

I. Executive Summary

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In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this section of the Draft Environmental Impact Report (EIR) contains a brief summary of The Bloc (Project) and its potential environmental effects. More detailed information regarding the Project and its potential environmental effects is provided in the following sections of this Draft EIR. Also included in this section is an overview of the purpose and focus of this Draft EIR, a description of the organization of this Draft EIR, an overview of existing Project Site Conditions, a general description of the Project, issues raised during the Notice of Preparation (NOP) process, including areas of controversy, a description of the public review process for this Draft EIR, a summary of environmental impacts, a list of the Project Design Features (PDFs) and mitigation measures to be implemented as part of the Project, and a summary of the alternatives to the Project evaluated in this Draft EIR that would reduce or avoid impacts, including identification of the Environmentally Superior Alternative.

1. Purpose of this Draft EIR

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

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

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

In accordance with Section 15128 of the CEQA Guidelines, an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the Draft EIR. An Initial Study was prepared for the Project and a Notice of Preparation (NOP) was distributed for public comment to the State Clearinghouse, Governor's Office of Planning and Research, responsible agencies, owners and occupants within a 500-foot radius of the Project Site, and all other interested parties on December 16, 2022, for a 30-day review period. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental impact area is or is not analyzed further in this Draft EIR. The City determined through the Initial Study that the environmental factors listed below would be potentially impacted by the Project:

- Air Quality
- Cultural Resources (Historical Resources)
- Energy
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials (Emergency Access)¹
- Land Use and Planning (Consistency with Plans)
- Noise
- Public Services (Fire Protection and Police Protection)
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems (Water Supply and Infrastructure and Energy Infrastructure)

¹ Note that impacts with regard to emergency access are evaluated in Section IV.H, Transportation, of this Draft EIR and because this is the only Hazards and Hazardous Materials impact evaluated in the Draft EIR there is no separate section for Hazards and Hazardous Materials in Section IV of this Draft EIR.

The City determined through the Initial Study that the Project would not have the potential to cause significant impacts related to: aesthetics; agriculture and forestry resources; air quality (odors); biological resources; cultural resources (archaeological resources and human remains); geology and soils; hazards and hazardous materials (other than emergency access); hydrology and water quality; land use (physical division of an established community); mineral resources; noise (airport or airstrip-related hazards); population and housing; public services (schools, parks, and other public facilities); recreation; transportation (hazards due a geometric design feature); utilities and service systems (stormwater drainage facilities, wastewater; telecommunication facilities, and solid waste); and wildfire. Therefore, these topics are not analyzed further in this Draft EIR.

3. Draft EIR Organization

This Draft EIR is comprised of the following sections:

- I. **Executive Summary.** This section describes the purpose of the Draft EIR, Draft EIR focus and effects found not to be significant, Draft EIR organization, existing conditions, Project summary, issues raised during the NOP process, including areas of controversy, public review process, summary of environmental impacts, PDFs, mitigation measures, and summary of alternatives.
- II. **Project Description.** This section describes the location, existing conditions, objectives, and characteristics of the Project, and identifies requested permits and approvals.
- III. **Environmental Setting.** This section contains a description of the existing physical and built environment and a list of related projects in the vicinity of the Project Site.
- IV. **Environmental Impact Analysis.** This section contains the environmental setting for the specific environmental topic, Project and cumulative impact analyses, PDFs (where applicable), mitigation measures, (where necessary) and conclusions regarding the level of significance after mitigation for each of the following environmental issues: air quality; cultural resources (historic resources); energy; greenhouse gas emissions; land use and planning (consistency with plans); noise; public services (fire protection and police protection); transportation; tribal cultural resources; and utilities and service systems (water supply and infrastructure and energy infrastructure).
- V. **Alternatives.** This section provides an analysis of a reasonable range of alternatives to the Project including: No Project Alternative; Development in Accordance with the Proposed DTLA 2040 Plan Alternative (2 New Parking

Levels); and Development in Accordance with the Proposed DTLA 2040 Plan Alternative (No New Parking Levels).

