V. Alternatives

V. Alternatives

1. Introduction

The identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process under CEQA. Specifically, Public Resources Code (PRC) Section 21001 states, in part, that the environmental review process is intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives which will avoid or substantially lessen such significant effects. In addition, PRC Section 21002.1(a) states, in part, that the purpose of an environmental impact report is to identify the significant effects on the environment of a project, identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.

Direction regarding the consideration and discussion of project alternatives in an EIR is provided in CEQA Guidelines Section 15126.6(a) as follows:

> *An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed 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 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 is to avoid or substantially lessen any of the significant effects of a project while still feasibly obtaining most of the basic project objectives. Based on the analyses provided in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant and unavoidable impacts regarding on- and off-site (utilities /staging) noise sources during construction and off-site vibration with respect to human annoyance during construction. Cumulative impacts regarding on- and off-site (haul trucks) noise during construction and off-site vibration with respect to human annoyance during construction would also be significant and unavoidable.

Based on the significant environmental impacts of the Project, the basic objectives established for the Project (refer to Section II, Project Description, of this Draft EIR), and the feasibility of the alternatives considered, the three alternatives to the Project listed below were selected for evaluation. Table V-1 on page V-3 provides a comparison of the Project and the three alternatives being considered.

- **Alternative 1—No Project Alternative:** Alternative 1 assumes that the Project would not be approved, no new permanent development would occur within the Project Site, and the existing environment would be maintained. Thus, the physical conditions of the Project Site and Development Area would generally remain as they are today. Specifically, within the Development Area, the existing nine-story parking/retail podium building and below grade levels, which include two basement levels (with one level of vehicle parking and one level of loading area and a gym/fitness use), five stories of enclosed parking, four stories of existing retail floor area (one of which includes theater uses), and rooftop parking, would remain unchanged by Alternative 1.

Table V-1
Summary Comparison of Development Proposed under the Alternatives to the Project

	Project	Alternative 1: No Project Alternative	Alternative 2: Development in Accordance with the Proposed DTLA 2040 Plan Alternative (2 New Parking Levels)	Alternative 3: Development in Accordance with the Proposed DTLA 2040 Plan Alternative (No New Parking Levels)
Residential[a]	495,016 sf (466 du)	—	95,844 sf (107 du)	280,094 sf (307 du)
New Parking Level[b]	—	—	184,250 sf	—
Existing Commercial (Theater and Retail) Square Footage to be Changed to Residential Uses	24,342 sf	—	24,342 sf	24,342 sf
Net Increase	470,674 sf	—	280,094 sf	280,094 sf
Total Floor Area Upon Completion of Project[c]	1,894,988 sf	—	1,680,066 sf	1,680,066 sf
Total FAR	10.15:1	—	9:1	9:1
Total Parking	1,948 spaces		1,948 spaces	1,507 spaces
Maximum Height	710 ft	—	351 ft	511 ft
Number of Stories	53	—	23	37
Soil Export	18,239 cy	—	18,239 cy	18,239 cy

cy = cubic yards
du = dwelling units
ft = feet
sf = square feet
[a] *Includes both residential units and common residential area (e.g., residential amenities, lobby, halls, elevators, stairwells, etc.).*
[b] *Under the proposed DTLA 2040 Plan and associated zoning, new above-grade parking would be counted towards the Project Site's FAR.*
[c] *Floor area as defined by LAMC Section12.03 and includes existing uses to remain.*
Source: Handel Architecture and Eyestone Environmental, 2024.

- **Alternative 2—Development in Accordance with the Proposed DTLA 2040 Plan[1] Alternative (2 New Parking Levels):** Alternative 2 would develop the same types of uses as the Project but in accordance with the draft land use and zoning designations for the Project Site under the proposed DTLA 2040 Community Plan (DTLA 2040 Plan). Under the DTLA 2040 Plan and associated zoning update as currently proposed, the Project Site would be designated as part of the Transit Core General Plan land use designation, which has a maximum floor area ratio (FAR) range of 10.0 to 13.0. The Project Site's zoning as proposed in the DTLA 2040 Plan would allow land uses that include multi-family residential, regional retail and services, office, hotel, and entertainment uses, which are similar to the uses currently permitted. Under the proposed DTLA 2040 Plan and associated zoning, new above-grade parking would be counted toward the Project Site's FAR. Alternative 2 would develop a high-rise 23-story building with a maximum height of 351 feet. The building would consist of 107 residential units, comprising approximately 95,844 square feet of floor area, and 184,250 square feet of two new levels of above-grade parking. As with the Project, to accommodate Alternative 2, approximately 24,342 square feet of existing commercial (theater and retail) uses in the podium building would be changed to residential uses, but the other existing commercial and hotel uses on the Project Site would remain. Upon completion of Alternative 2, the Project Site would include 1,680,066 square feet of floor area (including the new above-grade parking levels) with an FAR of 9:1, which would be within the maximum FAR range allowed by the proposed DTLA 2040 Plan.

- **Alternative 3—Development in Accordance with the Proposed DTLA 2040 Plan Alternative (No New Parking Levels):** Similar to Alternative 2, Alternative 3 would develop the same types of uses as the Project but in accordance with the draft land use and zoning designations for the Project Site under the proposed DTLA 2040 Plan. However, unlike Alternative 2, Alternative 3 would not include any new above-grade parking levels. Alternative 3 would develop a high-rise 37-story building with a maximum height of 511 feet. The building would consist of 307 residential units that would comprise approximately 280,094 square feet of floor area. As with the Project, to accommodate Alternative 3, approximately 24,342 square feet of existing commercial (theater and retail) uses in the podium building would be changed to residential uses, but the other existing commercial and hotel uses on the Project Site would remain. Upon completion of Alternative 3, the Project Site would include 1,680,066 square feet of floor area with an FAR of 9:1, which would comply with the maximum FAR range allowed by the proposed DTLA 2040 Plan.

[1] *The Downtown Los Angeles Community Plan is referred to herein as the DTLA 2040 Plan.*

3. Alternatives Considered and Rejected as Infeasible

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

Alternatives to Eliminate Significant Noise and Vibration Impacts During Construction: As discussed in Section IV.F, Noise, of this Draft EIR, the Project would result in short-term significant and unavoidable construction-related on- and off-site (utilities/staging) noise and off-site vibration (human annoyance) impacts. Cumulative impacts with respect to on- and off-site (haul trucks) noise during construction and off-site vibration with respect to human annoyance during construction would also be significant and unavoidable. The following approaches were considered to avoid or reduce these impacts:

- Approach (a)—Extended Construction Duration: An approach that reduces daily construction activity by extending the duration of the construction period was evaluated. Typically, a reduction of 50 percent in the number of construction equipment pieces or construction traffic (haul and delivery trucks trips) would reduce the construction-related noise levels by approximately 3 dBA (just perceptible). However, this approach was rejected for the following reasons:

  - With respect to construction-related noise, a reduction in the number of pieces of construction equipment would also reduce noise levels compared to the Project (depending on the amount of reduction) but would still exceed the significance threshold. Specifically, reducing the on-site construction equipment during the demolition phase from 33 pieces to 17 pieces of equipment (48-percent reduction) would reduce the construction noise at the off-site receptors by 1.7 dBA L_{eq} at receptor location R2, 2.0 dBA L_{eq} at receptor location R1, and 2.4 dBA L_{eq} at receptor locations R3, R4, and R5 (as compared to the Project). The estimated construction noise levels with a 48-percent reduction in the number of pieces of construction equipment would still exceed the significance threshold by up to 5.4 dBA L_{eq} at receptor

location R1 and 6.5 dBA L_{eq} at receptor location R2 during the demolition phase. Therefore, on-site construction noise levels under this approach would be somewhat less than the Project (depending on the amount of reduction) but would still exceed the significance threshold. In addition, the reduction would be less than 3.0 dBA, which is the level where noise is perceptible. This approach would also be inefficient and would increase the number of days that sensitive receptors would be impacted by construction activities. Furthermore, due to the proximity of the off-site noise sensitive receptors and the building heights, it would not be practical to reduce the construction noise levels to below the significance threshold by further extending the duration of construction (and reducing the number of pieces of construction equipment) as even a single piece of equipment would result in noise levels above the significance threshold. For example, a single piece of construction equipment would generate a noise level up to 77.4 dBA L_{eq} at receptor location R2, which would exceed the significance threshold by 2.8 dBA. Even with the mitigation measure (temporary noise barrier), the construction noise level of a single piece of equipment at receptor locations R1 and R2 would still exceed the significance threshold, as the temporary noise barrier would not be effective in reducing the construction-related noise levels for the upper levels of receptor locations R1 and R2. In addition, the estimated noise reduction provided with the 48-percent reduction (1.7 to 2.4 dBA) is not considered a substantial reduction. Furthermore, the noise impacts associated with the off-site utility improvements along Hope Street would remain significant even with mitigation measure, as the temporary noise barrier would not be effective in reducing the construction noise levels at the upper levels of receptor R2.

  - Similar to the Project, the off-site construction vibration impacts with an extended construction duration would remain significant, as the vibration impact analysis is based on the peak vibration level generated by an individual truck passing by a sensitive receptor. Therefore, as with the Project, off-site construction vibration impacts (human annoyance), due to heavy trucks traveling by sensitive receptors, would also continue to be significant as there are no feasible mitigation measures to reduce the off-site construction vibration impacts.

- Approach (b)—Reduced Development: An approach that reduces the amount of development that would occur under the Project to the extent that the significant construction-related noise and vibration impacts of the Project would be avoided or substantially reduced was also evaluated. Reduced development scenarios are considered in Alternatives 2 and 3. As discussed in further detail below, the reduced development evaluated in Alternatives 2 and 3 would somewhat reduce the duration of on-site construction noise impacts, but the significant construction-related noise and vibration impacts of the Project would remain. Due to the close proximity of the sensitive receptors (i.e., directly across from the Project Site) and a constrained Project Site that does not have the space to create a meaningful buffer zone, it would not be practical to substantially mitigate

the on-site construction noise impacts of the Project. In order to reduce the on-site construction noise impacts to a less-than-significant level, a buffer zone of a minimum of 290 feet and 245 feet would need to be provided between the receptors R1 and R2 and the construction area, respectively, which is not feasible due to site constraints(i.e., limited area of the existing building structure). Furthermore, the noise impacts associated with the off-site utility improvements along Hope Street would remain significant even with mitigation measure, as the temporary would not be effective in reducing the construction noise levels at the upper levels of receptor R2. In addition, the off-site construction vibration impacts would be significant since the vibration impact analysis is based on the peak vibration level generated by an individual truck passing by a sensitive receptor. While reduced development would result in off-site construction vibration impacts (human annoyance) that would be shorter in duration, due to heavy trucks traveling by sensitive receptors, impacts would be significant similar to the Project. Due to the inherent nature of the Project Site, reductions in the amount of development beyond that evaluated in Alternatives 2 and 3 would not avoid the significant and unavoidable on-site construction noise or off-site construction vibration impacts.

As discussed above, neither the extension of construction duration nor further reduction of development beyond that in Alternatives 2 and 3 would avoid the significant and unavoidable on- and off-site (utilities/staging) construction noise or off-site construction vibration impacts of the Project. This is because the significant unavoidable construction-related noise and vibration impacts of the Project result primarily from the close proximity of the Project Site and the proposed haul route to existing noise- and vibration-sensitive uses rather than the amount or duration of Project construction activities. Therefore, an alternative that includes one or both of these approaches would not substantially reduce or eliminate the significant noise and vibration impacts of the Project, and, thus, no further consideration of these approaches in the EIR is required.

Alternative Project Site: The results of a search for an alternative site on which the Project could be built determined that suitable similar locations are not available to meet the underlying purpose of the Project to integrate high-density multi-family housing uses and associated amenities with existing commercial/retail/restaurant uses in close proximity to an existing rail station and, thus, reduce vehicle miles traveled (VMT) and promote walkability within the Downtown Los Angeles community. The availability of an alternative site is also restricted by the Project's objectives, which include, but are not limited to, (1) adding new residential units without displacing any existing residential uses and developing a residential high rise tower on a built-out commercial site adjacent to transit and jobs; (2) developing a creative building design that provides high-density, multi-family residential uses that are integrated into an existing parking facility and mixed-use commercial development resulting in a synergistic development where people can live, work, and play; (3) reducing vehicular trips and promoting regional and local mobility objectives by locating high-density residential uses near a regional-serving transit

hub and an abundance of existing commercial uses; and (4) constructing a high-density, residential development that incorporates the principles of smart growth, including sustainable design, infill development, proximity to transit, walkability, and the provision of bicycle facilities. In addition, it is not expected that the Applicant can reasonably acquire, control, or have access to a suitable alternative urban infill site of similar size with a direct Metro portal. Furthermore, even if a suitable alternative site could be found and were available, it is anticipated that the significant and unavoidable impacts with respect to on-site noise and off-site vibration sources during construction would still occur. Specifically, given the Project's purpose of locating new multi-family housing directly adjacent to transit, jobs, and commercial services and amenities in Downtown Los Angeles, any alternative site would also likely be an infill site with nearby noise-sensitive receptors, and since noise levels during peak day construction activities are used for measuring impacts, noise levels from on-site construction activities would be similar to those of the Project. In addition, since construction vibration impacts are evaluated based on the peak vibration levels generated by each type of construction equipment, vibration levels associated with on- and off-site construction activities would be similar to the Project. Thus, in accordance with CEQA Guidelines Section 15126.6(f), the alternative site 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 each alternative (with the exception of the No Project Alternative) would implement the same project design features (PDFs) and mitigation measures identified in Section IV, Environmental Impact Analysis, of this Draft EIR.

