

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. Public Resources Code (PRC) Section 21002 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. If specific economic, social, or other conditions make infeasible such alternatives, individual projects may be approved in spite of one or more 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 decision making and public participation. An EIR is not required to consider alternatives which are infeasible.

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

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

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

2. Overview of Selected Alternatives

As indicated above, the intent of the alternatives analysis is to avoid or substantially lessen any of the significant effects of a project. Based on the analysis 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 regard to on-site construction noise (Project-level), off-site operational noise (cumulative), and freeway safety (Project-level and cumulative). Accordingly, the following alternatives to the Project have been selected for evaluation based on the significant environmental impacts of the Project, the objectives established for the Project (listed in Section II, Project Description, of this Draft EIR), the feasibility of the alternatives considered, public input received during the scoping period, and the existing zoning designation on the Project Site:

- Alternative 1: No Project/No Build Alternative
- Alternative 2: Reduced Density Alternative
- Alternative 3: Reduced Density Alternate Use Alternative
- Alternative 4: Office with Hotel Future Campus Expansion Phase Alternative

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, and such alternatives are also discussed below.

3. Alternatives Considered and Rejected as Infeasible

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

- **Alternative Project Site:** The Applicant owns the Project Site, and its location is conducive to the development of a commercial project. The Project Site is located in the Arts District, which is characterized by a mix of uses, including residential, commercial, office, and industrial uses. These uses make the Project Site particularly suitable for the redevelopment of 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. 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 Arts District area that could accommodate the Project were to be found, it would be expected that the significant and unavoidable impact associated with cumulative operational off-site noise would also occur, similar to the proposed Project on the Project Site because existing traffic volumes in the Arts District are so low that the addition of additional trips would also result in an exceedance of the noise threshold. Additionally, considering the mix of uses in the Arts District, which includes sensitive uses, it is possible that development of the Project at an alternative site could potentially be closer to sensitive uses and, thus, may produce other environmental impacts that would otherwise not occur at the current Project Site or result in greater environmental impacts when compared to 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 impact without resulting in other environmental impacts. Thus, this alternative was rejected from further consideration.
- **Alternatives to Eliminate Significant Noise Impacts During Construction:** As discussed in Section IV.F, Noise, of this Draft EIR, construction of the Project would result in a significant noise impact during the nighttime concrete pour for the mat foundation (estimated to be approximately five days). Typical noise mitigation includes the use of temporary noise barrier. However, due to the height of the future mixed-use development at receptor location R2 (31-story building), it would not be feasible to construct a temporary noise barrier tall

enough to effectively reduce the construction noise at the upper levels. Moreover, the expected duration of the impact is quite short. There are no other feasible mitigation measures to further reduce the nighttime construction noise level at receptor location R2, and based on structural and seismic requirements, the construction methods cannot be feasibly modified (i.e., an alternative to a mat pour). Specifically, based on feedback from the Project's geotechnical engineer, the only other foundation system that could be considered would consist of a deep pile foundation system.¹ However, a deep pile system would require additional drilling and vibration, which would last for several weeks, as compared to the five days estimated for the Project. The pile installation would also require daily concrete delivery, which would add to construction noise and traffic. Therefore, construction noise impacts associated with on-site construction noise levels (during the nighttime concrete pour) would remain significant and unavoidable with a pile foundation system and as stated previously, no other feasible alternative foundation system was identified. Additionally, although an alternative with a smaller building footprint could potentially reduce the length of time this impact would occur, construction noise impact at receptor location R2 would not be avoided for the reasons detailed above. It should be noted that this impact would only occur if the proposed mixed-use development at receptor location R2 is completed and occupied prior to or during Project construction; as such the impact would be short-term and of very short duration (i.e., approximately five days). Nevertheless, because no feasible mitigation measures were identified that could reduce this impact to a less-than-significant level, and because the mat foundation pour is integral to construction of the Project, an alternative to eliminate nighttime construction noise impact during the concrete pour for the mat foundation has been rejected from further consideration in this Draft EIR.

- **All-Commercial Alternative to Eliminate the Significant Freeway Safety Impact:** As discussed in Section IV.H, Transportation, of this Draft EIR, Mitigation Measures TR-MM-1, TR-MM-2, and TR-MM-3 would reduce both Project-level and cumulative significant impacts at the US-101 Southbound Off-Ramp to 7th Street, I-10 Eastbound Off-Ramp to Porter Street, and I-10-Westbound Off-Ramp to Mateo Street/Enterprise Street to a less-than-significant level. However, since the improvements are within the responsibility and jurisdiction of another public agency (i.e., Caltrans), the City of Los Angeles, cannot guarantee the mitigation would be approved and implemented, and there are no alternatives that can be implemented with respect to freeway safety that do not also involve Caltrans. Therefore, impacts are assumed to be significant and unavoidable.

Therefore, an All-Commercial Alternative to eliminate the significant Project-level and cumulative impact related to freeway safety was considered. As shown in

¹ Email communication with Gregorio Varela, P.E., Geotechnologies, Inc., July 22, 2022.

Table 3A of the Transportation Assessment, of the off-ramps where the Project is estimated to have a safety impact, the Project adds the most car lengths to the US-101 Southbound/7th Street Off-Ramp during the A.M. peak hour (i.e., six car lengths). Per LADOT guidance, a Project/Alternative can add up to 1 car length to an off-ramp queue that exceeds capacity before there is a freeway safety impact. Therefore, in order to go from 6 car lengths to 1 car length, an alternative would need to reduce the A.M. inbound trip generation by approximately 83 percent. In order to accomplish this, the Project would need to be reduced to 119,600 square feet of office uses and 15,499 square feet of retail/restaurant uses. This reduction in square footage would reduce peak hour traffic to a sufficient degree to avoid the Project's impacts with respect to freeway safety at US-101 Southbound Off-Ramp and 7th Street, I-10 Eastbound Off-Ramp and Porter Street, and I-10 Westbound Off-Ramp and Mateo Street/Enterprise Street.

Therefore, although this scenario would avoid the Project's significant and unavoidable freeway safety impact, the degree of reduction is too great to meet Project objectives. As such, this alternative was removed from further consideration. However, Alternative 3, the Reduced Density Alternate Use Alternative, which includes residential uses instead of office uses, is analyzed below and would avoid the Project's significant and unavoidable freeway safety impact.

- **Alternatives to Eliminate Significant Cumulative Off-Site Noise Impacts During Operation:** An alternative designed to eliminate the significant and unavoidable cumulative operational noise impact was considered. However, because of the related projects in the immediate Project vicinity whose vehicle trips are expected to utilize Santa Fe Avenue and Mateo Street north of the Project Site, future noise levels along Mateo Street (between 6th Street and 7th Street) and along Santa Fe Avenue (between 6th Street and 7th Street) would be significant even without the Project. Therefore, the addition of any traffic from the Project or any alternative would incrementally increase noise levels that would contribute to a significant cumulative impact. Conventional mitigation measures, such as providing noise barrier walls to reduce the off-site traffic noise impacts, would not be feasible as the barriers would obstruct the access and visibility to the properties along the impacted roadway segments. Thus, this alternative was rejected from further consideration. Nevertheless, it should be noted that a reduced development alternative would lessen the degree of this impact. Accordingly, the Reduced Density Alternative and Reduced Density Alternative Use Alternative been analyzed.
- **Alternative with all Aboveground Parking:** An alternative was considered that would include all aboveground parking, increasing the height of the proposed building from 13 stories to 18 stories. This alternative was considered as it had the potential to replace the identified mat foundation system with a different foundation system (pad foundation, spread footing, piles, etc.). Upon further review, this alternative would still require a mat foundation during construction

because of soil conditions and the same traffic generation during operation and, as such, would not avoid any of the Project's significant and unavoidable impacts related to on-site construction noise (Project-level), off site operational noise (cumulative), and freeway safety (Project-level and cumulative). Additionally, the massing of such a structure could also result in greater impacts to nearby historic resources, including the Ford Factory Building within the Project Site. Lastly, such a parking structure deviates from certain provisions of the existing guidance provided by the City Planning Commission in its October 206 Advisory Notice Relative to Above-Grade Parking, as well as certain provisions included in the DTLA Community Plan Update. Therefore, this alternative was rejected from further consideration.

- **DTLA Community Plan Compliant Alternative:** An alternative was considered that would conform with the DTLA Community Plan update. However, this alternative was too similar to the Project regarding use, density, and frontages for the Project Site. Therefore, this alternative was rejected from further consideration.

4. Alternatives Analysis Format

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the project objectives, identified in Section II, Project Description, of this Draft EIR, would be substantially attained by the alternative.² The evaluation of 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, as applicable.
- 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."

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

- Greater: Where the net impact of the alternative would clearly be more adverse or less beneficial than the Project, the comparative impact is said to be “greater.”
 - Similar: Where the impact of the alternative and Project would be roughly equivalent, the comparative impact is said to be “similar.”
- c. The comparative analysis of the impacts is followed by a general discussion of whether the underlying purpose and basic 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 below in Table V-1 on page V-8.

**Table V-1
Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project**

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Reduced Density Alternative	Alternative 3: Reduced Density Alternate Use Alternative	Alternative 4: Office with Hotel Future Campus Expansion Phase Alternative
A. AIR QUALITY					
<i>Construction</i>					
<i>Regional and Localized Emissions</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Toxic Air Contaminants</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>					
<i>Regional and Localized Emissions</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Regional Emissions— Less (Less Than Significant) Localized Emissions— Greater (Less Than Significant)
<i>Toxic Air Contaminants</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
B. CULTURAL RESOURCES					
<i>Historic Resources</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Archaeological Resources</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)

Table V-1 (Continued)
Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Reduced Density Alternative	Alternative 3: Reduced Density Alternate Use Alternative	Alternative 4: Office with Hotel Future Campus Expansion Phase Alternative
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)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	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)	Similar (Less Than Significant)
D. GREENHOUSE GAS EMISSIONS					
<i>Greenhouse Gas Emissions</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
E. LAND USE					
<i>Conflict with Land Use Plans</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Greater (Less Than Significant)	Similar (Less Than Significant)
F. NOISE					
<i>Construction</i>					
<i>On-Site Noise</i>	Significant and Unavoidable	Less (No Impact)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)	Similar (Significant and Unavoidable)

Table V-1 (Continued)
Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Reduced Density Alternative	Alternative 3: Reduced Density Alternate Use Alternative	Alternative 4: Office with Hotel Future Campus Expansion Phase Alternative
<i>Off-Site Noise</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>On-Site Vibration</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Off-Site Vibration</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>					
<i>On-Site Noise</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Off-Site Noise</i>	Less Than Significant ^a	Less (No Impact)	Less (Less Than Significant) ^a	Less (Less Than Significant)	Similar (Less Than Significant) ^a
G. PUBLIC SERVICES					
<i>Fire Protection</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)

Table V-1 (Continued)
Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Reduced Density Alternative	Alternative 3: Reduced Density Alternate Use Alternative	Alternative 4: Office with Hotel Future Campus Expansion Phase Alternative
<i>Police Protection</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	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)	Similar (Less Than Significant)
<i>Vehicle Miles Traveled</i>	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Greater (Less Than Significant)	Greater (Less Than Significant)
<i>Hazardous Geometric Design Features (including Freeway Safety)</i>	Significant and Unavoidable ^a	Less (No Impact)	Less (Significant and Unavoidable) ^a	Less (Less Than Significant)	Greater (Significant and Unavoidable) ^a
I. TRIBAL CULTURAL RESOURCES					
<i>Tribal Cultural Resources</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)

Table V-1 (Continued)
Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Reduced Density Alternative	Alternative 3: Reduced Density Alternate Use Alternative	Alternative 4: Office with Hotel Future Campus Expansion Phase 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)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)
<i>Energy Infrastructure</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<p>^a <i>Cumulative impacts would be significant and unavoidable.</i> <i>Source: Eyestone Environmental, 2023.</i></p>					

5. Project Objectives

CEQA Guidelines Section 15124(b) states that the project description shall contain “a statement of the objectives sought by the proposed project.” Section 15124(b) of the CEQA Guidelines further states that “the statement of objectives should include the underlying purpose of the project.” The underlying purpose of the Project 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. As set forth in the CEQA Guidelines, the Project’s basic and fundamental objectives are provided below:

- 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.
- 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.
- 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.