- VI. Other CEQA Considerations.** This section provides a discussion of significant unavoidable impacts that would result from the Project and the reasons why the Project is being proposed notwithstanding the significant unavoidable impacts. An analysis of the significant irreversible changes in the environment and potential secondary effects that would result from the Project is also included. This section also analyzes potential growth-inducing impacts of the Project and potential secondary effects caused by the implementation of the mitigation measures for the Project. Lastly, a summary of the possible effects of the Project that were determined not to be significant within the Initial Study is provided.
- VII. References.** This section lists the references and sources used in the preparation of this Draft EIR.
- VIII. Acronyms and Abbreviations.** This section provides a list of acronyms and abbreviations used in this Draft EIR.
- IX. List of Preparers.** This section lists the persons, public agencies, and organizations that were consulted or contributed to the preparation of this Draft EIR.

This Draft EIR includes the following appendices to support the environmental analyses prepared for the Project:

- Appendix A Initial Study, NOP, and NOP Comment Letters
 - Appendix A.1 Initial Study
 - Appendix A.2 Notice of Preparation
 - Appendix A.3 NOP Comment Letters
- Appendix B Air Quality and Greenhouse Gas Emissions
 - Appendix B.1 Air Quality and Greenhouse Gas Emissions Methodology
 - Appendix B.2 Air Quality Worksheet and Modeling Output Files
 - Appendix B.3 Greenhouse Gas Worksheets and Modeling Output Files
- Appendix C Historical Report
- Appendix D Energy Resources Calculations

- Appendix E Land Use Tables
- Appendix F Lighting Study
- Appendix G Noise Calculation Worksheets
- Appendix H Public Service Provider Response Letters
 - Appendix H.1 Los Angeles Fire Department Letter
 - Appendix H.2 Los Angeles Police Department Letter
- Appendix I Transportation
 - Appendix I.1 Transportation Assessment
 - Appendix I.2 Traffic Hazards Review Letter
 - Appendix I.3 Los Angeles Department of Transportation Assessment Letter
- Appendix J Tribal Cultural Resources
 - Appendix J.1 TCR Assessment
 - Appendix J.2 AB 52 Notification Letters and Verification of Mailings
 - Appendix J.3 AB 52 Pre-conclusion and Closure Letters
- Appendix K Utility Report
- Appendix L VMT Calculator Output for Alternatives
 - Appendix L.1 VMT Calculator Output for Alternative 2
 - Appendix L.2 VMT Calculator Output for Alternative 3

4. Existing Project Site Conditions

The Project Site is comprised of approximately 4.285 acres currently occupied by The Bloc, a mixed-use development that encompasses an entire City block. The northern portion of the Project Site (outside of the proposed Development Area, defined in Section 5, Description of the Proposed Project, below) is developed with a 33-story office tower, a 26-story hotel tower, and commercial uses that surround the outdoor plaza and front along the streets. A direct portal to the Metro 7th Street/Metro Center Station is located in The Bloc's outdoor plaza. The southern portion of the Project Site that comprises the Development Area is currently developed with an existing nine-story parking/retail podium building and below grade levels, which include two basement levels (including 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. There is an approximate 11-foot grade change from the high point of the Project Site at 7th and Flower Streets and the low point near 8th and Hope Streets. The existing uses total approximately 1,424,314 square feet of floor area and comprise 656,423 square feet of commercial office space, 28,599 square feet of medical office space, 269,622 square feet of retail uses, 23,180 square feet of restaurant/bar uses, 30,363 square feet of fitness uses, a 28,770-square-foot theater that includes 569 fixed seats, and a 387,357-square-foot hotel that includes 496 rooms and 25,282 square feet of meeting/banquet spaces. The Project Site also includes approximately 1,971 parking spaces. Existing landscaping adjacent to the Project Site includes 25 street trees. There are no private property trees associated with the Project Site..

Vehicular access to the Project Site is provided via existing ingress/egress driveways along Hope Street, 8th Street, and Flower Street. Primary vehicle access is provided via two ingress/egress driveways along Flower and Hope Streets. Additionally, along 8th Street, there is one ingress driveway and one egress driveway, as well as a separate driveway located mid-block along 8th Street, which is designated for delivery vehicles to access the subterranean loading area. The hotel's porte-cochere, which provides a pick-up/drop-off area and valet parking for hotel guests, is located mid-block along Hope Street. Pedestrian access adjacent to the Project Site is located along Hope Street, Flower Street, and 7th Street.