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

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

- Less: Where the net impact of the alternative would be clearly less adverse or more beneficial than the impact of the Project, the comparative impact is said to be “less.”

- Greater: Where the net impact of the alternative would clearly be more adverse or less beneficial than the Project, the comparative impact is said to be “greater.”

- Similar: Where the 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 in Table V-2 on page V-10.

Table V-2
Comparison of Impacts Associated with the Alternatives

Impact Area	Project	Alternative 1: No Project Alternative	Alternative 2: Development in Accordance with the Proposed DTLA 2040 Plan Alternative (2 New Parking Levels)	Alternative 3: Development in Accordance with the Proposed DTLA 2040 Plan Alternative (No New Parking Levels)
A. AIR QUALITY				
Regional Emissions				
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Localized Emissions				
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Toxic Air Contaminants				
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
B. CULTURAL RESOURCES				
Historical Resources	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)

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

Impact Area	Project	Alternative 1: No Project Alternative	Alternative 2: Development in Accordance with the Proposed DTLA 2040 Plan Alternative (2 New Parking Levels)	Alternative 3: Development in Accordance with the Proposed DTLA 2040 Plan Alternative (No New Parking Levels)
C. ENERGY				
Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources				
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Conflict with Plans for Renewable Energy or Energy Efficiency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
D. GREENHOUSE GAS EMISSIONS				
Greenhouse Gas Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
E. LAND USE AND PLANNING				
Conflict with Land Use Plans	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
F. NOISE[a]				
Construction				
On-Site Noise	Significant and Unavoidable	Less (No Impact)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)
Off-Site Noise (Haul Trucks)	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Off-Site Noise (Utilities and Staging)	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)

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

Impact Area	Project	Alternative 1: No Project Alternative	Alternative 2: Development in Accordance with the Proposed DTLA 2040 Plan Alternative (2 New Parking Levels)	Alternative 3: Development in Accordance with the Proposed DTLA 2040 Plan Alternative (No New Parking Levels)
On-Site Vibration (Building Damage)	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
On-Site Vibration (Human Annoyance)	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Off-Site Vibration (Building Damage)	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Off-Site Vibration (Human Annoyance)	Significant and Unavoidable	Less (No Impact)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)
Operation				
On-Site Noise	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Off-Site Noise	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Vibration	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
G. PUBLIC SERVICES				
Fire Protection				
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)

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

Impact Area	Project	Alternative 1: No Project Alternative	Alternative 2: Development in Accordance with the Proposed DTLA 2040 Plan Alternative (2 New Parking Levels)	Alternative 3: Development in Accordance with the Proposed DTLA 2040 Plan Alternative (No New Parking Levels)
Police Protection				
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
H. TRANSPORTATION				
Conflict with Plans	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Vehicle Miles Traveled	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
Freeway Safety Analysis	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Emergency Access	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
I. TRIBAL CULTURAL RESOURCES				
Tribal Cultural Resources	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
J. UTILITIES AND SERVICE SYSTEMS				
Water Supply and Infrastructure				
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)

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

Impact Area	Project	Alternative 1: No Project Alternative	Alternative 2: Development in Accordance with the Proposed DTLA 2040 Plan Alternative (2 New Parking Levels)	Alternative 3: Development in Accordance with the Proposed DTLA 2040 Plan Alternative (No New Parking Levels)
Energy Infrastructure				
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)

[a] *Cumulative on- and off-site (haul trucks) noise impacts and cumulative off-site vibration impacts with respect to human annoyance during Project construction would be significant and unavoidable.*

Source: Eyestone Environmental, 2024.

V. Alternatives

A. Alternative 1: No Project

1. Description of the Alternative

In accordance with the CEQA Guidelines, the No Project Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states in part that, "in certain instances, the No Project Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, Alternative 1, the No Project Alternative, assumes that the Project would not be approved, no new permanent development would occur within the Project Site, and the existing environment, as described in Section II, Project Description, of this Draft EIR, would be maintained. Specifically, the existing nine-story parking/retail podium building and below grade levels, which include two basement levels (with one level of vehicle parking and one level of loading area and a gym/fitness use), five stories of enclosed parking, four stories of existing retail floor area (one of which includes theater uses), and rooftop parking would remain unchanged by Alternative 1, and the signage proposed to be authorized by the Sign Supplemental Use District (SUD) would not be installed.

As with the Project, City regulations (Ordinance No. 183,893) require seismic retrofit of the existing non-ductile concrete podium. However, to provide a conservative analysis, the retrofit is not evaluated as part of the No Project Alternative.

2. Environmental Impacts

a. Air Quality[3]

(1) Consistency with Air Quality Plans

Alternative 1 would not alter the existing on-site uses or require any construction activities on the Project Site. Therefore, Alternative 1 would not result in air quality impacts that could result in a potential conflict with the goals and policies of the South Coast Air

[3] *As indicated above, a seismic retrofit of the existing non-ductile concrete podium would be required at some point in time per City regulations (Ordinance No. 183,893). However, to provide a conservative analysis, the retrofit is not evaluated as part of the No Project Alternative.*

Quality Management District's (SCAQMD's) Air Quality Management Plan (AQMP) or the City of Los Angeles General Plan. Thus, no impacts would occur, which would be less than impacts associated with the Project.

(2) Construction

(a) Regional Emissions

Alternative 1 would not alter the existing on-site uses or require any construction activities on the Project Site. Therefore, Alternative 1 would not result in any construction emissions associated with the use of heavy-duty construction equipment, vehicle trips generated from haul trucks and construction workers traveling to and from the Project Site, or fugitive dust from demolition and excavation. No construction-related regional air quality impacts would occur. Thus, impacts related to regional air quality emissions during construction would be less under Alternative 1 when compared to the less-than-significant impacts of the Project.

(b) Localized Emissions

As indicated previously, Alternative 1 would not result in any construction emissions through the use of heavy-duty construction equipment and through vehicle trips generated from haul trucks and construction workers traveling to and from the Project Site, or fugitive dust from demolition and excavation. Therefore, construction-related localized air quality impacts would not occur. Thus, impacts related to localized air quality emissions during construction would be less under Alternative 1 when compared to the less-than-significant impacts of the Project.

(3) Operation

(a) Regional Emissions

Alternative 1 would not result in new development or increased operations that could generate additional operational emissions related to vehicular traffic or the consumption of electricity and natural gas beyond what is currently generated by the existing uses. No operational air quality impacts associated with regional emissions would occur. Thus, impacts related to regional air quality emissions during operation would be less under Alternative 1 when compared to the less-than-significant impacts of the Project.

(b) Localized Emissions

Alternative 1 would not result in new development or increased operations that could generate additional operational emissions related to vehicular traffic or the consumption of electricity and natural gas beyond what is currently generated by the existing uses.

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

(4) Toxic Air Contaminants

(a) Construction

Since construction activities would not occur on the Project Site, Alternative 1 would not result in diesel particulate emissions during construction that could generate substantial toxic air contaminants (TACs). As such, no impacts associated with the construction-related release of TACs would occur under Alternative 1. Therefore, the construction-related TACs impacts of this alternative would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 would not result in new development or increase the intensity of the existing uses on the Project Site. As such, no increase in mobile source emissions and their associated TACs would be generated under Alternative 1, and no impact would occur. Therefore, the operational TACs impacts of Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

b. Cultural Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, there are no historical resources on the Project Site. In addition, no construction activities that could potentially affect adjacent or nearby historical resources would occur under Alternative 1. Therefore, no impacts to historical resources would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

c. Energy[4]

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

(a) Construction

Construction activities would not occur under Alternative 1. As such, Alternative 1 would not generate a short-term demand for energy during construction, which could result in the wasteful, inefficient, or unnecessary consumption of energy resources, and no impacts would occur. Therefore, the construction-related energy impacts of Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

The No Project 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 would have no potential to result in the wasteful, inefficient, or unnecessary consumption of energy resources. As such, impacts would be less when compared to the less-than-significant impacts of the Project.

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

Alternative 1 would not involve any new development or modify existing uses. As such, Alternative 1 would not have the potential to conflict with plans for renewable energy or energy efficiency. No impacts related to renewable energy or energy efficiency plans would occur under this alternative. Therefore, the impacts of Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

d. Greenhouse Gas Emissions

Alternative 1 would not develop new or different uses on the Project Site. As such, no new greenhouse gas (GHG) emissions beyond what is currently generated by the existing uses on the Project Site would be generated under Alternative 1. Therefore, no impacts related to GHG emissions would occur, and the GHG impacts of Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

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[4] *As indicated above, a seismic retrofit of the existing non-ductile concrete podium would be required at some point in time per City regulations (Ordinance No. 183,893). However, to provide a conservative analysis, the retrofit is not evaluated as part of the No Project Alternative.*

e. Land Use and Planning

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

f. Noise[5]

(1) Noise

(a) Construction

No new construction activities would occur under Alternative 1. As such, no construction-related noise would be generated on- or off-site under this alternative, and no construction noise impacts would occur. As such, Project-level off-site construction noise impacts (haul trucks) would be less when compared to the impacts of the Project. Additionally, Alternative 1 would eliminate the significant and unavoidable on-site construction noise impacts (both Project-level and cumulative), Project-level off-site construction noise impacts (utilities/staging), and the cumulative off-site construction noise impacts (haul trucks).

(b) Operation

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

(2) Vibration

(a) Construction

No new construction activities would occur under Alternative 1. Therefore, no construction-related vibration would be generated on-site or off-site under Alternative 1,

[5] *As indicated above, a seismic retrofit of the existing non-ductile concrete podium would be required at some point in time per City regulations (Ordinance No. 183,893). However, to provide a conservative analysis, the retrofit is not evaluated as part of the No Project Alternative.*

and no construction-related vibration impacts would occur. As such, on-site construction-related vibration impacts (related to both building damage and human annoyance) and off-site construction-related vibration impacts (with respect to building damage) would be less when compared to the less-than-significant impacts of the Project. Additionally, Alternative 1 would eliminate the significant and unavoidable off-site construction vibration impacts with respect to human annoyance.

(b) Operation

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

g. Public Services[6]

(1) Fire Protection

(a) Construction

As Alternative 1 would not include any construction activities, it would not result in a construction-related demand for fire protection facilities or services from the Los Angeles Fire Department (LAFD). Thus, no construction-related fire protection impacts would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

No changes to existing on-site land uses or operations would occur under Alternative 1. Therefore, there would be no potential to increase the level of activity on the Project Site or increase the service population for the LAFD stations that serve the Project Site. No impacts to fire protection facilities would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

[6] *As indicated above, a seismic retrofit of the existing non-ductile concrete podium would be required at some point in time per City regulations (Ordinance No. 183,893). However, to provide a conservative analysis, the retrofit is not evaluated as part of the No Project Alternative.*

(2) Police Protection

(a) Construction

As Alternative 1 would not include any construction, it would not result in a construction-related demand for police protection facilities or services from the Los Angeles Police Department (LAPD). Therefore, Alternative 1 would not result in any police protection impacts due to construction, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

No changes to existing on-site land uses or operations would occur under Alternative 1. Therefore, there would be no potential to increase the level of activity on the Project Site or increase the service population for the LAPD stations that serve the Project Site. No impacts to police protection facilities would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

h. Transportation

Since Alternative 1 would not develop new or different land uses on the Project Site, Alternative 1 would not generate any additional vehicle trips or VMT or alter existing access or circulation within the Project Site during operation. Therefore, no impacts would occur with respect to operational traffic, including conflicts with programs, plans, ordinances, or policies addressing the circulation system; VMT; and emergency access. Therefore, impacts under Alternative 1 would be less than the less-than-significant impacts of the Project.

i. Tribal Cultural Resources

Grading and other earthwork activities would not occur under Alternative 1. Therefore, there would be no potential for Alternative 1 to uncover subsurface tribal cultural resources. As such, no impacts to tribal cultural resources would occur under Alternative 1, and impacts would be less when compared to those of the Project, which would be less than significant.

j. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Construction activities would not occur under Alternative 1. Therefore, Alternative 1 would not generate a short-term demand for water during construction, and construction-related impacts to water supply and infrastructure would not occur. As such, impacts under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

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

(2) Energy Infrastructure

(a) Construction

Construction activities would not occur under Alternative 1. Therefore, Alternative 1 would not generate a short-term demand for energy during construction, and construction-related impacts to energy infrastructure would not occur. As such, impacts related to energy infrastructure under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

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

3. Comparison of Impacts

Alternative 1 would eliminate the Project's significant and unavoidable impacts with respect to on-site noise sources during construction, off-site noise sources during construction (utilities/staging), and off-site vibration with respect to human annoyance

during construction. Additionally, Alternative 1 would also avoid the Project's significant and unavoidable cumulative impacts with respect to on-site noise during construction, off-site noise during construction (haul trucks), and off-site vibration with respect with human annoyance during construction. Impacts associated with the remaining environmental topics would be less when compared to the Project's less-than-significant impacts.