V. Alternatives

A. Alternative 1: No Project/No Build Alternative

1. Description of the Alternative

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which 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.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

The No Project/No Build Alternative would not alter the existing uses or require any construction activities on the Project Site. Therefore, no construction-related air quality impacts associated with regional and localized emissions would occur under Alternative 1, and impacts would be less 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, the No Project/No Build Alternative would not result in diesel particulate matter (DPM) 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 the No Project/No Build Alternative would be less when compared to the less-than-significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

The No Project/No Build Alternative would not result in new development or increased operations that could generate additional operational emissions related to vehicular traffic or the consumption of 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. Thus, 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

The No Project/No Build Alternative 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 the No Project/No Build Alternative, and such impacts would be less when compared to the less-than-significant impacts of Project.

b. Cultural Resources

(1) Historical Resources

The Ford Factory Building on Lot 3 of the Project Site is a designated historical resource. However, no demolition, grading, or other earthwork activities that could potentially affect this or any nearby historical resources would occur under the No Project/No Build Alternative. Therefore, impacts to historical resources would not occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Archaeological Resources

No grading or earthwork activities would occur under the No Project/No Build Alternative. Therefore, there would be no potential for Alternative 1 to uncover subsurface archaeological resources. As such, no impacts to archaeological resources would occur, and impacts would be less when compared to the less-than-significant impacts of the Project.

c. Energy

(1) Construction

Construction activities would not occur under the No Project/No Build Alternative. Therefore, Alternative 1 would not generate a short-term demand for energy during construction, and construction-related impacts to energy would not occur. As such, impacts under the No Project/No Build Alternative would be less when compared to the less-than-significant impacts of the Project.

(2) Operation

The No Project/No Build Alternative would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the long-term energy demand on the Project Site. However, unlike the Project, Alternative 1 would not include new buildings meeting updated energy efficiency targets, such as the applicable 2022 CALGreen requirements and the Los Angeles Green Building Code, or exceed Title 24 energy efficiency requirements by 10 percent as with the Project. Specifically, the Project Site would continue operation of the seven buildings constructed between 1918 and 1952. Impacts with respect to wasteful, inefficient, and unnecessary use of energy would be less than significant but greater than the less-than-significant impacts of the Project.

d. Greenhouse Gas Emissions

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

e. Land Use

Under the No Project/No Build Alternative, there would be no changes to the physical or operational characteristics of the existing on-site uses. No land use approvals or permits would be required. Therefore, Alternative 1 would not result in any inconsistencies with existing land use plans and policies that govern the Project Site, including those that were adopted for the purpose of avoiding or mitigating an environmental effect. No impacts associated with conflicts with land use regulations and plans would occur, and impacts would be less when compared to the less-than-significant impacts of the Project.

f. Noise

(1) Construction

Construction activities would not occur on the Project Site under the No Project/No Build Alternative. Therefore, no construction-related noise or vibration would be generated on-site or off-site. As such, Alternative 1 would avoid the Project's significant and unavoidable on-site noise impacts during construction. Alternative 1 would also avoid the Project's cumulative impacts with respect to on- and off-site construction noise. No impacts associated with construction noise and vibration would occur under Alternative 1, which would avoid the significant and unavoidable impacts of the Project.

(2) Operation

The No Project/No Build Alternative would not develop new uses on the Project Site, and no changes to existing site operations would occur. Therefore, no new stationary or mobile noise sources would be introduced to the Project Site or the Project Site vicinity. As such, no impacts associated with on-site or off-site operational noise would occur under Alternative 1, which would avoid the significant and unavoidable cumulative off-site operational noise impact of the Project.

g. Public Services

(1) Fire Protection

No construction or changes to existing land uses and operations on-site would occur under Alternative 1. Therefore, there would be no changes to current conditions, introduction of new uses, or alterations to the public right-of-way necessitating the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility that would be required in order to maintain service. No impacts to fire protection services would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Police Protection

No construction or changes to existing land uses and operations on-site would occur under Alternative 1. Therefore, there would be no changes to current conditions, introduction of new uses, or alterations to the public right-of-way necessitating the addition of a new police station or the expansion, consolidation, or relocation of an existing facility that would be required in order to maintain service. 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/No Build 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 the Project Site during operation. Therefore, no impacts would occur with respect to potential conflicts with programs, plans, ordinances, or policies addressing the circulation system; VMT; or hazardous geometric design features. Alternative 1 would avoid the significant and unavoidable freeway safety impacts of the Project.

i. Tribal Cultural Resources

Grading and other earthwork activities would not occur under the No Project/No Build Alternative. 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

The No Project/No Build Alternative would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the long-term water demand on the Project Site. No impacts to water supply and water infrastructure would occur under the No Project/No Build Alternative, and impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Energy Infrastructure

The No Project/No Build Alternative would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the long-term energy demand on the Project Site, and no new or upgraded infrastructure would be required. No operational impacts related to energy infrastructure would occur under the No Project/No Build Alternative, and impacts would be less when compared to the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above and shown in Table V-1 on page V-8, 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), off-site noise during operation

(cumulative), and freeway safety (Project-level and cumulative). Impacts associated with the remaining environmental issues would be less than those of the Project.

4. Relationship of the Alternative to Project Objectives

Under the No Project/No Build Alternative, the existing uses 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 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. In addition, Alternative 1 would not meet any of the Project objectives:

- 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 associated attached annex on-site.
- 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.
- 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.

V. Alternatives

B. Alternative 2: Reduced Density Alternative

1. Description of the 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.

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.

Under Alternative 2, the overall amount of construction would be reduced in comparison to the Project, and one less subterranean parking level would be developed. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, 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 DPM 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 TAC emissions. Overall construction emissions generated by Alternative 2 would be less than those of the Project because Alternative 2 would require less overall construction and one less subterranean parking level. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 2 would be 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 natural gas. The development proposed under Alternative 2 would be reduced compared to the Project (i.e., 481,200 square feet under Alternative 2 versus 661,800 square feet under the Project), but 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 P of this Draft EIR, Alternative 2 would result in 3,524 net daily vehicle trips and 26,954 net daily VMT as compared to the Project's minimum increase of 6,380 net daily vehicle trips and 48,107 net daily VMT.^{3,4} 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 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 under 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 less-than-significant impacts of the Project.

³ *Fehr & Peers, Technical Memorandum, Violet Street Creative Office Campus Project: Alternatives Analysis, October 17, 2022. See Appendix P of this Draft EIR.*

⁴ *As stated in Section IV.H, Transportation, of the Draft EIR, the Project is estimated to result in a net increase of 6,389 daily vehicle trips and a total daily VMT of 48,177 under the 7th Place driveway scenario, and a net increase of 6,380 daily vehicle trips and a total daily VMT of 48,107 under the Violet Street driveway scenario.*

(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 emissions from delivery trucks. Alternative 2 would include less development than the Project but would include 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

(1) Historical Resources

As discussed above, the Ford Factory building located on the Project Site is a designated historical resource. However, as with the Project, Alternative 2 does not propose any work to the Ford Factory building or its adjacent parking garage. None of the character-defining features associated with the designated Ford Factory building would be removed or altered as a result of Alternative 2. As with the Project, Alternative 2 would be differentiated from the Ford Factory building such that it does not replicate any of the historic elements or features of the historic building or attempt to appear as historic construction. Therefore, as with the Project, the Ford Factory building would remain eligible for federal, state, and local listing upon completion of Alternative 2. Impacts would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Archaeological Resources

Similar to the Project, Alternative 2 would require excavation and grading for building foundations and subterranean parking. In the event that any archaeological resources are unexpectedly encountered during construction, work in the area would temporarily be halted while assessment of the find is conducted by a qualified archaeologist in accordance with the regulatory standards set forth in PRC Section 21083.2 and CEQA Guidelines Section 15064.5(c) to ensure the appropriate treatment of any potential unique archaeological resources unexpectedly encountered during grading and excavation activities. Therefore, impacts related to archaeological resources under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

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 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, which would be less when compared to the less-than-significant impacts of the Project 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., 481,201 square feet versus 661,800 square feet under the Project) but would 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 P of this Draft EIR, Alternative 2 would result in 3,524 net daily vehicle trips and 26,954 net daily VMT as compared to the Project's minimum increase of 6,380 net daily vehicle trips and 48,107 net daily VMT and, thus, would consume less operation-related petroleum-based fuels than the Project.^{5,6} 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 Los Angeles Green

⁵ *Fehr & Peers, Technical Memorandum, Violet Street Creative Office Campus Project: Alternatives Analysis, October 17, 2022. See Appendix P of this Draft EIR.*

⁶ *As stated in Section IV.H, Transportation, of the Draft EIR, the Project is estimated to result in a net increase of 6,389 daily vehicle trips and a total daily VMT of 48,177 under the 7th Place driveway scenario, and a net increase of 6,380 daily vehicle trips and a total daily VMT of 48,107 under the Violet Street driveway scenario.*

Building Code, and would implement Project Design Feature GHG-PDF-1, requiring the incorporation of sustainability features, and Project Design Feature WAT-PDF-1 to reduce water consumption, 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 modes of transportation that are more efficient and minimize fuel consumption. Therefore, similar to 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, which would be less when compared to the less-than-significant impacts of the Project because less development is proposed.

