I. Executive Summary

I. Executive Summary

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this section of this Draft Environmental Impact Report (EIR) contains a brief summary of the 1111 Sunset Project (Project) and its potential environmental effects. More detailed information regarding the Project and its potential environmental effects is provided in the following sections of this Draft EIR. Also included in this section is an overview of the purpose and focus of this Draft EIR, a description of the organization of this Draft EIR, a general description of the Project, a general description of areas of controversy, a description of the public review process for this Draft EIR, a list of the project design features and mitigation measures to be implemented as part of the Project, and a summary of the alternatives to the Project evaluated in this Draft EIR including identification of the Environmentally Superior Alternative.

1. Purpose of this Draft EIR

As described in Section 15123(a) and 15362 of the CEQA Guidelines, an EIR is an informational document that will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. Therefore, the purpose of this Draft EIR is to focus the discussion on the Project's potential environmental effects that the City of Los Angeles (City), as the Lead Agency, has determined to be, or potentially may be significant. Feasible mitigation measures are recommended, when applicable, that could reduce or avoid the Project's significant environmental impacts.

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

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

In accordance with Section 15128 of the CEQA Guidelines, an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the Draft EIR. An Initial

Study was prepared for the Project and a Notice of Preparation (NOP) was distributed for public comment to the State Clearinghouse, Governor's Office of Planning and Research, responsible agencies, and other interested parties on May 21, 2018, for a 30-day review period. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City determined through the Initial Study the potential for significant impacts in the following environmental issue areas:

- Air Quality
- Cultural Resources (historical resources and archaeological resources)
- Energy
- Geology and Soils (geology and soils and paleontological resources)
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use
- Noise
- Population and Housing
- Public Services (including fire protection, police protection, schools, parks and recreation, and libraries)
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems (including water supply and infrastructure, wastewater, and energy infrastructure)

The City determined through the Initial Study that the Project would not have the potential to cause significant impacts related to aesthetics; agricultural and forestry resources; objectionable odors; biological resources (with mitigation); archaeological resources (with mitigation); paleontological resources (with mitigation); human remains; landslides; soil erosion and loss of topsoil; expansive soil; the ability of soils to support the use of septic tanks; airport or airstrip-related hazards; wildland fires; flood hazards; inundation by seiche, tsunami, or mudflow; physical division of an established community;

conflict with an adopted habitat conservation plan or natural community conservation plan; mineral resources; airport or airstrip-related noise; displacement of people or housing; changes in air traffic patterns; and solid waste. Therefore, these areas were not further analyzed in this Draft EIR.[1] The Initial Study demonstrating that no significant impacts would occur for these issue areas is included in Appendix A of this Draft EIR.

3. Draft EIR Organization

This Draft EIR is comprised of the following sections:

I. Executive Summary. This section describes the purpose of this Draft EIR, Draft EIR focus and effects found not to be significant, Draft EIR organization, Project summary, areas of controversy and issues to be resolved, public review process, summary of alternatives, and a summary of environmental impacts and mitigation measures.

II. Project Description. This section describes the Project location, existing conditions, Project objectives, and characteristics of the Project.

III. Environmental Setting. This section contains a description of the existing physical and built environment and a list of related projects anticipated to be built in the vicinity of the Project Site.

IV. Environmental Impact Analysis. This section contains the environmental setting, Project and cumulative impact analyses, mitigation measures (where necessary), and conclusions regarding the level of significance after mitigation for each of the following environmental issues: air quality; cultural resources; energy; geology and soils; greenhouse gas emissions; hazards and hazardous materials; hydrology and water quality; land use; noise; population and housing; public services (fire protection, police protection, schools, parks and recreation, and libraries); transportation; tribal cultural resources; and utilities and service systems (water supply and infrastructure, wastewater, and energy infrastructure).

V. Alternatives. This section provides an analysis of a reasonable range of alternatives to the Project including: No Project/No Build Alternative; Zoning Compliant Alternative; Office Campus Alternative; Retail and Residential

[1] *Note that the mitigation measures for archaeological resources and paleontological resources included in the Initial Study were updated in Sections IV.B, Cultural Resources and IV.D. Geology and Soils, of this Draft EIR, respectively.*

Campus Alternative; Reduced Density Alternative; and Residential Townhome Alternative.

VI. Other CEQA Considerations. This section provides a discussion of significant unavoidable impacts that would result from the Project and the reasons why the Project is being proposed notwithstanding the significant unavoidable impacts. An analysis of the significant irreversible changes in the environment and potential secondary effects that would result from the Project is also presented here. This section also analyzes potential growth-inducing impacts of the Project and potential secondary effects caused by the implementation of the mitigation measures for the Project. Lastly, a summary of the possible effects of the Project that were determined not to be significant within the Initial Study is provided.

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

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

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

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

- Appendix A—Initial Study, NOP (Notice of Preparation), and NOP Comment Letters
  - Appendix A.1—Initial Study
  - Appendix A.2—Notice of Preparation (NOP)
  - Appendix A.3—NOP Comment Letters
- Appendix B—Protected Tree Report
- Appendix C—Technical Appendix for Air Quality and Greenhouse Gas Emissions
  - Appendix C.1—Air Quality and Greenhouse Gas Emissions Methodology
  - Appendix C.2—Air Quality Worksheet and Modeling Output Files
  - Appendix C.3—Greenhouse Gas Worksheets and Modeling Output Files

