initial Study, NOP, and NOP Comment Letters
 - Appendix A.1 Initial Study
 - Appendix A.2 Notice of Preparation
 - Appendix A.3 NOP Comment Letters and Scoping Meeting Comments
- Appendix B TPA Memo
- Appendix C Air Quality and Greenhouse Gas Emissions
 - Appendix C.1 Air Quality and Greenhouse Gas Emissions Methodology
 - Appendix C.2 Air Quality Worksheet and Modeling Output Files
 - Appendix C.3 Greenhouse Gas Worksheets and Modeling Output Files
- Appendix D Historical Resources Technical Report
- Appendix E Archaeological Resources Assessment
- Appendix F Energy Analysis Spreadsheets
- Appendix G Energy Infrastructure Memorandum
- Appendix H Land Use Tables
- Appendix I Noise and Vibration Calculation Worksheets
- Appendix J Los Angeles Fire Department Letter

- Appendix K Water Utility Technical Report
- Appendix L Los Angeles Police Department Letter
- Appendix M Transportation
 - Appendix M.1 Transportation Study
 - Appendix M.2 LADOT Approval Letter
- Appendix N Tribal Cultural Resources Report
- Appendix O Water Supply Assessment
- Appendix P Alternatives Analysis Technical Memorandum

4. Thresholds of Significance

In 2006, the City published the L.A. CEQA Thresholds Guide (Thresholds Guide) as a guidance document for preparing CEQA analyses for projects within the City. The Thresholds Guide includes two sets of criteria to evaluate project impacts: screening criteria, which provide direction in determining the appropriate environmental document required for a project; and significance thresholds, which assist in determining whether a project’s impacts generally would be significant under normal circumstances and would therefore require mitigation. Although intended as a voluntary tool, the Thresholds Guide offers a consistent set of evaluation criteria applicable to most discretionary projects in the City, and the Los Angeles Department of City Planning has typically used both the screening criteria and significance thresholds as the basis for project analyses in its CEQA documents. However, the Thresholds Guide clearly indicates the Lead Agency—in this case, the Department of City Planning—retains the authority to determine significance thresholds on a case-by-case basis, dependent upon unique environments, evolving regulatory requirements, and the nature of each project. In addition, the Thresholds Guide states it is not intended as a substitute for the use of independent judgment to determine significance or the evaluation of the evidence in the record. Moreover, it states “[b]ecause evaluation practices continue to evolve due to changing regulations, scientific methods, and court decisions, the project evaluator and lead City agency should always use the best information and evaluation methods available, including those from sources other than the Thresholds Guide.”¹

¹ City of Los Angeles, *L.A. CEQA Thresholds Guide, 2006, p. 3.*

In light of an evolving regulatory environment, recent case law, new topics, such as greenhouse gas emissions and tribal cultural resources, that are now addressed in Appendix G of the State CEQA Guidelines (Appendix G), and the age of the Thresholds Guide, City Planning has begun to update its CEQA guidance. At this point in time, City Planning has chosen to rely on the Appendix G questions as thresholds of significance. As noted above, the City has discretion in choosing appropriate significance thresholds. Therefore, throughout this Draft EIR, the threshold questions contained in Appendix G are used. The factors and considerations set forth in the Thresholds Guide are utilized, where appropriate, to assist in answering the Appendix G threshold questions.

5. Project Site

a. Project Site Location

The Project Site is located at 2030, 2034, 2038, 2042, 2046, 2054, and 2060 East 7th Street; 715, 721, 725, 729, 733, 777, 801, 805, 809, 813, 817, 821, 825, 827, and 829 South Santa Fe Avenue; 2016, 2020, 2023, 2026, 2027, 2030, 2031, 2034, 2035, 2037, 2038, 2040, and 2043 East 7th Place; and 2017, 2023, 2027, 2031, 2035, 2039, 2045, and 2051 Violet Street, within the Central City North Community Plan Area of the City, approximately 14 miles east of the Pacific Ocean. Primary Regional access to the Project Site is provided by the Hollywood Freeway (U.S. Highway 101 or US-101), the Santa Monica Freeway (Interstate 10 or I-10), and the Golden State Freeway (Interstate 5 or I-5), which are accessible within approximately one mile of the Project Site. Local access to the Project Site is provided by several local streets, including Santa Fe Avenue, Violet Street, Mateo Street, 7th Street, and Alameda Street. The 273,930-square-foot (approximately 6.288-acre) Project Site is bounded by 7th Street to the north, Santa Fe Avenue to the east, Violet Street to the south, and various public alleyways to the west. The Project Site is partially bisected by 7th Place, an east/west Collector Street, which terminates within the Project Site and provides vehicular access to Mateo Street to the west. A public alleyway traverses the Project Site, running north/south between the terminus of 7th Place and Violet Street.

b. Existing Project Site Conditions

The Project Site is comprised of four lots. Lot 1, located at the southwestern corner of the Project Site (2045 E. Violet Street and 2020 E. 7th Place) is improved with 25,798 square feet of warehouse uses and 9,940 square feet of office uses, along with associated surface parking and truck loading areas. Lot 2, located at the northwestern corner of the Project Site (2030 E. 7th Street) is developed with a five-story, 163,804-square-foot, 604-stall vehicle parking garage with a rooftop level. The at-grade and above-grade parking structure has vehicular ingress and egress from 7th Street and 7th Place. Lot 3, located at the northeastern portion of the Project Site (777 S. Santa Fe Avenue) along

Santa Fe Avenue between 7th Street and Violet Street is currently improved with a two- and five-story 244,795 square-foot office building currently occupied by Warner Music Group. Constructed in 1913, this building originally served as a factory and warehouse for the Ford Motor Company and, in 2015, was renovated to accommodate offices, retail, and restaurant uses. Lot 4, located at the southeastern corner of the Project Site (2051 E. Violet Street), is developed with a 21,880-square-foot warehouse with one story and a mezzanine. The Project Site also includes portions of 7th Place and an alley that connects the terminus of 7th Place to Violet Street. The Project Site is partially bisected by 7th Place, an east/west Collector Street, which terminates within the Project Site and provides vehicular access to Mateo Street to the west. A public alleyway traverses the Project Site, running north/south between the terminus of 7th Place and Violet Street. Landscaping within the Project Site is limited to common ornamental trees, grasses, and shrubs.