The Project Site is located within the Financial Core of the Central City Community Plan area. The Project Site has a General Plan land use designation of Regional Center Commercial and is zoned C2-4D by the Los Angeles Municipal Code (LAMC). The "C2" denotes the Commercial Zone pursuant to LAMC Section 12.14; the number "4" denotes Height District 4, which allows a maximum floor area ratio (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. Los Angeles Department of City Planning is currently updating the Central City Community Plan in conjunction with the Central City North Community Plan, whose areas together comprise Downtown Los Angeles, in a combined planning process referred to as the Downtown Community Plan (DTLA 2040 Plan). The Los Angeles City Council (City Council) at its meeting on May 3, 2023, voted unanimously to approve the Downtown Community Plan and the New Zoning Code with an amendment. The City Council also recommended a number of follow up items including studies and reports that were requested in the motions of various Council Offices. Following City Council approval of the Plan and new Zoning Code, the implementing ordinances will be reviewed and finalized by the City Attorney, to ensure clarity of

regulations and consistency with state law. After this Form and Legality process is complete, the Plan and new Zoning Code will be brought into effect by the City Council. Since the implementing ordinances for the Downtown Community Plan and the new Zoning Code have not been finalized and have not become effective, the information provided herein is for informational purposes only. As currently proposed by the draft DTLA 2040 Plan, the Project Site will be designated as part of the Transit Core land use designation, which corresponds to the Project Site's proposed zone, and will allow a maximum FAR of between 9:1 and 13:1, with general uses that include multi-family residential, regional retail and services, office, hotel, and entertainment uses.²

The Project Site is located within a Transit Priority Area, as defined by Senate Bill (SB) 743 and City Zoning Information File No. 2452³ and is located within 0.5 mile of public transit as defined by Assembly Bill (AB) 2097 (Government Code Section 65863.2 (a)).

5. Description of the Proposed Project

The Project would develop 466 residential units within a new high-rise tower. Development of the new tower would occur within the southern half of the Project Site (Development Area). The existing hotel and commercial uses on the Project Site would be retained, with the exception of approximately 24,342 square feet of existing commercial (theater and retail) uses in the podium building that would be changed to residential uses (including the new residential lobby) comprising portions of both the podium and the new tower. The rooftop parking level of the existing nine-story parking/retail podium building would be enclosed, and two additional levels of parking would be added, increasing the podium to 12 stories. The two existing subterranean levels, which provide vehicle parking and loading areas for deliveries, would be retained. The new tower would contain 53 stories and would extend through and above the 12-story podium. A portion of the existing podium building along Hope Street, from the existing rooftop parking level to the lower basement, would be demolished to allow the construction of the new tower within and above the podium. The new tower would extend approximately 710 feet above grade as measured pursuant to height specifications established in LAMC Section 12.03's definitions of "Height of Building Structure" and "Grade (Adjacent Ground Level)." The proposed 53-story tower would include a residential lobby and relocated retail space (Plaza Level), three floors of retail use on the Street Level and Levels 2 and 3, eight floors of parking use and residential storage (Levels 4 to 11), 37 floors of residential units (Levels 14 to 50), two amenity floors (on the

² Los Angeles Department of City Planning, *Downtown Los Angeles Community Plan Update (DTLA 2040)*, <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update>, accessed March 4, 2024.

³ *The City's Zone Information and Map Access System (ZIMAS) confirms the Project Site's location within a Transit Priority Area, as defined in the City's Zoning Information File No. 2452.*

podium roof level and the tower roof level), and two floors of mechanical uses (Levels 13 and 52). The two subterranean levels of the new tower would be used for parking, loading areas, gym/fitness use, retail, bicycle parking, and mechanical equipment. The residential uses and associated amenities would comprise approximately 495,016 square feet of floor area. This floor area is comprised of the conversion to residential uses of approximately 24,342 square feet of existing commercial (theater and retail) uses located within the podium and a net increase of 470,674 square feet of floor area. Upon completion of the Project, the Project Site would include 1,894,988 square feet of floor area with a FAR of 10.15:1. It is estimated that approximately 18,239 cubic yards of export would be hauled from the Project Site.