  - Appendix C.4—LADOT VMT Calculator Outputs
  - Appendix C.5—CalEEMod Outputs Alternatives 3 and 4 Operations
- Appendix D—Air Quality and Health Effects
- Appendix E—Technical Appendix for Cultural Resources
  - Appendix E.1—Cultural Resources Technical Report
  - Appendix E.2—Cultural and Paleontological Resource Evaluation and Impact Assessment
- Appendix F—Energy Calculations
- Appendix G—Technical Appendix for Geology and Soils
  - Appendix G.1—Geotechnical Engineering Investigation
  - Appendix G.2—Geology and Soils Review Letter
  - Appendix G.3—Geology and Soils Approval Letter
- Appendix H—Technical Appendix for Hazards and Hazardous Materials
  - Appendix H.1—Phase I Environmental Site Assessment
  - Appendix H.2— Phase I Supplemental Information Letter
  - Appendix H.3—Oil Well Report
  - Appendix H.4—Methane Report
- Appendix I—Water Resources Technical Report
- Appendix J— Land Use
  - Appendix J.1—Land Use Tables—Mixed Use Development Scenario
  - Appendix J.2—Land Use Tables—No-Hotel Development Scenario
- Appendix K—Noise Calculation Worksheets
- Appendix L—Los Angeles Fire Department Response Letter
- Appendix M—Los Angeles Police Department Response Letter
- Appendix N—Los Angeles Unified School District Response Letter

- Appendix O—Los Angeles Department of Recreation and Parks Response Letter
- Appendix P—Los Angeles Public Library Response Letter
- Appendix Q—Technical Appendix for Traffic
  - Appendix Q.1—Transportation Analysis
  - Appendix Q.2—Los Angeles Department of Transportation Assessment Letter
- Appendix R—Tribal Cultural Resources
  - Appendix R.1—Tribal Cultural Resources Report
  - Appendix R.2—AB 52 Notification Letter and Delivery Confirmations
  - Appendix R.3—AB 52 Consultation Communication
- Appendix S—Technical Appendix for Utilities and Service Systems
  - Appendix S.1—Water Supply Assessment
  - Appendix S.2—Utility Infrastructure Technical Report: Water, Wastewater, and Energy
- Appendix T—Transportation Assessment for the Alternatives

4. Revisions to State CEQA Guidelines Appendix G

In January 2018, the Office of Planning and Research proposed comprehensive updates to the CEQA Guidelines which revised the threshold question for aesthetics, air quality, cultural resources, geology and soils, hydrology and water quality, land use and planning, noise, population and housing, transportation, and utilities and service systems and included additional threshold questionss to address wildfires. This Draft EIR considers the revised thresholds for the environmental topics addressed herein in Section IV, Environmental Impact Analysis. In addition, the new topic of telecommunications facilities added to the revised threshold questions for utilities and service systems as well as the new threshold questions addressing wildfires are addressed in Section VI. Other CEQA Considerations, of this Draft EIR.

5. Existing Project Site Conditions

The Project Site comprises a 262,437-square-foot lot at 1111–1115 Sunset Boulevard and a 10,481-square-foot portion of Beaudry Avenue and Sunset Boulevard

adjacent to the 1111–1115 Sunset Boulevard lot. The 262,437-square-foot portion of the Project Site is specifically comprised of the 1111 Sunset Boulevard parcel (Parcel B) and an airspace lot (Parcel A) at 1115 Sunset Boulevard. This portion of the Project Site is an oval-shaped site that is currently developed with five buildings (referred to herein as Buildings 1 through 5). The 1111–1115 Sunset Boulevard lot was used as the headquarters for the Metropolitan Water District from 1963 to 1993. Buildings 1 through 4, which were completed between 1963 and 1973, were specifically constructed for the Metropolitan Water District. In 1994, the 1111–1115 Sunset Boulevard lot was transferred to Holy Hill Community Church. Holy Hill Community Church provided for the construction of Building 5 as the church's new sanctuary. Construction of Building 5 commenced in 1998. During operation of the 1111–1115 Sunset Boulevard lot by the Holy Hill Community Church, Building 4 located at 1115 Sunset Boulevard remained vacant. The Holy Hill Community Church experienced financial troubles and were prompted to subdivide the parcel (Parcel A, an airspace parcel) that contained the general envelope of Building 4. In 2011, the Holy Hill Community Church sold Parcel A. The Holy Hill Community Church declared bankruptcy in 2014 and vacated Parcel B (1111 Sunset Boulevard). The four existing buildings within Parcel B at 1111 Sunset Boulevard (Buildings 1, 2, 3, and 5) are currently vacant. Building 4 at 1115 Sunset Boulevard, which is not part of the Project, is located along the northern portion of the lot and is currently occupied by the Elysian apartments and a ground floor restaurant.

The four existing vacant structures within the Project Site comprise approximately 114,600 square feet and are three stories with an approximate height of 58 feet. The Project Site also includes surface parking and circulation areas generally located on the eastern half of the Project Site. Vehicular access to the Project Site is available at driveways along White Knoll Drive and Alpine Street. The Project Site slopes generally east to west with a grade difference of approximately 51 feet. Unmaintained landscaping, including trees, is dispersed throughout the Project Site. There are 104 trees located on-site that are species that are not protected by the LAMC (e.g., Canary Pine trees, Jacaranda trees, Saucer Magnolias, Olive trees and Strawberry trees). The Project Site also includes one Coastal Live Oak tree, which is a species that is protected by the LAMC. The Project Site also contains numerous Palm species, such as the Mexican and Canary Palms, which are not actually trees. In addition, there are 40 street trees within the public rights-of-way surrounding the Project Site that are not species that are protected by the LAMC (e.g., Jacaranda trees and Canary Pine trees). The 10,481-square-foot portion of Beaudry Avenue and Sunset Boulevard of the Project Site includes part of the Beaudry Avenue frontage extending generally around the south and east portions of the 1111–1115 Sunset Boulevard lot as well as a portion of the street and the existing triangular median island that divides Beaudry Avenue at Sunset Boulevard. The Beaudry Avenue frontage around the 1111–1115 Sunset Boulevard lot is currently improved with sidewalks and street trees. The Beaudry Triangle, a triangular road separator that divides

Beaudry Avenue at Sunset Boulevard, is paved and landscaped with trees and shrubs that are unmaintained and in poor condition.

