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 impacts that cannot be feasibly mitigated to less than significant levels with respect to on-site and off-site noise sources during construction and on- and off-site vibration during construction (pursuant to the significance threshold for human annoyance). Cumulative impacts associated with on-site and off-site noise during construction and off-site vibration during construction (pursuant to the significance threshold for human annoyance) 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 alternatives to the Project listed below were selected for evaluation:

- **Alternative 1, No Project/No Build Alternative:** The No Project/No Build Alternative assumes that the Project would not be approved, no new permanent development would occur within the Project Site, and the existing environment would be maintained. Thus, the physical conditions of the Project Site would generally remain as they are today. Specifically, the existing buildings as well as the surface parking areas would remain on the Project Site, and no new construction would occur.

- **Alternative 2, Reduced Development Alternative:** The Reduced Development Alternative would develop the same mix of uses as the Project but would reduce the total amount of new floor area by approximately 25 percent. This alternative would include the development of 506,708 square feet of total floor area comprised

of 224,259 square feet of studios, 51,894 square feet of production support space, and 230,555 square feet of office space. As with the Project, the proposed uses would be provided in 16 studios, which would be grouped together within five studio buildings; three covered production support areas adjacent to the studio buildings; and two new office buildings. This alternative could also include retail space within the lobby spaces of the proposed office buildings. The potential retail space could comprise approximately 6,000 square feet of the proposed office space.

- **Alternative 3, Increased Setback Alternative:** The Increased Setback Alternative would include the same uses as the Project. However, Alternative 3 would incorporate a 75-foot setback along the Project Site's southern boundary to address the Project's significant and unavoidable construction-related noise and vibration impacts. With the increased setback, the number of studios would be reduced from 16 studios to 11 studios. As with the Project, these studios would be grouped together within five studio buildings. Like the Project, three covered production support areas adjacent to the studio buildings would also be included. Similarly, two new office buildings are also proposed as part of this alternative. Overall, Alternative 3 would comprise a total floor area of 512,611 square feet with a floor area ratio (FAR) of 0.81:1.

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

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

	Project	Alternative 1: No Project/No Build	Alternative 2: Reduced Development	Alternative 3: Increased Setback
Studios	299,012 sf	—	224,259 sf	224,720 sf
Production Support (including Mill Space)	69,192 sf		51,894 sf	57,336 sf
Office	307,407 sf (includes potential 8,000 sf of retail)	—	230,555 sf (includes potential 6,000 sf of retail)	230,555 sf (includes potential 6,000 sf of retail)
Floor Area Upon Completion	675,611 sf	—	506,708 sf	512,611 sf
Total FAR	1.06:1	—	0.80:1	0.81:1
Total Parking	800 sp	—	600 sp	800 sp
Maximum Height	up to 74 ft (up to five stories)	—	up to 61 ft (up to four stories)	up to 61 ft (up to four stories)
Maximum Depth of Excavation	11 ft bgs		11 ft bgs	11 ft bgs
Soil Export	40,000 cy	—	34,000 cy	34,000 cy

bgs = below ground surface
cy = cubic yards
du = dwelling units
sp = spaces
Source: Eyestone Environmental, 2024.

3. Alternatives Considered and Rejected as Infeasible

As set forth in CEQA Guidelines Section 15126.6(c), the range of potential alternatives to a 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 as well as 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 the CEQA Guidelines, the alternatives that have been considered and rejected include the following:

- **Alternatives to Eliminate Significant Noise and Vibration Impacts:**

  - Alternative Approach (a)—Extended Construction Duration: An approach that extends the construction period, thus reducing the amount of daily construction activity that would occur under the Project was reviewed and rejected as infeasible for the following reasons:

    - Construction noise levels from on-site and off-site noise sources are dependent on the type and number of pieces of construction equipment operating simultaneously (on-site equipment) and the number of construction trucks (for material delivery, concrete, and hauling), respectively. Under this alternative approach, it is anticipated that the daily number of pieces of on-site construction equipment and the number of off-site construction truck trips would be reduced compared to the Project due to the extended construction duration. Typically, a reduction of 50 percent in the number of pieces of construction equipment operating simultaneously would be required to reduce the construction-related noise levels by 3 dBA (just perceptible). With regard to the Project's construction-related noise levels from on-site construction activities, a reduction from 50 pieces to 25 pieces of construction equipment (a 50-percent reduction) operating simultaneously for the building construction phase would reduce the construction noise level at the off-site receptor locations by 0.9 dBA L_{eq} at receptor location R6, 2.0 dBA L_{eq} at receptor locations R2 and R3, 2.2 dBA L_{eq} at receptor location R1, 2.8 dBA at receptor location R6A (in the event that the mixed-use development at receptor location R6 is not built), 2.9 dBA at receptor location R4, and 3.1 dBA at receptor locations R5 and R7 (as compared to the Project).[1] However, the estimated construction noise levels with a 50-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 R6A, 6.2 dBA L_{eq} at receptor location R1, 6.3 dBA L_{eq} at receptor location R2, 9.3 dBA L_{eq} at receptor location R3, and 20.3 dBA L_{eq} at receptor location R6 during the building construction phase. The Project Mitigation Measure NOI-MM-1 would reduce the construction noise levels to less than significant at the ground level at the affected receptor, exception for receptor R6 (due to limit of 20 dBA maximum noise reduction). In addition, the temporary noise barrier would not be effective in reducing the noise impacts at upper levels of receptor locations R3, R6 and R6A. Therefore, while the construction noise levels under this approach would be less than the Project (depending on the amount of equipment reduction), noise levels from on-site construction activities would still exceed the significance threshold.

      In addition, this approach would be inefficient as construction activities would intentionally be delayed and would increase the number of days that

[1] *Refer to Appendix M of this Draft EIR.*

sensitive receptors would be impacted by construction activities, resulting in the extension of other impacts experienced by surrounding uses such as the generation of air emissions from construction equipment. Furthermore, due to the proximity of the off-site noise sensitive receptors and their associated building heights (i.e., receptor locations R3, R6, and R6A (in the event that the mixed-use development at receptor location R6 is not built)), 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 89.0 dBA L_{eq} at receptor location R6, which would exceed the significance threshold by 19.5 dBA. Even with implementation of the same mitigation measure as the Project (temporary noise barrier), the construction noise level of a single piece of equipment at receptor location R6 would still exceed the significance threshold due to the limitation of the temporary construction noise barrier's ability to attenuate sound. Moreover, the temporary noise barrier would not be effective in reducing the construction-related noise levels for the upper levels of receptor location R6 because the noise barrier would not break the line of site. In addition, the estimated noise reduction provided with the 50-percent reduction in simultaneously operating equipment (0.7 dBA to 2.2 dBA) is not considered a substantial noise reduction. As such, the on-site construction noise impacts under this approach would be less but would remain significant.

- The on-site construction vibration impacts (pursuant to the significance criteria for human annoyance) would be significant, similar to the Project, as the vibration impact analysis is based on the peak vibration level generated by individual construction equipment. While this approach would extend the construction duration, similar construction equipment as the Project (e.g., drill rig and large bulldozer) would be utilized. Since similar construction equipment would be used, vibration levels would be similar to the Project. In addition, because the haul routes would be the same, off-site construction vibration impacts (human annoyance), due to heavy trucks traveling near sensitive receptors, would also continue to be significant similar to the Project.

– Alternative Approach (b)—Central Location of Development: An approach where the proposed construction activities and development is moved closer to the center of the Project Site, thus pulling back the proposed development and associated construction activities from the off-site sensitive receptors, was reviewed and rejected as infeasible for the following reasons:

- Construction noise levels can be reduced by providing additional distance between the receptor and the construction equipment. Noise levels from construction equipment would attenuate approximately 6 dBA per doubling

of distance. The construction noise levels associated with the building phases for the proposed development placed closer to the center of the Project Site would be lower than the Project due to the increased distance between the Project Site and the sensitive receptors. The noise level reduction, depending on the setback from the property line, would be limited due to the size of the Project Site and the line of sight to adjacent noise sensitive receptors. For example, in order to reduce the construction noise levels by 6 dBA at receptors adjacent to the Project Site, i.e., receptor location R2 (to the north), R3 (to the east), and R6 (to the south, the setback from the property line would be 180 feet, 170 feet, and 70 feet, from the north, east, and west, respectively. Due to the close proximity of the sensitive receptors (i.e., receptor location R6 is adjacent to the Project Site) and a constrained Project Site that does not have the space to create a meaningful buffer zone, it would not be practical to substantially mitigate the on-site construction noise impacts of the Project. In addition, noise levels during the site demolition, site preparation and grading would be similar to the Project, as construction activities for these phases would be similar on peak days. As such, the on-site construction noise impacts under this approach would remain significant similar to the Project.

- The on-site construction vibration impacts on human annoyance would be reduced as the construction equipment would be further from the sensitive receptors. However, on-site construction vibration (human annoyance) would continue to exceed the 72 VdB significance threshold, due to the limited buffer distance. Because the haul routes would remain the same, the off-site construction vibration impacts (human annoyance), due to heavy trucks traveling by sensitive receptors, would be significant similar to the Project.

As indicated above, none of the above approaches would substantially reduce or avoid the significant construction-related noise and vibration (human annoyance) impacts of the Project. Furthermore, Approaches (a) and (b) would not achieve the Project's underlying purpose and objectives to the same extent as the Project and Approach (a) would extend the construction period, meaning impacts would affect sensitive receptors for a longer period of time, making this approach infeasible. Therefore, an alternative that includes one or more of these approaches has been rejected from further consideration in this Draft EIR.

- **Alternative Project Site:** The results of a search to find 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 improve a series of underutilized parcels into a new production studio campus that would provide new television, video, and motion picture production facilities to retain production activities and jobs in Los Angeles while supporting the evolving needs of the entertainment industry for additional office space. The availability of an alternative site is also restricted by the Project's objectives, which include the following area-specific objectives: optimize the development potential of an industrial-zoned site

by providing a mixture of production support, office, soundstage, and other production uses on a single site; provide adequate parking to support the unique requirements of studio campuses while minimizing ground disturbance and associated air emissions by providing parking above grade; provide production space to assist the greater Los Angeles region and the State of California to retain entertainment-related jobs; contribute to the revitalization of the City of Los Angeles' Arts District by creating a development that would provide jobs for artists residing in the vicinity of the Project Site; provide new studio space to ease production studio occupancy levels within the greater Los Angeles area, and; locate new job-creating uses near housing centers to reduce vehicle miles traveled.

In addition, an alternative site is not considered feasible as it is not expected, and would be speculative, that the Applicant can reasonably acquire, control, or have access to a suitable alternative site that would provide for the uses and square footage proposed by the Project.

Furthermore, if a suitable alternative site could be found, it is anticipated that the significant and unavoidable impacts with respect to on-site noise and vibration sources during construction would still occur but at other sensitive receptors. Specifically, a Project objective is to develop job generating uses near housing centers and transit systems. Accordingly, an alternative site would also be an infill site with nearby noise-sensitive receptors. As discussed, noise levels during peak day construction activities are used for measuring impacts. Noise levels, therefore, from on-site construction activities would be similar to those of the Project regardless of the alternative location. 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. As a result, an alternative project site is unlikely to avoid or substantially lessen the Project's significant noise effects.

Thus, in accordance with CEQA Guidelines Section 15126.6(f), this alternative was rejected from further consideration.