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

As with the Project, Alternative 2 would comply with the Los Angeles Green Building Code and, thus, with the 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. In addition, as with the Project, Alternative 2 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 the goals of the SCAG's RTP/SCS, which incorporate VMT targets established by SB 375. 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, as with the Project, Alternative 2 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 vehicle trips generated and associated VMT, as well as by energy consumption resulting from the proposed land uses. The number of daily trips and daily VMT under Alternative 2 would be reduced when compared to the Project. Specifically, as provided in Appendix P of this Draft EIR, Alternative 2 would result in 3,524 net daily vehicle trips and 26,954 net daily VMT as compared to the Project's minimum increase of 6,380 net daily vehicle trips and 48,107 net daily VMT.^{7,8} In addition, energy and water consumption from the proposed

⁷ *Fehr & Peers, Technical Memorandum, Violet Street Creative Office Campus Project: Alternatives Analysis, October 17, 2022. See Appendix P of this Draft EIR.*

⁸ *As stated in Section IV.H, Transportation, of the Draft EIR, the Project is estimated to result in a net increase of 6,389 daily vehicle trips and a total daily VMT of 48,177 under the 7th Place driveway (Footnote continued on next page)*

land uses would be reduced compared to the Project due to the reduction in development (i.e., 481,201 square feet under Alternative 2 as compared to 661,800 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. As with the Project, Alternative 2 would be designed to comply with the requirements of the CALGreen Code and the Los Angeles Green Building Code. As with the Project, Alternative 2 would 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 Los Angeles Green Building Code as applicable. With compliance with the CALGreen Code and the Los Angeles 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, which would be less when compared to the less-than-significant impacts of the Project.

e. Land Use

As previously described, Alternative 2 would develop the same mix of uses at the Project but at a reduced density. As such, Alternative 2 would require the same discretionary approvals as the Project. Specifically, as with the Project, Alternative 2 would require a Vesting Zone and Height District Change, Vesting Conditional Use to allow a Floor Area Ratio averaging across a Unified Development, Zone Variance, Site Plan Review, and Vesting Tentative Tract Map. As with the Project, following approval of the General Plan amendment and zone changes, 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 Central City North 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) Construction

The types of construction activities under Alternative 2 would be substantially similar to the Project, although the amount of construction activities would be less and the duration shorter due to the reduction in total floor area (i.e., 481,201 square feet under Alternative 2

scenario, and a net increase of 6,380 daily vehicle trips and a total daily VMT of 48,107 under the Violet Street driveway scenario.

as compared to 661,800 square feet under the Project) and one less subterranean parking level (i.e., three levels under Alternative 2 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 those 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. However, similar to the Project, on-site construction noise would be significant and unavoidable under Alternative 2 (during the nighttime mat pour phase, for a maximum of five days), but cumulative impacts would be less than significant. Nonetheless, the overall amount/duration of construction activities and associated noise under Alternative 2 would be less when compared to the significant and unavoidable impacts and the less-than-significant cumulative impacts of the Project.

(2) 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 of approximately 27 percent reduction in square footage under this alternative (i.e., 481,201 square feet under Alternative 2 as compared to 661,800 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 Project Design Features NOI-PDF-3 (acoustic screening of outdoor mechanical equipment), NOI-PDF-4 (acoustic screening of loading docks), and NOI-PDF-5 (controls on amplified sound), which would minimize on-site operational noise. As with 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 when 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., 3,598 net daily trips versus 6,380 net daily trips under the Project).^{9,10} The reduction in vehicle trips would result in a decrease in off-site operational traffic-related noise levels under Alternative 2, and Project-level impacts under this alternative would be less than significant and less when compared to the less-than-significant impacts of the Project. However, as with the Project, despite the reduction in off-site operational traffic noise, cumulative impacts under Alternative 2 would remain significant and unavoidable because cumulative noise impacts along Mateo Street (between 6th Street and 7th Street) and along Santa Fe Avenue (between 6th Street and 7th Street) would also be significant even without 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, but the amount of construction 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 related to 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 the Project, Alternative 2 would implement Project Design Feature TR-PDF-1, Construction Traffic Management Plan, which would include provisions for maintaining emergency access and minimizing delays in emergency response during construction. Furthermore, as with the Project, emergency vehicles could 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 Alternative 2, thereby reducing the potential for traffic-related conflicts. Therefore, as with the Project, construction of Alternative 2 would not result in the need for new or altered

⁹ *Fehr & Peers, Technical Memorandum, Violet Street Creative Office Campus Project: Alternatives Analysis, October 17, 2022. See Appendix P of this Draft EIR.*

¹⁰ *As stated in Section IV.H, Transportation, of the Draft EIR, the Project is estimated to result in a net increase of 6,389 daily vehicle trips and a total daily VMT of 48,177 under the 7th Place driveway scenario, and a net increase of 6,380 daily vehicle trips and a total daily VMT of 48,107 under the Violet Street driveway scenario.*

government facilities (i.e., fire stations). Impacts under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project because the duration of construction would be reduced.

(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. 17, the “first-in” station, as well as Fire Station Nos. 9, 4, 25, and 2. As with the Project, Alternative 2 would develop office and retail/restaurant uses, though at a reduced density. Therefore, the resulting increase in service population would be less than the Project. Specifically, the net increase in fire service population would be 1,896 employees compared to 2,744 employees with the Project.¹¹ Nonetheless, similar to the Project, Alternative 2 would implement all applicable City Building Code and Fire Code requirements, including, but not limited to, structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm, and communications systems.

As with the Project, domestic and fire water service to the Project Site under Alternative 2 would continue to be supplied by LADWP. As discussed in Section IV.G.1, Public Services—Fire Protection, of this Draft EIR, the Fire Flow Availability Report indicates adequate hydrant pressure and flow are not currently available at the Project Site. However, as with the Project, Alternative 2 would include necessary upgrades to improve the surrounding water mains that would facilities flow and pressure requirements.

Based on the above, operation of Alternative 2 would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service. Therefore, impacts associated with new or physically altered government facilities would be less than significant and would be less when compared to the less-than-significant impacts of the Project due to the decrease in service population.

(2) Police Protection

(a) Construction

Similar to the Project, construction of Alternative 2 can create demand for police services. However, as with the Project, the demand for police protection services during construction would be offset by the removal of the existing uses on the Project Site. Furthermore, the daytime population at the Project Site during construction would be temporary in nature. However, construction sites can be sources of nuisances and

¹¹ *Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation Version 1.3, May 2020.*

vandalism. When not properly secured, construction sites can contribute to an increased demand for police protection services. As with the Project, Alternative 2 would incorporate Project Design Feature POL-PDF-1 into its design to implement temporary security measures, including security fencing, lighting, and locked entry to secure the Project Site during construction which would reduce demand for police protection services.

With regard to emergency vehicle access, as with the Project, a Construction Traffic Management Plan would be implemented during construction of Alternative 2 to ensure that adequate and safe access remains available within and near the Project Site during construction. Furthermore, construction-related traffic generated by the Project would not significantly impact LAPD response within the Project vicinity as emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. Accordingly, the construction-related impacts of Alternative 2 would be minimized and would not generate a demand for additional police protection services that would substantially exceed the capability of the LAPD to serve the Project Site. Construction of Alternative 2 would not necessitate the provision of new or physically altered facilities in order to maintain the LAPD's capability to serve the Project Site (i.e., Alternative 2 would not result in adverse physical impacts associated with the construction of new or altered facilities). Therefore, impacts would be less than significant and less when compared to the less-than-significant impacts of the Project because the duration of construction would be reduced.

(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 Newton Community Police Station. As with the Project, 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 due to less development under this alternative. However, as with the Project, Alternative 2 would not include residential uses to affect the Newton 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-7, which require security camera systems and keycard entry into buildings; proper lighting of building entrances, walkways and parking areas; secure design that maximizes visibility; sufficient lighting of parking areas; open views of entrances and exits; consultation with LAPD's Crime Prevention Unit; and provision to the LAPD of a diagram showing access routes and additional information to facilitate police response. As with the Project, these project design features would help reduce the increase in demand for police services under Alternative 2. Therefore, as with the Project, operation 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 when compared to the less-than-significant impacts of the Project.

h. Transportation

Similar to the Project, Alternative 2 would generally support multimodal transportation options. As with the Project, Alternative 2 would include passenger drop-offs to minimize impacts to the public right-of-way and enhance the user experience by integrating multi-modal transportation options. This alternative would also include the same new landscaping and pedestrian lighting as the Project, as well as short-term and long-term bicycle parking in accordance with the LAMC. As with the Project, Alternative 2 would also provide a pedestrian paseo connecting the existing and proposed buildings. Therefore, Alternative 2 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be similar to the Project.

Alternative 2 would result in 3,524 net daily vehicle trips and 26,954 net daily VMT, which are less than the minimum increase of 6,380 net daily vehicle trips and 48,107 net daily VMT under the Project.^{12,13} The proposed commercial uses under Alternative 2 would result in 7.0 VMT per employee, which is below the Central APC threshold of 7.6 but greater than the 6.7 VMT per employee under the Project. Alternative 2 has a higher VMT per employee ratio than the Project because there would be less internal capture of trips between the office and retail/restaurant uses due to the reduction in the sizes and changes in the relative proportion of the land uses. No residential uses are proposed, so there would be no residential VMT. Therefore, impacts would be less than significant under this alternative but greater when compared to the less-than-significant impacts of the Project.

Alternative 2 would not introduce hazardous geometric design features, and as is the case with the Project, all driveways would be designed to LADOT standards. Impacts would be less than significant and similar to the Project.

With respect to freeway safety, Alternative 2 would result in 28 to 30 percent fewer peak hour trips than the Project. However, this would still increase the vehicle queues at the US-101 Southbound Off-Ramp and 7th Street, I-10 Eastbound Off-Ramp and Porter Street, and I-10 Westbound Off-Ramp and Mateo Street/Enterprise Street. Mitigation Measures TR-MM-1 through TR-MM-3 identified in Section IV.H, Transportation, which would signalize these intersections, would mitigate these impacts to a less-than-significant level. However, since the improvements involve another jurisdiction (i.e., Caltrans) beyond the City of Los Angeles, implementation cannot be guaranteed. Therefore, both Project-

¹² Fehr & Peers, *Technical Memorandum, Violet Street Creative Office Campus Project: Alternatives Analysis*, October 17, 2022. See Appendix P of this Draft EIR.

¹³ As stated in Section IV.H, Transportation, of the Draft EIR, the Project is estimated to result in a net increase of 6,389 daily vehicle trips and a total daily VMT of 48,177 under the 7th Place driveway scenario, and a net increase of 6,380 daily vehicle trips and a total daily VMT of 48,107 under the Violet Street driveway scenario.

level and cumulative impacts would remain significant and unavoidable but less when compared to the significant and unavoidable impacts of the Project.

i. Tribal Cultural Resources

Similar to the Project, Alternative 2 requires excavation and grading for building foundations and subterranean parking. While the uncovering of tribal cultural resources is not anticipated, if tribal cultural resources are discovered during construction, such resources would be treated in accordance with State law (i.e., CEQA Guidelines Section 15064.5(d), PRC Sections 21080.3.1(b), 21080.3.2(a), 21084.3, etc.). Accordingly, impacts to tribal cultural resources would be less than significant and 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 require water for dust control, equipment cleaning, excavation, and export of dirt, including the removal and re-compaction of dirt during the grading process. Construction-related water use under Alternative 2 would be less due to the reduced amount of excavation and grading under this alternative. Furthermore, as with the Project, while Alternative 2 would require trenching for the required on-site water distribution system and connection to the existing water mains in the adjacent streets, 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. As with the Project, prior to ground disturbance, project contractors would coordinate with LADWP to identify the locations and depth of all lines, LADWP would be notified in advance of proposed ground disturbance activities, to avoid water lines and disruption of water service, and LADWP would review and approve all appropriate connection requirements, pipe depths, and connection location(s). In addition, as with the Project, Alternative 2 would implement Project Design Feature TR-PDF-1, Construction Traffic Management Plan, to ensure the safe flow of pedestrian, bicycle and vehicular traffic around the construction sites during construction. As with the Project, Alternative 2 would not result in construction activities that require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental impacts. Alternative 2 would result in less-than-significant impacts and less when compared to the less-than-significant impacts of the Project.