4. Relationship of the Alternative to Project Objectives

Under the No Project Alternative, the Project would not be approved, no new residential uses would be developed, no Sign SUD would be established, no physical changes would be made within the Project Site, and the existing environment would be maintained. As such, Alternative 1 would not meet the underlying purpose of the Project, which is to integrate high-density multi-family housing uses and associated amenities with existing commercial/retail/restaurant uses in close proximity to an existing rail station portal and other public transit options, employment and other commercial uses and, thus, reduce VMT and promote walkability within the Downtown Los Angeles community. Furthermore, Alternative 1 would not meet any of the Project basic objectives as listed below:

- To provide high-density multi-family housing in furtherance of the goals of the City's Housing Element and the City's Regional Housing Needs Assessment.
- To add new residential units without displacing any existing residential uses by developing a residential high-rise tower on a built-out commercial site adjacent to transit and jobs
- To develop a creative building design that provides high-density multi-family residential uses that are integrated into an existing parking facility and mixed-use commercial development resulting in a synergistic development where people can live, work and play.
- To support the Central City Community Plan's Objective 1.2 to increase the range of housing choices available to Downtown employees.
- To create and enhance a pedestrian-oriented environment and promote walkability by creating a safe, inviting street-level identity for the Project Site along Hope Street through the introduction of a ground floor residential lobby, relocated retail space with new storefront entries, and enhanced sidewalk paving and landscaping, all within close proximity to existing commercial/retail uses and services.
- To promote resource and energy conservation by incorporating sustainable and green building design and construction.

- To encourage the reduction of vehicular trips and promote regional and local mobility objectives by locating high-density residential uses near a regional-serving transit hub (Metro 7th Street/Metro Center Station) and an abundance of existing commercial uses that will provide services to residents and employment opportunities.

- To construct a high-density, residential development that incorporates the principles of smart growth, including sustainable design, infill development, proximity to transit, walkability, and the provision of bicycle facilities.

- To facilitate unique and creative signage that would support and enhance the existing and proposed development, create a sense of place with a lively and exciting pedestrian experience, establish a strong site identity, and support the site's diverse uses, guided by standards that ensure cohesion and compatibility with surrounding land uses.

V. Alternatives

B. Alternative 2: Development in Accordance with the Proposed DTLA 2040 Plan Alternative (2 New Parking Levels)

1. Description of the Alternative

Alternative 2, Development in Accordance with the Proposed DTLA 2040 Plan Alternative (2 New Parking Levels), would develop the same types of uses as the Project but in accordance with the draft General Plan land use and zoning designations for the Project Site under the proposed DTLA 2040 Community Plan (DTLA 2040 Plan). Under the DTLA 2040 Plan and associated zoning update as currently proposed, the Project Site would be designated as part of the Transit Core General Plan land use designation, which has a maximum FAR range of 10.0 to 13.0. The Project Site's zoning as proposed in accordance with the DTLA 2040 Plan would allow land uses that include multi-family residential, regional retail and services, office, hotel, and entertainment uses, which are similar to the uses currently permitted. While above-grade parking is not included as floor area for purposes of calculating FAR under the current zoning, under the proposed DTLA 2040 Plan and associated zoning, new above-grade parking would be counted towards the Project Site's FAR.

Alternative 2 would develop a high-rise 23-story building with a maximum height of 351 feet. The building would include 107 new residential units, comprising approximately 95,844 square feet, and two new above-grade parking levels, comprising approximately 184,250 square feet.. As with the Project, to accommodate Alternative 2, approximately 24,342 square feet of existing commercial (theater and retail) uses in the podium building would be changed to residential uses, but the other existing commercial and hotel uses on the Project Site would remain. Upon completion of Alternative 2, the Project Site would include 1,680,066 square feet of floor area (including the new above-grade parking levels) with a FAR of 9:1, which would be within the maximum FAR range allowed by the proposed DTLA 2040 Plan.

Similar to the Project, construction of Alternative 2 would include the required seismic retrofitting and would make other modifications to the existing parking podium, resulting in the reduction of the number of existing spaces. As a result of the seismic retrofit work and the residential structural support, elevators, stairwells, bicycle parking,

mechanical rooms and storage areas, a total of 464 existing parking spaces would be eliminated.

Alternative 2 would not include any changes to the existing vehicular ingress/egress driveways, and no new driveways are proposed. While the proposed DTLA 2040 Plan does not include minimum vehicle parking requirements, Alternative 2 would provide a total of 1,948 automobile parking spaces, which would be similar to the Project. The parking spaces would be provided within the existing podium building as modified, in the two existing subterranean parking levels, and in the two new levels of above-grade parking. In accordance with LAMC requirements, Alternative 2 would provide 86 bicycle parking spaces (8 short-term and 78 long-term bicycle parking spaces).

Alternative 2 would establish the proposed Sign District and implement similar building design, signage, lighting, vehicular and pedestrian access, setbacks, and sustainability features as those proposed for the Project. In accordance with the DTLA 2040 Plan, Alternative 2 would be required to provide 11,500 square feet of open space, of which a minimum of 2,156 square feet would need to be landscaped. Alternative 2 would provide approximately 11,500 square feet of open space, of which 8,625 square feet would be exterior open space and 2,875 square feet of interior open space. In addition, 2,156 square feet of total exterior common open space would be landscaped.

With regard to construction activities and schedule, it is anticipated that the overall duration of construction would be reduced compared to that of the Project based on the reduction in overall building area and shorter tower. Similar to the Project, it is estimated that approximately 18,239 cubic yards of export would be hauled from the Project Site under Alternative 2.

2. Environmental Impacts

a. Air Quality

(1) Consistency with Air Quality Plans

Alternative 2 would develop the same uses as the Project but at a reduced scope and density in accordance with the proposed DTLA 2040 Plan and associated zoning. Thus, similar to the Project, Alternative 2 would concentrate new residential uses within a High-Quality Transit Area (HQTA), thereby reducing VMT. As with the Project, Alternative 2 would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for these pollutants, exceed any of the State and federal standards, or delay timely attainment of air quality standards or interim emission reductions specified in the AQMP. Thus, Alternative 2 would be consistent with the goals and policies of the AQMP. In addition, similar to the Project, Alternative 2 would promote the City of

Los Angeles General Plan Air Quality Element goals, objectives, and policies applicable to the Project. Thus, similar to the Project, Alternative 2 would not conflict with or obstruct implementation of the AQMP and would serve to advance applicable policies of the City pertaining to air quality. Impacts under Alternative 2 would be less than significant and similar to the impacts of the Project.

(2) Construction

(a) Regional Emissions

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 haul trucks and 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, mobile source emissions would result from the use of construction equipment, such as dozers, loaders, and cranes. As with the Project, pursuant to Project Design Feature AQ-PDF-1, Alternative 2 would also commit to using electric powered air compressors, aerial lifts, cement mixers, concrete saws, tower cranes, excavators, forklifts and welders in place of diesel versions of this equipment. Use of this electric powered construction equipment would reduce combustion emissions in comparison to diesel powered equipment. As with the Project, during the finishing phase of the Project, paving and the application of architectural coatings (e.g., paints) would potentially release volatile organic compounds (VOCs).

Under Alternative 2, construction activities would be reduced in comparison to the Project due to the reduction in the total building area. 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 impacts on these days would be similar to those of the Project. Therefore, the construction-related regional emissions under Alternative 2 would be less than significant and similar when compared to the less-than-significant impacts of the Project. However, the overall duration of construction activities and associated daily construction emissions would be reduced.

(b) Localized Emissions

On-site construction activities under Alternative 2 would be located at similar distances from sensitive receptors as the Project. Although Alternative 2 would result in a reduction in the amount of proposed development compared to the Project, the intensity of construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, localized impacts on these days would be similar to the less-than-significant impacts of the Project.

Therefore, as with the Project, localized impacts under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

(3) Operation

(a) Regional Emissions

As discussed above, Alternative 2 includes the development of 107 residential units and two new levels (184,250 square feet) of above-grade parking. As summarized in Appendix L of this Draft EIR, based on the proposed uses, the number of daily trips and daily VMT generated by Alternative 2 would be less than the number of daily trips generated by the Project. Specifically, Alternative 2 would generate a total of 239 daily vehicle trips and 1,737 daily VMT, which would be less than the Project's 1,213 daily vehicle trips and 7,564 daily VMT.[7] As operational regional air pollutant emissions associated with Alternative 2 would be generated by vehicle trips and VMT, which are the largest contributors to operational air pollutant emissions and, to a lesser extent, by the reduction in square footage and consumption of electricity, the operational regional emissions of Alternative 2 would be less than those of the Project. Therefore, the operational regional air pollutant emissions of Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Localized Emissions

Localized operational impacts are determined primarily by traffic volumes. As identified above, Alternative 2 would generate a total of 239 daily vehicle trips and 1,737 daily VMT, which would be less than the Project's 1,213 daily vehicle trips and 7,564 daily VMT.[8] As such, total vehicular emissions under Alternative 2 would be less when compared to the Project. In addition, as with the Project, Alternative 2 would not introduce any major new sources of air pollution within the Project Site. On-site sources would generate less operational emissions compared to the Project as the development proposed under Alternative 2 would be reduced compared to the Project. Accordingly, localized air quality impacts under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

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[7] *See Appendix L of this Draft EIR for VMT Calculator Outputs for Alternatives.*

[8] *See Appendix L of this Draft EIR for VMT Calculator Outputs for Alternatives*

(4) Toxic Air Contaminants

(a) Construction

As with the Project, construction of Alternative 2 would generate diesel particulate emissions associated with heavy equipment operations. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to construction TAC emissions given the short-term construction schedule. Overall construction TAC emissions generated by Alternative 2 would be less than those of the Project due to the reduction in construction activities. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Operation

As set forth in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential TAC emissions associated with Project operations would include diesel particulate matter (DPM) from delivery trucks. Under Alternative 2, the overall increase in the number of deliveries and associated DPM emissions would be less than the Project due to reduction in development. Similar to the Project, the land uses proposed under Alternative 2 are not considered land uses that generate substantial TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not proposed by Alternative 2, similar to the Project. Accordingly, as with the Project, operation of Alternative 2 would not release substantial amounts of TACs that would exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0. Therefore, impacts under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

b. Cultural Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, there are no historical resources on the Project Site. Therefore, as with the Project, Alternative 2 would not result in direct impacts to historical resources as no such resources would be demolished, destroyed, relocated, or altered.

With regard to indirect impacts on adjacent historical resources, as with the Project, Alternative 2 would not materially impair the integrity of the adjacent historical resources, which would continue to convey their historic significance and remain listed or eligible for listing in the National or California Register and designated or eligible for designation as a Historic-Cultural Monument (HCM)I. In addition, The Bloc is a non-contributing property within the boundary of the 7th Street Commercial Historic District (Historic District). Similarly, as with the Project, this Historic District would not be materially impaired by the

development under Alternative 2 and would remain eligible for listing in the National and California Registers and eligible for designation as a Historic Preservation Overlay Zone (HPOZ). In addition, while construction of the Project would include vibration-generating grading and construction activities on the Project Site, this vibration would not be sufficient to result in material damage to the off-site historical resources in the vicinity. Because the amount of excavation and grading would generally be the same between the Project and Alternative 2 and would occur the same distance from off-site historical resources, vibration associated with on-site construction activities under Alternative 2 would similarly not damage off-site historical resources in the vicinity.

Based on the above, Alternative 2 would result in less-than-significant impacts with respect to historical resources, and such impacts would be similar when compared 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 associated with the conveyance of water for dust control and, on a limited basis, to power lighting, electric equipment, and other construction activities. As with the Project, the electricity demand during construction of Alternative 2 would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Similar to the Project, construction activities associated with Alternative 2 would not involve the consumption of natural gas. As with the Project, construction of Alternative 2 would also consume energy in the form of petroleum-based fuels associated with the use of on- and off-road vehicles and on-road construction equipment. Construction equipment/vehicles used during construction of Alternative 2 would also 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. Overall, as with the Project, Alternative 2 construction activities would require energy demand that is not wasteful, inefficient, or unnecessary. However, the energy consumed during construction of Alternative 2 would be reduced compared to the Project due to the reduction in the overall amount of construction activities. Therefore, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 2 and less when compared to the less-than-significant impacts due to the reduction in construction activities and duration.

(b) Operation

As with the Project, Alternative 2 operations would generate an increased demand for electricity. Since the development under Alternative 2 would be reduced when compared to the Project, buildout of Alternative 2 would result in a lower projected net increase in the on-site demand for electricity than the Project. With regard to natural gas demand during operation, as with the Project, Alternative 2 would be subject to the City's All Electric Buildings Ordinance, which does not allow for natural gas equipment to be installed as part of any new development. In addition, as with the Project, Alternative 2 would be developed in accordance with applicable energy conservation requirements, including those in California's Building Energy Efficiency Standards (Title 24 standards), CALGreen Code, and the Los Angeles Green Building Code. Alternative 2 would also implement the same project design features as the Project. Specifically, pursuant to Project Design Features GHG-PDF-1 the design of new building would incorporate sustainability features (e.g., Energy Star-labeled products, and use of LED lighting). Pursuant to WAT-PDF-2, the new building would incorporate water conservation features, such as high-efficiency Energy Star–rated residential clothes washers and dishwashers, drought-tolerant plants, and drip/subsurface irrigation, among others. Moreover, Alternative 2 would provide LAMC-required bicycle parking and EV/EV-ready parking. Therefore, as with the Project, operation of Alternative 2 would not involve the wasteful, inefficient, or unnecessary consumption of energy resources. As such, Alternative 2 would result in less-than-significant impacts related to energy use during operation, and such impacts would be less when compared to the less-than-significant impacts of the Project.