The Project Site is located within the planning boundary of the Central City North Community Plan[2] area. The Project Site is designated as General Commercial and zoned C2-2D (Commercial Zone, Height District 2 with Development Limitation[3]). Height District 2 imposes no height limit and typically permits a floor area ratio of 6:1. However, the Project Site's floor area ratio is further restricted to 3:1 by a site-specific "D" limitation established by Ordinance 174,327 (effective January 5, 2002). It is also noted that Footnote No. 4 of the Community Plan limits the Project Site's FAR to 3:1. The permitted density within the Project Site, regardless of the development scenario pursued, is one dwelling unit per 400 square feet of lot area or one guest room per 200 square feet of lot area. In addition, no front yard setbacks are required for commercial or residential uses. The Project Site is also located within a Transit Priority Area, as defined by Zoning Information (ZI) File 2452 and is subject to the Freeway Adjacent Advisory Notice for Sensitive Uses, per ZI File 2427.[4,5]

6. Description of the Proposed Project

The 1111 Sunset Project is a new mixed-use development on a 272,918-square-foot (6.27-acre) site. The Project proposes two development scenarios—the Mixed Use Development Scenario and the No-Hotel Development Scenario. Under the Mixed Use Development Scenario, up to 737 residential units (including up to 76 restricted affordable housing units), up to 180 hotel rooms, up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area are proposed. Under the No Hotel Development Scenario, a maximum of up to 827 residential units (including up to 76 restricted affordable housing units) would be constructed along with up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area. The additional residential units (under the No-Hotel Development Scenario) would be located in the same building as the hotel Sunset Building and would replace the 180 hotel rooms proposed by the Mixed Use Development Scenario. Regardless of the removal of the hotel, the Project design would remain as proposed and as described herein and would comprise a maximum of 994,982 square feet of floor area.

---

[2] *The City is currently in the process of updating the Central City North Community Plan.*

[3] *Ordinance No. 174327, approved by City Council on November 2, 2001, signed by the Mayor on November 15, 2001, effective January 5, 2002.*

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

[5] *ZI 2427, Freeway Adjacent Advisory Notice for Sensitive Uses, addresses air pollution caused by freeway proximity.*

Under either development scenario, the proposed uses would be built above a screened six-level parking podium, which would be partially below grade (number of subterranean levels would vary from one to six levels based on topography) and partially above grade within four primary structures,[6] including two residential towers (referred to herein as Tower A and Tower B), a hotel/residential tower (referred to herein as the Sunset Building), and a commercial building that could contain office, retail, restaurant, and parking uses (referred to herein as the Courtyard Building). Separate from four primary structures, three low-rise, non-residential structures would be oriented towards Sunset Boulevard and Beaudry Avenue. In addition, a portion of the proposed residential uses would be provided in low-rise residential buildings (not part of the residential towers) dispersed throughout the eastern and southern portions of the Project Site around the base of the two residential towers. Office and commercial uses could be provided in the lower floors of these low-rise residential buildings. While the proposed structures would appear as separate buildings, the proposed structures collectively comprise a single building per the City's Building Code due to the unifying partially subterranean parking structure/podium.

The proposed residential uses would be concentrated along the eastern and southern boundaries of the Project Site. Specifically, Tower A would be situated along the southern portion of the Project Site while Tower B would be located along the eastern portion of the Project Site. Tower A would include approximately 406 residential units and comprise approximately 421,000 square feet of floor area, including amenities. Tower A would comprise 49 levels with an approximate height of 572 feet. Tower B would include approximately 246 residential units and comprise approximately 262,000 square feet of floor area, including amenities. Tower B would comprise 30 levels with an approximate height of 408 feet. Individual low-rise residential buildings would be dispersed around the base of the two residential towers. The low-rise residential buildings could include two to eight units within each building and range from two to four stories up to 91 feet in height. The Project's residential density could move from building to building. However, the maximum overall density would remain constant and maximum floor areas would remain substantially.

The Sunset Building would be located at the southwestern corner of the Project Site, primarily fronting Sunset Boulevard. The Sunset Building would comprise approximately 105,000 square feet and include either 180 hotel guest rooms (75,000 of floor area), approximately 20,000 square feet of commercial food and beverage uses, 5,800 square feet of lobby/service areas, and 4,200 square feet of meeting space or 90 residential units, associated amenity space and 20,000 square feet of commercial uses.[7] The Sunset

---

[6] *While the proposed structures would appear as separate buildings, the proposed structures collectively comprise one building per the City's Building Code due to the unifying subterranean parking.*

[7] *The 20,000 sf of hotel food and beverage uses is included in the 95,000 square feet of commercial area.*

Building would comprise up to 17 levels and with an approximate height of 211 feet. Adjacent to the Sunset Building along Sunset Boulevard and Beaudry Avenue would be low-rise commercial and office structures that would be oriented towards Sunset Boulevard and Beaudry Avenue. The low-rise commercial and office structures would comprise one to three levels with an approximate height of 64 feet.

Behind the low-rise commercial structures fronting Sunset Boulevard would be the Courtyard Building. The Courtyard Building would comprise approximately 57,500 square feet and include approximately 48,000 square feet of office space and 9,500 square feet of commercial space. The Courtyard Building would include three levels with an approximate height of 91 feet.