The Project Site is located in a highly urbanized area at the southern part of the Central City North Community Plan area. Surrounding land uses consist of a mixture of low and mid-rise buildings occupied by industrial, warehouse, office, and residential uses. Properties to the north are developed with live-work units, commercial, and industrial uses. Properties to the south are developed with industrial and warehouse uses. Properties to the east are developed with multi-family residential and industrial and warehouse uses. Properties to the west are developed with low-rise commercial and industrial uses. All properties immediately adjacent to the Project Site are located within the M3-1-RIO zone.²

c. Land Use and Zoning

The Project Site is located within the Central City North Community Plan area. The Project Site has a General Plan land use designation of Heavy Manufacturing and is zoned M3-1-RIO (Heavy Manufacturing, Height District 1, River Improvement Overlay District). Pursuant to the LAMC, the M3 Zone permits M2 uses that include a wide variety of industrial, manufacturing, and storage uses, Industrial I uses, Nuisance type uses 500 feet from any other zone, as well as office and commercial uses. The Height District 1 designation, in conjunction with the M3 Zone has no height limit and an FAR of 1.5:1. The RIO designation is for the City's River Improvement Overlay (RIO) district, which is designed to provide for preservation of tributaries and rivers in the City of Los Angeles by promoting river identity, supporting local species, and convenient access, among many

² *A project immediately to the north of the Project Site is in the process of requesting a General Plan Amendment, Zone Change, and Height District Change from "Heavy Manufacturing" to "Regional Center Commercial" as well as a corresponding zone change from M3-1-RIO to C2-2-RIO. In addition, A 347-unit, 36-story mixed-use development approximately 250-feet to the east of the Project Site was granted a General Plan Amendment and Zone Change, approved by City Planning Commission in April 2021.*

other aspects. The Project Site is also located within a Transit Priority Area (TPA)³, the Los Angeles State Enterprise Zone, the Central Industrial Redevelopment Project Area, and within a Tier 3 Transit Oriented Communities (TOC) area.

6. Description of the Proposed Project

a. Project Overview

The Project proposes to develop a new creative office campus that knits together uses spanning existing and proposed buildings on an approximately 273,930-square foot (6.288 acre) site. Specifically, the Project proposes a new 13-story (including mechanical penthouse), a maximum 450,599-square-foot commercial building, featuring up to 435,100 square feet of office uses, 15,499 square feet of ground floor retail and/or restaurant uses, and 1,264 automobile parking spaces in one at-grade, two above-grade, and four below-grade parking levels within Lot 1 of the Project Site, located at the southwestern corner of the Project Site.⁴ The Project also includes approximately 74,018 square feet of outdoor areas, comprised of 20,418 square feet of balconies and roof decks for the private use of office tenants and their guests, as well as 53,600 square feet of shared outdoor areas in both deck areas and a covered ground floor area. In addition, the Applicant has requested that a number of existing and proposed public right-of-way areas within the Project Site be vacated and/or otherwise modified to improve pedestrian circulation within and throughout the Project Site. These deviations include maintaining the existing half right-of-way dimension along Violet Street, waiving a future alley dedication on the westerly edge of the Project Site, and vacating the majority of 7th Place from Mateo Street into the Project Site to create a pedestrian paseo. The ground floor paseo would provide pedestrian access to the proposed and existing uses, creating a unified development and introducing new public space that would be improved and programmed with ground floor retail and/or restaurant uses, seating areas, and landscaped areas of varying size and shaded areas. As part of the Project, the existing 25,798 square feet of warehouse and 9,940 square feet of office uses, along with associated surface parking, all located on Lot 1 on the southwestern portion of the Project Site, would be demolished. The 244,795-square-foot Warner Music Group building (originally the Ford Factory building) on Lot 3 and 604-space vehicle parking garage on Lot 2 would remain with no change in use or alteration of the historic building.

³ *The Project's location within a TPA is documented in the Applicability of Transit Priority Area (TPA) to the 2045 Violet Project technical memorandum prepared by Fehr & Peers in March 2020 and included as Appendix B of this Draft EIR.*

⁴ *During its initial phase, the Project would develop up to 435,100 square feet of office uses under the 7th Place driveway scenario and up to 432,910 square feet of office uses under the Violet Street driveway scenario. Therefore, in order to present the most conservative scenario, this Draft EIR analyzes 435,100 square feet of office uses unless otherwise noted.*