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

As discussed in Section IV.C, Energy, of this Draft EIR, the energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the 2022 CALGreen Code, the Los Angeles Green Building Code, and Ordinance No. 187,714. As these conservation policies are mandatory under the City's Building Code, Alternative 2, as with the Project, would not conflict with applicable plans for renewable energy or energy efficiency. Furthermore, as with the Project, Alternative 2 would comply with the goals of the SCAG's 2020–2045 RTP/SCS, which incorporates VMT targets established by SB 375. As with the Project, the residential development proposed under Alternative 2 and its proximity to public transportation would serve to reduce VMT and associated transportation fuel usage within the region. During construction activities, the Project would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations.

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

d. Greenhouse Gas Emissions

As discussed in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, GHG emissions from a development project are determined in large part by the number of daily vehicle trips generated and associated VMT, as well as by the energy consumption from proposed land uses. As previously discussed above, the number of daily trips and daily VMT under Alternative 2 would be reduced compared to the Project due to the reduction in development. In addition, energy and water consumption from the proposed land uses would be reduced compared to the Project due to the reduction in new development. Specifically, Alternative 2 would include 107 new residential units, comprising approximately 95,844 square feet, which would be less than the Project's 466 new residential units, comprising 495,016 square feet. 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 to meet the standards of LEED Silver® or equivalent green building standards per Project Design Feature GHG-PDF-1. Alternative 2 would include a new residential development in proximity to existing jobs (including those that may be offered on-site), destinations, and other neighborhood services in a Transit Priority Area (TPA) and HQTA in proximity to transit. Specifically, the Project Site contains a portal to the Metro 7th Street/Metro Center Station, which provides direct access to the Metro B (Red) Line, Metro D (Purple) Line, Metro A (Blue) Line, and Metro E (Exposition) Line. Additional transit options near the Project Site include the Metro local line 51 and 66; LADOT Commuter Express (CE) routes 409, 422, 423, 431, 437, 448, and 534; LADOT DASH Routes A, E, and F; Antelope Valley Transportation Authority (AVTA) 785; Metro Express 460 and J (Silver) line; Torrance Transit Route 4X; and Orange County Transportation Authority (OCTA) 701. The Project would include LAMC-required bicycle parking and would include EV chargers and EV ready parking, which would reduce VMT and associated fuel usage and GHG emissions. Moreover, like the Project, Alternative 2 would be all-electric in compliance with Ordinance 187,714. With compliance with applicable regulations and with implementation of comparable sustainability features as the Project, Alternative 2 would be consistent with the GHG reduction plans and policies, such as the 2022 Scoping Plan, the 2020–2045 RTP/SCS, and the Green New Deal. Thus, impacts related to GHG emissions under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

e. Land Use and Planning

Alternative 2, Development in Accordance with Proposed DTLA 2040 Plan Alternative (2 New Parking Levels), would develop the same types of uses as the Project but in accordance with the proposed DTLA 2040 Plan and associated zoning. Under the

proposed DTLA 2040 Plan and associated zoning, the Project Site would have a General Plan land use designation of Transit Core,with a maximum Base FAR of 9:1. Under the proposed DTLA 2040 Plan and associated zoning, new above-grade parking would be counted towards the Project Site's FAR.

The Project Site is currently zoned C2-4D by the LAMC. The "C2" denotes the Commercial Zone pursuant to LAMC Section 12.14; the number "4" denotes Height District 4, which allows a maximum FAR of 13 to 1; and the "D" denotes the D Limitation, enacted under Ordinance No. 164,307 (Subarea 1915) effective January 30, 1989, which limits FAR to a maximum of 6 to 1 with some exceptions, including the Transfer of Floor Area Rights (TFAR). The Project Site's existing zoning allows land uses that include multi-family residential, regional retail and services, office, hotel, and entertainment uses.

As with the Project, Alternative 2 would develop a new multi-family residential tower on an urban infill site in a City-designated TPA and SCAG-designated HQTA in close proximity to employment opportunities, shopping, services, and transit (including an on-site Metro 7th Street/Metro Center Station portal). Alternative 2 would implement a design similar to the Project that improves the pedestrian experience and promotes walkability. Specifically, Alternative 2 would feature pedestrian enhancements, including, but not limited to, replacement of street trees and enhanced sidewalk paving along a 190-foot portion of Hope Street, a new residential entrance, a new storefront for the relocated retail space, and the relocated pedestrian passageway to the interior retail plaza, which are all at the ground level along the Hope Street frontage of the existing podium building. Given the location of the Project Site along and in proximity to major transit corridors, as well as the incorporation of pedestrian and streetscape improvements and design features, Alternative 2 would reduce the use of single-occupant vehicle trips and support VMT reduction. Alternative 2 would also provide a variety of private open space and recreational amenities within the Project Site for the residents and their visitors. Furthermore, the proposed development would be designed to be compatible with the general urban characteristics of the surrounding neighborhood. Alternative 2 would also require similar discretionary approvals as the Project. Alternative 2 would not promote the plans, policies, and regulations regarding the provision of housing to the same extent as the Project as a result of the substantial reduction of residential units (466 units to 107 units) under this alternative. Nonetheless, due to the overall similarities in the development proposals of the Project and Alternative 2, this Alternative would not conflict with the applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect, including those set forth in the General Plan, Transportation Element, Central City Community Plan, DTLA 2040 Plan, LAMC, Downtown Design Guide: Urban Design Standards and Guidelines, Citywide Design Guidelines, and SCAG's RTP/SCS. Overall impacts related to land use and planning under Alternative 2 would be less than significant and similar when compared to the less-than-significant impacts of the Project.

f. Noise

(1) Noise

(a) Construction

The types of construction activities under Alternative 2 would be similar to the Project, although the amount of construction activities and duration would be reduced due to a smaller development proposed under Alternative 2. 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. Although the amount of new construction activities would be reduced 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 (i.e., similar types and number of construction equipment). As with the Project, Alternative 2 would implement Project Design Feature NOI-PDF-1 (regarding using construction equipment equipped with state-of-the-art noise shielding and muffling devices) and Project Design Feature NOI-PDF-2 (regarding prohibition on the use of impact driven pile systems), which would minimize construction noise. In addition, Alternative 2 would also implement Mitigation Measure NOI-MM-1, which would reduce noise levels at the ground level of nearby sensitive receptors. However, the temporary sound barrier would not be effective in reducing the construction noise at upper levels of nearby sensitive receptors. Since there are no other feasible mitigation measures to further reduce construction-related noise at the upper levels of nearby sensitive receptors, on- and off-site (utilities/staging) construction noise would remain significant and unavoidable under Alternative 2.

Given the use of the same haul route as the Project, off-site construction noise impacts associated with haul trucks under Alternative 2 would remain less than significant. As with the Project, the cumulative noise impacts due to on- and off-site (haul trucks) construction activities would remain significant and unavoidable as construction noise levels during maximum activity days under Alternative 2 would be similar to the Project. However, given the overall reduction in construction activities, impacts would occur over a shorter construction period.

(b) Operation

As discussed in Section IV.F, Noise, of this Draft EIR, sources of operational noise under the Project would include (a) on-site stationary noise sources, including outdoor mechanical equipment (e.g., heating, ventilation, and air conditioning [HVAC] equipment), activities associated with the proposed outdoor spaces, parking facilities, and loading dock and (b) off-site mobile (roadway traffic) noise sources. Regarding on-site operational noise, Alternative 2 would introduce noise from on-site noise sources similar to the Project. However, it is anticipated that with the overall reduction in uses under this alternative

(107 new residential units comprising approximately 95,844 square feet versus 466 new residential units comprising 495,016 square feet), the noise levels from building mechanical equipment and outdoor spaces would be reduced. 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. In addition, similar to the Project, Alternative 2 would implement Project Design Feature NOI-PDF-3 (acoustic screening of outdoor mechanical equipment) and Project Design Feature NOI-PDF-4 (controls on outdoor amplified sound systems), which would minimize on-site operational noise. 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 due to the reduction in the number of residential units and total development. Specifically, Alternative 2 would generate a total of 279 daily vehicle trips and 1,737 daily VMT, which would be less than the Project's 1,213 daily vehicle trips and 7,564 daily VMT.[9] The reduction in vehicle trips would result in a decrease in off-site operational traffic-related noise levels under Alternative 2. Therefore, as with the Project, off-site noise impacts under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 2 would be similar to the Project, although the amount and duration of construction activities would be reduced. As with the Project, construction of Alternative 2 would generate on- and off-site vibration from the use of heavy-duty construction equipment and from truck trips. On- and off-site vibration levels would be expected to be similar to those of the Project during peak construction activities. Accordingly, as with the Project, construction activities under Alternative 2 would result in less-than-significant on-site vibration impacts (both building damage and human annoyance) and off-site vibration impacts (building damage) but would result in significant unavoidable off-site vibration impacts with respect to human annoyance due to haul trucks. Although the overall construction activities and construction duration under Alternative 2 would be reduced when compared to the Project, because haul trucks would follow the same haul routes and pass by the same receptor locations as the Project, the Project-level and cumulative off-site construction vibration impact due to off-site

[9] *See Appendix L of this Draft EIR for VMT Calculator Outputs for Alternatives*

construction trucks would remain significant and unavoidable as there are no feasible mitigation measures to reduce these off-site construction vibration impacts. However, given the overall reduction in construction activities, such impacts would occur over a shorter construction period.

(b) Operation

As described in Section IV.F, Noise, of this Draft EIR, sources of vibration related to operation of the Project would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under Alternative 2. As with the Project, vehicular-induced vibration from Alternative 2, including vehicle circulation, would not generate perceptible vibration levels at off-site sensitive uses. In addition, as with the Project, building mechanical equipment installed as part of Alternative 2 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration transmission such that the vibration would not be perceptible at the off-site sensitive receptors. Therefore, as with the Project, operation of Alternative 2 would not increase the existing vibration levels in the immediate vicinity of the Project Site. As such, vibration impacts associated with operation of Alternative 2 would also be less than significant. However, such impacts would be less than those of the Project due to the reduction in vehicle trips and floor area under this alternative.

g. Public Services

(1) Fire Protection

(a) Construction

The types of construction activities required for Alternative 2 would be similar to those of the Project, although the amount of development and associated construction activities and construction traffic would be reduced due to smaller amount of development proposed under Alternative 2. As with the Project, as discussed in Section IV.G.1, Public Services—Fire Protection, of this Draft EIR, construction under Alternative 2 would occur in compliance with all applicable federal, State, and local requirements concerning fire prevention and hazardous materials, which would effectively reduce the potential for construction-related fire and explosion.

Additionally, while construction activities would primarily be contained within the boundaries of the Project Site, it is expected that construction fences may encroach into the public right-of-way, and the sidewalk and one travel lane on Hope Street would temporarily be utilized as a staging area for construction equipment adjacent to the Project Site. These short-term and temporary construction activities could temporarily increase response times for emergency vehicles due to travel time delays caused by traffic during

the Project's construction phase. Furthermore, pursuant to California Vehicle Code (CVC) Section 21806, the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, construction of Alternative 2, as with the Project, would not result in the need for new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. In addition, as with the Project, a Construction Traffic Management Plan (CTMP) would be prepared for Alternative 2 pursuant to Project Design Feature TR-PDF-1 identified in Section IV.H, Transportation, of this Draft EIR, which will ensure that adequate and safe access would remain available within and near the Project Site during construction activities. Impacts under Alternative 2 would be less than significant and, with a shorter construction duration and scope, would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 2 would generate a new residential and visitor population that would contribute to an increase in demand for LAFD fire protection services, which could, in turn, result in a need for new or physically altered government facilities. Similar to the Project, Alternative 2 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, life safety features (e.g., automatic fire sprinkler systems, fire service access elevators, etc.) and would undergo LAFD fire/life safety plan review to ensure compliance with the above, which would reduce the demand for fire protection services and also ensure adequate emergency access. Furthermore, as with the Project, traffic generated by Alternative 2, which would be substantially less compared to the Project due to the reduction in daily vehicle trips, would not significantly impact emergency vehicle response to the Project Site and surrounding area as the drivers of emergency vehicles have the ability to bypass traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As with the Project, Alternative 2 would not modify existing driveways, and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Given the reduction in total floor area, the fire and domestic water need for Alternative 2 would be less than the those of the Project. However, as with the Project, Alternative 2 could potentially require a portion of the existing 8-inch water main on Hope Street to be upgraded to a 12-inch main or equivalent, as determined by the Los Angeles Department of Water and Power (LADWP), to ensure that adequate fire flow is available. As discussed in Section IV.J.1 Utilities and Service Systems—Water Supply and Infrastructure, impacts associated with this potential infrastructure improvement would be less than significant. Therefore, similar to the Project, this alternative would not necessitate the construction of new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. As such, impacts with regard to fire protection

services during operation of Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in development and associated service population.