4. Alternatives Analysis Format

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the project objectives, identified in Section II,

Project Description, of this Draft EIR, would be substantially attained by the alternative.[2] The evaluation of each of the alternatives follows the process described below:

a. The net environmental impacts of the alternative are determined for each environmental issue area analyzed in Section IV, Environmental Impact Analysis, of this Draft EIR, assuming that the alternative would implement the same project design features and mitigation measures identified in Section IV, Environmental Impact Analysis, of this Draft EIR.

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

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

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

   - Similar: Where the 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.

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

Table V-2
Comparison of Impacts Associated with the Alternatives

Impact Area	Project	Alternative 1: No Project	Alternative 2: Reduced Development Alternative	Alternative 3: Increased Setback Alternative
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)				
Historical Resources	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)
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)

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

Impact Area	Project	Alternative 1: No Project	Alternative 2: Reduced Development Alternative	Alternative 3: Increased Setback Alternative
Conflict with Plans for Renewable Energy or Energy Efficiency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
D. GEOLOGY AND SOILS (PALEONTOLOGICAL RESOURCES)				
Paleontological Resources	Less Than Significant w/Mitigation	Less (No Impact)	Similar (Less Than Significant w/Mitigation)	Similar (Less Than Significant w/Mitigation)
E. GREENHOUSE GAS EMISSIONS				
Greenhouse Gas Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
F. LAND USE AND PLANNING				
Conflict with Land Use Plans	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
G. NOISE[a]				
Construction				
On-Site Noise	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Less (Significant and Unavoidable)
Off-Site Noise	Significant and Unavoidable[b]	Less (No Impact)	Similar (Significant and Unavoidable)[c]	Similar (Significant and Unavoidable)[d]
On-Site Vibration (Building Damage)	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)
On-Site Vibration (Human Annoyance)	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Less (Significant and Unavoidable)

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

Impact Area	Project	Alternative 1: No Project	Alternative 2: Reduced Development Alternative	Alternative 3: Increased Setback Alternative
Off-Site Vibration (Building Damage)	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Off-Site Vibration (Human Annoyance)	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (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)
H. 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)	Less (Less Than Significant)
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)
I. TRANSPORTATION				
Conflict with Plans	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 2: Reduced Development Alternative	Alternative 3: Increased Setback Alternative
Vehicle Miles Traveled	Less Than Significant	Less (No Impact)	Similar (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				
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)
J. TRIBAL CULTURAL RESOURCES				
Tribal Cultural Resources	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
K. 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)
Wastewater				
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)
Energy Infrastructure				
Construction	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 2: Reduced Development Alternative	Alternative 3: Increased Setback Alternative
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)

[a] *Cumulative on-site construction noise and cumulative off-site construction vibration (human annoyance) would also be significant and unavoidable under the Project.*

[b] *Off-site construction related noise impacts associated with trucks would be less than significant; off-site construction-related noise associated with installation of potential utility improvements would be significant and unavoidable.*

[c] *Significant and unavoidable if this alternative were to require similar off-site utility improvements.*

[d] *Significant and unavoidable if this alternative were to require similar off-site utility improvements.*

Source: Eyestone Environmental, 2024.

V. Alternatives

A. Alternative 1: No Project/No Build

1. Description of the Alternative

In accordance with the CEQA Guidelines, Alternative 1, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states in part that, "in certain instances, the No Project Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, Alternative 1, the No Project/No Build Alternative, assumes that the Project would not be approved, no new permanent development would occur within the Project Site, and the existing environment would be maintained. Thus, the physical conditions of the Project Site would generally remain as they are today. Specifically, the existing buildings as well as the surface parking areas would remain on the Project Site, and no new construction would occur.

2. Environmental Impacts

a. Air Quality

(1) Regional Emissions

(a) Construction

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 construction worker and construction truck traffic, fugitive dust from demolition and excavation, or the use of heavy-duty construction equipment. Therefore, construction-related regional air quality impacts would not occur. Thus, impacts related to regional air quality emissions during construction would be less under Alternative 1 than the Project, which would be less than significant.

(b) Operation

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 new operational air quality impacts associated with regional emissions would

occur under Alternative 1. Thus, impacts related to regional air quality emissions during operation would be even less under Alternative 1 than the less than significant impacts of the Project.

(2) Localized Emissions

(a) Construction

As previously discussed, Alternative 1 would not result in any construction emissions associated with construction worker and construction truck traffic, fugitive dust from demolition and excavation, or the use of heavy-duty construction equipment. Therefore, no construction air quality impacts associated with localized emissions would occur under Alternative 1, and such impacts would be less than the less than significant impacts of the Project.

(b) Operation

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 new operational air quality impacts associated with localized emissions would occur under Alternative 1, and such impacts would be less than the less than significant impacts of the Project.

(3) 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). No impacts associated with the construction-related release of TACs would occur under Alternative 1, and such impacts would be less than 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 new impact would occur. Therefore, the operational TACs impacts of Alternative 1 would be less than the less than significant impacts of the Project.

b. Cultural Resources (Historical 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

(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 than the less than significant impacts of the Project.

(b) Operation

Alternative 1 would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the long-term energy demand on the Project Site and would have no potential to result in an increase in the wasteful, inefficient, or unnecessary consumption of energy resources. No operational impacts related to energy would occur under Alternative 1, and impacts would be less than 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. As such, Alternative 1 would not increase energy usage at the Project Site, and therefore 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 than the less than significant impacts of the Project.

d. Geology and Soils (Paleontological Resources)

Alternative 1 would not result in new development that would require grading or earthwork activities. As such, Alternative 1 would not result in the potential discovery of previously unknown paleontological resources. No impacts associated with paleontological

resources would occur under Alternative 1, and impacts would be less than the impacts of the Project, which would be less than significant with mitigation.

e. Greenhouse Gas Emissions

Alternative 1 would not develop new 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 emissions impacts of Alternative 1 would be less than the less than significant impacts of the Project.

f. 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 than the less than significant impacts of the Project.

g. Noise

(1) Noise

(a) Construction

No new construction activities would occur under Alternative 1. As such, no construction-related on-site and off-site noise impacts would occur under this alternative. Therefore, Alternative 1 would avoid the significant and unavoidable construction-related on- and off-site noise impacts of the Project.

(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 stationary or mobile (e.g., traffic) noise sources would be introduced to the Project Site or the vicinity of the Project Site. As such, no impacts associated with operational on-site and off-site 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, and no construction-related vibration impacts would occur. As such, construction-related vibration impacts (related to both building damage and human annoyance) would be less when compared to those of the Project. As such, Alternative 1 would avoid the significant and unavoidable impacts for on-site and off-site vibration during construction (pursuant to the significance threshold for 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.

h. Public Services

(1) Fire Protection

(a) Construction

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

(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 than 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 than the less than significant impacts of the Project.

i. Transportation

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

j. 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 previously unknown subsurface tribal cultural resources. As such, no impacts to tribal cultural resources would occur under Alternative 1, and impacts would be less than those of the Project, which would be less than significant.

k. 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 than 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 than the less than significant impacts of the Project.

(2) Wastewater

(a) Construction

Construction activities would not occur under Alternative 1. Therefore, Alternative 1 would not generate wastewater during construction and construction-related impacts to wastewater conveyance and treatment facilities would not occur. As such, Alternative 1 impacts related to wastewater would be less than 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 operational wastewater flows from the Project Site. Since no operational impacts related to wastewater conveyance and treatment facilities would occur, Alternative 1 impacts related to wastewater would be less than the less than significant impacts of the Project.

(3) 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 than 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 than 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 and on- and off-site vibration during construction (pursuant to the significance threshold for human annoyance). Alternative 1 would also avoid the Project's significant and unavoidable cumulative impacts with respect to off-site noise during construction and off-site vibration during construction (pursuant to the significance threshold for human annoyance). In addition, Alternative 1 would avoid the Project's less than significant impacts with mitigation. Impacts associated with the remaining environmental issues would be less than those of the Project.

4. Relationship of the Alternative to Project Objectives

Under Alternative 1, the existing buildings and associated surface parking would remain on the Project Site, and no new development would occur. As such, Alternative 1 would not meet the underlying purpose of the Project, which is to improve a series of underutilized parcels into a new production studio campus that would provide new television, video, and motion picture production facilities to retain production activities and jobs in Los Angeles while supporting the evolving needs of the entertainment industry for additional office space. The Project's specific objectives are provided below. Furthermore, Alternative 1 would not meet any of the Project basic objectives as listed below:

- Develop an industrially zoned lot with uses, ancillary support amenities and a unique architectural design at an intensity which contributes to the economic vitality of the surrounding community.

- Provide production studio space to assist the greater Los Angeles region and the State of California to retain entertainment-related jobs and ease production studio occupancy levels within the greater Los Angeles area.

- Reduce vehicle miles traveled by providing a mixture of production support, office, soundstage, and other related job-creating uses on a single site near housing, amenities, and transportation in both the Arts District and Downtown Los Angeles.

- Minimize ground disturbance and associated air emissions while providing a right-size amount of vehicle parking.

- Contribute to the sustainment of the City of Los Angeles' Arts District by creating a development providing production support and soundstage space that would support the economic viability of the Arts District as well as artists residing in the vicinity of the Project Site.

V. Alternatives

B. Alternative 2: Reduced Development Alternative

1. Description of the Alternative

Alternative 2, the Reduced Development Alternative, would develop the same mix of uses as the Project but would reduce the total amount of new floor area by approximately 25 percent. Specifically, this alternative would include the development of 224,259 square feet of studios, 51,894 square feet of production support space, and 230,555 square feet of office space for a total floor area of approximately 506,708 square feet (compared to the Project's 675,611 square feet of new floor area). As with the Project, the proposed uses would be provided in 16 studios, which would be grouped together within five studio buildings; three covered production support areas adjacent to the studio buildings; and two new office buildings. This alternative could also include up to 6,000 square feet of retail space inclusive of up to 3,000 square feet of restaurant space within the lobby spaces of each of the proposed office buildings.

As with the Project, each of the studio buildings would be one story and have a maximum height of up to 57 feet to the top of the parapet (mechanical equipment could extend up to an additional 20 feet). The proposed covered production support areas would each sit between the studio buildings and would be one story with a height of up to 20 feet. Compared to the five stories and 74 feet in height of the proposed office structures under the Project, the proposed office structures under Alternative 2 would each be four stories and up to 61 feet in height to the last occupiable floor (mechanical equipment could extend up to an additional 20 feet).

Alternative 2 would include a total of 600 vehicular parking spaces within a five-story parking structure (compared to the 800 vehicular parking spaces under the Project). As with the Project, Alternative 2 would require limited grading and excavation activities which would extend to a maximum depth of approximately 11 feet below ground surface. It is estimated that approximately 34,000 cubic yards of export would be hauled from the Project Site (compared to the 40,000 cubic yards of export under the Project).

Upon completion, Alternative 2 would comprise 506,708 square feet of floor area (compared to the Project's 675,611 square feet of new floor area) with an FAR of approximately 0.797 to 1 out of an allowable FAR of 1.5 to 1. As with the Project, the existing

uses comprising 311,000 square feet as well as the associated surface parking would be removed.

2. Environmental Impacts

a. Air Quality

(1) Regional Emissions

(a) Construction

As with the Project, construction of Alternative 2 has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. As discussed in Section IV.A, Air Quality, of this Draft EIR, during Project construction, maximum daily emissions occur during the grading, excavation, and foundation phases. During these phases, the number of equipment as well as trucks exporting soil and delivering concrete would be greater than other phases of construction (e.g., building construction, architectural coatings phases).