The Applicant is requesting a General Plan Amendment to change Lot 1's land use designation from Heavy Manufacturing to Regional Center Commercial and a Vesting Zone Change from the M3-1-RIO zone to C2-2-RIO zone. If approved, this same 110,300-square-foot portion of the Project Site would have a maximum permitted FAR of 6:1, permitting a maximum of 661,800 square feet of development with respect to this portion of the Project Site. However, the proposed development on this portion of the Project Site is only 435,000 square feet. As part of the Project approvals, the Applicant is requesting a Floor Area Ratio Averaging Conditional Use Permit, which would allow the remaining 211,201 square feet of floor area (from the rezoned portion) to be averaged across the entire Project Site as a Unified Development. Together with the 244,795 square feet of existing development to remain (the Ford Factory Building), this yields 906,595 square feet of aggregate development across the unified Project Site, which corresponds to an overall sitewide FAR of 3.31. Accordingly, the Project includes a Future Campus Expansion Phase, which would encompass a potential expansion opportunity for additional office use (or other allowed uses), consistent with the current M3-1-RIO zone to be developed within Lot 4 of the Project Site at the northwestern corner of Violet Street and Santa Fe Avenue. Construction of the Future Campus Expansion Phase would require the demolition of an existing 21,880-square-foot warehouse building. The precise uses and development plan for the Future Campus Expansion Phase are not known at this Time. Such uses would ultimately be considered by the City pursuant to subsequent permit applications in accordance with City requirements applicable to the Project Site at the time of application. The Future Campus Expansion Phase could be utilized for any uses consistent with the existing M3-1-RIO zone. The Project's environmental analysis analyzes office and restaurant uses (which are both uses authorized by the M3-1-RIO zone) in order to provide a conservative analysis. Accordingly, the Future Campus Expansion Phase is analyzed as 191,201 square feet of office uses and 20,000 square feet of restaurant uses throughout this Draft EIR unless otherwise noted.

b. Design and Architecture

The proposed office tower incorporates varying rooflines, a sloping high-rise tower, expansive elongated windows with nonreflective glass, and material breaks (i.e., glass fiber reinforced concrete [GFRC], different glass systems, and louvred fins) in the vertical façade. Along with new ground floor landscaped paseo, the proposed balconies (located on Levels 8 and 10) create breaks in the façade. All above ground parking levels would be architecturally screened on three sides. The proposed commercial building would complement the Warner Music Group building by promoting pedestrian activity in the area while also introducing new uses and a new office building that reflects a style consistent with new nearby development. The proposed 217-foot 6-inch-tall building includes commercial spaces at the ground floor, parking at floors two through three and office space at floors 4 through 12. The ground floor commercial spaces fronting Violet Street would be

set back under upper parking levels, which are supported by concrete columns at ground level. The ground floor commercial spaces would be clad in concrete and brick with large, aluminum framed windows and tenant signage on the south elevation. The ground floor also includes a new landscaped paseo, which promotes pedestrian activity at the street level and complements existing nearby uses.

The three above-grade parking levels would be clad in concrete, while upper office levels would be clad in aluminum and non-reflective glass and screened with GFRC and vertical metal panels that are spaced to create tall, narrow openings. The office space on floors 4 through 12 are located on the northern half of the building, creating a massing that steps back and up from Violet Street at the approximate midpoint of the structure. Multilevel balcony cutouts are irregularly located at four locations within the south elevation of the building. These cutouts help to break up the otherwise flat massing of the south elevation. The roof above floors 3 and 12 are designed in an irregular sawtooth shape when viewed from the east and west elevations. This design feature helps to further distinguish the building from surrounding structures, which are predominantly rectilinear in form. Mechanical equipment will be located on the roof level above office level 12.

c. Outdoor Areas and Landscaping

The Project would provide 74,018 square feet of outdoor areas and landscaping through the introduction of a 42,957-square-foot ground floor paseo and a total of 31,061 square feet comprised of 15,961 square feet of balconies located on levels 1.5 through 4 and 8, along with 15,100 square feet of roof decks located on the roof of levels 1, 4, 5, and 12. While the Project is not required to provide outdoor areas and/or landscaping, the proposed ground floor paseo would improve pedestrian connectivity throughout the Project Site, while the outdoor decks and balconies would provide tenants with convenient access to the outdoors. Both the private and public deck areas are designed with a combination of landscape, hardscape, seating areas, and pavers. The covered ground floor areas are maintained with concrete pavers, planting areas, and seating. Additionally, the outdoor and landscape areas would unify the site by encouraging an active ground floor and providing a cohesive plant palette. This enhanced public realm creates a series of pedestrian pathways linking the campus both internally as a unified development and externally with the existing public realm. A total of 59 trees of various species would be planted throughout the Project Site, including six street trees that would be provided along adjacent streets.

The Project would also enhance the public realm with streetscape improvements to create a cohesive visual identity for the Project Site and enhance the pedestrian experience with appropriate connectivity to the surrounding area. Along all street frontages, pedestrian access would be improved and allow for planting areas and six street trees. Plantings would include resilient, drought-tolerant native and adaptive tree, shrub,

and groundcover species, including shade trees. Adjacent to the Violet Street sidewalk, pedestrian scale improvements, including pavers, and planters, would be provided to highlight the main entrance. This design is complemented with a landscaped vehicular drop-off and pick-up area.

d. Access, Public Transit, and Parking

Vehicular access (ingress/egress) to the parking structure would be provided via one driveway on East 7th Place, which extends into the paseo, or via one driveway on Violet Street. In addition, a rideshare drop-off area would be provided on Violet Street, along the southern border of the Project Site. Access to the loading dock would be provided to the east of the parking structure entry/exit driveway. Pedestrian access to the buildings would be provided along multiple points throughout the Project Site.

Public transit service in the vicinity of the Project Site is currently provided by multiple local and regional bus lines provided by the Los Angeles County Metropolitan Transportation Authority (Metro) and the Los Angeles Department of Transportation (LADOT). Specifically, transit options in the vicinity of the Project Site include the Metro L Line (Gold) Little Tokyo/Arts District Station, located approximately 1.4 miles northwest of the Project Site; Metro bus lines 18 and 62 located approximately 0.11 mile north of the Project Site along with Metro bus line 60 located approximately 0.04 mile southeast; and the DASH City West bus stop located approximately 0.58 mile northwest of the Project Site.