(b) Operation

As previously discussed, Alternative 2 would develop office and retail and/or restaurant uses but at a reduced density. As shown in Table V-2 on page V-34, Alternative 2 would result in a net increase in water demand of 91,389 gpd, which is less than the minimum increase of 106,567 gpd in net water demand generated by the Project with all office and restaurant uses in the Future Campus Expansion Phase.¹⁴ As with the Project, domestic and fire water service to the Project Site under Alternative 2 would continue to be supplied by LADWP. Similar to the Project, it is anticipated that LADWP would also be able to meet the water demand of Alternative 2.

As discussed in Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, the Project Site does not currently have adequate fire flow to serve the Project. However, as with the Project, Alternative 2 would include necessary upgrades to the surrounding water mains to facilitate the necessary flow and pressure requirements, and Alternative 2 would also incorporate a fire sprinkler suppression system to reduce or eliminate the public hydrant demands. Upon completion, similar to the Project, water supply infrastructure would also be able to meet the reduced demand under Alternative 2. The Applicant would also construct the necessary on-site infrastructure and connections to the LADWP system pursuant to applicable City requirements under this alternative.

Based on the above, the estimated water demand for Alternative 2 would not exceed the available supplies projected by LADWP or the available capacity within the distribution infrastructure that would serve the Project Site. Therefore, operational impacts of Alternative 2 on water supply and water infrastructure would be less than significant and 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 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. This alternative would consume even less

¹⁴ *The Future Campus Expansion Phase that includes 20,000 square feet of restaurant uses would result in a net increase in water demand of 132,170 gpd.*

**Table V-2
Estimated Water Consumption for Alternative 2**

Land Use	Unit	Generation Factor^a	Total Water Demand/ Wastewater Generation (gpd)
Existing to be Removed^b			
Warehouse	25,798 sf		
Warehouse (Future Campus Expansion Phase) ^c	21,880 sf		
Office	9,940 sf		
<i>Subtotal</i>			1,248 ^c
Proposed			
Office	260,000 sf	0.12/gpd/sf	31,200
Office (Future Campus Expansion Phase) ^c	211,201 sf	0.12/gpd/sf	25,344
Restaurant ^d	500 seats	30/gpd/seat	15,000
Fitness Center ^e	2,308 sf	0.65/gpd/sf	1,500
Base Demand Adjustment ^f			2,332
Landscaping ^e	16,081 sf		670
Covered Parking ^e	409,536 sf		269
Cooling Tower ^e	1,185 ton		16,322
<i>Subtotal</i>			92,637
Total Net Water Demand			91,389
<p><i>gpd = gallons per day</i> <i>ksf = 1,000 square feet</i> <i>sf = square feet</i></p> <p>^a Generation factors are provided by LADWP in the Project's Water Supply Assessment included as Appendix O of this Draft EIR.</p> <p>^b Existing water use to be removed was estimated by using the average of the 5-year billing record from January 2015 to December 2019. Billing record from 2020 and 2021 were not used because building vacancies in 2020 and 2021 were higher than normal due to COVID.</p> <p>^c The proposed Project includes a Future Campus Expansion Phase which encompasses a potential expansion opportunity. The Future Campus Expansion Phase will require demolishing the existing warehouse building in Lot 4.</p> <p>^d Food/drink and retail businesses are all assumed to be full service restaurant for a conservative water demand estimate. This assumes 20 sf/seat.</p> <p>^e Assumes the same square footage and required ordinance savings as the Project.</p> <p>^f Base Demand Adjustment is the estimated savings due to Ordinance No. 180822 accounted for in the current version of Bureau of Sanitation Sewer Generation Rates. LADWP does not provide their methodology for this calculation, so it is therefore assumed to be the same as the Project</p> <p>Source: Eyestone Environmental, 2023.</p>			

electricity during construction due to the reduction in development and associated construction activities under this alternative. As with the Project, since the Project Site is an urban infill site that is already served by electricity and natural infrastructure, it is not anticipated that 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. Therefore, as with 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. Thus, construction impacts under Alternative 2 would 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 2 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 2 operation would result in less electricity and natural gas consumption than the Project due to the reduction in development under this alternative, and because the existing electricity and natural gas infrastructure would be adequate to serve Project operation, existing energy infrastructure would 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, CALGreen Code, and the Los Angeles Green Building Code, and would implement Project Design Feature GHG-PDF-1, requiring the incorporation of sustainability features, and Project Design Feature 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. Thus, operational impacts under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above and shown in Table V-1 on page V-8, Alternative 2 would reduce, but not eliminate, the Project's significant and unavoidable impacts with respect to on-site noise during construction (Project-level), off-site noise during operation (cumulative), and freeway safety (Project-level and cumulative). 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.

4. Relationship of the Alternative to Project Objectives

Under Alternative 2, the same 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 (i.e., 481,201 square feet versus 661,800 square feet under the Project). As such, Alternative 2 would 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 a lesser extent than the Project.

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

- 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.

V. Alternatives

C. Alternative 3: Reduced Density Alternate Use Alternative

1. Description of the 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.

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.

Under Alternative 3, the overall amount of construction would be reduced in comparison to the Project, and two fewer subterranean parking levels would be developed. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, 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 DPM 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 TAC emissions. Overall construction emissions generated by Alternative 3 would be less than those of the Project because Alternative 3 would require less overall construction and two fewer subterranean parking levels. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 3 would be 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 3 would be generated by vehicle trips to the Project Site and the consumption of natural gas. The development proposed under Alternative 3 would be reduced compared to the Project (i.e., 481,200 square feet under Alternative 3 versus 661,800 square feet under the Project). Specifically, as provided in Appendix P of this Draft EIR, Alternative 3 would result in 3,296 net daily vehicle trips and 23,705 net daily VMT as compared to the Project's minimum increase of 6,380 net daily vehicle trips and 48,107 net daily VMT.^{15,16} As such, the number of new daily trips generated by Alternative 3 would be less than the number of new daily trips generated by the Project. 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 3 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 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 under Alternative 3 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 3 would be less than significant and less when compared to the less-than-significant impacts of the Project.

¹⁵ Fehr & Peers, *Technical Memorandum, Violet Street Creative Office Campus Project: Alternatives Analysis*, October 17, 2022. See Appendix P of this Draft EIR.

¹⁶ As stated in Section IV.H, *Transportation*, of the Draft EIR, the Project is estimated to result in a net increase of 6,389 daily vehicle trips and a total daily VMT of 48,177 under the 7th Place driveway scenario, and a net increase of 6,380 daily vehicle trips and a total daily VMT of 48,107 under the Violet Street driveway scenario.

(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 emissions from delivery trucks. Alternative 3 would include less development than the Project but otherwise include uses typical of urban development and, thus, would require reduced 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

(1) Historical Resources

As discussed above, the Ford Factory building located on the Project Site is a designated historical resource. However, as with the Project, Alternative 3 does not propose any work to the Ford Factory building or its adjacent parking garage. None of the character-defining features associated with the designated Ford Factory building would be removed or altered as a result of Alternative 3. As with the Project, Alternative 3 would be differentiated from the Ford Factory building such that it does not replicate any of the historic elements or features of the historic building or attempt to appear as historic construction. Therefore, as with the Project, the Ford Factory building would remain eligible for federal, state, and local listing upon completion of Alternative 3. Impacts would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Archaeological Resources

Similar to the Project, Alternative 3 would require excavation and grading for building foundations and subterranean parking. In the event that any archaeological resources are unexpectedly encountered during construction, work in the area would temporarily be halted while assessment of the find is conducted by a qualified archaeologist in accordance with the regulatory standards set forth in PRC Section 21083.2 and CEQA Guidelines Section 15064.5(c) to ensure the appropriate treatment of any potential unique archaeological resources unexpectedly encountered during grading and excavation activities. Therefore, impacts related to archaeological resources under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

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, which would be less when compared to the less-than-significant impacts of the Project 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., 481,201 square feet versus 661,800 square feet under the Project) and, thus, would be expected to generate overall lower operational energy demand than the Project. Furthermore, as provided in Appendix P of this Draft EIR, Alternative 3 would result in 3,296 net daily vehicle trips and 23,705 net daily VMT as compared to the Project's minimum increase of 6,380 net daily vehicle trips and 48,107 net daily VMT and, thus, would consume less operation-related petroleum-based fuels than the Project.^{17,18} Similar to the Project, Alternative 3 would comply with applicable energy conservation requirements during operation, including California's Building Energy Efficiency Standards (Title 24 standards), CALGreen Code, and the Los Angeles Green Building Code, and would implement Project Design Feature

¹⁷ Fehr & Peers, *Technical Memorandum, Violet Street Creative Office Campus Project: Alternatives Analysis*, October 17, 2022. See Appendix P of this Draft EIR.

¹⁸ As stated in Section IV.H, *Transportation*, of the Draft EIR, the Project is estimated to result in a net increase of 6,389 daily vehicle trips and a total daily VMT of 48,177 under the 7th Place driveway scenario, and a net increase of 6,380 daily vehicle trips and a total daily VMT of 48,107 under the Violet Street driveway scenario.

GHG-PDF-1, requiring the incorporation of sustainability features, and Project Design Feature WAT-PDF-1 to reduce water consumption, 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 modes of transportation that are more efficient 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 during operation, which would be less when compared to the less-than-significant impacts of the Project because less development is proposed.

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

As with the Project, Alternative 3 would comply with the Los Angeles Green Building Code and, thus, with the Title 24 standards and the CALGreen Code. Therefore, similar to the Project, Alternative 3 would incorporate measures that are beyond current State and City energy conservation requirements. In addition, as with the Project, Alternative 3 would implement project design features requiring additional sustainability measures and the use of energy-efficient appliances. With regard to transportation related energy usage, Alternative 3 would also comply with the goals of the SCAG's RTP/SCS, which incorporate VMT targets established by SB 375. 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, as with the Project, Alternative 3 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 resulting from the proposed land uses. The number of daily trips and daily VMT under Alternative 3 would be reduced when compared to the Project. Specifically, as provided in Appendix P of this Draft EIR, Alternative 3 would result in 3,296 net daily vehicle trips and 23,705 net daily VMT as compared to the Project's minimum increase of 6,380 net daily vehicle trips and 48,107 net daily VMT.^{19,20} In addition, energy and water consumption from the

¹⁹ Fehr & Peers, *Technical Memorandum, Violet Street Creative Office Campus Project: Alternatives Analysis*, October 17, 2022. See Appendix P of this Draft EIR.