As summarized in Table V-1 on page V-4, while Alternative 2 would reduce the total building area compared to the Project, Alternative 2 would still require excavation to a depth of 11 feet below ground surface and an associated soil export of 34,000 cubic yards compared to the Project's soil export of 40,000 cubic yards. With the overall reduction in total building area and reduced soil export, the overall duration of construction activities would be reduced in comparison to the Project. However, the intensity of air emissions and fugitive dust from grading, excavation, and foundation activities under Alternative 2 would be similar to the Project on peak construction days because the maximum number of construction equipment and trucks operating during the excavation and foundation phases would be similar to the Project on a daily basis (i.e., there would be no change to the intensity of maximum construction activity on peak days). As such, air emissions during maximum activity days, which determine the impact conclusion, would be similar to those of the Project. Hence, as with the Project, construction-related daily maximum regional construction emissions under Alternative 2 would not exceed SCAQMD daily significance thresholds. Therefore, impacts under Alternative 2, like the Project, would be less than significant, with the degree of the impact similar to that of the Project during peak construction activity.

(b) Operation

Operational regional air pollutant emissions associated with Alternative 2 would be generated by vehicle trips to the Project Site, which are the largest contributors to operational air pollutant emissions, and the consumption of electricity and natural gas. As previously discussed, Alternative 2 would reduce the overall development proposed on the Project Site. As such, the number of net new daily vehicle trips generated by Alternative 2 would be less than the net new daily vehicle trips generated by the Project. Specifically, as summarized in Appendix M of this Draft EIR, based on the proposed uses, Alternative 2 would generate a total of 3,396 daily vehicle trips and 24,929 daily VMT, which would be less than the Project's 3,815 daily vehicle trips and 27,985 daily VMT.[3] Since the amount of vehicular emissions is based on the number of trips generated, the overall pollutant emissions generated by Alternative 2 would be less than the emissions generated by the Project. With the reduction in overall floor area, both area sources and stationary sources would also generate less on-site operational air emissions compared to the Project. Therefore, under Alternative 2, total contributions to regional air pollutant emissions during operation would be less than the Project's contribution. Thus, impacts to regional air quality under Alternative 2 operation would be less than significant and less than the less than significant impacts of the Project.

(2) Localized Emissions

(a) Construction

On-site construction activities under Alternative 2 would be located at similar distances from sensitive receptors as the Project. In addition, as previously discussed above, the intensity of construction activities under Alternative 2 would be similar to the Project on days with maximum construction activities. As such, air emissions during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Because localized emissions under the Project would not exceed the SCAQMD localized screening threshold during construction, neither would such emissions generated by Alternative 2 exceed SCAQMD screening thresholds during construction of Alternative 2. Impacts associated with localized air pollutant emissions during construction of Alternative 2 would be less than significant and similar to the less significant impacts of the Project.

(b) Operation

Localized operational impacts are determined primarily by traffic volumes. As identified above, Alternative 2 would generate a total of 3,396 daily vehicle trips and 24,929 daily VMT, which would be less than the Project's 3,815 daily vehicle trips and 27,985 daily

[3] *See Appendix M of this Draft EIR for VMT Calculator Outputs for Alternatives.*

VMT.[4] As such, the number of net new daily vehicle trips generated by Alternative 2 would be less than the net new daily vehicle trips generated by the Project. In addition, area sources and stationary sources would also generate less on-site operational air 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 operation would be less than significant and less than the less than significant impacts of the Project.

(3) Toxic Air Contaminants

(a) Construction

As with the Project, construction of Alternative 2 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less than significant impacts with regard to construction TAC emissions. Overall construction TAC emissions generated by Alternative 2 would be less than those of the Project due to the reduction in the overall duration and the amount of construction activities as a result of the reduced development. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 2 would be less than significant and less than 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 from delivery trucks. The Project would result in a net decrease in heavy duty diesel truck trips resulting from the removal of the existing warehouse uses. Under Alternative 2, the overall decrease in the number of deliveries and associated diesel particulate matter emissions over existing conditions would be reduced compared to the Project due to reduction in development. Furthermore, similar to the Project, the land uses proposed under Alternative 2 are not considered land uses that generate substantial TAC emissions. Therefore, Alternative 2 operation would not release substantial amounts of TACs. Impacts due to TAC emissions and the corresponding cancer risk under Alternative 2 would be less than significant and less than the less than significant impacts of the Project.

[4] *See Appendix M of this Draft EIR for VMT Calculator Outputs for Alternatives.*

b. Cultural Resources (Historical Resources)

With regard to direct impacts on historical resources, as discussed in Section IV.B, Cultural Resources, of this Draft EIR, the existing buildings on the Project Site are not eligible for listing in the National or California Register or for local designation. However, similar to the Project, construction activities associated with Alternative 2 would have the potential to directly impact historical resources located at 1567 Industrial Street, which is the only contributing property to the potential Downtown Los Angeles Historic District that is immediately adjacent to the Project Site. Specifically, excavation and new construction for Alternative 2 could result in settling or displacement of the foundations of the existing historic buildings. As with the Project, precautions would be taken during planning, excavation, and construction of Alternative 2, which would ensure that Alternative 2 would similarly not result in material alteration of adjacent historical structures. In addition, as with the Project, while construction of Alternative 2 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. While the duration of construction would be reduced under Alternative 2 due to the reduced development, given that the amount of grading and excavation would be similar to the Project and would occur within 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.

With regard to indirect impacts on historical resources, as discussed in Section IV.B, Cultural Resources, of this Draft EIR, the Project Site is located immediately adjacent to the potential Downtown Los Angeles Industrial Historic District. As with the Project, Alternative 2 would be in conformance with Standard 9 set forth by the Secretary of the Interior's Standards for Treatment of Historic Properties as it would not destroy any spatial relationships that characterize adjacent and nearby historical resources. Specifically, as with the Project, Alternative 2 would be designed in a contemporary art style and would be distinct from the surrounding buildings located within the potential historic district. As Alternative 2 would maintain a similar size, scale, proportion, and massing to the adjacent potential historic district, Alternative 2 would conform with Secretary's Standard 9 and would not destroy the potential historic district's integrity of setting.

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 to convey water for dust control and to power lighting, electronic equipment, and other construction activities, and petroleum-based fuels for heavy construction equipment, delivery and haul trucks, and construction worker traffic. Similar to the Project, construction activities associated with Alternative 2 would not involve the consumption of natural gas. As with the Project, Alternative 2 would also generate a demand for transportation energy associated with on- and off-road vehicles. However, the energy consumed during construction of Alternative 2 would be reduced compared to the Project due to the reduction in construction activities and duration. As with the Project, the use of construction equipment/vehicles used during construction of Alternative 2 would comply with Title 24 standards and other applicable energy conservation requirements, CARB anti-idling and In-Use Off-Road Diesel-Fueled Fleet regulations, federal fuel efficiency standards, and other applicable requirements. Alternative 2 would also implement design features, similar to the Project, to reduce energy usage and fuel consumption during construction. Therefore, as with the Project, Alternative 2 construction activities would require energy demand that is not wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 2 and less than the less than significant impacts of the Project.

(b) Operation

As with the Project, Alternative 2 operations would generate an increased demand for electricity. However, as with the Project, with compliance with applicable CALGreen requirements and City Ordinance No. 187,714 requiring all new buildings to be all-electric buildings,[5,6] Alternative 2 would similarly generate a net decrease in the on-site demand for natural gas with potential natural gas usage limited to a potential restaurant use within the proposed office uses. Notwithstanding, based on the overall reduction in total development

[5] *Chapter IX of the LAMC requires that all new buildings be all-electric buildings, with some exceptions. Equipment typically powered by natural gas such as space heating, water heating, cooking appliances and clothes drying would need to be powered by electricity for new construction. Exceptions are made for commercial restaurants, laboratory, and research and development uses.*

[6] *It is assumed that this alternative would similarly incorporate Project Design Feature GHG-PDF-1 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR prohibiting the use of natural gas during operations with exceptions provided for water heaters, food operations (restaurant/commissary uses), and building heating for studio uses.*

proposed by Alternative 2, electricity, natural gas, and petroleum-based fuel consumption for Alternative 2 would be less than the Project's estimated increase in energy consumption. Furthermore, as with the Project, Alternative 2 would be developed in accordance with applicable energy conservation requirements, including those in California's Green Building Standards Code (Title 24/CALGreen standards). Therefore, as with the Project, operation of Alternative 2 would not involve the wasteful, inefficient, or unnecessary consumption of energy resources. Impacts related to energy use under Alternative 2 would be less than significant and less than 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 CALGreen (California Green Building Standards Code – Part 11, Title 24), the City of Los Angeles Green Building Code, City of LA Green New Deal, and the 2020–2045 RTP/SCS. 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 represent urban infill development within a Transit Priority Area and High Quality Transit Area in close proximity to transit, which would reduce vehicle trips, VMT, per capita VMT, and associated fuel usage in accordance with Senate Bill 375 and SCAG's RTP/SCS. As with the Project, Alternative 2 would also be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction, which would save transportation energy. Therefore, 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. Geology and Soils (Paleontological Resources)

As discussed in Section IV.D, Geology and Soils (Paleontological Resources), of this Draft EIR, there are no previously encountered fossil vertebrate localities located within the Project Site. As with the Project, Alternative 2 would include excavation to a depth of approximately 11 feet below ground surface for the placement of building footings. Therefore, the potential for Alternative 2 to disturb undiscovered paleontological resources during constriction would be similar to the Project. As such, like the Project, Alternative 2 would implement Mitigation Measures GEO-MM-1 through GEO-MM-4 in order to mitigate potential impacts to paleontological resources. Therefore, impacts to paleontological resources under Alternative 2 would be less than significant with mitigation and similar to the less than significant with mitigation impacts of the Project.

e. Greenhouse Gas Emissions

As discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, GHG emissions from a development project are determined in large part by the number of daily vehicle trips generated and associated VMT, as well as by energy consumption from proposed land uses. Under Alternative 2, the number of daily trips, daily VMT trip generation, and energy and water consumption would be reduced compared to the Project due to the reduction in development. Thus, the amount of GHG emissions generated by Alternative 2 would be less than the amount generated by the Project. In addition, as with the Project, Alternative 2 would be designed to comply with the requirements of Title 24 and the Los Angeles Green Building Code. Also, as with the Project, this alternative would comply with City Ordinance No. 187,714 requiring all new buildings to be all-electric buildings.[7,8] Like the Project, Alternative 2 would also increase urban density within a Transit Priority Area and High Quality Transit Area in proximity to transit, would include LAMC-required bicycle parking, and would include electric vehicle-ready parking, which would all reduce VMT and associated fuel usage and GHG emissions. Therefore, with compliance with applicable regulations and with implementation of comparable sustainability features as the Project, Alternative 2 would be consistent with the GHG reduction goals and objectives included in adopted State, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 2 would be less than significant and less than the less than significant impacts of the Project.

f. Land Use and Planning

As described above, Alternative 2 would develop the Project Site similar to the Project but would reduce the square footages of the studios, production support space, and office space, as well as the heights of the proposed office structures. Accordingly, the overall FAR, density, and building height would be reduced compared to the Project. As with the Project, following approval of the proposed land use entitlements, Alternative 2 would be consistent with the overall intent of the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site and that were adopted to avoid or mitigate an environmental effect, including but not limited to the City's General Plan Framework Element, Central City North Community Plan and LAMC, and SCAG's 2020–2045 RTP/SCS. Therefore, the impacts of Alternative 2 related to potential conflicts with applicable land use

---

[7] *Chapter IX of the LAMC requires that all new buildings be all-electric buildings, with some exceptions. Equipment typically powered by natural gas such as space heating, water heating, cooking appliances and clothes drying would need to be powered by electricity for new construction. Exceptions are made for commercial restaurants, laboratory, and research and development uses.*

[8] *It is assumed that this alternative would similarly incorporate Project Design Feature GHG-PDF-1 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR prohibiting the use of natural gas during operations with exceptions provided for water heaters, food operations (restaurant/commissary uses), and building heating for studio uses.*

plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant and similar to the less than significant impacts of the Project.

g. Noise

(1) Noise

(a) Construction

The types of construction activities under Alternative 2 would be similar to the Project; however, the overall amount of construction activities and duration would be reduced compared to the Project due to the reduction in overall development. As with the Project, construction of Alternative 2 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Under Alternative 2, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to that of the Project during maximum activity days during the grading, excavation, and foundation phases (i.e., there would be no change to the intensity for days in which the maximum construction activity is required). As such, noise levels during maximum activity days, which is used for measuring impact significance, would be similar to those of the Project. As with the Project, Alternative 2 would implement similar project design features and mitigation, which would minimize construction noise. However, while the overall amount of construction activities and duration would be reduced compared to the Project, as the impact significance is based on maximum construction activity days, Alternative 2 would similarly result in significant and unavoidable on-site construction noise impacts since the noise levels during maximum construction activity days would be similar to the Project. As previously discussed above in Subsection 3, Alternatives Considered and Rejected as Infeasible, any reduction in development would also result in significant and unavoidable on-site construction noise impacts because the noise generated by any one piece of construction equipment operating alone would result in noise levels above significance thresholds at the sensitive receptor locations due to their proximity to the Project Site.