(2) Police Protection

(a) Construction

As discussed above, construction activities under Alternative 2 would be similar to those of the Project; however, the overall amount of construction activities and duration of construction would be reduced compared to the Project due to the reduction in total floor area. Similar to the Project, construction would not generate a permanent population on the Project Site that would substantially increase the police service population of LAPD's Central Area. Nonetheless, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. However, as with the Project, Alternative 2 would implement Project Design Feature POL-PDF-1 to implement temporary security measures during construction, including security fencing, lighting, and locked entry to secure the Project Site during construction, which would serve to reduce demand on LAPD facilities.

Furthermore, as previously discussed, Alternative 2 would implement a CTMP to ensure that adequate and safe access is available within and near the Project Site during construction activities. Lastly, pursuant to CVC Section 21806, emergency vehicles can use their sirens to clear a path of travel or drive in the lanes of opposing traffic during an emergency to avoid traffic. Therefore, as with the Project, construction of Alternative 2 would not result in the need for new or altered government facilities (i.e., police stations), the construction of which would cause significant environmental impacts, in order to maintain service. 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 indicated in Section IV.G.2, Public Services—Police Protection, of this Draft EIR, LAPD considers the residential population within their service area to evaluate service capacity. As with the Project, Alternative 2 would introduce a new residential and visitor population to the Project Site and would increase LAPD's residential service population in the Central Area. However, the number of new residents and visitors would be reduced compared to the Project due to the reduction in residential units. As with the Project, Alternative 2 would generate General Fund tax revenues for the City, which could be used to expand law enforcement resources in the Central Area. Therefore, Alternative 2, as with the Project, would not result in the need for new or altered government facilities (i.e., police stations), the construction of which would cause significant environmental impacts, in order

to maintain service. In addition, Alternative 2 would implement the same project design features as the Project, which would contribute to offsetting the increase in demand for police services. Impacts under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduced service population.

h. Transportation

As previously described, Alternative 2 would be developed within the same Project Site as the Project. As such, the plans, policies, and programs applicable to the Project would also apply to Alternative 2. As with the Project, Alternative 2 would represent a high-density residential project on an urban infill site located in an active downtown area adjacent to multiple Metro bus stops and the Metro 7th Street/Metro Center Station portal on-site. As with the Project, this alternative would enhance pedestrian access within and around the Project Site as called for by the Mobility Plan and the Central City Community Plan; prioritize safety and access for all individuals utilizing the Project Site by complying with all American with Disabilities Act (ADA) requirements as required by the LAMC; include sidewalk design within the 190-foot portion of Hope Street and bicycle parking in accordance with LAMC requirements; and encourage walking, biking, and transit use as called for by the Central City Community Plan, Plan for a Healthy Los Angeles, and the proposed DTLA 2040 Plan. Alternative 2 would also reduce VMT per capita for residents, including through the implementation of transportation demand management (TDM) measures (e.g. the provision of short- and long-term bicycle parking that would serve to promote use of bicycles) as called for by the Mobility Plan, Central City Community Plan, SCAG's RTP/SCS, and the City's TDM Ordinance. Overall, the mixed-use nature of the Project Site and the resulting reduction in VMT, as well as the proposed streetscape and pedestrian improvements, would also help to reduce health impacts as called for by Plan for a Healthy Los Angeles. Furthermore, while 7th Street and 8th Street have been identified as part of the Vision Zero's High Injury Network, no specific Vision Zero projects are planned for near the Project Site, and, as with the Project, Alternative 2 would not conflict with the implementation of future Vision Zero projects along these roadways. Therefore, as with the Project, Alternative 2 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be less than significant. The degree of the impacts would be similar between the Alternative 2 and the Project as neither would conflict with an applicable transportation plan.

With respect to conflicts with CEQA Guidelines Section 15064.3(b), as shown in Appendix L of this Draft EIR, Alternative 2 would generate 321 total daily vehicle trips. With the existing 587 total daily vehicle trips, Alternative 2 would result in a net reduction of 266 total daily vehicle trips compared to the Project's net increase of 808 total daily vehicle trips. Accordingly, Alternative 2 would not generate a net increase of 250 or more daily vehicle trips to meet the screening criteria for further VMT analysis as identified in LADOT's

Transportation Assessment Guidelines.[10] Therefore, under Alternative 2, impacts with respect to conflicts with CEQA Guidelines Section 15064.3(b) would be less than significant and less when compared to the less-than-significant impacts of the Project.

Regarding freeway off-ramp safety, as required by LADOT's Interim Guidance for Freeway Safety Analysis, if a project is not expected to generate more than 25 or more peak hour trips at any freeway off-ramps, then a freeway ramp analysis is not required. The Project would add less than 25 trips to all the freeway off-ramps in both the morning and afternoon peak hours such that further analysis was not required, and thus, the Project was determined to result in less-than-significant freeway off-ramp safety impacts.[11] Since Alternative 2 would generate less daily traffic when compared to the Project, Alternative 2 would also result in less-than-significant freeway off-ramp safety impacts, and such impacts would be less when compared to the less-than-significant impacts of the Project.

As with the Project, Alternative 2 would not modify existing driveways. Additionally, all internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. This would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction Projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. Alternative 2 would not include the installation of barriers that could impede emergency vehicle access. Similar to the Project, Alternative 2 would be required to implement Project Design Feature POL-PDF-6, which would require that upon completion of construction and prior to the issuance of a building permit, the Applicant would submit a diagram of the Project Site to the LAPD's Central Area Commanding Officer that includes access routes and any additional information that might facilitate police response. Lastly, pursuant to CVC Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, Alternative 2 would result in less than significant emergency access impacts that would be similar to the less than significant impacts of the Project.

i. Tribal Cultural Resources

Alternative 2 would require the same excavation and ground-disturbing activities as those of the Project. As indicated in Section IV.I, Tribal Cultural Resources, of this Draft EIR, the Project Site does not contain any resources determined to be significant pursuant to the criteria set forth in PRC Section 5024.1(c). Accordingly, as with the Project,

[10] *See Appendix L of this Draft EIR for VMT Calculator Outputs for Alternatives.*

[11] *Gibson Transportation Consulting, Inc., Transportation Assessment for The Bloc Residential Tower and Signage SUD Project, Los Angeles, California, January 2023, revised February 2024.*

Alternative 2 would not cause a substantial adverse change in the significance of a tribal cultural resource, and impacts related to tribal cultural resources would be less than significant. Nonetheless, similar to the Project, Alternative 2 would comply with the City's established standard condition of approval to address inadvertent discovery of tribal cultural resources. Therefore, impacts under Alternative 2 would be similar when compared to the less-than-significant impacts of the Project.

j. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities for Alternative 2 would result in a temporary demand for dust control, cleaning of equipment, and preparation during the early construction phases. Construction-related water use under Alternative 2 would be less due to the reduced size of the proposed development. Additionally, as with the Project, Alternative 2 would require the removal of approximately 23,888 square feet of existing commercial uses in the podium building, estimated to consume approximately 597 gpd,[12] thereby partially offsetting the water demand associated with Project construction.

As previously discussed, Alternative 2 could potentially require a portion of the existing 8-inch water main on Hope Street to be upgraded to a 12-inch main or equivalent as determined by the LADWP. Similar to the Project, prior to ground disturbance, contractors would coordinate with LADWP to identify the locations and depth of all lines. Furthermore, LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. LADWP would review and approve all appropriate connection requirements, pipe depths, and connection location(s). Lastly, while trenching and installation activities could temporarily affect traffic flow and access on adjacent streets and sidewalks, Alternative 2 would implement a CTMP (Project Design Feature TR-PDF-1) to ensure that adequate and safe access remains available within and near the Project Site during the construction period. As such, 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.

[12] *This analysis is based on the water generation of 23,888 square feet of commercial retail uses to be removed and does not include the approximately 454 square feet of theater space to be removed because the removal of this space will not affect the existing water demand.*

Overall, Alternative 2 would result in less-than-significant impacts related to water supply and infrastructure, which would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 2 would result in an increase in long-term water demand. As indicated in Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, a conservative analysis for both fire suppression and domestic water flows has been completed by LADWP for the Project as summarized in the Utility Report included as Appendix K of this Draft EIR. As discussed therein, based on the Information of Fire Flow Availability Request (IFFAR), the Project has inadequate fire flow available to demonstrate compliance with LAMC Section 57.507; therefore, system upgrades would be necessary to meet the fire flow demand for the Project. The Project would upgrade a portion of the existing 8-inch water main on Hope Street to a 12-inch main pursuant to Project Design Feature WAT-PDF-1. As concluded in Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, with the implementation of Project Design Feature WAT-PDF-1, public water infrastructure would provide adequate water pressure to serve the Project Site's anticipated fire flow demands. Based on the reduction in the number of residential units as compared to the Project, water demand for Alternative 2 would be less than the Project's estimated net increase in water demand of 55,530 gallons per day (gpd). Nonetheless, Alternative 2 like the Project could potentially require a portion of the existing 8-inch water main on Hope Street to be upgraded to a 12-inch main or equivalent, as determined by the LADWP, to ensure adequate fire flow is available. As discussed above, the construction activities associated with these improvements would not cause significant environmental effects.

Additionally, as the estimated water demand for the Project was determined to be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040, the reduced water demand under Alternative 2 would also be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040. Thus, impacts to water supply under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(2) Energy Infrastructure

(a) Construction

As previously noted, the energy consumed by Alternative 2 would be reduced compared to the Project due to the reduction in the overall amount of construction activities. Therefore, as with the Project, impacts on infrastructure capacity associated with short-term construction activities 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 relative to existing conditions. However, based on the reduction in residential units and the reduced amount of total floor area proposed under Alternative 2, the total electricity consumption of Alternative 2 would be less than the total electricity consumption of the Project, which was determined to be adequately served by LADWP infrastructure. As with the Project, operation of Alternative 2 would not result in any demand for natural gas as Alternative 2 would also be subject to the City's All Electric Buildings Ordinance, which does not allow for natural gas equipment to be installed as part of new residential development. Therefore, impacts to energy infrastructure capacity 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

Based on the analysis above, Alternative 2 would not substantially reduce or avoid the Project's significant and unavoidable impacts with respect to on- and off-site (utilities/staging) noise sources during construction or off-site vibration with respect to human annoyance during construction. Additionally, Alternative 2 would not substantially reduce or avoid the Project's significant and unavoidable cumulative impacts regarding on- and off-site (haul trucks) noise during construction and off-site vibration with respect to human annoyance during construction. Impacts associated with operational regional and local air pollutant emissions, TACs, energy use during construction and operation, GHG emissions, off-site construction noise (haul trucks), construction vibration (on-site vibration impacts [both building damage and human annoyance] and off-site vibration impacts [building damage]), operational noise and vibration, public services (fire protection and police protection), VMT, freeway off ramp safety, and utilities and service systems (water supply and infrastructure and energy infrastructure) would be less than those of the Project and the remaining environmental topics would be similar to those of the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 2 would develop the same types of uses as the Project but at a reduced scope and density in accordance with the draft General Plan land use and zoning designations for the Project Site under the proposed DTLA 2040 Plan and associated zoning. While the amount of development under this alternative would be substantially less than under the Project, Alternative 2 would meet the underlying purpose of the Project, which is to integrate high-density multi-family housing uses and associated amenities with existing commercial/retail/restaurant uses in close proximity to an existing rail station portal and other public transit options, employment and other commercial uses and, thus, reduce

VMT and promote walkability within the Downtown community. However, Alternative 2 would be less effective than the Project in meeting this underlying purpose as a result of the substantial reduction of residential units (466 units to 107 units) under this alternative. As with the Project, Alternative 2 would establish the proposed Sign SUD.

Regarding the Project objectives, Alternative 2 would meet the following Project objectives to the same extent as the Project:

- To add new residential units without displacing any existing residential uses by developing a residential high-rise tower on a built-out commercial site adjacent to transit and jobs.
- To create and enhance a pedestrian-oriented environment and promote walkability by creating a safe, inviting street-level identity for the Project Site along Hope Street through the introduction of a ground floor residential lobby, relocated retail space with new storefront entries, and enhanced sidewalk paving and landscaping, all within close proximity to existing commercial/retail uses and services.
- To promote resource and energy conservation by incorporating sustainable and green building design and construction.
- To facilitate unique and creative signage that would support and enhance the existing and proposed development, create a sense of place with a lively and exciting pedestrian experience, establish a strong site identity, and support the site's diverse uses, guided by standards that ensure cohesion and compatibility with surrounding land uses.

Alternative 2 would also meet the following Project objectives but not to the same extent as the Project due to the reduced amount residential units under this alternative.

- To provide high-density multi-family housing in furtherance of the goals of the City's Housing Element and the City's Regional Housing Needs Assessment.
- To develop a creative building design that provides high-density multi-family residential uses that are integrated into an existing parking facility and mixed-use commercial development resulting in a synergistic development where people can live, work and play.
- To support the Central City Community Plan's Objective 1.2 to increase the range of housing choices available to Downtown employees.
- To encourage the reduction of vehicular trips and promote regional and local mobility objectives by locating high-density residential uses near a regional-serving transit hub (Metro 7th Street/Metro Center Station) and an abundance of

existing commercial uses that will provide services to residents and employment opportunities.