The Project would include a parking structure with one at-grade, two above-grade, and four below-grade levels and provide a total of 1,264 vehicular parking spaces. The Project would also provide 240 bicycle parking spaces under the 7th Place driveway scenario or 220 bicycle parking spaces under the Violet Street driveway scenario. Additional bicycle parking for the Future Campus Expansion Phase would be provided as required by code based upon the uses developed. The bicycle parking facilities would be accessible from the at-grade parking level via the lobby. In addition, the Project would comply with City and State requirements for providing electric vehicle (EV) charging capabilities and EV charging stations within the vehicle parking areas.

e. Lighting and Signage

The Project would include low-level exterior lights along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage would be incorporated. All lighting would comply with current energy standards and regulations, as well as design requirements. Project lighting would be designed to provide efficient and effective on-site lighting while minimizing light spill-over from the Project Site, reducing sky-glow, and improving nighttime visibility through glare reduction. All exterior and interior

lighting would meet high energy efficiency requirements utilizing light emitting diode (LED) or efficient fluorescent lighting technology. New street and pedestrian lighting within the public right-of-way would comply with applicable City regulations.

The Project is located in the RIO zone and is subject to the exterior lighting regulations of LAMC Section 13.17 F.3. The exterior lighting regulations of the RIO are intended to help provide an aesthetically pleasing environment in the vicinity of the Los Angeles River. The Project would comply with the RIO, including its exterior lighting regulations. Specifically, all site and building mounted LED or efficient fluorescent lighting would be designed such that the lighting produces a maximum initial luminance value no greater than 0.20 horizontal and vertical foot candles at the site boundary and no greater than 0.01 horizontal foot candles 15 feet beyond the site. No more than 5 percent of the total initial designed lumens would be emitted at an angle of 90 degrees or higher from nadir (straight down). No low pressure sodium, high pressure sodium, metal halide, quartz, incandescent greater than 60 watts, mercury vapor, or halogen fixtures are proposed.

Proposed signage would be designed to be aesthetically compatible with the proposed architecture of the Project and its surroundings. Proposed signage would include identity signage, building and tenant signage, and general ground level and way-finding pedestrian signage that would comply with LAMC signage regulations. The Project would not include signage with flashing or mechanical properties. Project signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off site glare. Illumination used for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

f. Sustainability Features

The Project's design is based on principles of smart growth and environmental sustainability, as demonstrated by its office/commercial configuration, emphasis on walkability, bike-friendly environment, and proximity to public transit.⁵ The Project would comply with the City of Los Angeles Green Building Code and the California Green Building Standards (CALGreen) Code and incorporate features to support and promote environmental sustainability, including an energy-efficient building, a pedestrian- and bicycle-friendly site design, solar ready rooftops, electric vehicle charging, water

⁵ *The Southern California Association of Governments (SCAG) considers smart growth to be a range of development and conservation strategies that help protect the natural environment and make communities more attractive, economically stronger, and more socially diverse. A balance is sought between economically prosperous, socially equitable, and environmentally sustainable community development. SCAG, Connect SoCal Final Program EIR, May 2020, Section 3.11, Land Use and Planning, p. 3.11-3.*

conservation measures, and waste reduction measures, among others. The Project would also utilize sustainable planning and building strategies and would incorporate the use of environmentally sustainable materials, where applicable.

g. Anticipated Construction Schedule

Construction of the Project would commence with demolition of the existing buildings and surface parking areas to be removed. This phase would be followed by grading and excavation for the subterranean parking. The building foundation would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Project construction is anticipated to begin in 2023 and be completed in 2026. As noted above, it is estimated that approximately 144,000 cubic yards of export would be hauled from the Project Site.

h. Requested Permits and Approvals

The list below includes the anticipated requests for approval of the Project. This Draft EIR will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

- Pursuant to City Charter Section 555 and LAMC Section 11.5.6, a General Plan Amendment to amend the Central City North Community Plan to re-designate Lot 1 (located at 2016, 2020, 2026, 2030, 2034, 2038, and 2040 East 7th Place, and 2017, 2023, 2027, 2031, 2035, 2039, and 2045 East Violet Street) from “Heavy Manufacturing” to “Regional Center Commercial”;
- Pursuant to LAMC Sections 12.32 F and 12.32 Q, a Vesting Zone and Height District Change from the M3-1-RIO Zone to the C2-2-RIO Zone for Lot 1 of the Project Site;
- Pursuant to LAMC Section 12.24 W.19, a Vesting Conditional Use to allow Floor Area Ratio averaging across a Unified Development;
- Pursuant to LAMC Section 12.27, a Zone Variance from LAMC Section 12.21 C.6 (b) to permit a loading zone to be provided with vehicular access from a public street;
- Pursuant to LAMC Section 16.05, Site Plan Review for a project resulting in more than 50,000 new square feet of nonresidential floor area within the Project Site;
- Pursuant to LAMC Sections 17.01, 17.10, 17.13, and 17.15, a Vesting Tentative Tract Map to permit the merger, vacation, and resubdivision of the Project Site

and portions of 7th Place, Violet Street, Santa Fe Avenue, and the abutting public alley to permit the creation of four ground lots; maintenance of the existing 30-foot width of the abutting half right-of-way of Violet Street; maintenance of the existing 40-foot width of the abutting half right-of-way of Santa Fe Avenue; maintenance of the existing 40-foot width of the abutting half right-of-way of 7th Street; maintenance of the existing 7.5-foot width of the abutting half right-of-way of the alley located at the westerly property line; and the export of greater than 144,000 cubic yards of materials; and

- Other discretionary and ministerial permits and approvals that are or may be required, including, but not limited to, temporary street closure permits, grading permits, excavation permits, haul route approval, street tree removal approval, foundation permits, and sign permits.