The proposed uses under the Mixed Use Development Scenario would require and provide 933 parking spaces in accordance with the requirements of the LAMC and Assembly Bill 744. In addition, the No-Hotel Development scenario would provide and require 907 parking spaces in accordance with the LAMC and Assembly Bill 744. The Project's parking requirement was calculated before AB 1245 amended AB 744. As such, parking for the Project was designed to account for parking prior to the application of AB 744. Although the Project's required parking could be further reduced based on AB 1245, given other factors, including market demand and to ensure no spillover of parking into the surrounding neighborhood, the Applicant is not proposing to further reduce the parking spaces provided. Parking would be provided in a six-level parking podium, which would be partially below grade and partially above grade. The portions of the parking that would be above grade would be wrapped in active uses or landscaping.[8] An additional 168 parking spaces for the existing Elysian apartment building would also be provided within a five-level, partially subterranean parking structure (Elysian Parking Facility) located within the northern portion of the footprint of the proposed Courtyard Building. The Elysian Parking Facility would be incorporated in the design of the Courtyard Building and include an approximately 12-foot setback from the Elysian apartment building. Residents, staff, and visitors of the Elysian apartment building would directly access the Elysian Parking Facility through up to five pedestrian bridges and through the 12-foot setback. The Elysian Parking Facility would also include a rooftop amenity deck for use by residents of the Elysian apartment building.

The Mixed Used Development Scenario would include a variety of open space totaling 82,925 square feet (excluding the Elysian Parking Facility roof deck), including approximately 70,175 square feet of exterior common open space; 7,800 square feet of

[8] *The lowest parking level, P1, would be fully subterranean. As the Project Site slopes, all other levels of the parking garage would be at least partially above grade and wrapped in active uses or landscaping as the grade is exposed.*

interior common open space; and 4,950 square feet of private open space, pursuant to the requirements of the LAMC. The No Hotel Development Scenario would include 93,050 square feet of open space, including approximately 77,075 square feet of exterior common open space; 9,075 square feet of interior common open space; and 6,900 square feet of private open space, pursuant to the requirements of the LAMC.

Implementation of the Project would require the removal of the existing vacant structures within the Project Site that together comprise approximately 114,600 square feet. The Project also includes the construction of a new electrical transformer yard with utility equipment located immediately west of the Elysian apartment building to serve the Elysian apartment building.

Refer to Section II. Project Description of this Draft EIR for a detailed description of the Project and the requested permits and approvals.

7. Areas of Controversy

Based on the NOP comment letters provided in Appendix A of this Draft EIR, issues known to be of concern include, but are not limited to, Project impacts associated with aesthetics, air quality, cultural resources, land use, geology and soils, hazards and hazardous materials, population and housing, schools, transportation, tribal cultural resources, and wastewater. Refer to Appendix A of this Draft EIR for copies of the NOP comment letters.

8. Public Review Process

The City prepared an Initial Study and circulated an NOP for public comment to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties on May 21, 2018, for a 30-day review period. In addition, a public scoping meeting for the Project was held on May 30, 2018. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR.

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

9. Summary of Environmental Impacts

Table I-1 on page I-12 provides a summary of the environmental impacts of the Project evaluated in this Draft EIR. Based on the analysis in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant

Table I-1
Summary of Impacts Under the Project

Environmental Issue	Proposed Project Impact
A. AIR QUALITY	
Construction	
Regional Emissions[9]	**Significant and Unavoidable**
Localized Emissions	Less Than Significant
Toxic Air Contaminants	Less Than Significant
Operation	
Regional Emissions	Less Than Significant
Localized Emissions	Less Than Significant
Toxic Air Contaminants	Less Than Significant
B. CULTURAL RESOURCES	
Historical Resources	Less Than Significant
Archaeological Resources	Less Than Significant with Mitigation
C. Energy	
Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources	
Construction	Less Than Significant
Operation	Less Than Significant
Conflict with Plans for Renewable Energy or Energy Efficiency	Less Than Significant
D. GEOLOGY AND SOILS	
Geology and Soils	Less Than Significant
Paleontological Resources	Less Than Significant with Mitigation
E. GREENHOUSE GAS EMISSIONS	Less Than Significant
F. HAZARDS AND HAZARDOUS MATERIALS	
Construction	Less Than Significant with Mitigation
Operation	Less Than Significant
G. HYDROLOGY AND WATER QUALITY	
Surface Water Quality	
Construction	Less Than Significant
Operation	Less Than Significant
Groundwater Quality	
Construction	Less Than Significant
Operation	Less Than Significant
Surface Water Hydrology	
Construction	Less Than Significant
Operation	Less Than Significant

[9] *As discussed in Section IV.A, Air Quality, of this Draft EIR, cumulative impacts from regional emissions during construction would be significant and unavoidable.*

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

Environmental Issue	Proposed Project Impact
Groundwater Hydrology	
Construction	Less Than Significant
Operation	Less Than Significant
H. LAND USE	Less Than Significant
I. NOISE	
Construction	
On-Site Noise[10]	**Significant and Unavoidable**
Off-Site Noise[11]	**Significant and Unavoidable**
On-Site Vibration (Building Damage)	Less Than Significant
On-Site Vibration (Human Annoyance)	**Significant and Unavoidable**
Off-Site Vibration (Building Damage)	Less Than Significant
Off-Site Vibration (Human Annoyance)[12]	**Significant and Unavoidable**
Operation	Less Than Significant
J. POPULATION, HOUSING, AND EMPLOYMENT	Less Than Significant
K. PUBLIC SERVICES	
Fire Protection	
Construction	Less Than Significant
Operation	Less Than Significant
Police Protection	
Construction	Less Than Significant
Operation	Less Than Significant
Schools	
Construction	Less Than Significant
Operation	Less Than Significant
Parks and Recreation	
Construction	Less Than Significant
Operation	Less Than Significant
Libraries	
Construction	Less Than Significant
Operation	Less Than Significant

[10] *As discussed in Section IV.I, Noise, of this Draft EIR, cumulative impacts from on-site noise sources during construction would be significant and unavoidable.*