²⁰ As stated in Section IV.H, *Transportation*, of the Draft EIR, the Project is estimated to result in a net increase of 6,389 daily vehicle trips and a total daily VMT of 48,177 under the 7th Place driveway scenario, and a net increase of 6,380 daily vehicle trips and a total daily VMT of 48,107 under the Violet Street driveway scenario.

proposed land uses would be reduced compared to the Project due to the reduction in development (i.e., 481,201 square feet under Alternative 3 as compared to 661,800 square feet under the Project). Thus, the amount of GHG emissions generated by Alternative 3 would be less than the amount generated by the Project. As with the Project, Alternative 3 would be designed to comply with the requirements of the CALGreen Code and the Los Angeles Green Building Code. As with the Project, Alternative 3 would 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 Los Angeles Green Building Code, as applicable. With compliance with the CALGreen Code and the Los Angeles 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, which would be less when compared to the less-than-significant impacts of the Project.

e. Land Use

As previously described, Alternative 3 would develop 260 multi-family residential units and 10,000 square feet of retail and/or restaurant uses during the initial phase and 211,201 square feet of office uses during the Future Campus Expansion Phase compared to all commercial uses under the Project. However, Alternative 3 would require the same discretionary approvals as the Project. Specifically, as with the Project, Alternative 3 would require a Vesting Zone and Height District Change, Vesting Conditional Use to allow a Floor Area Ratio averaging across a Unified Development, Zone Variance, Site Plan Review, and Vesting Tentative Tract Map. As with the Project, following approval of the General Plan amendment and zone changes, 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 Central City North Community Plan, and the LAMC. However, because the Community Plan calls for live-work units in this area, the development of traditional multi-family residential units would be inconsistent with the Community Plan. Generally, given that land use plans reflect a range of competing interests, a project should be compatible with a plan's overall goals and objectives but need not be in perfect conformity with every plan policy. Specifically, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match between a project and the applicable general plan. Therefore, impacts related to land use consistency would remain less than significant but would be greater than the Project due to the inconsistency with the Community Plan.

f. Noise

(1) Construction

The types of construction activities under Alternative 3 would be substantially similar to the Project, although the amount of construction activities would be less and the duration shorter due to the reduction in total floor area (i.e., 481,201 square feet under Alternative 3 as compared to 661,800 square feet under the Project) and two fewer subterranean parking levels (i.e., two levels under Alternative 3 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 those 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), as well as Mitigation Measure NOI-MM-1 (requiring temporary sound barriers around the construction site), which would minimize construction noise. However, similar to the Project, on-site construction noise would be significant and unavoidable under Alternative 3 (during the nighttime mat pour phase, for a maximum of five days), but cumulative impacts would be less than significant. Nonetheless, the overall amount/duration of construction activities and associated noise under Alternative 3 would be less when compared to the significant and unavoidable impacts and the less-than-significant cumulative impacts of the Project.

(2) 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 noise from similar on-site noise sources. However, it is anticipated that with the overall reduction in total floor area and uses of approximately 27 percent reduction in square footage under this alternative (i.e., 481,201 square feet under Alternative 3 as compared to 661,800 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 3 would implement project design features similar to Project Design Features NOI-PDF-3 (acoustic screening of outdoor mechanical equipment), NOI-PDF-4 (acoustic screening of loading docks), and NOI-PDF-5 (controls on amplified sound), which would minimize on-site operational noise. As with 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., 3,267 net daily trips versus 6,380 net daily trips under the Project).^{21,22} The reduction in vehicle trips would result in a decrease in off-site operational traffic-related noise levels under Alternative 3, and Project-level impacts under this alternative would be less than significant and less when compared to the less-than-significant impacts of the Project. However, as with the Project, in spite of the reduction in off-site operational traffic noise, cumulative impacts would remain significant and unavoidable because cumulative noise impacts along Mateo Street (between 6th Street and 7th Street) and along Santa Fe Avenue (between 6th Street and 7th Street) would also be significant even without 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 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 related to 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-1, Construction Traffic Management Plan, which would include provisions for maintaining emergency access and minimizing delays in emergency response during construction. Furthermore,

²¹ *Fehr & Peers, Technical Memorandum, Violet Street Creative Office Campus Project: Alternatives Analysis, October 17, 2022. See Appendix P of this Draft EIR.*

²² *As stated in Section IV.H, Transportation, of the Draft EIR, the Project is estimated to result in a net increase of 6,389 daily vehicle trips and a total daily VMT of 48,177 under the 7th Place driveway scenario, and a net increase of 6,380 daily vehicle trips and a total daily VMT of 48,107 under the Violet Street driveway scenario.*

as with the Project, emergency vehicles could 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 Alternative 3, thereby reducing the potential for traffic-related conflicts. Therefore, as with the Project, construction of Alternative 3 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, which would be less when 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. 17, the “first-in” station, as well as Fire Station Nos. 9, 4, 25, and 2. Alternative 3 would develop residential, office, and retail/restaurant uses, though at a reduced density compared to the Project. Therefore, the resulting increase in service population would be less than the Project. Specifically, the net increase in fire service population would be 1,414 residents and employees compared to 2,744 employees with the Project.²³ In addition, similar to the Project, Alternative 3 would implement all applicable City Building Code and Fire Code requirements, including, but not limited to, structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm, and communications systems. Therefore, in compliance with the City Fire Code and implementation of required fire/life safety features provided throughout the Project Site, Alternative 3 would reduce the potential incidents requiring an emergency response by LAFD.

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.G.1, Public Services—Fire Protection, of this Draft EIR, the Fire Flow Availability Report indicates adequate hydrant pressure and flow are not currently available at the Project Site. However, as with the Project, Alternative 3 would include necessary upgrades to improve the surrounding water mains that would facilities flow and pressure requirements.

Based on the above, operation of Alternative 3 would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service. Therefore, impacts associated with new or physically altered government facilities would be less than significant and would be less when compared to the less-than-significant impacts of the Project due to the decrease in service population.

²³ *Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation Version 1.3, May 2020.*

(2) Police Protection

(a) Construction

Similar to the Project, construction of Alternative 3 can create demand for police services. However, as with the Project, the demand for police protection services during construction would be offset by the removal of the existing uses on the Project Site. Furthermore, the daytime population at the Project Site during construction would be temporary in nature. However, construction sites can be sources of nuisances and vandalism. When not properly secured, construction sites can contribute to an increased demand for police protection services. As with the Project, Alternative 3 would incorporate Project Design Feature POL-PDF-1 into its design to implement temporary security measures, including security fencing, lighting, and locked entry to secure the Project Site during construction which would reduce demand for police protection services.

With regard to emergency vehicle access, as with the Project, a Construction Traffic Management Plan would be implemented during construction of Alternative 3 to ensure that adequate and safe access remains available within and near the Project Site during construction. Furthermore, construction-related traffic generated by the Project would not significantly impact LAPD response within the Project vicinity as emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. Accordingly, the construction-related impacts of Alternative 3 would be minimized and would not generate a demand for additional police protection services that would substantially exceed the capability of the LAPD to serve the Project Site. Construction of Alternative 3 would not necessitate the provision of new or physically altered facilities in order to maintain the LAPD's capability to serve the Project Site (i.e., Alternative 3 would not result in adverse physical impacts associated with the construction of new or altered facilities). Therefore, impacts would be less than significant and less when compared to the less-than-significant impacts of the Project because the duration of construction would be reduced.

(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 Newton Community Police Station. As with the Project, 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 due to less development under this alternative. Under Alternative 3, the Project would include 260 residential units, inclusive of 26 studio units, 117 1-bedroom units, and 117 2-bedroom units. However, unlike the Project, Alternative 3 would introduce a new residential population of 585 persons to the Project Site. The Newton Division's residential service population would increase from 128,000 to 128,585, but there would be

no change in the existing officer to resident ratio (i.e., 2.4 officers per 1,000 residents). Also, similar to the Project, Alternative 3 would implement Project Design Features POL-PDF-2 through POL-PDF-7, which require security camera systems and keycard entry into buildings; proper lighting of building entrances, walkways and parking areas; secure design that maximizes visibility; sufficient lighting of parking areas; open views of entrances and exits; consultation with LAPD's Crime Prevention Unit; and provision to the LAPD of a diagram showing access routes and additional information to facilitate police response. As with the Project, these project design features would help reduce the increase in demand for police services under Alternative 3. Therefore, as with the Project, operation 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.

h. Transportation

Similar to the Project, Alternative 3 would generally support multimodal transportation options. As with the Project, Alternative 3 would include passenger drop-offs to minimize impacts to the public right-of-way and enhance the user experience by integrating multi-modal transportation options. This alternative would also include the same new landscaping and pedestrian lighting as the Project, as well as short-term and long-term bicycle parking in accordance with the LAMC. As with the Project, Alternative 3 would also provide a pedestrian paseo connecting the existing and proposed buildings. Therefore, Alternative 3 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be similar to the Project.

Alternative 3 would result in 3,296 net daily vehicle trips and 23,705 net daily VMT, which is less than the minimum increase of 6,380 net daily vehicle trips and 48,107 net daily VMT with the Project.^{24,25} The proposed commercial uses under Alternative 3 would result in 7.6 VMT per employee, which meets but does not exceed the Central APC threshold of 7.6, and is greater than the 6.7 VMT per employee with the Project. In addition, Alternative 3 would also result in a residential VMT per capita of 5.8, which is below the Central APC threshold of 6.0. No residential uses are proposed under the Project, so there would be no residential VMT. Therefore, impacts would remain less than significant but would be greater when compared to the less-than-significant impacts of the Project.

²⁴ Fehr & Peers, *Technical Memorandum, Violet Street Creative Office Campus Project: Alternatives Analysis*, October 17, 2022. See Appendix P of this Draft EIR.

²⁵ As stated in Section IV.H, *Transportation*, of the Draft EIR, the Project is estimated to result in a net increase of 6,389 daily vehicle trips and a total daily VMT of 48,177 under the 7th Place driveway scenario, and a net increase of 6,380 daily vehicle trips and a total daily VMT of 48,107 under the Violet Street driveway scenario.

Alternative 3 would not introduce hazardous geometric design features, and, as is the case with the Project, all driveways would be designed to LADOT standards. Impacts would be less than significant and similar to the Project.