As part of the Project, the existing podium and subterranean levels would be seismically upgraded to comply with applicable requirements and accommodate the tower and additional parking levels. As a result of the seismic retrofit, a total of 464 existing parking spaces would be eliminated.

The Project would include a total of 1,948 vehicular parking spaces located within eight above ground parking levels and one basement parking level. The Project would also add 214 bicycle parking spaces (192 long-term and 22 short-term). The Project does not propose any changes to the existing vehicular ingress/egress driveways, and no new driveways are proposed. In addition, no changes are proposed to the existing Metro 7th Street/Metro Center Station portal.

The Project would provide approximately 54,750 square feet of open space, of which 44,750 square feet would be exterior open space. In addition, 13,600 square feet of the total exterior common open space would be landscaped.

The Applicant has also requested that the City approve a Sign Supplemental Use District (Sign District) as part of the Project. The proposed Sign District would establish signage standards for the proposed signs authorized therein. The proposed Sign District's Conceptual Sign Plan includes a total of 18 signs, including nine Digital Display Signs, three non-digital Wall Signs, and six non-digital Identification Signs. Digital Display Signs would include off-site advertising. Additionally, the Conceptual Sign Plan includes eight Digital Kiosks (three floor-mounted and five wall-mounted) that are considered to be signs under applicable City regulations. These Digital Kiosks would identify tenants and serve to orient and direct visitors to the diverse uses at the Project Site and would include off-site advertising.

Entitlements, reviews, permits, and approvals required to implement the Project include, but are not necessarily limited to, the following:

- Pursuant to Los Angeles Municipal Code (LAMC) Section 14.5.6 A, a Transfer of Floor Area Rights (TFAR) greater than 50,000 square feet of floor area for the transfer of up to 470,674 square feet of floor area from the Los Angeles Convention Center (Donor Site), located at 1201 South Figueroa Street, to be added to the Project Site (Receiver Site) with an existing 1,424,314 square feet, thereby permitting a total maximum of 1,894,988 square feet, or 10.15:1 FAR in lieu of the otherwise permitted existing nonconforming 7.63:1 FAR and the maximum 6:1 FAR permitted by the C2-4D Zone.
- Pursuant to LAMC Section 16.05 approval of Site Plan Review for a project that adds more than 50 dwelling units.
- Pursuant to LAMC Sections 17.03 and 17.15, approval of Vesting Tentative Tract Map (Tract No. VTT-83482-HCA), including the following:
 - Resubdivision and condominium purposes.
 - Creation of two (2) new airspace lots containing up to 466 residential condominium units.
 - Maintain the existing 10.2 foot-wide sidewalk in-lieu of the 12-foot wide sidewalk and eliminate the 5-foot wide sidewalk easement required on 8th Street due to the location of the existing building to remain.
 - Maintain the existing 10.1 foot-wide sidewalk in-lieu of the 15-foot wide sidewalk and eliminate the 3-foot wide sidewalk easement required on Hope Street due to the location of the existing building to remain.
 - Maintain the existing 9.9-foot-wide sidewalk in lieu of the 12-foot wide sidewalk required on 7th Street or any additional sidewalk easements due to the location of the existing building to remain.
 - Request that no corner cut dedication be provided in-lieu of the 15-foot by 15-foot corner cut required at the southeastern intersection of 7th Street and Flower Street due to the location of the existing building to remain.
 - Request that no corner cut dedication be provided in-lieu of the 15-foot by 15-foot corner cut required at the southwestern intersection of 7th Street and Hope Street due to the location of the existing building to remain.
 - Haul Route with the export of 18,239 cubic yards.
- Pursuant to LAMC Sections 12.32-S and 13.1, establishment of a Sign Supplemental Use District, pursuant to existing Case No. CPC-2018-6388-SN, filed on October 31, 2018. The Applicant requests the establishment of The Bloc Supplemental Use District, a “SN” Sign District for the block bounded by Flower Street on the west, 8th Street on the south, Hope Street on the east, and 7th Street on the north.

- Certification of the Environmental Impact Report (EIR) for the Project.
- Approval by the City Board of Public Works for the Removal of Trees in the Public Right of Way.
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, demolition, excavation, shoring, foundation, grading and building permits, tree removal permits, haul route approval, revocable permits, B-permit, and sign permits and project permit compliance approvals for signs.