[11] *As discussed in Section IV.I, Noise, of this Draft EIR, cumulative impacts from off-site noise sources during construction would be significant and unavoidable.*

[12] *As discussed in Section IV.I, Noise, of this Draft EIR, cumulative vibration impacts from off-site construction activities would be significant and unavoidable with respect to the significance criteria for human annoyance.*

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

Environmental Issue	Proposed Project Impact
L. TRANSPORTATION	
Conflict with Plans	Less Than Significant
Vehicle Miles Traveled	Less Than Significant
Hazardous Design Features	Less Than Significant
Emergency Access	Less Than Significant
Freeway Safety Analysis	Less Than Significant
M. TRIBAL CULTURAL RESOURCES	Less Than Significant with Mitigation
N. UTILITIES AND SERVICE SYSTEMS	
Water Supply and Infrastructure	
Construction	Less Than Significant
Operation	Less Than Significant
Wastewater	
Construction	Less Than Significant
Operation	Less Than Significant
Energy Infrastructure	
Construction	Less Than Significant
Operation	Less Than Significant

Source: Eyestone Environmental, 2021.

and unavoidable environmental impacts relative to: air quality (regional emissions during construction) and construction noise and vibration (on-site and off-site construction noise, and on-site and off-site construction vibration impacts related to human annoyance). Cumulative impacts associated with regional air quality impacts during construction, construction noise impacts from on-site and off-site noise sources, and vibration impacts associated with off-site construction pursuant to the significance threshold for human annoyance, would also be significant and unavoidable.

10. Project Design Features

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

a. Greenhouse Gas Emissions

Project Design Feature GHG-PDF-1: The Project shall prohibit the use of natural gas-fueled fireplaces in the proposed residential units.

b. Hazards and Hazardous Materials

Project Design Feature HAZ-PDF-1: Project buildings would be placed in a manner so as to not significantly impede future access to the locations of the existing wells as depicted in CalGEM's maps.

c. Noise

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

Project Design Feature NOI-PDF-2: All outdoor mounted mechanical equipment will be enclosed or screened from off-site noise-sensitive receptors.

Project Design Feature NOI-PDF-3: All loading docks and trash collecting areas will be acoustically screened from off-site noise-sensitive receptors.

Project Design Feature NOI-PDF-4: Project construction will not include the use of driven (impact) pile systems.

Project Design Feature NOI-PDF-5: Outdoor amplified sound systems, if any, will be designed so as not to exceed the maximum noise level of 85 dBA ($L_{eq\text{-}1hr}$) at a distance of 25 feet from the amplified speaker sound systems at the Sunset Building Roof Deck. A qualified noise consultant will provide written documentation that the design of the system complies with these maximum noise levels.

Project Design Feature NOI-PDF-6: The occupancy for the Elysian Parking outdoor roof deck will be limited to 150 people.

d. Public Services—Police Protection

Project Design Feature POL-PDF-1: Prior to the start of construction, the Applicant shall implement temporary security measures including security fencing (e.g., chain-link fencing), low-level security lighting, and locked entry (e.g., padlocked gates or guard-restricted access) to limit access by the general public. Regular security patrols during non-construction hours shall also be provided.

Project Design Feature POL-PDF-2: During operation, the Project shall incorporate a 24-hour/seven-day security plan to ensure the safety of its residents and site visitors. The Project's security plan could include, but not be limited to, the following design features:

- Installing and utilizing a 24-hour security camera network throughout the underground parking structure, the elevators, the common and amenity spaces, the lobby areas, and the rooftop and ground level outdoor open spaces;
- Controlling access to all building elevators, hotel rooms, residences, and resident-only common areas;
- Maintaining staff on-site, including at the lobby concierge desk and within the car valet area. Designated staffers shall be dedicated to monitoring the Project's security cameras and directing staff to locations where any suspicious activity is viewed; and
- Training staff on security policies for the Project's buildings. Duties of the security personnel would include, but not be limited to, assisting residents and visitors with site access, monitoring entrances and exits of buildings, managing and monitoring fire/life/safety systems, and patrolling the property.

Project Design Feature POL-PDF-3: The Project shall provide lighting of buildings and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings.

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

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

e. Transportation

Project Design Feature TR-PDF-1: A detailed Construction Management Plan, including street closure information, a detour plan, haul routes, and a staging plan, will be prepared and submitted to the City for review and approval. The Construction Management Plan would formalize how construction would be carried out and include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. The Construction Management Plan will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and will include, but not be limited to, the following elements, as appropriate:

- Scheduling workdays to begin and end prior to the morning and afternoon peak hours, respectively, to the extent feasible so as to avoid worker trips during those peak hours.

- Scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible, to reduce the effect on traffic flow on surrounding streets.
- Planning and scheduling of construction activities so as to minimize the duration of sidewalk and lane closures on Sunset Boulevard.
- Provision of worker parking on-site or in designated off-site private parking areas and prohibition of construction-related vehicle parking on surrounding public streets, other than the streets adjacent to the Project Site.
- Provision of replacement parking for neighboring residents to make up for on-street parking temporarily lost during Project construction.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men) and to maintain access for land uses in the vicinity of the Project Site.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate, especially as it pertains to maintaining safe routes to schools.

Project Design Feature TR-PDF-2: The Project shall include the following TDM measures to further reduce VMT:

- Unbundled Parking/Parking Cash-Out: The Project would provide unbundling parking, which requires residents and tenants to specifically opt-in to a parking lease (unbundled parking) and requires companies to refund the cost of parking to employees who opt-out (parking cash-out).
- Promotions and Marketing: The Project shall include a transportation management coordinator (TMC) on the building management staff to promote the benefits of TDM. The TMC will provide information on public transit and any related incentives, flexible work schedules and telecommuting programs, pedestrian and bicycle amenities provided, rideshare/carpool/vanpool programs, and parking incentives.
- Ride-Share Program: The Project shall participate in the Downtown Transportation Management Organization (TMO), which would help to match employees with similar commutes into ride-share programs.
- First-Mile/Last-Mile Options: The Transportation Center at the Project Site shall support services that address first-mile/last-mile connectivity issues with public transit.