With respect to freeway safety, Alternative 3 would result in 85 to 92 percent fewer peak hour trips than the Project. Because of the decrease in peak hour traffic, Alternative 3 would not increase the vehicle queues at the US-101 Southbound Off-Ramp and 7th Street, I-10 Eastbound Off-Ramp and Porter Street, and I-10 Westbound Off-Ramp and Mateo Street/Enterprise Street. Therefore, impacts would be less than significant under Alternative 3, which would avoid the Project's significant and unavoidable Project-level and cumulative impact with respect to freeway queueing.

i. Tribal Cultural Resources

Similar to the Project, Alternative 3 requires excavation and grading for building foundations and subterranean parking. While the uncovering of tribal cultural resources is not anticipated, if tribal cultural resources are discovered during construction, such resources would be treated in accordance with State law (i.e., CEQA Guidelines Section 15064.5(d), PRC Sections 21080.3.1(b), 21080.3.2(a), 21084.3, etc.). Accordingly, impacts to tribal cultural resources would be less than significant and 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 3 would require water for dust control, equipment cleaning, excavation, and export of dirt, including the removal and re-compaction of dirt during the grading process. Construction-related water use under Alternative 3 would be less due to the reduced amount of excavation and grading under this alternative. Furthermore, as with the Project, while 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. Specifically, prior to ground activities associated with the limited trenching activities, project contractors would notify LADWP in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. In addition, as with the Project, Alternative 3 would implement Project Design Feature TR-PDF-1, Construction Traffic Management Plan, to ensure the safe flow of pedestrian, bicycle, and vehicular traffic around the construction sites during construction. As with the Project, Alternative 3 would not result in construction activities that require or result in the

relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental impacts. Alternative 3 would result in less-than-significant impacts and less when compared to the less-than-significant impacts of the Project.

(b) Operation

As previously discussed, Alternative 3 would develop residential, office, and retail and/or restaurant uses but at a reduced density compared to the Project. As shown in Table V-3 on page V-52, Alternative 3 would result in a net increase in water demand of 92,559 gpd, which is less than the minimum increase of 106,567 gpd in net water demand generated by the Project with all office and restaurant uses in the Future Campus Expansion Phase.²⁶ As with the Project, domestic and fire water service to the Project Site under Alternative 3 would continue to be supplied by LADWP. Similar to the Project, it is anticipated that LADWP would also be able to meet the water demand of Alternative 3.

As discussed in Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, the Project Site does not currently have adequate fire flow to serve the Project. However, as with the Project, Alternative 3 would include necessary upgrades to the surrounding water mains to facilitate the necessary flow and pressure requirements, and Alternative 3 would also incorporate a fire sprinkler suppression system to reduce or eliminate the public hydrant demands. Upon completion, similar to the Project, water supply infrastructure would also be able to meet the reduced demand under Alternative 3. The Applicant would also construct the necessary on-site infrastructure and connections to the LADWP system pursuant to applicable City requirements under this alternative.

Based on the above, the estimated water demand for Alternative 3 would not exceed the available supplies projected by LADWP or the available capacity within the distribution infrastructure that would serve the Project Site. Therefore, operational impacts of Alternative 3 on water supply and water infrastructure would be less than significant and 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

²⁶ *The Future Campus Expansion Phase that includes 20,000 square feet of restaurant uses would result in a net increase in water demand of 132,170 gpd.*

**Table V-3
Estimated Water Consumption for Alternative 3**

Land Use	Unit	Generation Factor ^a	Total Water Demand/ Wastewater Generation (gpd)
Existing to be Removed^b			
Warehouse	25,798 sf		
Warehouse (Future Campus Expansion Phase) ^c	21,880 sf		
Office	9,940 sf		
<i>Subtotal</i>			1,248 ^c
Proposed			
Multi-family: Studio	26 du	75 gpd/du	1,950
Multi-family: 1-bedroom	117 du	110 gpd/du	12,870
Multi-family: 2-bedroom	117 du	150 gpd/du	17,550
Office (Future Campus Expansion Phase) ^c	211,201 sf	0.12/gpd/sf	25,344
Restaurant ^d	500 seats	30/gpd/seat	15,000
Fitness Center ^e	2,308 sf	0.65/gpd/sf	1,500
Base Demand Adjustment ^f			2,332
Landscaping ^e	16,081 sf		670
Covered Parking ^e	409,536 sf		269
Cooling Tower ^e	1,185 ton		16,322
<i>Subtotal</i>			93,807
Total Net Water Demand			92,559
<p><i>du = dwelling unit</i> <i>gpd = gallons per day</i> <i>ksf = 1,000 square feet</i> <i>sf = square feet</i></p> <p>^a Generation factors are provided by LADWP.</p> <p>^b Existing water use to be removed was estimated by using the average of the 5-year billing record from January 2015 to December 2019. Billing record from 2020 and 2021 were not used because building vacancies in 2020 and 2021 were higher than normal due to COVID.</p> <p>^c The proposed Project includes a Future Campus Expansion Phase which encompasses a potential expansion opportunity. The Future Campus Expansion Phase will require demolishing the existing warehouse building in Lot 4.</p> <p>^d Food/drink and retail businesses are all assumed to be full service restaurant for a conservative water demand estimate. This assumes 20 sf/seat.</p> <p>^e Assumes the same square footage and required ordinance savings as the Project.</p> <p>^f Base Demand Adjustment is the estimated savings due to Ordinance No. 180822 accounted for in the current version of Bureau of Sanitation Sewer Generation Rates. LADWP does not provide their methodology for this calculation, so it is therefore assumed to be the same as the Project.</p> <p>Source: Eyestone Environmental, 2023.</p>			

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. This alternative would consume even less electricity during construction due to the reduction in development and associated construction activities under this alternative. As with the Project, since the Project Site is an urban infill site that is already served by electricity and natural infrastructure, it is not anticipated that Alternative 3 would require extensive off-site infrastructure improvements. Lastly, as with 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. Therefore, as with 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. Thus, construction 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 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 due to the reduction in development under this alternative, and because the existing electricity and natural gas infrastructure would be adequate to serve Project operation, existing energy infrastructure would 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 Code, and the Los Angeles Green Building Code, and would implement Project Design Feature GHG-PDF-1, requiring the incorporation of sustainability features, and Project Design Feature 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. Thus, operational impacts under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above and shown in Table V-1 on page V-8, 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.

4. Relationship of the Alternative to Project Objectives

Alternative 3 would develop residential, office, and retail and/or restaurant uses on the Project Site but at a reduced square footage compared to the Project (i.e., 481,201 square feet versus 661,800 square feet) and with a reduced emphasis on office development. As such, Alternative 3 would somewhat 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 but to a lesser extent than 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 due to the reduction in development and in the office component of the Project:

- 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.

V. Alternatives

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

1. Description of the 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.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

As with the Project, construction of Alternative 4 has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Under Alternative 4, the overall amount of construction would be similar to the Project since the same amount of development is proposed. In addition, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, 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 4 would generate DPM 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 TAC emissions. Overall construction emissions generated by Alternative 4 would be similar to the Project because the same amount of development is proposed. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 4 would be similar 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 4 would be generated by vehicle trips to the Project Site and the consumption of natural gas. As with the Project, the development proposed under 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.). As such, the number of new daily trips generated by Alternative 4 would be more than the number of new daily trips generated by the Project. However, the daily VMT generated by Alternative 4 would be less than VMT generated by the Project. Specifically, as provided in Appendix P of this Draft EIR, Alternative 4 would result in a total of 6,454 net daily vehicle trips and 47,582 net daily VMT as compared to the Project's minimum increase of 6,380 net daily vehicle trips and 48,107 net daily VMT.^{27,28} As vehicular emissions depend on the number of trips and VMT, vehicular sources would result in similar mobile source emissions compared to the Project. In addition, hotel uses under Alternative 4 would require less natural gas demand²⁹ in comparison to office and restaurant uses under the Proposed Project. Therefore, impacts associated with regional operational emissions under Alternative 4 would be less than significant and marginally 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 4 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 4 would also be less than significant. Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. As discussed above, the number of daily trips generated under Alternative 4 would be greater than the Project, and the number of peak-hour trips would also be greater than the Project. However, as with the Project, the peak-hour trips generated by Alternative 4 would not result in any localized mobile source operational impacts. Therefore, localized and stationary source impacts under Alternative 4 would be less than significant but would be greater when compared to the less-than-significant impacts of the Project.

(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 emissions from delivery trucks. Alternative 4 would include the same amount of development as the

²⁷ Fehr & Peers, *Technical Memorandum, Violet Street Creative Office Campus Project: Alternatives Analysis, October 17, 2022. See Appendix P of this Draft EIR.*

²⁸ As stated in Section IV.H, *Transportation, of the Draft EIR, the Project is estimated to result in a net increase of 6,389 daily vehicle trips and a total daily VMT of 48,177 under the 7th Place driveway scenario, and a net increase of 6,380 daily vehicle trips and a total daily VMT of 48,107 under the Violet Street driveway scenario.*

²⁹ *Alternative 4 assumes hotel rooms would not include kitchens. The Project would provide sustainability features such as Energy-Star labeled products and be compliant with 2019 Title 24 Standards and CALGreen Code. Additionally, the City's All-Electric Buildings Ordinance No. 187714 would require hotels to have all-electric energy sources and have zero natural gas usage, while restaurants would be exempt.*

Project and include similar uses and, thus, would require a similar number of operational truck deliveries³⁰ and associated DPM emissions. Therefore, Alternative 4 would result in less than significant operational TAC emission impacts, which would be similar to the less-than-significant impacts of the Project.

b. Cultural Resources

(1) Historical Resources

As discussed above, the Ford Factory building located on the Project Site is a designated historical resource. However, as with the Project, Alternative 4 does not propose any work to the Ford Factory building or its adjacent parking garage. None of the character-defining features associated with the designated Ford Factory building would be removed or altered as a result of Alternative 4. As with the Project, Alternative 4 would be differentiated from the Ford Factory building such that it does not replicate any of the historic elements or features of the historic building or attempt to appear as historic construction. Therefore, as with the Project, the Ford Factory building would remain eligible for federal, state, and local listing upon completion of Alternative 4. Impacts would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Archaeological Resources

Similar to the Project, Alternative 4 would require excavation and grading for building foundations and subterranean parking. In the event that any archaeological resources are unexpectedly encountered during construction, work in the area would temporarily be halted while assessment of the find is conducted by a qualified archaeologist in accordance with the regulatory standards set forth in PRC Section 21083.2 and CEQA Guidelines Section 15064.5(c) to ensure the appropriate treatment of any potential unique archaeological resources unexpectedly encountered during grading and excavation activities. Therefore, impacts related to archaeological resources under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

³⁰ *Alternative 4 assumes that linen services would be done on-site and that the hotel retail and restaurant would have less deliveries compared to an office use.*

c. Energy

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

(a) Construction

Similar to the Project, construction activities under Alternative 4 would consume electricity to convey water for dust control and to power lighting, electronic equipment, and other construction activities, and petroleum-based fuels for heavy construction equipment, delivery and haul trucks, and construction worker traffic. However, as with the Project, the use of construction equipment/vehicles under Alternative 4 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 4 would not involve the wasteful, inefficient, or unnecessary consumption of energy resources. As such, Alternative 4 would result in less-than-significant impacts to energy resources during construction, which would be similar to the less-than-significant impacts of the Project because the same amount of development is proposed.