- To reduce vehicular trips and promote regional and local mobility objectives by locating high-density residential uses near a regional-serving transit hub (Metro 7th Street/Metro Center Station) and an abundance of existing commercial uses that will provide services to residents and employment opportunities.

- To construct a high-density, residential development that incorporates the principles of smart growth, including sustainable design, infill development, proximity to transit, walkability, and the provision of bicycle facilities.

V. Alternatives

C. Alternative 3: Development in Accordance with the Proposed DTLA 2040 Plan Alternative (No New Parking Levels)

1. Description of the Alternative

Alternative 3, Development in Accordance with the Proposed DTLA 2040 Plan Alternative (No New Parking Levels), would develop the same types of uses as the Project but in accordance with the draft General Plan land use and zoning designations for the Project Site under the proposed DTLA 2040 Plan. Under the proposed DTLA 2040 Plan and associated zoning, the Project Site would be designated as part of the Transit Core General Plan land use designation, which has a maximum FAR range of 10.0 to 13.0. The Project Site's zoning as proposed in the DTLA 2040 Plan would allow land uses that include multi-family residential, general retail and services, office, hotel, and entertainment uses, which are similar to the uses currently permitted.

Alternative 3 would develop a high-rise 37-story building with a maximum height of 511 feet. The building would consist of 307 new residential units totaling approximately 280,094 square feet. As with the Project, to accommodate Alternative 3, approximately 24,342 square feet of existing commercial (theater and retail) uses in the podium building would be changed to residential uses, but the other existing and commercial and hotel uses on the Project Site would remain. Upon completion of Alternative 3, the Project Site would include 1,680,066 square feet of floor area with an FAR of 9:1, which would be within the maximum FAR range allowed by the proposed DTLA 2040 Plan.

Similar to the Project, construction of Alternative 3 would include the required seismic retrofitting and would make other modifications to the existing parking podium, resulting in the reduction of the number of existing spaces. As a result of the seismic retrofit work and the residential structural support, elevators, stairwells, bicycle parking, mechanical rooms and storage areas, a total of 464 existing parking spaces would be eliminated.

Alternative 3 would not include any changes to the existing vehicular ingress/egress driveways, and no new driveways are proposed. While the proposed DTLA 2040 Plan does not include minimum vehicle parking requirements, Alternative 3 would provide a total of

1,507 automobile parking spaces (441 spaces less than under the Project). The parking spaces would be provided within the existing podium building and in one of the two existing subterranean parking levels, as modified. No additional parking levels would be constructed. In accordance with LAMC requirements, Alternative 3 would provide 167 bicycle parking spaces (15 short-term and 152 long-term bicycle parking spaces).

Alternative 3 would establish the proposed Sign District and implement similar building design, signage, lighting, vehicular and pedestrian access, setbacks, and sustainability features as those proposed for the Project. In accordance with the DTLA 2040 Plan, Alternative 3 would be required to provide 33,575 square feet of open space, of which a minimum of 6,295 square feet would need to be landscaped. Alternative would provide approximately 33,575 square feet of open space, of which 25,181 square feet would be exterior open space and 8,394 square feet of interior open space. In addition, 6,295 square feet of total exterior common open space would be landscaped.

With regard to construction activities and schedule, it is anticipated that the overall duration of construction would be reduced compared to that of the Project based on the reduction in overall building area and shorter tower. Similar to the Project, it is estimated that approximately 18,239 cubic yards of export would be hauled from the Project Site under Alternative 3.

2. Environmental Impacts

a. Air Quality

(1) Consistency with Air Quality Plans

Alternative 3 would develop the same uses as the Project but at a reduced scope and density in accordance with the proposed DTLA 2040 Plan and associated zoning. Thus, similar to the Project, Alternative 3 would concentrate new residential uses within an HQTA, thereby reducing VMT. As with the Project, Alternative 3 would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for these pollutants, exceed any of the State and federal standards, or delay timely attainment of air quality standards or interim emission reductions specified in the AQMP. Thus, Alternative 3 would be consistent with the goals and policies of the AQMP. In addition, similar to the Project, Alternative 3 would promote the City of Los Angeles General Plan Air Quality Element goals, objectives, and policies applicable to the Project. Thus, similar to the Project, Alternative 3 would not conflict with or obstruct implementation of the AQMP and would serve to advance applicable policies of the City pertaining to air quality. Impacts under Alternative 3 would be less than significant and similar to the impacts of the Project.

(2) Construction

(a) Regional Emissions

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 haul trucks and 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, mobile source emissions, primarily NO_X, would result from the use of construction equipment, such as dozers, loaders, and cranes. As with the Project, pursuant to Project Design Feature AQ-PDF-1, Alternative 3 would also commit to using electric powered air compressors, aerial lifts, cement mixers, concrete saws, tower cranes, excavators, forklifts and welders in place of diesel versions of this equipment. Use of this electric powered construction equipment would reduce combustion emissions in comparison to diesel powered equipment. As with the Project, during the finishing phase of the Project, paving and the application of architectural coatings (e.g., paints) would potentially release VOCs.

Under Alternative 3, construction activities would be reduced in comparison to the Project due to the reduction in the total building area. 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 impacts on these days would be similar to those of the Project. Therefore, the construction-related regional emissions under Alternative 3 would be less than significant and similar when compared to the less-than-significant impacts of the Project. However, the overall duration of construction activities and associated daily construction emissions would be reduced.

(b) Localized Emissions

On-site construction activities under Alternative 3 would be located at similar distances from sensitive receptors as the Project. Although Alternative 3 would result in a reduction in the amount of proposed development compared to the Project, the intensity of construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, localized impacts on these days would be similar to the less-than-significant impacts of the Project. Therefore, as with the Project, localized impacts under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(3) Operation

(a) Regional Emissions

As discussed above, Alternative 3 includes the development of 307 residential units. As summarized in Appendix L of this Draft EIR, based on the proposed uses, the number of daily trips and daily VMT generated by Alternative 3 would be less than the number of daily trips generated by the Project. Specifically, Alternative 3 would generate a total of 800 daily vehicle trips and 4,989 daily VMT, which would be less than the Project's 1,213 daily vehicle trips and 7,564 daily VMT.[13] As operational regional air pollutant emissions associated with Alternative 3 would be generated by vehicle trips and VMT, which are the largest contributors to operational air pollutant emissions and, to a lesser extent, by the reduction in square footage and consumption of electricity, the operational regional emissions of Alternative 3 would be less than those of the Project. Therefore, the operational regional air pollutant emissions of Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Localized Emissions

Localized operational impacts are determined primarily by traffic volumes. As identified above, Alternative 3 would generate a total of 800 daily vehicle trips and 4,989 daily VMT, which would be less than the Project's 1,213 daily vehicle trips and 7,564 daily VMT.[14] As such, total vehicular emissions under Alternative 3 would be less when compared to the Project. In addition, as with the Project, Alternative 3 would not introduce any major new sources of air pollution within the Project Site. On-site sources would generate less on-site operational emissions compared to the Project as the development proposed under Alternative 3 would be reduced compared to the Project. Therefore, localized air quality impacts under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(4) Toxic Air Contaminants

(a) Construction

As with the Project, construction of Alternative 3 would generate diesel particulate emissions associated with heavy equipment operations. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to construction TAC emissions given the short-term construction schedule. Overall

[13] *See Appendix L of this Draft EIR for VMT Calculator Outputs for Alternatives.*

[14] *See Appendix L of this Draft EIR for VMT Calculator Outputs for Alternatives.*

construction TAC emissions generated by Alternative 3 would be less than those of the Project due to the reduction in construction activities. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Operation

As set forth in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential TAC emissions associated with Project operations would include DPM from delivery trucks. Under Alternative 3, the overall increase in the number of deliveries and associated DPM emissions would be less than the Project due to reduction in development. Similar to the Project, the land uses proposed under Alternative 3 are not considered land uses that generate substantial TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not proposed by Alternative 3 similar to the Project. Accordingly, as with the Project, Alternative 3 would not release substantial amounts of TACs that would exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0. Therefore, impacts under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project.

b. Cultural Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, there are no historical resources on the Project Site. Therefore, as with the Project, Alternative 3 would not result in direct impacts to historical resources as no such resources would be demolished, destroyed, relocated, or altered.

With regard to indirect impacts on adjacent historical resources, as with the Project, Alternative 3 would not materially impair the integrity of the adjacent historical resources, which would continue to convey their historic significance and remain listed or eligible for listing in the National or California Register and designated or eligible for designation as a HCM. In addition, The Bloc is a non-contributing property within the boundary of the Historic District. Similarly, as with the Project, this Historic District would not be materially impaired by the development under Alternative 3 and would remain eligible for listing in the National and California Registers and eligible for designation as a HPOZ. Since Alternative 3 would include less total floor area than the Project and shorter tower, but with a similar high-rise configuration in the same location, it would not materially impair the context of the adjacent historical resources. In addition, while construction of the Project would include vibration-generating grading and construction activities on the Project Site, this vibration would not be sufficient to result in material damage to the off-site historical resources in the vicinity. Because the amount of excavation and grading would generally be the same between the Project and Alternative 3 and would occur the same distance from off-site

historical resources, vibration associated with on-site construction activities under Alternative 3 would similarly not damage off-site historical resources in the vicinity.

Therefore, based on the above, Alternative 3 would result in less-than-significant impacts with respect to historical resources, and such impacts would be similar when compared 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 associated with the conveyance of water for dust control and, on a limited basis, to power lighting, electric equipment, and other construction activities. As with the Project, the electricity demand during construction of Alternative 3 would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Similar to the Project, construction activities associated with Alternative 3 would not involve the consumption of natural gas. As with the Project, construction of Alternative 3 would also consume energy in the form of petroleum-based fuels associated with the use of on- and off-road vehicles and on-road construction equipment. Construction equipment/vehicles used during construction of Alternative 3 would also 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. Overall, as with the Project, Alternative 3 construction activities would require energy demand that is not wasteful, inefficient, or unnecessary. However, the energy consumed during construction of Alternative 3 would be reduced compared to the Project due to the reduction in the overall amount of construction activities. Therefore, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 3 and less when compared to the less-than-significant impacts due to the reduction in construction activities and duration.

(b) Operation

As with the Project, Alternative 3 operations would generate an increased demand for electricity. Since development under Alternative 3 would be reduced when compared to the Project, buildout of Alternative 3 would result in a lower projected net increase in the on-site demand for electricity than the Project. With regard to natural gas demand during operation, as with the Project, Alternative 3 would be subject to the City's All Electric

Buildings Ordinance, which does not allow for natural gas equipment to be installed as part of any new development. In addition, as with the Project, Alternative 3 would be developed in accordance with applicable energy conservation requirements, including those in California's Building Energy Efficiency Standards (Title 24 standards), CALGreen Code, and the Los Angeles Green Building Code. Alternative 3 would also implement the same project design features as the Project. Specifically, pursuant to Project Design Features GHG-PDF-1 the design of the new building would incorporate sustainability features (e.g., Energy Star-labeled products, and use of LED lighting). Pursuant to WAT-PDF-2, the new building would incorporate water conservation features, such as high-efficiency Energy Star–rated residential clothes washers and dishwashers, drought-tolerant plants, and drip/subsurface irrigation, among others. Moreover, Alternative 3 would provide LAMC-required bicycle parking and EV/EV-ready parking. 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 related to energy use during operation, and such impacts would be less when compared to the less-than-significant impacts of the Project.

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

As discussed in Section IV.C, Energy, of this Draft EIR, the energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the 2022 CALGreen Code, the Los Angeles Green Building Code, and Ordinance No. 187,714. As these conservation policies are mandatory under the City's Building Code, Alternative 3, as with the Project, would not conflict with applicable plans for renewable energy or energy efficiency. Furthermore, as with the Project, Alternative 3 would comply with the goals of the SCAG's 2020–2045 RTP/SCS, which incorporates VMT targets established by SB 375. As with the Project, the residential development proposed under Alternative 3 and its proximity to public transportation would serve to reduce VMT and associated transportation fuel usage within the region. During construction activities, the Project would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations. Therefore, Alternative 3, as with the Project, would not conflict with plans for renewable energy or energy efficiency. The impacts of Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

d. Greenhouse Gas Emissions

As discussed in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, GHG emissions from a development project are determined in large part by the number of daily vehicle trips generated and associated VMT, as well as its energy consumption. As previously discussed above, the number of daily trips and daily VMT under Alternative 3 would be reduced compared to the Project due to the reduction in development. In addition, energy and water consumption from the proposed land uses would be reduced

compared to the Project due to the reduction in net development (i.e., 280,094 square feet under Alternative 3 versus 470,674 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 to meet the standards of LEED Silver® or equivalent green building standards per Project Design Feature GHG-PDF-1. Alternative 3 would include a new residential development in proximity to existing jobs (including those that may be offered on-site), destinations, and other neighborhood services in a TPA and HQTA in proximity to transit. Specifically, the Project Site contains a portal to the Metro 7th Street/Metro Center Station, which provides direct access to the Metro B (Red) Line, Metro D (Purple) Line, Metro A (Blue) Line, and Metro E (Exposition) Line. Additional transit options near the Project Site include the Metro local line 51 and 66; LADOT CE routes 409, 422, 423, 431, 437, 448, and 534; LADOT DASH Routes A, E, and F; AVTA 785; Metro Express 460 and J (Silver) line; Torrance Transit Route 4X; and OCTA 701. As with the Project, Alternative 3 would include LAMC-required bicycle parking, and would include EV ready parking, which would reduce VMT and associated fuel usage and GHG emissions. Moreover, like the Project, Alternative 3 would be all-electric in compliance with Ordinance 187,714. With compliance with applicable regulations and with implementation of comparable sustainability features as the Project, Alternative 3 would be consistent with the GHG reduction plans and policies, such as the 2022 Scoping Plan, the 2020–2045 RTP/SCS, and the Green New Deal. Thus, impacts related to GHG emissions under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project.

e. Land Use and Planning

Alternative 3, Development in Accordance with Proposed DTLA 2040 Plan Alternative (No New Parking Levels), would develop the same types of uses as the Project but in accordance with the proposed DTLA 2040 Plan and associated zoning. Under the proposed DTLA 2040 Plan and associated zoning, the Project Site would have a General Plan land use designation of Transit Core, with a maximum Base FAR of 9:1. Per the proposed DTLA 2040 Plan and associated zoning, new above-grade parking would be counted towards the Project Site's FAR; however no new above-grade parking is proposed as part of Alternative 3.