- Pedestrian Network Improvements: The Project shall widen sidewalks on all sides of the Project Site to meet Mobility Plan standards. The Project shall install a new pedestrian crosswalk with continental crosswalk markings across Sunset Boulevard at White Knoll Drive with the installation of a traffic signal at that location. The Project shall also install all-way stop-control at the intersection of Beaudry Avenue & Alpine Street, where there is currently an uncontrolled crosswalk across Beaudry Avenue.

f. Utilities and Service Systems—Water Supply and Infrastructure

Project Design Feature WAT-PDF-1: In addition to regulatory requirements, the Project design shall incorporate the following water conservation features to support water conservation in addition to those measures required by the City's current codes and ordinances:

- High-Efficiency Toilets with a flush volume of 1.1 gallons per flush, or less.
- Showerheads with a flow rate of 1.5 gallons per minute, or less.
- Residential Lavatory Faucets (manual) with a flow rate of 0.5 gallons per minute, or less.
- ENERGY STAR Certified Residential Clothes Washers—Front-loading with Integrated Water Factor of 2.7 or less and capacity of 5.6 cubic feet.
- ENERGY STAR Certified Residential Dishwashers—standard with 3.2 gallons/cycle or less.
- Domestic Water Heating System located in close proximity of point(s) of use.
- Individual metering and billing for water use for every residential dwelling unit and commercial unit.
- Water-saving Pool Filter or Reuse pool backwash water for irrigation.
- Pool/Spa recirculating filtration equipment.
- Pool splash troughs around the perimeter that drain back into the pool.
- Install a meter on the pool make-up line so water use can be monitored and leaks can be identified and repaired.
- Proper Hydro-zoning/Zoned Irrigation - (groups plants with similar water requirements together).

g. Utilities and Service Systems—Wastewater

Project Design Feature WAS-PDF-1: The Project Applicant shall provide for the upsizing of the existing 8-inch sewer line on Beaudry Avenue, or equivalent infrastructure improvements determined by LA Sanitation, to ensure adequate capacity is available to serve the estimated sewer flows of the Project.

Project Design Feature WAS-PDF-2: During operation of the Project, the proposed swimming pools shall not be drained concurrently. In addition, the largest swimming pool shall be drained over a minimum span of two days.

11. Mitigation Measures

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

a. Air Quality

Mitigation Measure AIR-MM-1: All off-road diesel-powered equipment greater than 50 hp used during Project demolition, grading/excavation, and concrete foundation activities shall meet USEPA Tier 4 final emissions standards.

Mitigation Measure AIR-MM-2: The Project representative shall require operator(s)/construction contractor(s) to commit to using 2010 model year or newer engines that meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NO_X emissions or newer, cleaner trucks for: (1) haul trucks associated with demolition and grading activities; and (2) concrete delivery trucks during concrete mat foundation pours. To monitor and ensure 2010 model year or newer trucks are used at the Project Site, the Lead Agency shall require that truck operator(s)/construction contractor(s) maintain records of trucks during the applicable construction activities associated with the Project and make these records available to the Lead Agency upon request.

Mitigation Measure AIR-MM-3: All construction equipment shall be properly tuned and maintained in accordance with the manufacturer's specifications. Prior to the commencement of any construction activities, contractors must submit documentation to demonstrate the ability to maintain all construction equipment properly tuned and maintained. The contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications.

Mitigation Measure AIR-MM-4: Contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, regardless of their weight, trucks and vehicles in loading and unloading queues shall have their engines turned off after five minutes when not in use, to reduce vehicle emissions.

Mitigation Measure AIR-MM-5: To the extent possible, petroleum-powered construction activity shall utilize electricity from power poles rather than temporary diesel power generators and/or gasoline power generators. If stationary petroleum-powered construction equipment, such as generators, must be operated continuously, such equipment shall be located at least 100 feet from sensitive land uses, whenever possible.

Mitigation Measure AIR-MM-6: The Project would include the use of solar-powered generators, to the extent commercially available and feasible, should generators be required during construction.

b. Biological Resources

BIO-MM-1: If feasible, the removal of vegetation shall occur outside of the raptor nesting season, generally recognized as February 1 to June 30. If vegetation removal must occur during the nesting season, then a qualified biologist shall conduct a nesting bird survey prior to any vegetation removal. If active nests are identified, the biologist shall flag vegetation containing active nests. The biologist shall establish appropriate buffers around active nests to be avoided until the nests are no longer active and the young have fledged. Buffers shall be based on the species identified, but generally will consist of 300 feet for raptors as determined by the Project Biologist. If for some reason, it is not possible to remove all vegetation during the non-nesting season, then vegetation to be removed during the nesting season must be surveyed by a qualified biologist no more than three days prior to removal. If no raptors are found, the vegetation can be removed. If nesting raptors are detected, then removal must be postponed until the fledglings have vacated the nest or the biologist has determined that the nest has failed. Furthermore, the biologist shall establish an appropriate buffer zone where construction activity may not occur until the fledglings have vacated the nest or the biologist has determined that the nest has failed. Similarly, for vegetation being preserved, if construction is to occur during the nesting season, preserved vegetation should be surveyed for the presence of nesting birds. If nesting raptors are detected, the biologist shall establish a 300-foot buffer zone where construction activity may not occur until the fledglings have vacated the nest or the biologist has determined that the nest has failed. If feasible, the demolition shall occur outside of the nesting season, generally recognized as February 1 to June 30 because of the potential for indirect impacts to nearby nests.