(b) Operation

As with the Project, operation of Alternative 4 would generate an increased consumption of electricity and natural gas relative to existing conditions. When compared to the Project, Alternative 4 would include the same amount of development but would include a hotel use during the Future Campus Expansion Phase compared to the office use for the Project. Hotel uses under Alternative 4 would require less natural gas and electricity demand in comparison to office and restaurant uses under the Proposed Project. Water demand (and associated electricity consumption) for hotel uses under Alternative 4 would be marginally greater than the office and retail/restaurant uses proposed under the Project. With the increase in water demand and decrease in natural gas and electricity usage in comparison to the Project, overall, on-site operational energy demand under Alternative 4 would be less than the Project. Furthermore, as provided in Appendix P of this Draft EIR, Alternative 4 would result in a total of 6,454 net daily vehicle trips and 47,582 net daily VMT as compared to the Project's minimum increase of 6,380 net daily vehicle trips and 48,107 daily VMT and, thus, would consume similar operation-related petroleum-based fuels compared to the Project.^{31,32} Similar to the Project, Alternative 4 would comply with

³¹ Fehr & Peers, *Technical Memorandum, Violet Street Creative Office Campus Project: Alternatives Analysis, October 17, 2022*. See Appendix P of this Draft EIR.

applicable energy conservation requirements during operation, including California's Building Energy Efficiency Standards (Title 24 standards), CALGreen Code, and the Los Angeles Green Building Code, and would implement Project Design Feature GHG-PDF-1, requiring the incorporation of sustainability features, and Project Design Feature WAT-PDF-1 to reduce water consumption, 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 modes of transportation that are more efficient and minimize fuel consumption. Therefore, as with the Project, operation of Alternative 4 would not involve the wasteful, inefficient, or unnecessary consumption of energy resources. As such, Alternative 4 would result in less-than-significant impacts during operation, which would be overall similar to the less-than-significant impacts of the Project.

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

As with the Project, Alternative 4 would comply with the Los Angeles Green Building Code and, thus, with the Title 24 standards and the CALGreen Code. Therefore, similar to the Project, Alternative 4 would incorporate measures that are beyond current State and City energy conservation requirements. In addition, as with the Project, Alternative 4 would implement project design features requiring additional sustainability measures and the use of energy-efficient appliances. With regard to transportation related energy usage, Alternative 4 would also comply with the goals of the SCAG's RTP/SCS, which incorporate VMT targets established by SB 375. As with the Project, Alternative 4 would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction. Therefore, as with the Project, Alternative 4 would not conflict with plans for renewable energy or energy efficiency. The impacts of Alternative 4 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 resulting from the proposed land uses. The number of daily trips under Alternative 4 would be increased when compared to the Project. However, the daily VMT generated by Alternative 4 would be less than VMT generated by the Project. Specifically, as provided in Appendix P of this Draft EIR, Alternative would result in a total of 6,454 net daily vehicle

³² As stated in Section IV.H, Transportation, of the Draft EIR, the Project is estimated to result in a net increase of 6,389 daily vehicle trips and a total daily VMT of 48,177 under the 7th Place driveway scenario, and a net increase of 6,380 daily vehicle trips and a total daily VMT of 48,107 under the Violet Street driveway scenario.

trips and 47,582 net daily VMT as compared to the Project's minimum increase of 6,380 net daily vehicle trips and 48,107 daily VMT.^{33,34} Mobile source emissions under Alternative 4 would be similar to the Project. In addition, energy from the proposed land uses would be less than the Project. Hotel uses under Alternative 4 would require less natural gas and electricity demand in comparison to office and restaurant uses under the Proposed Project. Water usage under Alternative 4 would increase in comparison to the Project. With the reduction in energy usage emissions and increase in water usage in comparison to the Project, the amount of GHG emissions generated by Alternative 4 would cumulatively be less than the amount generated by the Project. As with the Project, Alternative 4 would be designed to comply with the requirements of the CALGreen Code and the Los Angeles Green Building Code. As with the Project, Alternative 4 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 Los Angeles Green Building Code, as applicable. With compliance with the CALGreen Code and the Los Angeles Green Building Code, and with the implementation of comparable sustainability features as the Project, Alternative 4 would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 4 would be less than significant, which would be less when compared to the less-than-significant impacts of the Project.

e. Land Use

As previously described, Alternative 4 would develop the same mix of uses during the initial phase but would develop a 384-room hotel under the Future Campus Expansion Phase. However, Alternative 4 would require the same discretionary approvals as the Project. Specifically, as with the Project, Alternative 4 would require a Vesting Zone and Height District Change, Vesting Conditional Use to allow a Floor Area Ratio averaging across a Unified Development, Zone Variance, Site Plan Review, and Vesting Tentative Tract Map. As with the Project, following approval of the General Plan amendment and zone changes, Alternative 4 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 Central City North Community Plan, and the LAMC. The hotel use would be

³³ *Fehr & Peers, Technical Memorandum, Violet Street Creative Office Campus Project: Alternatives Analysis, October 17, 2022. See Appendix P of this Draft EIR.*

³⁴ *As stated in Section IV.H, Transportation, of the Draft EIR, the Project is estimated to result in a net increase of 6,389 daily vehicle trips and a total daily VMT of 48,177 under the 7th Place driveway scenario, and a net increase of 6,380 daily vehicle trips and a total daily VMT of 48,107 under the Violet Street driveway scenario.*

consistent with the policy encouraging additional commercial vitality. 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) Construction

The types of construction activities under Alternative 4 would be substantially similar to the Project, and the amount of construction activities and duration would be similar to the Project because the same amount of development is proposed. As with the Project, construction of Alternative 4 would generate noise from the use of heavy-duty construction equipment, as well as from haul truck and construction worker trips. Under Alternative 4, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to those of the Project during maximum activity days. 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 4 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. However, similar to the Project, on-site construction noise would be significant and unavoidable under Alternative 4 (during the nighttime mat pour phase, for a maximum of five days), but cumulative impacts would be less than significant.

(2) 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 4 would introduce noise from similar on-site noise sources. In addition, similar to the Project, Alternative 4 would implement project design features similar to Project Design Features NOI-PDF-3 (acoustic screening of outdoor mechanical equipment), NOI-PDF-4 (acoustic screening of loading docks), and NOI-PDF-5 (controls on amplified sound), which would minimize on-site operational noise. As with the Project, Alternative 4 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 4 would be less than significant and similar when compared to the less-than-significant impacts of the Project.

With regard to operational off-site (i.e., traffic) noise, Alternative 4 would generate slightly more operational traffic than the Project (i.e., 6,454 net daily trips versus 6,380 net daily trips under the Project).^{35,36} The slight increase in vehicle trips would result in a slight increase of less than 0.1 dBA (L_{eq}) in off-site operational traffic-related noise levels under Alternative 4. However, as with the Project, Project-level impacts under this alternative would remain less than significant. In addition, the slight increase the net daily trips would result in a slight increase in off-site cumulative traffic noise less than 0.1 dBA (L_{eq}). As such, cumulative impacts under Alternative 4 would remain significant and unavoidable along Mateo Street (between 6th Street and 7th Street) and along Santa Fe Avenue (between 6th Street and 7th Street) and would be similar to the Project.

g. Public Services

(1) Fire Protection

(a) Construction

The amount and types of construction activities required for Alternative 4 would be similar to those of the Project. As with the Project, as discussed in Section IV.G.1, Public Services—Fire Protection, of this Draft EIR, construction under Alternative 4 would occur in compliance with all applicable federal, State, and local requirements related to 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 4 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 4 would implement Project Design Feature TR-PDF-1, Construction Traffic Management Plan, which would include provisions for maintaining emergency access and minimizing delays in emergency response during construction. Furthermore, as with the Project, 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 Alternative 4, thereby reducing the potential for traffic-related conflicts. Therefore, as with the Project, construction of Alternative 4 would not result in the need for new or altered government facilities (i.e., fire stations). Impacts under

³⁵ *Fehr & Peers, Technical Memorandum, Violet Street Creative Office Campus Project: Alternatives Analysis, October 17, 2022. See Appendix P of this Draft EIR.*

³⁶ *As stated in Section IV.H, Transportation, of the Draft EIR, the Project is estimated to result in a net increase of 6,389 daily vehicle trips and a total daily VMT of 48,177 under the 7th Place driveway scenario, and a net increase of 6,380 daily vehicle trips and a total daily VMT of 48,107 under the Violet Street driveway scenario.*

Alternative 4 would be less than significant and similar 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. 17, the “first-in” station, as well as Fire Station Nos. 9, 4, 25, and 2. As with the Project, Alternative 4 would develop office and retail/restaurant uses, but Alternative 4 also includes hotel uses. Specifically, the net increase in fire service population would be 1,938 employees compared to 2,744 employees with the Project.³⁷ Nonetheless, similar to the Project, Alternative 4 would implement all applicable City Building Code and Fire Code requirements, including, but not limited to, structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm, and communications systems.

As with the Project, domestic and fire water service to the Project Site under Alternative 4 would continue to be supplied by LADWP. As discussed in Section IV.G.1, Public Services—Fire Protection, of this Draft EIR, the Fire Flow Availability Report indicates adequate hydrant pressure and flow are not currently available at the Project Site. However, as with the Project, Alternative 2 would include necessary upgrades to improve the surrounding water mains that would facilities flow and pressure requirements.

Based on the above, operation of Alternative 4 would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service. Therefore, impacts associated with new or physically altered government facilities would be less than significant and would be less when compared to the less-than-significant impacts of the Project due to the decrease in service population.

(2) Police Protection

(a) Construction

Similar to the Project, construction of Alternative 4 can create demand for police services. However, as with the Project, the demand for police protection services during construction would be offset by the removal of the existing uses on the Project Site. Furthermore, the daytime population at the Project Site during construction would be temporary in nature. However, construction sites can be sources of nuisances and vandalism. When not properly secured, construction sites can contribute to an increased demand for police protection services. As with the Project, Alternative 4 would incorporate

³⁷ *Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation Version 1.3, May 2020.*

Project Design Feature POL-PDF-1 into its design to implement temporary security measures, including security fencing, lighting, and locked entry to secure the Project Site during construction which would reduce demand for police protection services.