With regard to off-site noise associated with truck travel, as with the Project, impacts during construction of Alternative 2 would be less than significant. In addition, to the extent this alternative requires similar off-site utility improvements as the Project, potential impacts associated with installation of off-site utility improvements would similarly be significant and unavoidable.

Overall, the construction-related noise impacts of Alternative 2 would be similar to the Project.

(b) Operation

As discussed in Section IV.G, Noise, of this Draft EIR, sources of operational noise under the Project would include (a) on-site stationary noise sources, including mechanical equipment, activities within the proposed outdoor spaces (located at Level 2 and Roof Level), parking facilities and loading dock, and studio-related operation; and (b) off-site mobile (roadway traffic) noise sources. Regarding on-site operational noise, Alternative 2 would introduce noise from similar on-site noise sources although these uses would be reduced. Alternative 2 would implement project design features similar to the Project, including regarding acoustic screening of loading areas from off-site noise receptors and controls on amplified sound, which would minimize on-site operational noise. As with the Project, Alternative 2 would also comply with the regulations under LAMC Section 112.02 which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. Thus, operational on-site noise impacts under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project due to the reduction in total floor area.

With regard to operational off-site (i.e., traffic) noise, Alternative 2 would generate less operational traffic when compared to the Project. Therefore, as with the Project, off-site noise impacts under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 2 would be similar to the Project, although the amount of development and associated duration of construction 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 construction activities and the associated construction on- and off-site vibration levels would be expected to be similar to those of the Project as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment (i.e., there would be no change to the intensity for the days in which the maximum construction activity is required). Therefore, peak vibration levels generated by construction equipment and construction truck trips under Alternative 2 would be similar to those of the Project as the same activities and same equipment would occur during the peak construction period. Accordingly, as with the Project, construction activities under Alternative 2 would result in significant and unavoidable on-site and off-site vibration impacts (human annoyance). In addition, as with the Project, vibration impacts due to on- and off-site construction activities under Alternative 2 would similarly be less than significant for on- and off-site construction vibration pursuant to the significance

threshold for building damage. Overall, construction-related impacts associated with Alternative 2 would be similar to the Project.

(b) Operation

As described in Section IV.G, 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; however, these sources would be reduced compared to the Project. As with the Project, vehicular-induced vibration from Alternative 2 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 and less than the less-than-significant impacts of the Project due to the reduction in vehicle trips and total floor area.

h. Public Services

(1) Fire Protection

(a) Construction

As previously discussed, the total floor area and building heights under Alternative 2 would be reduced compared to that of the Project. Therefore, the overall duration of construction for Alternative 2 would be reduced compared to the Project. As with the Project, construction activities under Alternative 2 would have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, exposed electrical lines, chemical reactions, and lighted cigarettes. As with the Project, construction activities under Alternative 2 would comply with the safety and health provisions of OSHA. Construction would also occur in compliance with all applicable federal, State, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, compliance with regulatory requirements would effectively reduce the potential for construction activities associated with Alternative 2 to expose people to the risk of fire or explosion related to hazardous materials.

Additionally, similar to the Project, while Alternative 2 construction activities would primarily be contained within the boundaries of the Project Site, construction activities also have the potential to affect fire protection services by adding construction traffic to the street

network and by necessitating partial lane closures for installation of required utility and street improvements. Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. However, as with the Project, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period and emergency access would not be impeded. Furthermore, similar to the Project, a Construction Traffic Management Plan (Project Design Feature TR-PDF-1 included in Section IV.J, Transportation, of this Draft EIR) would be implemented as part of Alternative 2 to ensure that adequate and safe access remains available within and near the Project Site during construction activities, and to ensure that the majority of construction-related traffic, including hauling activities and construction worker trips would occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts. Furthermore, emergency vehicles have the ability to avoid traffic delays through the use of sirens to clear paths of travel in accordance with the California Vehicle Code (CVC). 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. As such, construction-related impacts related to fire protection services under Alternative 2 would be less than significant, and less than the less than significant impacts of the Project due to the reduction in construction activities and duration.

(b) Operation

As with the Project, Alternative 2 would generate a new visitor and employee population on the Project Site that would contribute to an increased demand for LAFD fire protection services. However, due to the reduction in total new floor area and uses, Alternative 2 would generate a smaller service population compared to the Project. As such, the overall increased demand for LAFD fire protection services would be reduced compared to that of the Project. 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 and also ensure adequate emergency access. In addition, as with the Project, Alternative 2 would comply with the LAFD's Studio/Sound Stage Fire & Life Safety Requirements, and special effects, such as pyrotechnics, would be permitted through LAFD's Film Unit. Furthermore, as with the Project, traffic generated by Alternative 2 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. The driveways and internal circulation under Alternative 2 would also be designed to incorporate all applicable City Building Code and

Fire Code requirements regarding site access, including providing adequate emergency vehicle access.

As with the Project, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for Alternative 2. Therefore, similar to the Project, Alternative 2 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 than the less than significant impacts of the Project due to the reduction of total floor area and proposed uses.

(2) Police Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 2 would be similar to that 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 development. Similar to the Project, construction activities for Alternative 2 would not generate a permanent population on the Project Site that would substantially increase the police service population of the Central Community Police Station. In addition, due to the reduction of construction activities, the small temporary demand for police services would be shorter compared to the Project. Furthermore, as with the Project, Alternative 2 would incorporate Project Design Feature POL-PDF-1 to implement temporary security measures, including security fencing, lighting, and locked entry to secure the Project Site during construction, which would serve to reduce demand on LAPD facilities.

Similar to the Project, Alternative 2 would also implement a Construction Traffic Management Plan that would ensure continued provision of emergency access during construction. Additionally, pursuant to CVC Section 21806, emergency vehicles would use their sirens to clear a path of travel or drive in the lanes of opposing traffic during an emergency to avoid or bypass 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 than the less than significant impacts of the Project due to the reduced construction activities.

(b) Operation

Like the Project, Alternative 2 would not include any residential uses, and this would not increase the service population of the Central Community Police Station or impact the officer-to-resident ratio within the Central Area. Similar to the Project, Alternative 2 would

implement similar project design features as the Project during operation, which would help reduce the demand for police services and, 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. As such, impacts with regard to police protection services during operation of Alternative 2 would be less than significant, and less than the less than significant impacts of the Project.

i. Transportation

As previously described, Alternative 2 would be developed within the same Project Site as the Project and would include a mix of uses similar to the Project. In addition, while Alternative 2 would include a reduction in the studio uses, production support uses, and office uses proposed by the Project, Alternative 2 would feature similar vehicular, pedestrian, and bicycle access as the Project. Therefore, overall, as with the Project, the transportation-related plans, policies, and programs applicable to the Project would also apply to Alternative 2 (i.e., Mobility Plan 2035; Plan for a Healthy Los Angeles; Central City North Community Plan; LAMC, Vision Zero; Citywide Design Guidelines, and SCAG's 2020-2045 RTP/SCS.

As with the Project, Alternative 2 would not interfere with the complete streets balanced transportation network (i.e., Transit-Enhanced Network, Bicycle Enhanced Network, and Pedestrian-Enhanced Districts) concept of the Mobility Plan and would enhance pedestrian access within and around the Project Site as called for by the Mobility Plan and the Central City North Community Plan. In addition, sidewalk and driveway design, vehicular parking, bicycle parking, etc., would be provided in accordance with LAMC requirements. This alternative would also represent urban infill development within a TPA and HQTA in close proximity to transit which would encourage alternative transportation use as called for by the Mobility Plan and 2020–2045 RTP/SCS. Alternative 2 would support these transportation plans for the same reasons as the Project (e.g., would intensify urban density in close proximity to transit, would include similar roadway and sidewalk improvements, would comply with LAMC driveway and parking standards, etc.). Like the Project, Alternative 2 would also reduce work VMT per employee, including through the implementation of transportation demand management (TDM) measures as called for by the Mobility Plan, 2020–2045 RTP/SCS, and the City's TDM Ordinance.[9] Therefore, as with the Project, Alternative 2 would not conflict with a program, plan, ordinance, or policy addressing the circulation system. The impacts of Alternative 2 in this regard would be less than significant and similar to the less than significant impacts of the Project.

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

With respect to VMT, Alternative 2 would result in a lower daily VMT than the Project within the Central APC. Specifically, as shown in Appendix M of this Draft EIR, Alternative 2 would result in 24,929 total daily VMT, which would be comparatively less than the 27,985 daily VMT generated by the Project. However, the average work VMT per capita for Alternative 2 of 6.5 would be greater than the Project's work VMT per capita of 5.5. Notwithstanding, the work VMT per capita for Alternative 2 would be below the significance threshold of 7.6 for the Central APC. Therefore, as with the Project, Alternative 2 would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b), regarding VMT. As such, the VMT impacts of Alternative 2 would be less than significant and similar to the impacts of the Project.

With respect to freeway safety, as discussed in Section IV.I, Transportation, of this Draft EIR, a freeway safety analysis evaluates a proposed project's potential to cause or lengthen a forecasted off-ramp queue on the freeway mainline that could lead to a potential safety impact due to speed differentials between vehicles exiting the freeway off ramps and vehicles traveling on the freeway mainline. The City's guidance on freeway safety analysis requires analysis of freeway off-ramps where a proposed project adds 25 or more trips in either the morning or afternoon peak hour to be studied for potential queuing impacts. If the Project is not projected to add 25 or more peak hour trips at any freeway off-ramps, then a freeway ramp analysis is not required. According to the Transportation Assessment included as Appendix M of this Draft EIR, under Future with Project conditions, the queues at off-ramps would not exceed the ramp storage length during any of the analyzed peak hours and would not be subject to a speed differential analysis. The queues at the off-ramps would not extend onto the freeway mainline and would not result in a significant safety constraint. As Alternative 2 would generate fewer trips than the Project, Alternative 2 would not add 25 or more trips to any nearby freeway off-ramps, and no further freeway safety analysis is required. As such, impacts regarding freeway safety would also be less than significant and less than those of the Project.