As previously discussed, the Project Site is currently zoned C2-4D by the LAMC. The "C2" denotes the Commercial Zone pursuant to LAMC Section 12.14; the number "4" denotes Height District 4, which allows a maximum FAR of 13 to 1; and the "D" denotes the D Limitation, enacted under Ordinance No. 164,307 (Subarea 1915) effective January 30, 1989, which limits FAR to a maximum of 6 to 1 with some exceptions, including the TFAR.

The Project Site's existing zoning allows land uses that include multi-family residential, regional retail and services, office, hotel, and entertainment uses.

As with the Project, Alternative 3 would develop a new multi-family residential tower on an urban infill site in a City-designated TPA and SCAG-designated HQTA in close proximity employment opportunities, shopping, services, and transit (including an on-site Metro 7th Street/Metro Center Station portal). Alternative 3 would implement a design similar to the Project that improves the pedestrian experience and promotes walkability. Specifically, Alternative 3 would feature pedestrian enhancements, including, but not limited to, replacement of street trees and enhanced sidewalk paving along a 190-foot portion of Hope Street, a new residential entrance, a new storefront for the relocated retail space, and the relocated pedestrian passageway to the interior retail plaza, which are all at the ground level along the Hope Street frontage of the existing podium building. Given the location of the Project Site along and in proximity to major transit corridors, as well as the incorporation of pedestrian and streetscape improvements and design features, Alternative 3 would reduce the use of single-occupant vehicle trips and support VMT reduction. Alternative 3 would also provide a variety of private open space and recreational amenities within the Project Site for the residents and their visitors. Furthermore, the proposed development would be designed to be compatible with the general urban characteristics of the surrounding neighborhood. Alternative 3 would also require similar discretionary approvals as the Project. Alternative 3 would not promote the plans, policies, and regulations regarding the provision of housing to the same extent as the Project as a result of the substantial reduction of residential units (466 units to 307 units) under this alternative. Nonetheless, due to the overall similarities in the development proposals of the Project and Alternative 3, this Alternative would not conflict with the applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect, including those set forth in the General Plan, Transportation Element, Central City Community Plan, DTLA 2040 Plan, LAMC, Downtown Design Guide: Urban Design Standards and Guidelines, Citywide Design Guidelines, and SCAG's RTP/SCS. Overall, impacts related to land use and planning under Alternative 3 would be less than significant and similar when compared to the less-than-significant impacts of the Project.

f. Noise

(1) Noise

(a) Construction

The types of construction activities under Alternative 3 would be similar to the Project, although the amount of construction activities and duration would be reduced due to the reduction in total floor area (i.e., 280,094 square feet under Alternative 3 versus 495,016 square feet 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. Although the amount of new construction activities would be reduced 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, (i.e., similar types and number of construction equipment). As with the Project, Alternative 3 would implement Project Design Feature NOI-PDF-1 (regarding using construction equipment equipped with state-of-the-art noise shielding and muffling devices) and Project Design Feature NOI-PDF-2 (regarding prohibition on the use of impact driven pile systems), which would reduce construction noise. In addition, Alternative 3 would also implement Mitigation Measure NOI-MM-1, which would reduce noise levels at the ground level of nearby sensitive receptors. However, the temporary sound barrier would not be effective in reducing the construction noise at upper levels of nearby sensitive receptors. Since there are no other feasible mitigation measure to further reduce construction-related noise at the upper levels of nearby sensitive receptors, on- and off-site (utilities/staging) construction noise would remain significant and unavoidable under Alternative 3.

Given the use of the same haul route as the Project, off-site construction noise impacts associated with haul trucks under Alternative 3 would remain less than significant. As with the Project, the cumulative noise impacts due to on- and off-site (haul trucks) construction activities would remain significant and unavoidable, as construction noise levels during maximum activity days under Alternative 3 would be similar to the Project. However, given the overall reduction in construction activities, impacts would occur over a shorter construction period.

(b) Operation

As discussed in Section IV.F, Noise, of this Draft EIR, sources of operational noise under the Project would include (a) on-site stationary noise sources, including outdoor mechanical equipment (e.g., HVAC equipment), activities associated with the proposed outdoor spaces, parking facilities, and loading dock; and (b) off-site mobile (roadway traffic) noise sources. Regarding on-site operational noise, Alternative 3 would introduce noise from on-site noise sources similar to the Project. However, it is anticipated that with the overall reduction in net development and uses under this alternative (i.e., 280,094 square feet under Alternative 3 versus 470,674 square feet under the Project), the noise levels from building mechanical equipment, outdoor spaces, and parking facilities would be reduced. 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. In addition, similar to the Project, Alternative 3 would implement Project Design Feature NOI-PDF-3 (acoustic screening of outdoor mechanical equipment) and Project Design Feature NOI-PDF-4 (controls on outdoor amplified sound systems), which would minimize on-site operational noise. 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 due to the reduction in the number of residential units and total development. Specifically, Alternative 3 would generate a total of 800 daily vehicle trips and 4,989 daily VMT, which would be less than the Project's 1,213 daily vehicle trips and 7,564 daily VMT.[15] The reduction in vehicle trips would result in a decrease in off-site operational traffic-related noise levels under Alternative 3. Therefore, as with the Project, off-site noise impacts under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 3 would be similar to the Project, although the amount and duration of construction activities would be reduced. As with the Project, construction of Alternative 3 would generate on- and off-site vibration from the use of heavy-duty construction equipment and from truck trips. On- and off-site vibration levels would be expected to be similar to those of the Project during peak construction activities. Accordingly, as with the Project, construction activities under Alternative 3 would result in less-than-significant on-site vibration impacts (both building damage and human annoyance) and off-site vibration impacts (building damage) but would result in significant unavoidable off-site vibration impacts with respect to human annoyance due to haul trucks. Although the overall construction activities and construction duration under Alternative 3 would be reduced when compared to the Project, because haul trucks would follow the same haul routes and pass by the same receptor locations as the Project, the Project-level and cumulative off-site construction vibration impact due to off-site construction trucks would remain significant and unavoidable as there are no feasible mitigation measures to reduce these off-site construction vibration impacts. However, given the overall reduction in construction activities, impacts would occur over a shorter construction period.

(b) Operation

As described in Section IV.F, Noise, of this Draft EIR, sources of vibration related to operation of the Project would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under

[15] *See Appendix L of this Draft EIR for VMT Calculator Outputs for Alternatives.*

Alternative 3. As with the Project, vehicular-induced vibration from Alternative 3, including vehicle circulation, would not generate perceptible vibration levels at off-site sensitive uses. In addition, as with the Project, building mechanical equipment installed as part of Alternative 3 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration transmission such that the vibration would not be perceptible at the off-site sensitive receptors. Therefore, as with the Project, operation of Alternative 3 would not increase the existing vibration levels in the immediate vicinity of the Project Site. As such, vibration impacts associated with operation of Alternative 3 would also be less than significant. However, such impacts would be less than those of the Project due to the reduction in vehicle trips and total floor area.

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, although the amount of development and associated construction activities and construction traffic would be reduced due to the smaller development proposed under Alternative 3. As with the Project, as discussed in Section IV.G.1, Public Services—Fire Protection, of this Draft EIR, construction under Alternative 3 would occur in compliance with all applicable federal, State, and local requirements concerning fire prevention and hazardous materials, which would effectively reduce the potential for construction-related fire and explosion.

Additionally, while construction activities primarily be contained within the boundaries of the Project Site, it is expected that construction fences may encroach into the public right-of-way and the sidewalk, and one travel lane on Hope Street would temporarily be utilized as a staging area for construction equipment adjacent to the Project Site. These short-term and temporary construction activities could temporarily increase response times for emergency vehicles due to travel time delays caused by traffic during the Project's construction phase. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, construction of Alternative 3, as with the Project, would not result in the need for new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. In addition, as with the Project, a CTMP would be prepared for Alternative 3, which would ensure that adequate and safe access would remain available within and near the Project Site during construction activities. Impacts under Alternative 3 would be less than significant and, with a shorter construction duration and scope, would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 3 would generate a new residential and visitor that would contribute to an increase in demand for LAFD fire protection services, which could, in turn, result in a need for new of physically altered government facilities. Similar to the Project, Alternative 3 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, life safety features (e.g., automatic fire sprinkler systems, fire service access elevators, etc.) and would undergo LAFD fire/life safety plan review to ensure compliance with the above, which would reduce the demand for fire protection and services and also ensure adequate emergency access. Furthermore, as with the Project, traffic generated by Alternative 3 would not significantly impact emergency vehicle response to the Project Site and surrounding area as the drivers of emergency vehicles have the ability to bypass traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As with the Project, Alternative 3 would not modify existing driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Given the reduction in total floor area, the fire and domestic water need for Alternative 3 would be less than the those of the Project. However, Alternative 3 could potentially require a portion of the existing 8-inch water main on Hope Street to be upgraded to a 12-inch main or equivalent, as determined by the LADWP, to ensure that adequate fire flow is available. As discussed in Section IV.J.1 Utilities and Service Systems—Water Supply and Infrastructure, impacts associated with this potential infrastructure improvement would be less than significant. Therefore, similar to the Project, this alternative would not necessitate the construction of new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. As such, impacts with regard to fire protection services during operation of Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in development and associated service population.

(2) Police Protection

(a) Construction

As discussed above, construction activities under Alternative 3 would be similar to those of the Project; however, the overall amount of construction activities and duration of construction would be reduced compared to the Project due to the reduction in total floor area. Similar to the Project, construction would not generate a permanent population on the Project Site that would substantially increase the police service population of the Central Area. Nonetheless, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. However, as

with the Project, Alternative 3 would implement Project Design Feature POL-PDF-1 to implement temporary security measures during construction, including security fencing, lighting, and locked entry to secure the Project Site during construction, which would serve to reduce demand on LAPD facilities.

Furthermore, as previously discussed, Alternative 3 would implement a CTMP to ensure that adequate and safe access is available within and near the Project Site during construction activities. Lastly, pursuant to CVC Section 21806, emergency vehicles can use their sirens to clear a path of travel or drive in the lanes of opposing traffic during an emergency to avoid traffic. Therefore, as with the Project, construction of Alternative 3 would not result in the need for new or altered government facilities (i.e., police stations), the construction of which would cause significant environmental impacts, in order to maintain service. 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 indicated in Section IV.G.2, Public Services—Police Protection, of this Draft EIR, LAPD considers the residential population within their service area to evaluate service capacity. As with the Project, Alternative 3 would introduce a new residential and visitor population to the Project Site and would increase LAPD's residential service population in the Central Area. However, the number of new residents and visitors would be reduced compared to the Project due to the reduction in residential units. As with the Project, Alternative 3 would generate General Fund tax revenues for the City, which could be used to expand law enforcement resources in the Central Area. Therefore, Alternative 3, as with the Project, would not result in the need for new or altered government facilities (i.e., police stations), the construction of which would cause significant environmental impacts, in order to maintain service. In addition, Alternative 3 would implement the same project design features as the Project, which would contribute to offsetting the increase in demand for police services. Impacts under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduced service population.

h. Transportation

As previously described, Alternative 3 would be developed within the same Project Site as the Project. As such, the plans, policies, and programs applicable to the Project would also apply to Alternative 3. As with the Project, Alternative 3 would represent a high-density residential project on an urban infill site located in an active downtown area adjacent to multiple Metro bus stops and the Metro 7th Street/Metro Center Station portal on-site. As with the Project, this alternative would enhance pedestrian access within and around the Project Site as called for by the Mobility Plan and the Central City Community

Plan; prioritize safety and access for all individuals utilizing the Project Site by complying with all ADA requirements as required by the LAMC; include sidewalk design within the 190-foot portion of Hope Street and bicycle parking, in accordance with LAMC requirements; and encourage walking, biking, and transit use as called for by the Central City Community Plan, Plan for a Healthy Los Angeles, and the proposed DTLA 2040 Plan. Alternative 3 would also reduce VMT per capita for residents, including through the implementation of TDM measures (e.g. the provision of short- and long-term bicycle parking that would serve to promote use of bicycles) as called for by the Mobility Plan, Central City Community Plan, 2020–2045 RTP/SCS, and the City's TDM Ordinance. Overall, the mixed-use nature of the Project Site and the resulting reduction in VMT, as well as the proposed streetscape and pedestrian improvements, would also help to reduce negative health impacts as called for by Plan for a Healthy Los Angeles. Furthermore, while 7th Street and 8th Street have been identified as part of the Vision Zero's High Injury Network, no specific Vision Zero projects are planned for near the Project Site, and, as with the Project, Alternative 3 would not conflict with the implementation of future Vision Zero projects along these roadways. Therefore, as with the Project, Alternative 3 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be less than significant. The degree of the impacts would be similar between the Alternative 3 and the Project as neither would conflict with an applicable transportation plan.