6. Areas of Controversy

Based on the NOP comment letters provided in Appendix A of this Draft EIR, issues known to be of concern include, but are not limited to, Project impacts associated with air quality, greenhouse gas emissions, noise, transportation, tribal cultural resources, and utilities and service systems. Refer to Appendix A of this Draft EIR for copies of the NOP comment letters.

7. Public Review Process

The City prepared an Initial Study and circulated an NOP for public comment to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties on December 16, 2022, for a 30-day review period. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR.

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

8. Summary of Environmental Impacts

Table I-1 on page I-11 summarizes the environmental impacts of the Project evaluated in this Draft EIR. Based on the analysis in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant and unavoidable impacts regarding 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. Cumulative impacts regarding on-site noise during construction, off-site noise during construction (haul trucks), and off-site vibration with respect to human annoyance during construction would also be significant and unavoidable.

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

Environmental Topic	Project Impact Determination
A. AIR QUALITY	
<i>Consistency with Applicable Air Quality Plans</i>	Less Than Significant
<i>Regional Emissions</i>	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<i>Localized Emissions</i>	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<i>Toxic Air Contaminants (Exposure of Sensitive Receptors to Pollutant Concentrations)</i>	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
B. CULTURAL RESOURCES	
<i>Historical Resources</i>	Less Than Significant
C. ENERGY	
<i>Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources</i>	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<i>Conflict with Plans for Renewable Energy or Energy Efficiency</i>	Less Than Significant
D. GREENHOUSE GAS EMISSIONS	
<i>GHG Emissions</i>	Less Than Significant
<i>Conflict with Plans Adopted for the Purpose of Reducing GHG Emissions</i>	Less Than Significant
E. LAND USE AND PLANNING	
<i>Conflict with Land Use Plans</i>	Less Than Significant
F. NOISE	
<i>Construction^a</i>	
<i>On-Site Noise</i>	Significant Unavoidable
<i>Off-Site Noise (Haul Trucks)</i>	Less Than Significant
<i>Off-Site Noise (Utilities and Staging)</i>	Significant Unavoidable
<i>On-Site Vibration (Building Damage)</i>	Less Than Significant
<i>On-Site Vibration (Human Annoyance)</i>	Less Than Significant
<i>Off-Site Vibration (Building Damage)</i>	Less Than Significant
<i>Off-Site Vibration (Human Annoyance)</i>	Significant Unavoidable
<i>Operation</i>	
<i>On-Site Noise</i>	Less Than Significant
<i>Off-Site Noise</i>	Less Than Significant
<i>Vibration</i>	Less Than Significant

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

Environmental Topic	Project Impact Determination
G. PUBLIC SERVICES	
<i>Fire Protection</i>	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<i>Police Protection</i>	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
H. TRANSPORTATION	
<i>Conflict with Transportation Plans</i>	
Less Than Significant	
<i>Vehicle Miles Traveled</i>	
Less Than Significant	
<i>Hazardous Geometric Design (Freeway Safety Analysis)</i>	
Less Than Significant	
<i>Emergency Access^b</i>	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
I. TRIBAL CULTURAL RESOURCES	
<i>Tribal Cultural Resources</i>	
Less Than Significant	
J. UTILITIES AND SERVICE SYSTEMS	
<i>Water Supply and Infrastructure</i>	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<i>Energy Infrastructure</i>	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<p>^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.</p> <p>^b Note that hazard and hazardous materials-related impacts with regard to emergency access are evaluated in Section IV.H, Transportation, of this Draft EIR and because this is the only Hazards and Hazardous Materials impact evaluated in the Draft EIR there is no separate section for Hazards and Hazardous Materials in Section IV of this Draft EIR.</p> <p>Source: Eyestone Environmental, 2024.</p>	