Regarding emergency access, as with the Project, construction activities associated with Alternative 2 could potentially impact the provision of emergency services by the LAFD and the LAPD in the vicinity of the Project Site as a result of reduced or altered access around the Project Site. However, like the Project, Alternative 2 also would not require the closure of any vehicle travel lanes. Additionally, similar to the Project, most of the construction worker trips would occur outside the weekday peak traffic periods, thereby reducing the potential for traffic-related conflicts. Alternative 2 would also include the preparation of a Construction Traffic Management Plan prior to the start of construction which would ensure that adequate and safe access remains available within and near the Project Site during construction activities. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way.

During operation, all 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. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, 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 Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede emergency vehicle access. As such, like the Project, emergency access to the Project Site and surrounding area under Alternative 2 would be maintained and Alternative 2 would not result in inadequate emergency access during operation. Additionally, pursuant to California Vehicle Code 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.

Based on the above, Alternative 2 would not result in inadequate emergency access during construction or operation, and impacts would be less than significant. Such impacts would be less than those of the Project due to the reduced construction and duration of construction.

j. Tribal Cultural Resources

As previously discussed, Alternative 2 would include the same excavation depth of 11 feet below ground surface as the Project. As discussed in Section IV.J, Tribal Cultural Resources, of this Draft EIR, according to the results of the records searches and the Tribal Cultural Resources Report included in Appendix J of this Draft EIR, no tribal cultural resources or known cultural resources have been identified that could be impacted by the Project. Notwithstanding, like the Project, Alternative 2 would implement the City's standard condition of approval for the inadvertent discovery of tribal cultural resources which would address any potential impacts to previously unknown tribal cultural resources that may be encountered during construction. Therefore, Alternative 2 would result in less than significant impacts which would be similar to the less than significant impacts of the Project.

k. 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 construction equipment, grading, excavation/export, and re-compaction of soil. Construction-related water use under Alternative 2 would be less since the amount of new construction and the construction

duration required under Alternative 2 would be reduced. Furthermore, while Alternative 2 would require trenching for connection to the existing water mains in the adjacent streets similar to the Project, Alternative 2 would similarly implement a Construction Traffic Management Plan (Project Design Feature TR-PDF-1 included in Section IV.J, Transportation, of this Draft EIR) to ensure the safe and efficient flow of pedestrian and vehicular traffic around the construction sites during construction. 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. Alternative 2 would result in less than significant impacts that are less than the less than significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 2 would generate an increased demand for water relative to existing conditions. However, based on the reduction in total development, water demand for Alternative 2 would be less than the Project's estimated increase in water demand. Thus, the estimated net water demand under Alternative 2 would also be within the available and projected water supplies for LADWP under normal, single-dry, and multi-dry years through the year 2045. In addition, the existing water distribution infrastructure would be adequate to serve Alternative 2 since the water demand would be less than the water demand generated by the Project. Furthermore, similar to the Project, Alternative 2 would construct the necessary water infrastructure and connections to the LADWP water system pursuant to applicable City requirements to accommodate the new development. Thus, operational impacts to water supply and infrastructure under Alternative 2 would be less than significant and less than the less than significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, the existing sewer laterals would be capped during construction of Alternative 2. As such, no new sewage would enter the public sewer system. As with the Project, temporary facilities, such as portable toilet and hand wash stations, would be provided by the construction contractor; however, any sewage generated from these facilities would be collected and hauled off-site and would not be discharged into the public sewer system. Thus, wastewater generation from construction activities under Alternative 2 would not cause a measurable increase in wastewater flows.

Additionally, as with the Project, Alternative 2 would require the installation of new on-site sewer line connections to connect the proposed buildings to the existing off-site public sewer mains along the streets surrounding the Project Site. Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to the public infrastructure. As with the Project, any offsite work

that may affect services to the existing sewer lines in the vicinity of the Project Site during construction of Alternative 2 would be coordinated with the City of Los Angeles Bureau of Engineering (BOE). In addition, similar to the Project, a Construction Traffic Management Plan would be implemented during construction of Alternative 2 to reduce any temporary pedestrian and traffic impacts resulting from the minor off-site work that might result from trenching and installation of new sewer line connections. Therefore, construction-related impacts to the wastewater system under Alternative 2 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

Based on the reduction in total development, wastewater generation under Alternative 2 would be less than the Project's estimated wastewater flow. Since the Project's wastewater flows would be accommodated by the existing infrastructure, the wastewater generated by Alternative 2 would also be accommodated by the existing capacity of the Hyperion Water Reclamation Plant, and impacts with respect to treatment capacity would be less than significant.

Similar to the Project, sewer service for Alternative 2 would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site. Given that wastewater flows generated by Alternative 2 would be less than the estimated wastewater flow of the Project, it is anticipated that there would be sufficient capacity within the sewer lines serving the Project Site to accommodate the flows from Alternative 2. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for Alternative 2 during the permitting process. In addition, sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Thus, operational impacts with regard to wastewater generation and infrastructure capacity under Alternative 2 would be less than significant and less than the less than significant impacts of the Project.

(3) Energy Infrastructure

(a) Construction

As discussed above, Alternative 2 would reduce the amount of energy needed for construction activities based on the reduction in development and duration. As discussed in Section IV.C, Energy, of this Draft EIR, the estimated energy usage of the Project during construction would be within the available capacity and supply of the existing infrastructure. Since Alternative 2 would generate a reduced demand for energy during construction compared to the Project due to less overall construction, the energy demand of Alternative 2 would similarly be within the available capacity of the existing infrastructure. Therefore,

impacts to energy infrastructure capacity associated with construction of Alternative 2 would be less than significant and less than the less than significant impacts of the Project.

(b) Operation

As previously discussed, the total energy consumption of Alternative 2 would be less than that of the Project due to the reduction in uses. Therefore, as with the Project, the existing energy infrastructure would similarly have capacity to support Alternative 2. Impacts related to energy infrastructure would be less than significant under Alternative 2 and less than the less than significant impacts of the Project.

3. Comparison of Impacts

Based on the analysis above, Alternative 2 would not avoid the Project's significant and unavoidable noise and vibration impacts. However, Alternative 2 would reduce the overall amount of construction activities compared to the Project such that the impacts above related to construction noise and vibration would occur for a shorter duration as compared to the Project. In addition, Alternative 2 would also reduce some of the less than significant impacts of the Project (i.e., construction TACs, construction-related energy, construction-related fire protection, construction-related police protection, and construction-related water supply/infrastructure), while all other impacts would be similar to those of the Project. Alternative 2 would not result in greater impacts than the Project in terms of any of the environmental issues evaluated in this Draft EIR.

4. Relationship of the Alternative to Project Objectives

Alternative 2 would develop the same type of uses as the Project, but at a reduced density. As such, Alternative 2 would mostly meet the underlying purpose of the Project, which is to improve a series of underutilized parcels into a new production studio campus that would provide new television, video, and motion picture production facilities to retain production activities and jobs in Los Angeles while supporting the evolving needs of the entertainment industry for additional office space.

Regarding the Project objectives, Alternative 2 would meet the following Project objectives as effectively as the Project:

- Minimize ground disturbance and associated air emissions while providing a right-size amount of vehicle parking.

However, Alternative 2 would not meet the following objectives to optimize development of the Project Site and to provide new production studio space for the Arts District, Los Angeles region, and State of California to the same extent as the Project due to the overall reduction in the proposed studio, production support, and office uses:

- Develop an industrially zoned lot with uses, ancillary support amenities and a unique architectural design at an intensity which contributes to the economic vitality of the surrounding community.

- Provide production studio space to assist the greater Los Angeles region and the State of California to retain entertainment-related jobs and ease production studio occupancy levels within the greater Los Angeles area.

- Reduce vehicle miles traveled by providing a mixture of production support, office, soundstage, and other related job-creating uses on a single site near housing, amenities, and transportation in both the Arts District and Downtown Los Angeles.

- Contribute to the sustainment of the City of Los Angeles' Arts District by creating a development providing production support and soundstage space that would support the economic viability of the Arts District as well as artists residing in the vicinity of the Project Site.

- Provide new studio space to ease production studio occupancy levels within the greater Los Angeles area.

V. Alternatives

C. Alternative 3: Increased Setback Alternative

1. Description of the Alternative

Alternative 3, the Increased Setback Alternative, would develop the same uses as the Project. However, Alternative 3 would incorporate a 75-foot setback along the Project Site's southern boundary to reduce the Project's significant construction-related noise impacts, which would also result in an approximate 24 percent decrease in overall floor area compared to the Project. Specifically, with the increased setback, the number of studios would be reduced from 16 studios under the Project to 11 studios resulting in approximately 224,720 square feet (compared to the 299,012 square feet of studio uses under the Project). As with the Project, these studios would be grouped together within five studio buildings. In addition, similar to the Project, Alternative 3 would include three covered production support areas adjacent to the studio buildings that would be comprised of approximately 57,336 square feet of floor area (compared to the 69,192 square feet of production support areas under the Project). Furthermore, as with the Project, Alternative 3 would include two new office buildings comprised of approximately 230,555 square feet. Alternative 3 could also include up to 6,000 square feet of retail space inclusive of up to 3,000 square feet of restaurant space within the lobby spaces of each of the proposed office buildings. Overall, Alternative 3 would comprise a total floor area of 512,611 square feet of floor area (compared to the Project's 675,611 square feet of new floor area) with a floor area ratio (FAR) of 0.81:1. As with the Project, the existing uses comprising 311,000 square feet as well as the associated surface parking would be removed.

Like the Project, approximately 800 vehicular parking spaces would be provided for the proposed uses within a five-story parking structure and surface parking areas. As with the Project, Alternative 3 would require limited grading and excavation activities which would extend to a maximum depth of 11 feet below ground surface. It is estimated that approximately 34,000 cubic yards of export would be hauled from the Project Site (compared to the 40,000 cubic yards of export under the Project).

2. Environmental Impacts

a. Air Quality

(1) Regional Emissions

(a) Construction

As with the Project, construction of Alternative 3 has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. As discussed in Section IV.A, Air Quality, of this Draft EIR, during Project construction, maximum daily emissions occur during the grading, excavation, and foundation phases. During these phases, the number of equipment as well as trucks exporting soil and delivering concrete would be greater than other phases of construction (e.g., building construction, architectural coatings phases).

As summarized in Table V-1 on page V-4, while Alternative 3 would reduce the total building area compared to the Project, Alternative 2 would still require excavation to a depth of 11 feet below ground surface and an associated soil export of 34,000 cubic yards compared to the Project's soil export of 40,000 cubic yards. With the overall reduction in total building area and reduced soil export, the overall duration of construction activities would be reduced in comparison to the Project. However, the intensity of air emissions and fugitive dust from grading, excavation, and foundation activities under Alternative 3 would be similar to the Project on peak construction days because the maximum number of construction equipment and trucks operating during the excavation and foundation phases would be similar to the Project on a daily basis (i.e., there would be no material change to the intensity of maximum construction activity). As such, air emissions during maximum activity days, which determine the impact conclusion, would be similar to those of the Project. Hence, as with the Project, construction-related daily maximum regional construction emissions under Alternative 3 would not exceed SCAQMD daily significance thresholds. Therefore, impacts under Alternative 3, like the Project, would be less than significant, with the degree of the impact similar to that of the Project during peak construction activity.