With regard to emergency vehicle access, as with the Project, a Construction Traffic Management Plan would be implemented during construction of Alternative 4 to ensure that adequate and safe access remains available within and near the Project Site during construction. Furthermore, construction-related traffic generated by the Project would not significantly impact LAPD response within the Project vicinity as emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. Accordingly, the construction-related impacts of Alternative 4 would be minimized and would not generate a demand for additional police protection services that would substantially exceed the capability of the LAPD to serve the Project Site. Construction of Alternative 4 would not necessitate the provision of new or physically altered facilities in order to maintain the LAPD's capability to serve the Project Site (i.e., Alternative 4 would not result in adverse physical impacts associated with the construction of new or altered facilities). Therefore, impacts would be less than significant and similar 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 Newton Community Police Station. As with the Project, Alternative 4 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 4 due to the smaller increase in service population. However, as with the Project, Alternative 4 would not include residential uses to affect the Newton Division's residential service population or existing officer to population ratio. Also, similar to the Project, Alternative 4 would implement Project Design Features POL-PDF-2 through POL-PDF-7, which require security camera systems and keycard entry into buildings; proper lighting of building entrances, walkways and parking areas; secure design that maximizes visibility; sufficient lighting of parking areas; open views of entrances and exits; consultation with LAPD's Crime Prevention Unit; and provision to the LAPD of a diagram showing access routes and additional information to facilitate police response. As with the Project, these project design features would help reduce the increase in demand for police services under Alternative 4. Therefore, as with the Project, operation of Alternative 4 would not result in the need for new or altered government facilities (i.e., police stations). Impacts under Alternative 4 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 4 would generally support multimodal transportation options. As with the Project, Alternative 4 would include passenger drop-offs to minimize impacts to the public right-of-way and enhance the user experience by integrating multi-modal transportation options. This alternative would also include the same new landscaping and pedestrian lighting as the Project, as well as short-term and long-term bicycle parking in accordance with the LAMC. As with the Project, Alternative 4 would also provide a pedestrian paseo connecting the existing and proposed buildings. Therefore, Alternative 4 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be similar to the Project.

Alternative 4 would result in 6,454 net daily vehicle trips and 47,582 net daily VMT, which is slightly more than the minimum increase of 6,380 net daily vehicle trips and slightly less than the 48,107 net daily VMT with the Project.^{38,39} The proposed commercial uses under Alternative 4 would result in 7.2 VMT per employee, which is below the Central APC threshold of 7.6 but greater than the 6.7 VMT per employee under the Project. No residential uses are proposed, so there would be no residential VMT. Therefore, impacts would be less than significant under this alternative but greater when compared to the less-than-significant impacts of the Project.

Alternative 4 would not introduce hazardous geometric design features, and, as is the case with the Project, all driveways would be designed to LADOT standards. Impacts would be less than significant and similar to the Project.

With respect to freeway safety, Alternative 4 would result in approximately 3 percent more peak hour trips than the Project. As with the Project, this would increase the vehicle queues at the US-101 Southbound Off-Ramp and 7th Street, I-10 Eastbound Off-Ramp and Porter Street, and I-10 Westbound Off-Ramp and Mateo Street/Enterprise Street. Mitigation Measures TR-MM-1 through TR-MM-3 identified in Section IV.H, Transportation, which would signalize these intersections, would mitigate these impacts to a less-than-significant level. However, since the improvements involve another jurisdiction (i.e., Caltrans) beyond the City of Los Angeles, implementation cannot be guaranteed. Therefore, both Project-level and cumulative impacts would remain significant and

³⁸ Fehr & Peers, *Technical Memorandum, Violet Street Creative Office Campus Project: Alternatives Analysis*, October 17, 2022. See Appendix P of this Draft EIR.

³⁹ As stated in Section IV.H, Transportation, of the Draft EIR, the Project is estimated to result in a net increase of 6,389 daily vehicle trips and a total daily VMT of 48,177 under the 7th Place driveway scenario, and a net increase of 6,380 daily vehicle trips and a total daily VMT of 48,107 under the Violet Street driveway scenario.

unavoidable and would be greater when compared to the significant and unavoidable impacts of the Project because the increase in peak hour traffic would be slightly greater.

i. Tribal Cultural Resources

Similar to the Project, Alternative 4 requires excavation and grading for building foundations and subterranean parking. While the uncovering of tribal cultural resources is not anticipated, if tribal cultural resources are discovered during construction, such resources would be treated in accordance with State law (i.e., CEQA Guidelines Section 15064.5(d), PRC Sections 21080.3.1(b), 21080.3.2(a), 21084.3, etc.). Accordingly, impacts to tribal cultural resources would be less than significant and 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 4 would require water for dust control, equipment cleaning, excavation, and export of dirt, including the removal and re-compaction of dirt during the grading process. Construction-related water use under Alternative 4 would be similar to the Project because the amount of construction is the same. Furthermore, as with the Project, while Alternative 4 would require trenching for the required on-site water distribution system and connection to the existing water mains in the adjacent streets, 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. In addition, as with the Project, Alternative 4 would implement Project Design Feature TR-PDF-1, Construction Traffic Management Plan, to ensure the safe flow of pedestrian, bicycle, and vehicular traffic around the construction sites during construction. As such, as with the Project, Alternative 4 would not result in construction activities that require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental impacts. Alternative 4 would result in less-than-significant impacts, which are similar than the less-than-significant impacts of the Project.

(b) Operation

As previously discussed, Alternative 4 would develop office and retail and/or restaurant uses during the initial phase, but a 384-room hotel in the Future Campus Expansion Phase. As shown in Table V-4 on page V-69, Alternative 4 would result in a net increase in water demand of 141,375 gpd, which is greater than the maximum increase of 132,170 gpd in net water demand generated by the Project with office and restaurant uses

**Table V-4
Estimated Water Consumption for Alternative 4**

Land Use	Unit	Generation Factor ^a	Total Water Demand/ Wastewater Generation (gpd)
Existing to be Removed^b			
Warehouse	25,798 sf		
Warehouse (Future Campus Expansion Phase) ^c	21,880 sf		
Office	9,940 sf		
<i>Subtotal</i>			1,248 ^c
Proposed			
Office	435,000 sf	0.12/gpd/sf	52,200
Hotel (Future Campus Expansion Phase) ^c	384 rooms	120/room	46,080
Restaurant ^d	775 seats	30/gpd/seat	23,250
Fitness Center ^e	2,308 sf	0.65/gpd/sf	1,500
Base Demand Adjustment ^f			2,332
Landscaping ^e	16,081 sf		670
Covered Parking ^e	409,536 sf		269
Cooling Tower ^e	1,185 ton		16,322
<i>Subtotal</i>			142,623
Total Net Water Demand			141,375
<p>gpd = gallons per day ksf = 1,000 square feet sf = square feet</p> <p>^a Generation factors are provided by LADWP.</p> <p>^b Existing water use to be removed was estimated by using the average of the 5-year billing record from January 2015 to December 2019. Billing record from 2020 and 2021 were not used because building vacancies in 2020 and 2021 were higher than normal due to COVID.</p> <p>^c The proposed Project includes a Future Campus Expansion Phase which encompasses a potential expansion opportunity. The Future Campus Expansion Phase will require demolishing the existing warehouse building in Lot 4.</p> <p>^d Food/drink and retail businesses are all assumed to be full service restaurant for a conservative water demand estimate. This assumes 20 sf/seat.</p> <p>^e Assumes the same square footage and required ordinance savings as the Project.</p> <p>^f Base Demand Adjustment is the estimated savings due to Ordinance No. 180822 accounted for in the current version of Bureau of Sanitation Sewer Generation Rates. LADWP does not provide their methodology for this calculation, so it is therefore assumed to be the same as the Project</p> <p>Source: Eyestone Environmental, 2023.</p>			

in the Future Campus Expansion Phase.⁴⁰ As with the Project, domestic and fire water service to the Project Site under Alternative 4 would continue to be supplied by LADWP. Although Alternative 4 would result in greater water demand than the Project, because Alternative 4 would be generally consistent with the land use plans governing the Project Site which form the basis of LADWP's projections, it is anticipated that LADWP would also be able to meet the water demand of Alternative 4.

As discussed in Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, the Project Site does not currently have adequate fire flow to serve the Project. However, as with the Project, Alternative 4 would include necessary upgrades to the surrounding water mains to facilitate the necessary flow and pressure requirements, and Alternative 4 would also incorporate a fire sprinkler suppression system to reduce or eliminate the public hydrant demands. Upon completion, similar to the Project, water supply infrastructure would also be able to meet the demand under Alternative 4. The Applicant would also construct the necessary on-site infrastructure and connections to the LADWP system pursuant to applicable City requirements under this alternative.

Based on the above, the estimated water demand for Alternative 2 would not exceed the available supplies projected by LADWP or the available capacity within the distribution infrastructure that would serve the Project Site. However, operational impacts of Alternative 4 on water supply and water infrastructure would be less than significant but greater when compared to the less-than-significant impacts of the Project because of the increase in water demand by the hotel uses.

(2) Energy Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 4 would consume minor quantities of electricity (construction activities do not typically involve the consumption of natural gas). Construction activities under Alternative 4 would generate only a fraction of the electricity demand of the proposed office, retail/restaurant, and hotel operations, and since existing electricity infrastructure and supplies are adequate to serve Project operation, they would also be adequate to serve construction under Alternative 4. As with the Project, since the Project Site is an urban infill site that is already served by electricity and natural infrastructure, it is not anticipated that Alternative 4 would require extensive off-site infrastructure improvements. Lastly, as with the Project, Alternative 4 would be required to coordinate energy infrastructure improvements with LADWP and

⁴⁰ *The Future Campus Expansion Phase without restaurant uses would result in a net increase in water demand of 106,567 gpd.*

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. Therefore, as with the Project, construction activities under Alternative 4 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. Thus, construction impacts under Alternative 4 would be less than significant, which is similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 4 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. Alternative 4 operations would result in slightly less electricity and natural gas consumption than the Project due to the change to hotel uses under this alternative. Because the existing electricity and natural gas infrastructure would be adequate to serve Project operation, existing energy infrastructure would be adequate to serve Alternative 4 operations. Furthermore, as with the Project, Alternative 4 would be developed in accordance with applicable energy conservation requirements, including those in Title 24, CALGreen Code, and the Los Angeles Green Building Code, and would implement Project Design Feature GHG-PDF-1, requiring the incorporation of sustainability features, and Project Design Feature 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 4 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. Thus, operational impacts under Alternative 4 would be less than significant and slightly less when compared to the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above and shown in Table V-1 on page V-8, Alternative 4 would reduce, but not eliminate, the Project's significant and unavoidable impacts with respect to on-site noise during construction (Project-level), off-site noise during operation (cumulative), and freeway safety (Project-level and cumulative). Impacts with respect to freeway safety would also be slightly greater than the Project. Impacts with respect to VMT and localized air quality emissions 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.

4. Relationship of the Alternative to Project Objectives

Under Alternative 4, the same land uses (i.e., office, restaurant, and retail) would be developed at the Project Site as under the Project during the initial phase, but the Future Campus Expansion Phase would include a hotel rather than additional office. As such, Alternative 4 would 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 than the Project because all commercial uses and the same amount of development are proposed.

Regarding the Project objectives, Alternative 4 would meet the following Project objective to the same degree as the Project as it would include commercial land uses and similar building design, and would implement the same energy conservation and sustainability features:

- 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.
- 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.
- 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.

Alternative 4 would meet the remaining Project objectives, although to a lesser extent than the Project because less office square footage is proposed, which in turn would result in fewer new jobs:

- 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.

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

V. Alternatives

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.

Table V-1 on page V-8 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.

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.