9. Project Design Features

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

a. Air Quality

Project Design Feature AQ-PDF-1: The following equipment used during Project construction activities shall be electric-powered: air compressor, aerial lift, cement mixer, concrete saw, tower crane, excavator, forklift and welder.⁴

b. Greenhouse Gas Emissions

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

- a. U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) program to meet the standards of LEED Silver® or equivalent green building standards;
- b. Use of Energy Star-labeled products and appliances;
- c. Use of light-emitting diode (LED) lighting or other energy-efficient lighting technologies, such as occupancy sensors or daylight harvesting and dimming controls, where appropriate, to reduce electricity use;
- d. Fenestration designed for solar orientation; and
- e. Pedestrian- and bicycle-friendly design with short-term and long-term bicycle parking.

c. Noise

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

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

Project Design Feature NOI-PDF-3: Outdoor mounted mechanical equipment will be enclosed or screened by the building design (e.g., a roof parapet or mechanical screen) from view of off-site noise-sensitive receptors. The equipment screen will be impermeable (i.e., solid material with minimum weight of 2 pounds per square foot) and break the acoustic

⁴ This PDF is included in the quantitative analysis.

line-of-sight from the equipment to the off-site noise-sensitive receptors.

Project Design Feature NOI-PDF-4: Outdoor amplified sound systems, if any, will be designed so as not to exceed the maximum noise level of 80 dBA (L_{eq-1hr}) at a distance of 25 feet from the amplified speaker sound systems at Level 12 outdoor spaces and 85 dBA (L_{eq-1hr}) at a distance of 25 feet from the amplified speaker sound systems at Level 51 outdoor spaces. A qualified noise consultant will provide written documentation that the design of the system complies with this maximum noise level.

d. Public Services—Police Protection

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

Project Design Feature POL-PDF-2: During operation, the Project will provide a dedicated security team for the new tower.

Project Design Feature POL-PDF-3: During operation, the Project will include a closed-circuit security camera system for the new tower.

Project Design Feature POL-PDF-4: The Project will provide lighting of building entries and walkways to provide for pedestrian orientation and clearly identify a secure route to the points of entry into the building.

Project Design Feature POL-PDF-5: The Project will provide lighting of parking areas, elevators, and the residential lobby to maximize visibility and reduce areas of concealment.

Project Design Feature POL-PDF-6: The Project entrances to and exits from the new tower, open spaces around new tower, and the relocated pedestrian walkway along Hope Street will be designed, to the extent practicable, to be open and in view of surrounding sites.

Project Design Feature POL-PDF-7: Upon completion of construction of the new building and prior to the issuance of a building permit for the new building, the Project Applicant will submit a diagram of the Development Area to the LAPD Central Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

e. Transportation

Project Design Feature TR-PDF-1: A detailed Construction Traffic Management Plan (CTMP), including haul routes and staging plan, will be prepared and submitted to LADOT for review and approval prior to commencing construction for the new building. The CTMP will formalize how

Project construction will be carried out and identify specific actions that will reduce effects on the surrounding community. The CTMP will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site and will include, but not be limited to, the following measures:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation;
- Prohibition of construction worker or equipment parking on adjacent streets;
- A Traffic Control Plan formalizing the planning and scheduling of construction activities and identifying specific actions that will be undertaken to facilitate the flow of traffic on surrounding streets during construction. The Traffic Control Plan will be submitted to LADOT for review and approval prior to the issuance of demolition and grading permits for the new building;
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding Arterial Streets;
- Containment of construction activity within the Project Site boundaries, to the extent feasible;
- Implementation of safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers;
- Scheduling of construction-related deliveries, haul trips, etc., to occur outside the commuter peak hours to the extent feasible;
- Spacing of trucks so as to discourage a convoy effect;
- Sufficient dampening of the construction area to control dust caused by grading and hauling and reasonable control at all times of dust caused by wind;
- Maintenance of a log, available on the job site at all times, documenting the dates of hauling and the number of trips (i.e., trucks) per day; and
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities posted at the site readily visible to any interested party during site preparation, grading, and construction.

Project Design Feature TR-PDF-2: Prior to issuance of a certificate of occupancy for the new building, the Project will install vehicle signalized alert systems at all four existing parking garage driveways.

f. Utilities and Service Systems—Water Supply and Infrastructure

Project Design Feature WAT-PDF-1: As part of the construction of the new building, a portion of the existing 8-inch water main on Hope Street will be upgraded to a 12-inch main. The upgrade will include approximately 710 feet of 12-inch ductile iron (DI) water main from the intersection of Hope Street and 8th Street to a point 710 feet northeast of 8th Street. Due to the mainline upgrade, the existing 8-inch water main will be cut and plugged in two locations and three existing fire hydrants will be re-tapped. System upgrades will require repaving, which will be paid for by the Project Applicant via the City of LA Bureau of Engineering Street Damage Restoration Fee.