(b) Operation

As previously discussed, Alternative 3 would decrease the overall development proposed on the Project Site due to the increased setback along the southern boundary of the Project Site. As such, the number of net new daily vehicle trips generated by Alternative 3 would be less than the net new daily vehicle trips generated by the Project. Specifically,

as summarized in Appendix M of this Draft EIR, based on the proposed uses, Alternative 3 would generate a total of 3,413 daily vehicle trips and 25,055 daily VMT, which would be less than the Project's 3,815 daily vehicle trips and 27,985 daily VMT.[10] As vehicular emissions depend on VMT, the overall pollutant emissions generated by Alternative 3 would be less than the emissions generated by the Project. With the reduction in overall floor area, both area sources and stationary sources would also generate less on-site operational air emissions compared to the Project. Therefore, under Alternative 3, total contributions to regional air pollutant emissions during operation would be less than the Project's contribution. Thus, impacts to regional air quality under Alternative 3 operation would be less than significant and less than the less than significant impacts of the Project.

(2) Localized Emissions

(a) Construction

On-site construction activities under Alternative 3 would be located slightly further away from sensitive receptors compared to the Project due to the increased setback along the southern boundary of the Project Site. However, as previously discussed above, the intensity of construction activities under Alternative 3 would be similar to the Project on days with maximum construction activities. As such, air emissions associated with Alternative 3 during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Therefore, because localized emissions under the Project would not exceed the SCAQMD localized screening threshold during construction, neither would such emissions generated by Alternative 3 exceed SCAQMD screening thresholds during construction of Alternative 3. Impacts associated with localized air pollutant emissions during construction of Alternative 3 would be less than significant and similar to the less significant impacts of the Project.

(b) Operation

Localized operational impacts are determined primarily by traffic volumes. As identified above, Alternative 3 would generate a total of 3,413 daily vehicle trips and 25,055 daily VMT, which would be less than the Project's 3,815 daily vehicle trips and 27,985 daily VMT.[11] As such, the number of net new daily vehicle trips generated by Alternative 3 would be less than the net new daily vehicle trips generated by the Project. In addition, area sources and stationary sources would also generate less on-site operational air emissions compared to the Project as the development proposed under Alternative 3 would be reduced compared to the Project. Accordingly, localized air quality impacts under

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

[11] *See Appendix M of this Draft EIR for VMT Calculator Outputs for Alternatives*

Alternative 3 operation would be less than significant and less than the less than significant impacts of the Project.

(3) Toxic Air Contaminants

(a) Construction

As with the Project, construction of Alternative 3 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less than significant impacts with regard to construction TAC emissions. Overall construction TAC emissions generated by Alternative 3 would be less than those of the Project due to the reduction in construction activities as a result of the reduced development. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 3 would be less than significant and less than 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 from delivery trucks. Under Alternative 3, the overall increase in the number of deliveries and associated diesel particulate matter emissions would be reduced compared to the Project due to the slight reduction in development as a result of the increased setback. Furthermore, similar to the Project, the land uses proposed under Alternative 3 are not considered land uses that generate substantial TAC emissions. Therefore, Alternative 3's operation would not release substantial amounts of TACs. Impacts due to TAC emissions and the corresponding cancer risk under Alternative 3 would be less than significant and less than the less than significant impacts of the Project.

b. Cultural Resources (Historical Resources)

With regard to direct impacts on historical resources, as discussed in Section IV.B, Cultural Resources, of this Draft EIR, the existing buildings on the Project Site are not eligible for listing in the National or California Register or for local designation. However, similar to the Project, construction activities associated with Alternative 3 would have the potential to directly impact historical resources located at 1567 Industrial Street, which is the only contributing property to the potential Downtown Los Angeles Historic District that is immediately adjacent to the Project Site. Specifically, excavation and new construction for Alternative 3 could result in settling or displacement of the foundations of the existing historic buildings. As with the Project, precautions would be taken during planning, excavation, and construction, which would ensure that Alternative 3 would not result in material alternation of adjacent historical structures. In addition, as with the Project, while construction of

Alternative 3 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. Furthermore, while the amount of grading and excavation under Alternative would be similar to the Project, construction of Alternative 3 would occur slightly further away from the off-site historical resources compared to the Project due to the 75-foot setback along the southern boundary of the Project Site. As such, vibration associated with on-site construction activities under Alternative 3 would similarly not damage off-site historical resources, with a degree of impact less than that of the Project.

With regard to indirect impacts on historical resources, as discussed in Section IV.B, Cultural Resources, of this Draft EIR, the Project Site is located immediately adjacent to the potential Downtown Los Angeles Industrial Historic District. As with the Project, Alternative 3 would be in conformance with Standard 9 set forth by the Secretary of the Interiors Standards for Treatment of Historic Properties as it would not destroy any spatial relationships that characterize adjacent and nearby historical resources. Specifically, as with the Project, Alternative 3 would be designed in a contemporary art style and would be distinct from the surrounding buildings located within the potential historic district. As Alternative 3 would maintain a similar size, scale, proportion, and massing to the adjacent potential historic district, Alternative 3 would conform with Secretary's Standard 9 and would not destroy the potential historic district's integrity of setting.

Based on the above, Alternative 3 would result in less-than-significant impacts with respect to historical resources, and such impacts would be less 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 to convey water for dust control and to power lighting, electronic equipment, and other construction activities, and petroleum-based fuels for heavy construction equipment, delivery and haul trucks, and construction worker traffic. Similar to the Project, construction activities associated with Alternative 3 would not involve the consumption of natural gas. As with the Project, Alternative 3 would also generate a demand for transportation energy associated with on- and off-road vehicles. However, the energy consumed during construction of Alternative 3 would be reduced compared to the Project due to the slight reduction in construction activities and duration as a result of the increased setback. As with the Project, the use of construction equipment/vehicles used during construction of

Alternative 3 would comply with Title 24 standards and other applicable energy conservation requirements, CARB anti-idling and In-Use Off-Road Diesel-Fueled Fleet regulations, federal fuel efficiency standards, and other applicable requirements. Alternative 3 would also implement design features, similar to the Project, to reduce energy usage and fuel consumption during construction. Therefore, as with the Project, Alternative 3 construction activities would require energy demand that is not wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 3 and less than the less than significant impacts of the Project.

(b) Operation

As with the Project, Alternative 3 operations would generate an increased demand for electricity. However, as with the Project, with compliance with applicable CALGreen requirements and City Ordinance 187,714 requiring all new buildings to be all-electric buildings,[12,13] Alternative 3 would similarly generate a net decrease in the on-site demand for natural gas with potential natural gas usage limited to a potential restaurant use within the proposed office uses. Notwithstanding, based on the reduction in total development due to the increased setback, Alternative 3 would result in a lower projected net increase in the on-site demand for electricity compared to the Project. In the event the potential restaurant use is implemented, Alternative 3 would generate a similar natural gas demand compared to the Project as the potential restaurant use under Alternative 3 would be the same size as the Project. In addition, similar to the Project, Alternative 3 would implement a variety of energy conservation measures to reduce energy usage. Furthermore, as with the Project, Alternative 3 would be developed in accordance with applicable energy conservation requirements, including those in CALGreen (Title 24 standards). Therefore, as with the Project, operation of Alternative 3 would not involve the wasteful, inefficient, or unnecessary consumption of energy resources. Impacts related to energy use under Alternative 3 would be less than significant and less than 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 CALGreen (Part 11, Title 24), the City of

---

[12] *Chapter IX of the LAMC requires that all new buildings be all-electric buildings, with some exceptions. Equipment typically powered by natural gas such as space heating, water heating, cooking appliances and clothes drying would need to be powered by electricity for new construction. Exceptions are made for commercial restaurants, laboratory, and research and development uses.*

[13] *It is assumed that this alternative would similarly incorporate Project Design Feature GHG-PDF-1 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR prohibiting the use of natural gas during operations with exceptions provided for water heaters, food operations (restaurant/commissary uses), and building heating for studio uses.*

Los Angeles Green Building Code, City of LA Green New Deal, and the 2020–2045 RTP/SCS. 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 discussed previously, as with the Project, Alternative 3 would represent urban infill development within a Transit Priority Area and High Quality Transit Area in close proximity to transit, which would reduce vehicle trips, VMT, per capita VMT, and associated fuel usage in accordance with Senate Bill 375 and SCAG's RTP/SCS. As with the Project, Alternative 3 would also be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction, which would save transportation energy. 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. Geology and Soils (Paleontological Resources)

As discussed in Section IV.D, Geology and Soils (Paleontological Resources), of this Draft EIR, there are no previously encountered fossil vertebrate localities located within the Project Site. As with the Project, Alternative 3 would include excavation to a depth of approximately 11 feet below ground surface for the placement of building footings. Therefore, the potential for Alternative 3 to disturb undiscovered paleontological resources during constriction would be similar to the Project. As such, like the Project, Alternative 3 would implement Mitigation Measures GEO-MM-1 through GEO-MM-4 in order to mitigate potential impacts to paleontological resources. Therefore, impacts to paleontological resources under Alternative 3 would be less than significant with mitigation and similar to the less than significant with mitigation impacts of the Project.

e. Greenhouse Gas Emissions

As discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, GHG emissions from a development project are determined in large part by the number of daily vehicle trips generated and associated VMT, as well as by energy consumption from proposed land uses. Under Alternative 3, the number of daily trips, daily VMT trip generation, and energy and water consumption would be reduced compared to both Project due to the slight reduction in overall development as a result of the increased setback. Thus, the amount of GHG emissions generated by Alternative 3 would be less than the amount generated by the Project. In addition, as with the Project, Alternative 3 would be designed to comply with the requirements of Title 24 and the Los Angeles Green Building Code. Also, as with the Project, this alternative would comply with City Ordinance No. 187,714 requiring

all new buildings to be all-electric buildings.[14,15] Like the Project, Alternative 3 would also increase urban density within a Transit Priority Area and High Quality Transit Area in proximity to transit, would include LAMC-required bicycle parking, and would include electric vehicle-ready parking, which would all reduce VMT and associated fuel usage and GHG emissions. Therefore, with compliance with applicable regulations and with implementation of comparable sustainability features as the Project, Alternative 3 would be consistent with the GHG reduction goals and objectives included in adopted State, regional, and local regulatory plans. Thus, impacts related to GHG emissions under Alternative 3 would be less than significant and less than the less than significant impacts of the Project.

f. Land Use and Planning

As described above, Alternative 3 would develop the Project Site similar to the Project but would slightly reduce the square footages of the studios and production support space as a result of the increased setback. Accordingly, the overall FAR and density under Alternative 3 would be reduced compared to the Project. As with the Project, following approval of the proposed land use entitlements, Alternative 3 would be consistent with the overall intent of the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site and that were adopted to avoid or mitigate an environmental effect, including but not limited to the City's General Plan Framework Element, Central City North Community Plan and LAMC, and SCAG's 2020–2045 RTP/SCS. Therefore, the impacts of Alternative 3 related to potential conflicts with applicable land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant and similar to the less than significant impacts of the Project.

g. Noise

(1) Noise

(a) Construction

Alternative 3 would involve the same general phases of construction as the Project (i.e., site grading and excavation, building construction, and finishing/landscape installation).