With respect to conflicts with CEQA Guidelines Section 15064.3(b), as shown in Appendix L of this Draft EIR, Alternative 3 would generate 920 total daily vehicle trips. With the removal of the existing 587 total daily vehicle trips, Alternative 3 would result in a net increase of 333 daily vehicle trips. Accordingly, Alternative 3 would meet the screening criteria for further VMT analysis as identified in LADOT's *Transportation Assessment Guidelines* since the proposed uses would generate a net increase of 250 or more daily vehicle trips.[16] When accounting for the same project design features as the Project, the proposed uses under Alternative 3 would result in a lower daily VMT when compared to the Project. Specifically, as shown in Appendix L of this Draft EIR, Alternative 3 would result in 4,989 total daily VMT, which is substantially less than the 7,564 total daily VMT generated by the Project. Based on the population assumptions, this alternative would generate an average household VMT of 2.4 per capita.[17] As such, the average household VMT per capita for Alternative 3 would still fall below the significance threshold of 6.0 for the Central APC.[18] Therefore, under Alternative 3, impacts with respect to conflicts with CEQA Guidelines Section 15064.3(b) would be less than significant and similar than the less-than-significant impacts of the Project.

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[16] *See Appendix L of this Draft EIR for VMT Calculator Outputs for Alternatives.*

[17] *See Appendix L of this Draft EIR for VMT Calculator Outputs for Alternatives.*

[18] *See Appendix L of this Draft EIR for VMT Calculator Outputs for Alternatives.*

Regarding freeway off-ramp safety, as required by LADOT's Interim Guidance for Freeway Safety Analysis, if a project is not expected to generate more than 25 or more peak hour trips at any freeway off-ramps, then a freeway ramp analysis is not required. The Project would add less than 25 trips to all the freeway off-ramps in both the morning and afternoon peak hours such that further analysis was not required, and thus, the Project was determined to result in less-than-significant freeway off-ramp safety impacts.[19] Since Alternative 3 operations would generate less daily vehicle trips when compared to the Project. Because Alternative 3 would generate less daily traffic when compared to the Project, Alternative 3 would similarly result in less than significant freeway off-ramp safety impacts, and such impacts would be less when compared to the less-than-significant impacts of the Project.

As with the Project, Alternative 3 would not modify existing driveways. Additionally, all internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. This would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction Projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. Alternative 3 would not include the installation of barriers that could impede emergency vehicle access. Similar to the Project, Alternative 3 would be required to implement Project Design Feature POL-PDF-6, which would require that upon completion of construction and prior to the issuance of a building permit, the Applicant would submit a diagram of the Project Site to the LAPD's Central Area Commanding Officer that includes access routes and any additional information that might facilitate police response. Lastly, pursuant to CVC Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, Alternative 3 would result in less than significant emergency access impacts that would be similar to the less than significant impacts of the Project.

i. Tribal Cultural Resources

Alternative 3 would require the same excavation and ground-disturbing activities as those of the Project. As indicated in Section IV.I, Tribal Cultural Resources, of this Draft EIR, the Project Site does not contain any resources determined to be significant pursuant to the criteria set forth in PRC Section 5024.1(c). Accordingly, as with the Project, Alternative 3 would not cause a substantial adverse change in the significance of a tribal cultural resource, and impacts related to tribal cultural resources would be less than significant. Nonetheless, Alternative 3 would comply with the City's established standard

[19] *Gibson Transportation Consulting, Inc., Transportation Assessment for The Bloc Residential Tower and Signage SUD Project, Los Angeles, California, January 2023, revised February 2024.*

condition of approval to address inadvertent discovery of tribal cultural resources. Therefore, impacts under Alternative 3 would be similar when compared 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 result in a temporary demand for dust control, cleaning of equipment, and preparation during the early construction phases. Construction-related water use under Alternative 3 would be less due to the reduced size of the proposed development. Additionally, as with the Project, Alternative 3 would require the removal of approximately 23,888 square feet of existing water demand generating commercial uses in the podium building, estimated to consume approximately 597 gpd[20], thereby partially offsetting the water demand associated with Project construction.

As previously discussed, Alternative 3 could potentially require a portion of the existing 8-inch water main on Hope Street to be upgraded to a 12-inch main or equivalent as determined by the LADWP. Similar to the Project, prior to ground disturbance, contractors would coordinate with LADWP to identify the locations and depth of all lines. Furthermore, LADWP would be notified in advance of proposed ground disturbance activities, to avoid water lines and disruption of water service. LADWP would review and approve all appropriate connection requirements, pipe depths, and connection location(s). Lastly, while trenching and installation activities could temporarily affect traffic flow and access on adjacent streets and sidewalks, Alternative 3 would implement a CTMP (Project Design Feature TR-PDF-1) to ensure that adequate and safe access remains available within and near the Project Site during the construction period. As such, 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.

Overall, Alternative 3 would result in less-than-significant impacts related to water supply and infrastructure, which would be less when compared to the less-than-significant impacts of the Project.

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[20] *This analysis is based on the water generation of 23,888 square feet of commercial retail uses to be removed, and does not include the approximately 454 square feet of theater space to be removed because the removal of this space will not affect the existing water demand.*

(b) Operation

As with the Project, Alternative 3 would result in an increase in long-term water demand. As indicated in Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, a conservative analysis for both fire suppression and domestic water flows has been completed by LADWP for the Project as summarized in the Utility Report included as Appendix K of this Draft EIR. As discussed therein, based on the Information of Fire Flow Availability Request (IFFAR), the Project has inadequate fire flow available to demonstrate compliance with LAMC Section 57.507; therefore, system upgrades would be necessary to meet the fire flow demand for the Project. The Project would upgrade a portion of the existing 8-inch water main on Hope Street to a 12-inch main pursuant to Project Design Feature WAT-PDF-1. As concluded in Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, with the implementation of Project Design Feature WAT-PDF-1, public water infrastructure would provide adequate water pressure to serve the Project Site's anticipated fire flow demands. Based on the reduction in the number of residential units as compared to the Project, water demand for Alternative 3 would be less than the Project's estimated net increase in water demand of 55,530 gpd. Nonetheless, Alternative 3 like the Project could potentially require a portion of the existing 8-inch water main on Hope Street to be upgraded to a 12-inch main or equivalent, as determined by the LADWP, to ensure adequate fire flow is available. As discussed above, the construction activities associated with these improvements would not cause significant environmental effects.

Additionally, as the estimated water demand for the Project was determined to be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040, the reduced water demand under Alternative 3 would also be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040. Thus, impacts to water supply under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(2) Energy Infrastructure

(a) Construction

As previously noted, the energy consumed by Alternative 3 would be reduced compared to the Project due to the reduction in the overall amount of construction activities. Therefore, as with the Project, impacts on infrastructure capacity associated with short-term construction activities under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 3 would generate an increased consumption of electricity relative to existing conditions. However, based on the reduction in residential units and the reduced amount of total floor area proposed under Alternative 3, the total electricity consumption of Alternative 3 would be less than the total electricity consumption of the Project, which was determined to be adequately served by LADWP infrastructure. As with the Project, operation of Alternative 3 would not result in any demand for natural gas as Alternative 3 would also be subject to the City's All Electric Buildings Ordinance, which does not allow for natural gas equipment to be installed as part of new residential development. Therefore, impacts to energy infrastructure capacity 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

Based on the analysis above, Alternative 3 would not substantially reduce or avoid the Project's significant unavoidable impacts with respect to on- and off-site (utilities/ staging) noise sources during construction or off-site vibration with respect to human annoyance during construction. Additionally, Alternative 3 would not substantially reduce or avoid the Project's significant and unavoidable cumulative impacts regarding on- and off-site (haul trucks) noise during construction and off-site vibration with respect to human annoyance during construction. Impacts associated with operational regional and local air pollutant emissions, TACs, energy use during construction and operation, GHG emissions, off-site construction noise (haul trucks), construction vibration (on-site vibration impacts [both building damage and human annoyance] and off-site vibration impacts [building damage], operational noise and vibration, public services (fire protection and police protection), freeway off-ramp safety, and utilities and service systems (water supply and infrastructure and energy infrastructure) would be less than those of the Project and the remaining environmental topics would be similar to those of the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 3 would develop the same uses as the Project but at a reduced scope and density in accordance with the draft General Plan land use and zoning designations for the Project Site under the proposed DTLA 2040 Plan and associated zoning. While the amount of development under this alternative would be less than under the Project, Alternative 3 would meet the underlying purpose of the Project, which is to integrate high-density multi-family housing uses and associated amenities with existing commercial/ retail/restaurant uses in close proximity to an existing rail station portal and other public transit options, employment and other commercial uses and, thus, reduce VMT and

promote walkability within the Downtown community. However, Alternative 3 would be less effective than the Project in meeting this underlying purpose as a result of the substantial reduction of residential units (466 units to 307 units) under this alternative. As with the Project, Alternative 3 would establish the proposed Sign SUD.

Regarding the Project objectives, Alternative 3 would meet the following Project objectives to the same extent as the Project:

- To add new residential units without displacing any existing residential uses by developing a residential high-rise tower on a built-out commercial site adjacent to transit and jobs.
- To create and enhance a pedestrian-oriented environment and promote walkability by creating a safe, inviting street-level identity for the Project Site along Hope Street through the introduction of a ground floor residential lobby, relocated retail space with new storefront entries, and enhanced sidewalk paving and landscaping, all within close proximity to existing commercial/retail uses and services.
- To promote resource and energy conservation by incorporating sustainable and green building design and construction.
- To facilitate unique and creative signage that would support and enhance the existing and proposed development, create a sense of place with a lively and exciting pedestrian experience, establish a strong site identity, and support the site's diverse uses, guided by standards that ensure cohesion and compatibility with surrounding land uses.

Alternative 3 would also meet the following Project objectives but not to the same extent as the Project due to the reduced amount residential units under this alternative.

- To provide high-density multi-family housing in furtherance of the goals of the City's Housing Element and the City's Regional Housing Needs Assessment.
- To develop a creative building design that provides high-density multi-family residential uses that are integrated into an existing parking facility and mixed-use commercial development resulting in a synergistic development where people can live, work and play.
- To support the Central City Community Plan's Objective 1.2 to increase the range of housing choices available to Downtown employees.
- To encourage the reduction of vehicular trips and promote regional and local mobility objectives by locating high-density residential uses near a regional-serving transit hub (Metro 7th Street/Metro Center Station) and an abundance of

existing commercial uses that will provide services to residents and employment opportunities.

- To construct a high-density, residential development that incorporates the principles of smart growth, including sustainable design, infill development, proximity to transit, walkability, and the provision of bicycle facilities.

V. Alternatives

F. Environmentally Superior Alternative

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

With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible alternatives includes Alternative 1, the No Project Alternative; Alternative 2, the Development in Accordance with the Proposed DTLA 2040 Plan Alternative (2 New Parking Levels) Alternative; and Alternative 3, the Development in Accordance with the Proposed DTLA 2040 Plan Alternative (No New Parking Levels) Alternative. Table V-2 on page V-10 provides a comparative summary of the environmental impacts anticipated under each alternative with the environmental impacts associated with the Project. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to CEQA Guidelines Section 15126.6(c) , the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

As previously discussed, implementation of the Project would result in significant and unavoidable impacts regarding the following: on- and off-site (utilities/staging) noise sources during construction and off-site vibration with respect to human annoyance during construction. Cumulative impacts with respect to on- and off-site (haul trucks) noise during construction and off-site vibration with respect to human annoyance during construction would also be significant and unavoidable. Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project Alternative, would avoid all of the Project's significant environmental impacts. However, Alternative 1 would not meet any of the Project's objectives or underlying purpose to integrate needed high-density multi-family housing uses and associated amenities with existing commercial/retail/restaurant uses in close proximity to an existing rail station portal and, thus, reduce VMT and promote walkability within the Downtown community.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative 2 is the Environmentally Superior Alternative. As evaluated above, although neither one of the development alternatives (i.e.,

Alternatives 2 and 3) would avoid or substantially reduce the significant unavoidable impacts of the Project, both would reduce these impacts and the majority of the less-than-significant impacts of the Project. However, Alternative 2 would reduce these impacts to a greater extent than Alternative 3 due to the greater reduction in overall development and residential units. While Alternative 2 is the Environmentally Superior Alternative, this alternative would not meet many of the Project objectives to the same extent as the Project primarily due to the reduction of residential units compared to the Project (466 units to 107 units).