7. Areas of Controversy

Potential areas of controversy and issues to be resolved by the City's decision-makers may include those environmental issue areas where the potential for a significant and unavoidable impact has been identified. In addition, CEQA-related issues raised during the public scoping meeting and NOP comment period include air quality (analysis regarding consistency with South Coast Air Quality Management District's [SCAQMD] Air Quality Management Plan [AQMP], mitigation, and permitting requirements); LADWP facilities; and greenhouse gas (GHG) emissions. All of these issues were evaluated in this Draft EIR or the Initial Study prepared for the Project and included as Appendix A.1 of this Draft EIR. Based on the analysis in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant Project-level impacts that cannot be feasibly mitigated with respect to on-site construction noise and freeway safety. In addition, as evaluated in Section IV and summarized below, implementation of the Project would result in significant cumulative impacts that cannot be feasibly mitigated with regard to off-site operational noise and freeway safety.

8. Public Review Process

The City prepared an Initial Study and circulated an NOP for public comments to the State Clearinghouse, OPR, responsible agencies, and other interested parts on November 5, 2021, for a 30-day review period. The City also held an online public scoping meeting for the Project on November 18, 2021. The Initial Study, NOP, and NOP comment letters/scoping meeting comments are included as Appendices A.1 through A.3, respectively, of this Draft EIR.

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

9. Summary of Environmental Impacts

Table I-1 beginning on page I-16 summarizes the environmental impacts of the Project evaluated in this Draft EIR. Based on the analysis in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant Project-level impacts that cannot be feasibly mitigated with respect to on-site construction noise and freeway safety, as well as cumulative impacts with respect to off-site operational noise and freeway safety.

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

Impact Area	Project
A. AIR QUALITY	
<i>Construction</i>	
<i>Regional Emissions</i>	Less Than Significant
<i>Localized Emissions</i>	Less Than Significant
<i>Toxic Air Contaminants</i>	Less Than Significant
<i>Operation</i>	
<i>Regional Emissions</i>	Less Than Significant
<i>Localized Emissions</i>	Less Than Significant
<i>Toxic Air Contaminants</i>	Less Than Significant
B. CULTURAL RESOURCES	
<i>Historic Resources</i>	Less Than Significant
<i>Archaeological Resources</i>	Less Than Significant
C. ENERGY	
<i>Wasteful Consumption of Energy</i>	Less Than Significant
<i>Conflict with Energy Plans</i>	Less Than Significant
D. GREENHOUSE GAS EMISSIONS	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
E. LAND USE	
<i>Conflict with Land Use Plans</i>	Less Than Significant
F. NOISE	
<i>Construction</i>	
<i>On-Site Noise</i>	Significant and Unavoidable (Project-level only)
<i>Off-Site Noise</i>	Less Than Significant
<i>On-Site Vibration</i>	Less Than Significant
<i>Off-Site Vibration</i>	Less Than Significant
<i>Operation</i>	
<i>On-Site Noise</i>	Less Than Significant
<i>Off-Site Noise</i>	Significant and Unavoidable (cumulative only)
<i>Vibration</i>	Less Than Significant
G. PUBLIC SERVICES	
<i>Fire Protection</i>	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<i>Police Protection</i>	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant

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

Impact Area	Project
H. TRANSPORTATION	
<i>Conflict with Plans</i>	Less Than Significant
<i>Vehicle Miles Traveled</i>	Less Than Significant
<i>Geometric Design Features (including Freeway Safety)</i>	Significant and Unavoidable (both Project-level and cumulative)
I. TRIBAL CULTURAL RESOURCES	
<i>Tribal Cultural Resources</i>	Less Than Significant with Mitigation
J. UTILITIES AND SERVICE SYSTEMS	
<i>Water Supply and Infrastructure</i>	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<i>Energy Infrastructure</i>	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<hr/> <i>Source: Eystone Environmental, 2023.</i>	

10. Project Design Features

a. Air Quality

Project Design Feature AIR-PDF-1: Where power poles are available, electricity from power poles and/or solar powered generators rather than temporary diesel or gasoline generators will be used during construction.

b. Greenhouse Gas Emissions

Project Design Feature GHG-PDF-1: The design of the new buildings will incorporate the following sustainability features:

- a. Use of Energy Star-labeled products and appliances.
- b. Use of light-emitting diode (LED) lighting or other energy-efficient lighting technologies, such as occupancy sensors or daylight harvesting and dimming controls, where appropriate, to reduce electricity use.
- c. Water-efficient plantings with drought-tolerant species;
- d. Fenestration designed for solar orientation; and

- e. Pedestrian- and bicycle-friendly design with short-term and long-term bicycle parking.

c. Noise

Project Design Feature NOI-PDF-1: During plan check for each phase of Project construction, the contractor will provide a statement to the City indicating their power construction equipment (including combustion engines), fixed or mobile, will be equipped with state-of-the-art noise shielding and muffling devices (consistent with manufacturers' standards). The statement will further indicate that the equipment will be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated. The contractor will comply and cause all subcontractors to comply with the foregoing.

Project Design Feature NOI-PDF-2: Project construction will not include the use of driven (impact) pile systems.

Project Design Feature NOI-PDF-3: All outdoor mounted mechanical equipment will be screened from off-site noise-sensitive receptors. The equipment screen will be impermeable (i.e., solid material with minimum weight of 2 pounds per square feet) and break the line-of-sight from the equipment to the off-site noise-sensitive receptors.

Project Design Feature NOI-PDF-4: All loading docks will be acoustically screened from off-site noise-sensitive receptors. Loading docks and trash compactors will only operate during daytime hours.