Project Design Feature WAT-PDF-2: The design of the new building will incorporate the following additional water conservation features:

- High-efficiency Energy Star–rated residential clothes washers.
- High-efficiency Energy Star–rated residential dishwashers, should dishwashers be provided.
- Drip/Subsurface Irrigation (Micro-Irrigation).
- Proper Hydro-Zoning/Zoned Irrigation (groups plants with similar water requirements together).
- Drought-Tolerant Plants

10. Mitigation Measures

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

a. Noise

Mitigation Measure NOI-MM-1: A temporary and impermeable sound barrier shall be erected at the locations listed below during the tower construction. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

- Along the southern property line of the Project Site between the construction areas and the noise sensitive use on the south side of 8th Street (receptor R1). The temporary sound barrier shall be designed to provide a minimum 13-dBA noise reduction at the ground level of receptor location R2.
- Along the eastern side of the Project’s off-site staging area (along Hope Street) between the construction areas and the noise sensitive use on the east side of Hope Street (receptor R2). The

temporary sound barrier shall be designed to provide a minimum 13-dBA noise reduction at the ground level of receptor location R2.

- During the off-site utility improvements construction along Hope Street. Provide a temporary moveable noise barrier between the construction equipment and receptor locations R1, R2, and R3, where feasible. The temporary noise barrier shall be designed to provide minimum 3-dBA, 6-dBA, and 2-dBA noise reductions at the ground level of receptor locations R1, R2, and R3, respectively.

11. Alternatives to Reduce Significant Impacts

This Draft EIR examined three alternatives to the Project, including the No Project Alternative, the Development in Accordance with the Proposed DTLA 2040 Plan Alternative (2 New Parking Levels), and the Development in Accordance with Proposed DTLA 2040 Plan Alternative (No New Parking Levels). Alternatives to the Project are identified for the purpose of substantially reducing or avoiding the significant impacts of the Project. The Draft EIR concludes that the Project would result in significant and unavoidable impacts regarding on-site construction noise, off-site construction noise related to utilities and staging, and off-site construction vibration related to human annoyance. Cumulative impacts regarding on-site construction noise, off-site construction noise related to haul trucks and off-site construction vibration related to human annoyance would also be significant and unavoidable.

A general description of these alternatives is provided below. Refer to Section V, Alternatives, of this Draft EIR for a more detailed description of these alternatives and a comparative analysis of the impacts of these alternatives with those of the Project. Two alternatives were considered and rejected as being infeasible for the Project: an alternative to eliminate significant noise and vibration impacts during construction and an alternative Project site.

a. Alternative 1: No Project/No Build 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 (Sign District) would not be installed.

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 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 to human annoyance during construction. Impacts associated with the remaining environmental topics would be less when compared to the Project's less-than-significant impacts.

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

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 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.

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 the same as 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 not include any changes to the existing vehicular ingress/egress driveways, and no new driveways are proposed.

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.

Alternative 2 would not substantially reduce or avoid the Project's significant and unavoidable impacts with respect to on-site noise sources during construction, off-site noise sources during construction (utilities/staging) 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-site noise sources during construction, off-site noise during construction (haul trucks) 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.

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

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, as in Alternative 2, but without constructing any new 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 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 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 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 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.

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 not include any changes to the existing vehicular ingress/egress driveways, and no new driveways are proposed.

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 3 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 would be 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.

Alternative 3 would not substantially reduce or avoid the Project's significant unavoidable impacts with respect to on-site noise sources during construction, off-site noise sources during construction (utilities/staging) 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-site noise sources during construction, off-site noise during construction (haul trucks) 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.

d. 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.

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 discussed 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.

The underlying purpose of the Project 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. While Alternative 2 is the Environmentally Superior Alternative, this alternative would be less effective than the Project in meeting the underlying purpose of the Project as a result of the substantial reduction of residential units (466 units to 107 units).

However, 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 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.