---

[14] *Chapter IX of the LAMC requires that all new buildings be all-electric buildings, with some exceptions. Equipment typically powered by natural gas such as space heating, water heating, cooking appliances and clothes drying would need to be powered by electricity for new construction. Exceptions are made for commercial restaurants, laboratory, and research and development uses.*

[15] *It is assumed that this alternative would similarly incorporate Project Design Feature GHG-PDF-1 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR prohibiting the use of natural gas during operations with exceptions provided for water heaters, food operations (restaurant/commissary uses), and building heating for studio uses.*

In addition, while the amount and duration of construction activities would be reduced, the types of construction activities required for Alternative 3 would be substantially similar to the Project. However, construction activities under Alternative 3 would be located further away from the sensitive receptors located south of the Project Site, including receptor locations R5, R6, and R6A, due to the 75-foot setback along the Project Site's southern boundary. Therefore, construction noise levels at receptor locations R5, R6 and R6A would be reduced with the additional buffer distance. However, construction noise levels at other off-site receptor locations, R1 through R4, and R7 would be similar to the Project. The construction noise levels at receptor locations R5, R6 and R6A would be reduced by approximately 1.1 dBA, 6.5 dBA and 1.7 dBA, respectively. The construction noise levels would be further reduced with implementation of Mitigation Measure NOI-MM-1, which would reduce the construction to less than significant at the ground level of receptors R1, R2, R3, R6, R6A and R7. However, similar to the Project, construction noise levels at receptors R3, R6 and R6A (in the event that the mixed-use development at receptor location R6 is not built), would remain significant as the temporary construction sound barriers would not be effective in reducing the construction noise at the upper levels of these receptor locations. In summary, similar to the Project, on-site construction-related noise impacts under Alternative 3 would be significant and unavoidable. However, the overall construction impacts under Alternative 3 would be less than those of 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. While the overall amount and duration of construction would be slightly reduced, off-site construction activities and the associated construction noise levels would be expected to be similar to the Project during maximum activity days during the grading, excavation, and foundation phase (i.e., there would be no change to the intensity of construction activities on days in which maximum construction activities would occur). As such, noise levels during maximum activity days, which is used for measuring impact significance, would be similar to those of the Project. Therefore, off-site construction noise impacts under Alternative 3 would be similar to the Project and would remain less than significant. In addition, to the extent this alternative requires similar off-site utility improvements as the Project, potential impacts associated with installation of off-site utility improvements would similarly be significant and unavoidable.

(b) Operation

As discussed in Section IV.G, Noise, of this Draft EIR, sources of operational noise under the Project would include: (a) on-site stationary noise sources, including mechanical equipment, activities within the proposed outdoor spaces (located at Level 2 and Roof Level), parking facilities, loading dock and trash compactors, and studio-related operation; and (b) off-site mobile (roadway traffic) noise sources. Regarding on-site operational noise, Alternative 3 would introduce noise from similar on-site noise sources. However, it is

anticipated that with the overall reduction in total floor area and uses under this alternative (i.e., 512,611 square feet under Alternative 3 compared to 675,611 square feet under the Project) the noise levels from building mechanical equipment, outdoor spaces, and studio-related operation would be slightly reduced. In addition, similar to the Project, Alternative 3 would implement Project Design Features similar to NOI-PDF-1 (acoustic screening of mechanical equipment from off-site noise receptors) and NOI-PDF-2 (controls on amplified sound) which would minimize on-site operational noise. Like the Project, Alternative 3 would also comply with the regulations under LAMC Section 112.02 which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. Thus, operational on-site noise impacts under Alternative 3 would be less than significant and less than 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 overall development. The reduction in vehicle trips would result in a decrease in off-site operational traffic-related noise levels under Alternative 3. Therefore, off-site noise impacts under Alternative 3 would be less than 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 vibration from the use of heavy-duty construction equipment as well as from truck trips. While the overall amount of construction activities would be reduced under Alternative 3, on- and off site construction activities and the associated construction-related on- and off-site vibration levels would be expected to be similar to those of the Project as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment (i.e., there would be no change to the intensity of construction activities on days in which maximum construction activities would occur). However, as previously noted, on-site construction activities under Alternative 3 would be located further away from the sensitive receptors located south of the Project Site, including R5, R6 and R6A, due to the 75-foot setback along the Project Site's southern boundary. Therefore, the on-site construction vibration levels at receptor locations R5, R6 and R6A would be reduced with the additional buffer distance. Specifically, the vibration levels at receptor locations R5, R6 and R6A would be reduced by approximately 2 VdB, 19 VdB and 3 VdB, respectively. The peak vibration levels at receptor location R6 would be reduced from 99 VdB to 80 VdB, which would still exceed the 72 VdB significance threshold for human annoyance. In addition, construction vibration levels at receptor locations R1, R2, and R3 would be similar to the Project, which would remain significant pursuant to the significance criteria for human

annoyance. Accordingly, as with the Project, construction activities under Alternative 3 would result in significant and unavoidable on-site vibration impacts (human annoyance).

With regard to the significance criteria for building damage, as with the Project, vibration impacts due to on-site construction activities under Alternative 3 would similarly be less than significant for on-site construction vibration pursuant to the significance threshold for building damage. Overall, construction-related vibration impacts from on-site sources associated with Alternative 3 would be reduced compared to the Project.

Peak vibration levels generated by construction truck trips would be similar to those of the Project. Therefore, vibration impacts with respect to building damage from off-site construction activities (i.e., construction trucks traveling on public roadways) would be less than significant. Similar to the Project, potential vibration impacts with respect to human annoyance from construction trucks traveling along the anticipated haul route would be potentially significant. However, as previously noted, the construction under Alternative 3 would be shortened and fewer haul truck trips would occur because of the smaller overall development area. As such, the impacts experienced during this peak construction phase would occur over a shorter period compared to the Project.

(b) Operation

As described in Section IV.G, Noise, of this Draft EIR, sources of vibration related to operation of the Project would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under Alternative 3. As with the Project, vehicular-induced vibration from Alternative 3, including vehicle circulation within the surface and above-grade parking facilities, would not generate perceptible vibration levels at off-site sensitive uses. In addition, like 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 be less than significant and less than the less than significant impacts of the Project due to the reduction in vehicle trips and total floor area.

h. Public Services

(1) Fire Protection

(a) Construction

As previously discussed, the total floor area would be slightly reduced compared to that of the Project due the increased setback. Therefore, the overall duration of construction for Alternative 3 would be reduced compared to the Project. As with the Project, construction activities under Alternative 3 would have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, exposed electrical lines, chemical reactions, and lighted cigarettes. As with the Project, construction activities under Alternative 3 would comply with the safety and health provisions of OSHA. Construction would also occur in compliance with all applicable federal, State, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, compliance with regulatory requirements would effectively reduce the potential for construction activities associated with Alternative 3 to expose people to the risk of fire or explosion related to hazardous materials.

Additionally, similar to the Project, while Alternative 3 construction activities would primarily be contained within the boundaries of the Project Site, construction activities also have the potential to affect fire protection services by adding construction traffic to the street network and by necessitating partial lane closures for installation of required utility and street improvements. Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. However, as with the Project, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period and emergency access would not be impeded. Furthermore, similar to the Project, a Construction Traffic Management Plan (Project Design Feature TR-PDF-1 included in Section IV.J, Transportation, of this Draft EIR) would be implemented as part of Alternative 3 to ensure that adequate and safe access remains available within and near the Project Site during construction activities, and to ensure that the majority of construction-related traffic, including hauling activities and construction worker trips would occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts. Furthermore, emergency vehicles have the ability to avoid traffic delays through the use of sirens to clear paths of travel in accordance with the CVC. 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. As such, construction-related impacts related to fire protection services under Alternative 3 would be less than significant, and less than the less than significant impacts of the Project due to the reduction in construction activities and duration.

(b) Operation

As with the Project, Alternative 3 would generate a new visitor and employee population on the Project Site that would contribute to an increased demand for LAFD fire protection services. However, due to the slight reduction in total new floor area as a result of the increased setback, Alternative 3 would generate a smaller service population compared to the Project. As such, the overall increased demand for LAFD fire protection services would be reduced compared to that of the Project. 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 also ensure adequate emergency access. In addition, as with the Project, Alternative 3 would comply with the LAFD's Studio/Sound Stage Fire & Life Safety Requirements, and special effects, such as pyrotechnics, would be permitted through LAFD's Film Unit. 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. The driveways and internal circulation under Alternative 3 would also be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access.

As with the Project, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for Alternative 3. Therefore, similar to the Project, Alternative 3 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 than the less than significant impacts of the Project due to the reduction of total floor area and proposed uses.

(2) Police Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 3 would be similar to that of the Project. However, the overall amount of construction activities and duration of construction would be reduced compared to the Project due to the slight reduction in development as a result of the increased setback. Similar to the Project, construction activities for Alternative 3 would not generate a permanent population on the Project Site that would substantially increase the police service population of the Central Community Police Station. In addition, due to the reduction of construction activities, the

small temporary demand for police services would be shorter compared to the Project. Furthermore, as with the Project, Alternative 3 would incorporate Project Design Feature POL-PDF-1 to implement temporary security measures, including security fencing, lighting, and locked entry to secure the Project Site during construction, which would serve to reduce demand on LAPD facilities.

Similar to the Project, Alternative 3 would implement a Construction Traffic Management Plan that would ensure continued provision of emergency access during construction. Lastly, pursuant to CVC Section 21806, emergency vehicles would use their sirens to clear a path of travel or drive in the lanes of opposing traffic during an emergency to avoid or bypass 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 than the less than significant impacts of the Project due to the reduced construction activities.

(b) Operation

Like the Project, Alternative 3 would not include any residential uses, and this would not increase the service population of the Central Community Police Station or impact the officer-to-resident ratio within the Central Area. Similar to the Project, Alternative 3 would implement similar project design features as the Project during operation, which would help reduce the demand for police services and, 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. As such, impacts with regard to police protection services during operation of Alternative 3 would be less than significant, and less than the less than significant impacts of the Project.

i. Transportation

As previously described, Alternative 3 would be developed within the same Project Site as the Project and would include a mix of uses similar to the Project. In addition, while Alternative 3 would include a slight reduction in the studio uses and production support uses proposed by the Project as a result of the increased setback, Alternative 3 would feature similar vehicular, pedestrian, and bicycle access as the Project. Therefore, overall, as with the Project, the transportation-related plans, policies, and programs applicable to the Project would also apply to Alternative 3 (i.e., Mobility Plan 2035; Plan for a Healthy Los Angeles; Central City North Community Plan; LAMC, Vision Zero; Citywide Design Guidelines, and SCAG's 2020-2045 RTP/SCS).

As with the Project, Alternative 3 would not interfere with the complete streets balanced transportation network (i.e., Transit-Enhanced Network, Bicycle Enhanced Network, and Pedestrian-Enhanced Districts) concept of the Mobility Plan and would enhance pedestrian access within and around the Project Site as called for by the Mobility Plan and the Central City North Community Plan. In addition, sidewalk and driveway design, vehicular parking, bicycle parking, etc., would be provided in accordance with LAMC requirements. This alternative would also represent urban infill development within a TPA and HQTA in close proximity to transit which would encourage alternative transportation use as called for by the Mobility Plan and 2020–2045 RTP/SCS. Alternative 3 would support these transportation plans for the same reasons as the Project (e.g., would intensity urban density in close proximity to transit, would include similar roadway and sidewalk improvements, would comply with LAMC driveway and parking standards, etc.). Like the Project, Alternative 3 would also reduce work VMT per employee, including through the implementation of transportation demand management (TDM) measures as called for by the Mobility Plan, 2020–2045 RTP/SCS, and the City's TDM Ordinance. Therefore, as with the Project, Alternative 3 would not conflict with a program, plan, ordinance, or policy addressing the circulation system. The impacts of Alternative 3 in this regard would be less than significant and similar to the less than significant impacts of the Project.