Project Design Feature NOI-PDF-5: Outdoor amplified sound systems, if any, will be designed so as not to exceed the maximum noise level of 80 dBA (L_{eq-1hr}) at a distance of 15 feet from the amplified speaker sound systems on the paseo at Level 1 and balconies on Levels 1.5, 2, 3, 4, 8, and 10; and 85 dBA (L_{eq-1hr}) at a distance of 25 feet at the roof decks on Levels 1.5, 4, and 12. A qualified noise consultant will provide written documentation, prior to issuance of a certificate of occupancy, that the design of the system complies with this maximum noise level.

d. Public Services—Police Protection

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

Project Design Feature POL-PDF-2: The Project will include a closed circuit camera system and keycard entry for the building and parking areas.

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

clearly identify a secure route between parking areas and points of entry into buildings.

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

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

Project Design Feature POL-PDF-6: Prior to the issuance of a building permit, the Applicant will consult with LAPD's Crime Prevention Unit regarding the incorporation of feasible crime prevention features appropriate for the design of the Project, including applicable features in LAPD's Design Out Crime Guidelines.

Project Design Feature POL-PDF-7: Upon completion of construction of the Project and prior to the issuance of a certificate of occupancy, the Applicant will submit a diagram of the Project Site to the LAPD's Newton Division Commanding Officer that includes access routes and any additional information that might facilitate police response.

e. Transportation

Project Design Feature TR-PDF-1: Prior to the start of construction, a Construction Traffic Management Plan will be prepared and submitted to LADOT for review and approval. The Construction Traffic Management Plan will include, but not necessarily be limited to, the following measures:

- As traffic lane, parking lane and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles, will be developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures;
- Ensure that access will remain unobstructed for land uses in proximity to the Project Site during construction;
- Provide off-site truck staging in a legal area furnished by the construction truck contractor;
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses and residences;
- Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods; and

- Describe the haul truck routes and avoid haul truck routes that travel passed Los Angeles Unified School District facilities.

f. Utilities and Service Systems—Water Supply and Infrastructure

Project Design Feature WAT-PDF-1: The Project design will incorporate the following design features to support water conservation in excess of LAMC requirements.

Fixtures

- WaterSense certified, low-flow toilets with flow rates of 1.1 gallons per flush (gpf) in lieu of 1.28 gpf.
- Showerheads (for fitness center/bicycle commuting) with a flow rate of 1.5 gallons per minute (gpm) in lieu of 1.8 gpm.
- Flow metering of cooling tower makeup water.

Landscape and Irrigation

- Drip/ Subsurface Irrigation (Micro-Irrigation)
- Drought-Tolerant Plants-100 percent of total landscaping
- Micro-Spray
- Proper Hydro-Zoning/Zoned Irrigation (groups plants with similar water requirements together)

11. Mitigation Measures

a. Transportation

Mitigation Measure TR-MM-1: The Applicant shall work with the City of Los Angeles and Caltrans to signalize the intersection of the US-101 Southbound Off-ramp and 7th Street. This shall require complying with the Caltrans project development process as a local agency-sponsored Project.

Mitigation Measure TR-MM-2: The Applicant shall work with the City of Los Angeles and Caltrans to signalize the intersection of the I-10 Eastbound Off-ramp and Porter Street. This shall require complying with the Caltrans project development process as a local agency-sponsored Project. Because of the proximity to other intersections, close signal coordination is recommended with nearby intersections.

Mitigation Measure TR-MM-3: The Applicant shall work with the City of Los Angeles and Caltrans to signalize the intersection of the I-10 Westbound Off-ramp and Mateo Street/Enterprise Street. This shall

require complying with the Caltrans project development process as a local agency-sponsored Project.

b. Tribal Cultural Resources

Mitigation Measure TCR-MM-1: Prior to commencing any ground disturbance activities at the Project Site, the Applicant, or its successor, shall retain qualified tribal monitors/consultants from the Gabrieleño Band of Mission Indians—Kizh Nation and a qualified archaeologist/archaeological monitor. Ground disturbance activities shall include excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil, pavement removal, grubbing, tree removals, boring or a similar activity at the Project Site. Any tribal monitor/consultant shall be approved by the Gabrieleño Band of Mission Indians—Kizh Nation Tribal Government. A qualified archaeologist/archaeological monitor shall be identified as principal personnel who must meet the Secretary of Interior standards for archaeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in Southern California. The archaeologist shall ensure that all other personnel associated with and hired for the archaeological monitoring are appropriately trained and qualified.

The archaeological and tribal monitors/consultants shall observe all ground disturbance activities on the Project Site at all times any ground disturbance activities are taking place. If ground disturbance activities are simultaneously occurring at multiple locations on the project site, an archaeological and tribal monitor shall be assigned to each location where the ground disturbance activities are occurring. The on-site monitoring shall end when the ground disturbing activities are completed, or when the City has determined that the Project Site has a low potential for impacting tribal cultural resources after consultation with the tribal monitor/consultant and archaeologist.

Prior to commencing any ground disturbance activities, the archaeological monitor in consultation with the tribal monitor/consultant, shall provide Worker Environmental Awareness Program (WEAP) training to construction crews involved in ground disturbance activities that includes information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover tribal cultural resources during ground disturbance activities. In addition, workers will be shown examples of the types of resources that would require notification of the archaeological monitor and tribal monitor. The Applicant shall maintain on the Project Site, for City inspection, documentation establishing the

WEAP training was completed for all members of the construction crew involved in ground disturbance activities.