If demolition must occur during the raptors nesting season, then a qualified biologist shall conduct a nesting raptors survey prior to any demolition. If active nests are identified, the biologist shall flag active nests and establish appropriate buffers around active nests to be avoided until the nests are no longer active and the young have fledged. Buffers will consist of 300 feet for raptors.

BIO-MM-2: If feasible, the removal of vegetation should occur outside of the nesting season, generally recognized as March 15 to August 15. If vegetation removal must occur during the nesting season, then a qualified biologist shall conduct a nesting bird survey prior to any vegetation removal. If active nests are identified, the biologist shall flag vegetation containing active nests. The biologist shall establish appropriate buffers around active nests to be avoided until the nests are no longer active and the young have fledged. Buffers will be based on the species identified, but generally will consist of 50 feet as determined by the Project Biologist. If for some reason, it is not possible to remove all vegetation during the non-nesting season, then vegetation to be removed during the nesting season must be surveyed by a qualified biologist no more than three days prior to removal. If no nesting birds are found, the vegetation can be removed. If nesting birds are detected, then removal must be postponed until the fledglings have vacated the nest or the biologist has determined that the nest has failed. Furthermore, the biologist shall establish an appropriate buffer zone where construction activity may not occur until the fledglings have vacated the nest or the biologist has determined that the nest has failed. Similarly, for vegetation being preserved, if construction is to occur during the nesting season, preserved vegetation shall be surveyed for the presence of nesting birds. If nesting birds are detected, the biologist shall establish an appropriate buffer zone where construction activity may not occur until the fledglings have vacated the nest or the biologist has determined that the nest has failed.

If feasible, building demolition should occur outside of the avian nesting season, generally recognized as March 15 to August 31 because of the potential for many urban-adapted birds to utilize cavities and other openings of the building. If demolition must occur during the nesting season, then a qualified biologist shall conduct a nesting bird survey prior to any demolition. If active nests are identified, the biologist shall flag active nests and establish appropriate buffers around active nests to be avoided until the nests are no longer active and the young have fledged. Buffers will be based on the species identified, but generally will extend of 50 feet from the nest site.

c. Cultural Resources

CUL-MM-1: Prior to the start of Project ground disturbance, including demolition, digging, trenching, plowing, drilling, tunneling, grading, leveling, removing peat, clearing, augering, stripping topsoil or a similar activity ("Ground Disturbance Activities") at the Project Site, a qualified principal archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology shall be retained to prepare a written Cultural Resource Monitoring and Treatment Plan in accordance with the Secretary of the Interior's Standards for Archaeological Documentation, to reduce potential Project effects on unanticipated archaeological resources unearthed during construction, with an emphasis on potential historical-period materials. The Cultural Resource Monitoring and Treatment Plan shall include the professional qualifications required of key staff, monitoring protocols relative to the varying archaeological sensitivity across the Project Site, provisions for evaluating and treating unanticipated cultural materials discovered during ground-disturbing activities, situations under which monitoring may be reduced or discontinued, and reporting requirements. The Cultural Resource Monitoring and Treatment Plan shall also include a section describing the protocol, in the event that unanticipated human remains are discovered during Project construction.

Prior to commencing any Ground Disturbance Activities at the Project Site, the Applicant, or its successor, shall retain archeological monitor(s) who are qualified to identify archaeological resources and who shall be approved by the Department of City Planning, Office of Historic Resources ("OHR").

Prior to the commencement of any Ground Disturbance Activities, the archaeological monitors shall provide Worker Environmental Awareness Program ("WEAP") training to construction crews involved in Ground Disturbance Activities that provides information on regulatory requirements for the protection of cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover cultural resources during Ground Disturbance Activities. In addition, workers will be shown examples of the types of resources that would require notification of the archaeological monitor. The Applicant shall maintain on the Project Site, for City inspection, documentation establishing that the training was completed for all members of the construction crew involved in Ground Disturbance Activities.

The archeological monitor(s) shall observe all Ground Disturbance Activities on the Project Site at all times from the surface of native soil down until bedrock is encountered which is anticipated to be at depths ranging from 1 to 16 feet. If Ground Disturbance Activities are occurring simultaneously at multiple locations on the Project Site, the

principal archaeologist shall determine if additional monitors are required for other locations where such simultaneous Ground Disturbance Activities are occurring. The on-site archaeological monitoring shall end when the Ground Disturbing Activities encounter bedrock in the Project area, or when the archaeological monitor determines that monitoring is no longer necessary.

d. Geology and Soils (Paleontological Resources)[13]

GEO-MM-1 (Previously included as Mitigation Measure CUL-MM-2 in the Initial Study and revised): The services of a Project paleontologist who meets professional standards (including a graduate degree in paleontology, geology, or related field, with demonstrated experience in the vertebrate, invertebrate, or botanical paleontology of California or related topical or geographic areas and at least one full year of supervisory experience), shall be retained prior to excavating, digging, trenching, plowing, drilling, tunneling, grading, leveling, removing peat, clearing, augering, stripping topsoil or a similar activity ("Ground Disturbance Activities") associated with the Project in order to develop a site-specific Paleontological Resource Mitigation and Treatment Plan. The Paleontological Resource Mitigation and Treatment Plan shall specify the levels and types of mitigation efforts based on the types and depths of Ground Disturbance Activities and the geologic and paleontological sensitivity of the Project Site. The Paleontological Resource Mitigation and Treatment Plan shall also include a description of the professional qualifications required of key staff, communication protocols during construction, fossil recovery protocols, sampling protocols for microfossils (if required), laboratory procedures, reporting requirements, and curation provisions for any collected fossil specimens.