With respect to VMT, Alternative 3 would result in a lower daily VMT than the Project within the Central APC. Specifically, as shown in Appendix M of this Draft EIR, Alternative 3 would result in 25,055 total daily VMT, which would be less than the 27,985 daily VMT generated by the Project. However, the average work VMT per capita for Alternative 3 of 6.5 would be greater than the Project's work VMT per capita of 5.5. Nonetheless, the work VMT per capital of Alternative 3 would be below the significance threshold of 7.6 for the Central APC. Therefore, as with the Project, Alternative 3 would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b), regarding VMT. As such, the VMT impacts of Alternative 3 would be less than significant and similar to the impacts of the Project.

With respect to freeway safety, as discussed in Section IV.I, Transportation, of this Draft EIR, a freeway safety analysis evaluates a proposed project's potential to cause or lengthen a forecasted off-ramp queue on the freeway mainline that could lead to a potential safety impact due to speed differentials between vehicles exiting the freeway off ramps and vehicles traveling on the freeway mainline. The City's guidance on freeway safety analysis requires analysis of freeway off-ramps where a proposed project adds 25 or more trips in either the morning or afternoon peak hour to be studied for potential queuing impacts. If the Project is not projected to add 25 or more peak hour trips at any freeway off-ramps, then a freeway ramp analysis is not required. According to the Transportation Assessment included as Appendix I of this Draft EIR, under Future with Project conditions, the queues at off-ramps would not exceed the ramp storage length during any of the analyzed peak hours and would not be subject to a speed differential analysis. The queues at the off-ramps would not extend

onto the freeway mainline and would not result in a significant safety constraint. As Alternative 3 would generate fewer trips than the Project, Alternative 3 would not add 25 or more trips to any nearby freeway off-ramps, and no further freeway safety analysis is required. As such, impacts regarding freeway safety would also be less than significant and less than those of the Project.

Regarding emergency access, as with the Project, construction activities associated with Alternative 3 could potentially impact the provision of emergency services by the LAFD and the LAPD in the vicinity of the Project Site as a result of reduced or altered access around the Project Site. However, like the Project, Alternative 3 also would not require the closure of any vehicle travel lanes. Additionally, similar to the Project, most of the construction worker trips would occur outside the weekday peak traffic periods, thereby reducing the potential for traffic-related conflicts. Alternative 3 would also include the preparation of a Construction Traffic Management Plan prior to the start of construction which would ensure that adequate and safe access remains available within and near the Project Site during construction activities. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way.

During operation, all 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. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, 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 Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede emergency vehicle access. As such, like the Project, emergency access to the Project Site and surrounding area under Alternative 3 would be maintained and Alternative 3 would not result in inadequate emergency access during operation. Additionally, pursuant to California Vehicle Code 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.

Based on the above, Alternative 3 would not result in inadequate emergency access during construction or operation, and impacts would be less than significant. Such impacts would be less than those of the Project due to the reduced construction and duration of construction.

j. Tribal Cultural Resources

As previously discussed, Alternative 3 would include the same excavation depth of 11 feet below ground surface as the Project. As discussed in Section IV.J, Tribal Cultural

Resources, of this Draft EIR, according to the results of the records searches and the Tribal Cultural Resources Report included in Appendix J of this Draft EIR, no tribal cultural resources or known cultural resources have been identified that could be impacted by the Project. Notwithstanding, like the Project, Alternative 3 would implement the City's standard condition of approval for the inadvertent discovery of tribal cultural resources which would address any potential impacts to previously unknown tribal cultural resources that may be encountered during construction. Therefore, Alternative 3 would result in less than significant impacts which would be similar to the less than significant impacts of the Project.

k. 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 construction equipment, grading, excavation/export, and re-compaction of soil. Construction-related water use under Alternative 3 would be less since the amount of new construction and the construction duration required under Alternative 3 would be slightly reduced as a result of the increased setback. Furthermore, while Alternative 3 would require trenching for connection to the existing water mains in the adjacent streets similar to the Project, Alternative 3 would similarly implement a Construction Traffic Management Plan (Project Design Feature TR-PDF-1 included in Section IV.J, Transportation, of this Draft EIR) to ensure the safe and efficient flow of pedestrian and vehicular traffic around the construction sites during construction. 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. Alternative 3 would result in less than significant impacts that are less than the less than significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 3 would generate an increased demand for water relative to existing conditions. However, based on the slight reduction in total development due to the increased setback, water demand for Alternative 3 would be less than the Project's estimated increase in water demand. Thus, the estimated net water demand under Alternative 3 would also be within the available and projected water supplies for LADWP under normal, single-dry, and multi-dry years through the year 2045. In addition, the existing water distribution infrastructure would be adequate to serve Alternative 3 since the water demand would be less than the water demand generated by the Project. Furthermore, similar to the Project, Alternative 3 would construct the necessary water infrastructure and connections to the LADWP water system pursuant to applicable City

requirements to accommodate the new development. Thus, operational impacts to water supply and infrastructure under Alternative 3 would be less than significant and less than the less than significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, the existing sewer laterals would be capped during construction of Alternative 3. As such, no new sewage would enter the public sewer system. As with the Project, temporary facilities, such as portable toilet and hand wash stations, would be provided by the construction contractor; however, any sewage generated from these facilities would be collected and hauled off-site and would not be discharged into the public sewer system. Thus, wastewater generation from construction activities under Alternative 3 would not cause a measurable increase in wastewater flows.

Additionally, as with the Project, Alternative 3 would require the installation of new on-site sewer line connections to connect the proposed buildings to the existing off-site public sewer mains along the streets surrounding the Project Site. Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to the public infrastructure. As with the Project, any offsite work that may affect services to the existing sewer lines in the vicinity of the Project Site during construction of Alternative 3 would be coordinated with the City of Los Angeles Bureau of Engineering (BOE). In addition, similar to the Project, a Construction Traffic Management Plan would be implemented during construction of Alternative 3 to reduce any temporary pedestrian and traffic impacts resulting from the minor off-site work that might result from trenching and installation of new sewer line connections. Therefore, construction-related impacts to the wastewater system under Alternative 3 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

Based on the slight reduction in total development due to the increased setback, wastewater generation under Alternative 3 would be less than the Project's estimated wastewater flow. Since the Project's wastewater flows would be accommodated by the existing infrastructure, the wastewater generated by Alternative 3 would also be accommodated by the existing capacity of the Hyperion Water Reclamation Plant, and impacts with respect to treatment capacity would be less than significant.

Similar to the Project, sewer service for Alternative 3 would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site. Given that wastewater flows generated by Alternative 3 would be less than the estimated

wastewater flow of the Project, it is anticipated that there would be sufficient capacity within the sewer lines serving the Project Site to accommodate the flows from Alternative 3. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for Alternative 3 during the permitting process. In addition, sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Thus, operational impacts with regard to wastewater generation and infrastructure capacity under Alternative 3 would be less than significant and less than the less than significant impacts of the Project.

(3) Energy Infrastructure

(a) Construction

As discussed above, Alternative 3 would reduce the amount of energy needed for construction activities based on the slight reduction in development due to the increased setback. As discussed in Section IV.C, Energy, of this Draft EIR, the estimated energy usage of the Project during construction would be within the available capacity and supply of the existing infrastructure. Since Alternative 3 would generate a reduced demand for energy during construction compared to the Project due to less overall construction, the energy demand of Alternative 3 would similarly be within the available capacity of the existing infrastructure. Therefore, impacts to energy infrastructure capacity associated with construction of Alternative 3 would be less than significant and less than the less than significant impacts of the Project.

(b) Operation

As previously discussed, the total energy consumption of Alternative 3 would be less than that of the Project due to the slight reduction in uses as a result of the increased setback. Therefore, as with the Project, the existing energy infrastructure would similarly have capacity to support Alternative 3. Impacts related to energy infrastructure would be less than significant under Alternative 3 and less than the less than significant impacts of the Project.

3. Comparison of Impacts

Based on the analysis above, Alternative 3 would not avoid the Project's significant and unavoidable noise and vibration impacts. However, Alternative 3 would reduce the amount of construction activities compared to the Project due to the 75-foot setback along the southern boundary of the Project Site such that the impacts above related to construction noise and vibration would be lessened but not to level of less than significant after application of all feasible mitigation. In addition, Alternative 3 would reduce several of the other construction-related less than significant impacts associated with the Project (i.e., TACs during construction, energy efficiency during construction, police and fire protection services

during construction, water and energy infrastructure during construction) while all other impacts would be similar to those of the Project. Alternative 3 would not result in greater impacts than the Project in terms of any of the environmental issues evaluated in this Draft EIR.

4. Relationship of the Alternative to Project Objectives

Alternative 3 would develop the same type of uses as the Project, but at a slightly reduced density due to the increased setback. As such, Alternative 3 would mostly meet the underlying purpose of the Project, which is to improve a series of underutilized parcels into a new production studio campus that would provide new television, video, and motion picture production facilities to retain production activities and jobs in Los Angeles while supporting the evolving needs of the entertainment industry for additional office space.

Regarding the Project objectives, Alternative 3 would meet the following Project objectives as effectively as the Project:

- Minimize ground disturbance and associated air emissions while providing a right-size amount of vehicle parking.

However, Alternative 3 would not meet the following objectives to optimize development of the Project Site and to provide new production studio space for the Arts District, Los Angeles region, and State of California to the same extent as the Project due to the overall reduction in the proposed studio and production support uses:

- Develop an industrially zoned lot with uses, ancillary support amenities and a unique architectural design at an intensity which contributes to the economic vitality of the surrounding community.

- Provide production studio space to assist the greater Los Angeles region and the State of California to retain entertainment-related jobs and ease production studio occupancy levels within the greater Los Angeles area.

- Reduce vehicle miles traveled by providing a mixture of production support, office, soundstage, and other related job-creating uses on a single site near housing, amenities, and transportation in both the Arts District and Downtown Los Angeles.

- Contribute to the sustainment of the City of Los Angeles' Arts District by creating a development providing production support and soundstage space that would support the economic viability of the Arts District as well as artists residing in the vicinity of the Project Site.

- Provide new studio space to ease production studio occupancy levels within the greater Los Angeles area.

V. Alternatives

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.

With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible alternatives includes: Alternative 1—No Project/No Build Alternative; Alternative 2—Reduced Development Alternative; and Alternative 3—Increased Setback 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 Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project/No Build Alternative, would avoid all of the Project's impacts (i.e., would avoid the Project's significant unavoidable impacts, less than significant impacts w/mitigation, and less than significant impacts).

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 3, the Increased Setback Alternative, would be the Environmentally Superior Alternative. As described above, while Alternative 3 (like Alternative 2) would not avoid the significant and unavoidable construction-related noise and vibration impacts of the Project, it would reduce these impacts to a greater extent compared to Alternative 2 as the on-site construction activities would be located further away from the sensitive receptors located south of the Project Site due to the 75-foot setback along the Project Site's southern boundary. In addition, Alternative 3 would reduce the majority of the Project's less than significant impacts due to the overall reduction in development as a result of the increased setback. Furthermore, Alternative 3 would not result in greater impacts compared to the Project.

In summary, based on the above and as summarized in Table V-2 on page V-10, while Alternative 3 would not avoid the Project's significant and unavoidable impacts, Alternative 3 would reduce these impacts to a greater extent than would Alternative 2. Furthermore, Alternative 3 would reduce more of the Project's other impacts than would Alternative 2. Lastly, as indicated previously, Alternative 3 would not result in greater impacts than the Project. Therefore, of the range of alternatives analyzed, Alternative 3, the Increased Setback Alternative, would be the Environmentally Superior Alternative.