In the event that any subsurface objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, all such activities shall temporarily cease within the area of discovery, the radius of which shall be determined by the archaeologist, in consultation with the tribal monitor/consultant approved by the Gabrieleño Band of Mission Indians—Kizh Nation, until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all ground disturbance activities in the immediate vicinity of the find until the find can be assessed by the archaeologist and tribal monitor/consultant.
2. If the archaeologist and tribal monitor/consultant determine the resources are Native American in origin, the Gabrieleño Band of Mission Indians—Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribe will request reburial or preservation for educational purposes.
3. The Applicant, or its successor, shall implement the tribe's recommendations if the archaeologist, in consultation with the tribal monitor/consultant, reasonably conclude that the tribe's recommendations are reasonable and feasible.
4. In addition to any recommendations from the Gabrieleño Band of Mission Indians—Kizh Nation, the archaeologist shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state, or local law, rule or regulation. Any discrepancies between the implementation of the recommendations shall be resolved through the City as the Lead Agency, in consultation with the archaeologist and tribal monitor/consultant.
5. The Applicant, or its successor, may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by both the archaeologist and tribal monitor/consultant and determined to be reasonable and appropriate.
6. The Applicant, or its successor, may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations

developed and approved pursuant to the process set forth in paragraphs 2 through 4 above.

7. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.
8. Notwithstanding paragraph 7 above, any information that the Department of City Planning, in consultation with the City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code, Section 6254(r), and handled in compliance with the City's AB 52 Confidentiality Protocols.
9. Archaeological and Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken.

12. Summary of Alternatives

This Draft EIR examined four alternatives to the Project in detail, including Alternative 1: the No Project/No Build Alternative; Alternative 2: Reduced Density Alternative; Alternative 3: Reduced Density Alternate Use Alternative; and Alternative 4: Office with Hotel Future Campus Expansion Phase Alternative. A general description of these alternatives is provided below. Refer to Section V, Alternatives, of this Draft EIR for a more detailed description of these alternatives, a comparative analysis of the impacts of these alternatives with those of the Project, and a description of the alternatives considered but rejected as infeasible.

a. Alternative 1: No Project/No Build 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 a proposed project does not proceed. CEQA Guidelines Section 15126.6(e)(3)(B) states that "in certain instances, the No Project Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, Alternative 1, the No Project/No Build Alternative, assumes that the Project would not be approved, and no new development would occur within the Project Site. Thus, the physical conditions of the Project Site would generally remain as they are today. Under Alternative 1, the

Project Site would continue to be developed with 302,413 square feet of office and warehouse uses and a parking structure. No new construction would occur.

b. Alternative 2: Reduced Density Alternative

Alternative 2 would develop the same mix of uses as the Project but at a reduced density. Specifically, Alternative 2 would develop 260,000 square feet of office uses and 10,000 square feet of retail and/or restaurant uses during the initial phase compared to 435,000 square feet of office uses and 15,499 square feet of retail/restaurant uses under the Project. Under this Alternative, the Future Campus Expansion Phase would consist of 211,201 square feet of office uses compared to 191,201 square feet of office uses and 20,000 square feet of restaurant uses under the Project. In total, Alternative 2 would develop 481,201 square feet of new uses within the Project Site, compared to 661,800 square feet under the Project, representing a reduction of approximately 27 percent. The proposed uses would be located in a 10-story, approximately 170-foot-tall building compared to 13 stories and 217.5 feet with the Project. Similar to the Project, the parking structure on Lot 2 of the Project Site and Ford Factory Building on Lot 3 of the Project Site would be retained with no change in use. As with the Project, Alternative 2 would include outdoor areas, consisting of paseos, decks, and balconies, but only 54,033 square feet would be provided compared to 74,018 square feet with the Project.

The proposed uses would be supported by 1,042 vehicle parking spaces and 152 bicycle parking spaces, comprised of 100 long-term spaces and 52 short-term spaces. Parking would be provided within one at-grade, two above-grade, and three below-grade levels, resulting in one less subterranean level than the Project. Access would be similar to the Project. Specifically, vehicular access to the parking structure would be provided via one driveway on East 7th Place, which extends into the paseo, or via one driveway on Violet Street. In addition, a rideshare drop-off area would be provided on Violet Street, along the southern border of the Project Site. Access to the loading dock would be provided to the east of the parking structure entry/exit driveway. Pedestrian access to the buildings would be provided along multiple points throughout the Project Site.

Alternative 2 would implement a similar building design as the Project, though the building would be shorter as noted above. Alternative 2 would also implement similar signage, lighting, setbacks, and sustainability features as those proposed for the Project. Alternative 2 would also require the same discretionary approvals as the Project. Due to the reduction in density, the duration of construction would also be reduced compared to the Project. Specifically, construction would take approximately 31 months compared to 32 months with the Project.

c. Alternative 3: Reduced Density Alternate Use Alternative

Alternative 3 would develop 260 multi-family residential units and 10,000 square feet of retail and/or restaurant uses during the initial phase compared to 435,000 square feet of office uses and 15,499 square feet of retail/restaurant uses under the Project. The 260 residential units would consist of 26 studio units, 117 1-bedroom units, and 117 2-bedroom units. Under Alternative 3, the Future Campus Expansion Phase would consist of 211,201 square feet of office uses compared to 191,201 square feet of office uses and 20,000 square feet of restaurant uses. In total, Alternative 3 would develop 481,201 square feet of new uses within the Project Site, compared to 661,800 under the Project, representing a reduction of approximately 27 percent. The proposed uses would be located in a 75-foot tall building compared to 217.5 feet with the Project. Similar to the Project, the parking structure on Lot 2 of the Project Site and Ford Factory Building on Lot 3 of the Project Site would be retained with no change in use. As with the Project, Alternative 3 would include outdoor areas, consisting of paseos, decks, and balconies, but only 27,325 square feet would be provided compared to 74,018 square feet with the Project due to the reduction in square footage and revised building footprint. However, because residential uses are provided, all 27,325 square feet of outdoor areas would be required to meet the LAMC definition of open space.

The proposed uses would be supported by 883 vehicle parking spaces and 231 bicycle parking spaces, comprised of 189 long-term spaces and 42 short-term spaces. Parking would be provided within one at-grade, two above-grade, and two below-grade levels, resulting in two fewer subterranean levels than the Project. Access would be similar to the Project. Specifically, vehicular access to the parking structure would be provided via one driveway on East 7th Place, which extends into the paseo, or one driveway on Violet Street. In addition, a rideshare drop-off area would be provided on Violet Street, along the southern border of the Project Site. Access to the loading dock would be provided to the east of the parking structure entry/exit driveway. Pedestrian access to the buildings would be provided along multiple points throughout the Project Site.

Alternative 3 would implement a generally similar building design as the Project, though the building would be shorter as noted above and certain design elements and construction methods would be tailored to suit a residential structure. Specifically, the building would be a maximum of 75 feet in height and, as a result, would have a larger footprint within the Project Site than the Project. Alternative 3 would also implement similar signage, lighting, setbacks, and sustainability features as those proposed for the Project. Alternative 3 would also require the same discretionary approvals as the Project. In addition, the duration of construction would be reduced compared to the Project. Specifically, construction would take approximately 27 months compared to 32 months with the Project.

d. Alternative 4: Office with Hotel Future Campus Expansion Phase Alternative

Alternative 4 would develop the same mix of uses as the Project during its initial phase, but the Future Campus Expansion Phase would consist of a hotel, instead of office. Specifically, as with the Project, Alternative 4 would develop 435,000 square feet of office uses and 15,499 square feet of retail/restaurant uses. The Future Campus Expansion Phase would, however, consist of a 211,201-square-foot hotel with 384 rooms and a standard range of amenities (i.e., pool, conference room, etc.). In total, as with the Project, Alternative 4 would develop the Project Site with 661,800 square feet of new uses, which would be located in a 13-story building up to 217.5 feet in height. As with the Project, Alternative 4 would include 74,018 square feet of outdoor areas, consisting of paseos, decks, and balconies.

The proposed uses would be supported by 1,178 vehicle parking spaces and 191 bicycle parking spaces, comprised of 117 long-term spaces and 74 short-term spaces. Parking would be provided within one at-grade, two above-grade, and four below-grade levels, similar to the Project. Access would be similar to the Project. Specifically, vehicular access to the parking structure would be provided via one driveway on East 7th Place, which extends into the paseo, or via one driveway on Violet Street. In addition, a rideshare drop-off area would be provided on Violet Street, along the southern border of the Project Site. Access to the loading dock would be provided to the east of the parking structure entry/exit driveway. Pedestrian access to the buildings would be provided along multiple points throughout the Project Site.

Alternative 4 would implement a similar building design as the Project, as well as similar signage, lighting, setbacks, and sustainability features as those proposed for the Project. Alternative 4 would also require the same discretionary approvals as the Project and the length of construction is anticipated to be similar.

e. 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.

Alternative 1, the No Project/No Build Alternative, would avoid the Project's significant and unavoidable impacts with respect to on-site noise during construction (Project-level), operational noise (cumulative), and freeway safety (Project-level and

cumulative). Alternative 1 would eliminate all of the Project's remaining less-than-significant impacts and less-than-significant impacts with mitigation as no changes to the existing conditions would occur. However, Alternative 1 would not meet any of the Project objectives or the Project's underlying purpose to redevelop underutilized parcels into a high-density, infill development that improves the function, design, and economic vitality of the commercial corridors within the Central City North Community Plan area.

As stated above, the CEQA Guidelines require the identification of an Environmentally Superior Alternative other than a No Project Alternative. Accordingly, in accordance with the CEQA Guidelines, a comparative evaluation of the remaining alternatives indicates that Alternative 3, the Reduced Density Alternative Use Alternative, is the Environmentally Superior Alternative. This Alternative represents a reduced density development with residential uses instead of office uses in the Project's initial phase. Alternative 3 would reduce, but not eliminate, the Project's significant and unavoidable impacts with respect to on-site noise during construction (Project-level) and off-site noise during operation (cumulative). Alternative 3 would, however, avoid the Project's significant and unavoidable impact (Project-level and cumulative) with respect to freeway safety. Impacts with respect to VMT would be greater than the Project but remain less than significant. Impacts associated with the remaining environmental issues would be similar to or less than those of the Project.

As stated above, because less office square footage is proposed, Alternative 3 would meet most of the Project's objectives to a lesser extent than the Project. Specifically, Alternative 3 would not meet the underlying purpose of the Project, which is to redevelop underutilized parcels into a high-density, infill development that improves the function, design, and economic vitality of the commercial corridors within the Central City North Community Plan area, to the same extent as the Project.

Regarding the Project objectives, Alternative 3 would meet the following Project objective to the same degree as the Project as it would include land uses typical of urban development 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 3 would meet the remaining Project objectives, although to a lesser extent than the Project the Project due to the reduction in the overall amount of development, and the reduction in office uses:

- Promote Central City North Community Plan Objective 2-1 to conserve and strengthen viable commercial development in the community and to provide additional opportunities for new commercial development and services.
- 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.
- Create an interactive creative office campus with outdoor areas, shared amenities (including publicly accessible outdoor areas), and landscaping while retaining an existing historic building and a (non-historic) attached annex on-site.
- Create a pedestrian-friendly project by creating a street-level identity for the Project Site and improving the pedestrian experience through the introduction of commercial uses on the ground floor level and the incorporation of a paseo to connect the existing uses with the new development.
- Support the growth of the City's economic base by creating a significant number of construction and permanent jobs.