This Project paleontologist shall supervise a qualified paleontologist, who may also be the archaeological monitor required by CUL-MM-1 if such monitor is qualified in both fields, to monitor Ground Disturbance Activities to identify potential paleontological remains. If artificial fill, significantly disturbed deposits, or younger deposits too recent to contain paleontological resources are encountered during construction, the Project paleontologist may reduce or curtail monitoring in the affected areas, after consultation with the Applicant and the City Office of Historic Resources.

---

[13] *In January 2018, OPR proposed comprehensive updates to the CEQA Guidelines,. Prior to the release of the revised threshold questions, the question related to potential impacts to paleontological resources was considered under cultural resources. This threshold question has since been moved and is now addressed under geology and soils.*

e. Hazards and Hazardous Materials

Mitigation Measure HAZ-MM-1: The Applicant is responsible for ensuring that all wells on the Project Site shall be abandoned and all construction in and around an abandoned well are consistent with current CalGEM regulations and recommendations (meeting the standards at the time of condition clearance). To ensure this requirement is met, the following shall be required:

- The Applicant shall engage a licensed Petroleum Engineer to monitor any and all grading or construction activities on, and in the vicinity of, oil well(s);
- The licensed Petroleum Engineer and/or his/her designee will visually inspect the excavation areas for signs of potential oil wells. If signs of potential oil well(s) cannot be visually identified or detected by the Petroleum Engineer and/or his/her designee, additional geophysical survey may also be performed during the excavation work to help locate potential oil wells, if present, within the Project Site;
- The City of Los Angeles Petroleum Administrator and/or his/her designee, in his or her reasonable discretion, shall monitor and inspect activities related to well abandonment, site preparation, zonal isolation, grading/shoring (CalOSHA), and other relevant activities on the Project Site to ensure public health and safety, regulatory consistency, and industry best practices;
- All well abandonment activities shall be consistent with CalGEM recommendations;
- The licensed Petroleum Engineer shall prepare a written report noting the exact location of the well (including latitude and longitude of each well in NAD 83 (to the sixth decimal place minimal) coordinate system), photos showing the condition of the well, and any other relevant documentation, evidencing compliance with CalGEM regulations and recommendations and shall submit said report to CalGEM (certified mail), the Petroleum Administrator, the Los Angeles City Certified Unified Program Agency (LACUPA), and to the Los Angeles Department of City Planning; and
- Prior to the issuance of building permit for the Project by the Los Angeles Department of Building and Safety (LADBS), the written report prepared by the licensed Petroleum Engineer must be approved by the City's Petroleum Administrator and LA CUPA.

Mitigation Measure HAZ-MM-2: If any on-site oil wells are located, the licensed Petroleum Engineer shall survey and leak test all oil wells and shall equip the wells in general accordance with relevant CalGEM and City

of Los Angeles Petroleum Administrator and/or his/her designee requirements as specified below.

A. Leak Tested: On-site oil wells will be leak tested for potential liquid and gas leakage. The top casing, if encountered, of oil wells within the boundary must be leak tested in the field for excessive methane levels, in coordination with CalGEM. Results of the leak test shall be documented by a Licensed Petroleum Engineer and included in the written report (see MM-HAZ-1 above);

B. Protection Measures: Appropriate protection measures shall be developed in accordance with relevant CalGEM and City of Los Angeles oil well requirements. Potential protection measures may include vent cones and related vent pipes and risers. Protection measures are typically implemented as a precautionary measure to help reduce and/or detect potential leak.

Mitigation Measure HAZ-MM-3: A soil and site management plan will be developed and implemented to ensure all on-site contaminated soil is properly disposed of at an appropriate, permitted disposal or treatment facility and to address the potential identification and abandonment of oil wells if encountered during earthwork activities.

- The soil management plan shall be submitted to the City of Los Angeles Department of Building and Safety for review and approval prior to the commencement of excavation and grading activities.
- As part of the soil management plan, a licensed Petroleum Engineer, and/or his/her designee, in his or her reasonable discretion, shall be present on the Project Site during grading and excavation activities in the suspected locations of the wells and shall be on call at other times to monitor compliance with the soil and site management plan.

Mitigation Measure HAZ-MM-4: During construction activities at the Project Site, controls shall be in place to mitigate the effects of subsurface gases and impacted soil and groundwater on workers and the public. During construction, the following shall be implemented:

- Gas monitoring devices would be present to alert workers of elevated gas concentrations when basement or subsurface soil disturbing work is being performed;
- Contingency procedures would be in place if elevated gas concentrations are detected such as the mandatory use of personal protective equipment, evacuating the area, and/or increasing ventilation within immediate work area where the elevated concentrations are detected;
- Workers would be trained to identify exposure symptoms and implement alarm response actions;

- If the groundwater elevation is lowered using dewatering wells prior to excavation below groundwater, groundwater would be collected, treated, and discharged in accordance with Los Angeles Regional Water Quality Control Board (LARWQCB) requirements;
- Soil and groundwater exposed during excavations would be minimized to reduce the surface area which could off-gas. This will be done by staggering exposed demolition areas;
- Soil removed as part of construction will be sampled and tested for off-site disposal in a timely manner. If soil is stockpiled prior to disposal, it would be managed in accordance with the Project's Storm Water Pollution Prevention Plan (SWPPP);
- Fencing would be established to limit public access and allow for gas dilution; and
- Health and Safety Plan (HASP) development which would describe the work activities and hazards associated with each work activity. Hazard mitigation would be presented in the HASP to limit construction risks to workers. The HASP would have emergency contact numbers, maps to the nearest hospital, gas monitoring action levels, gas response actions, allowable worker exposure times, and mandatory PPE requirements. The HASP will be signed by all workers onsite to demonstrate their understanding of the construction risks.

Mitigation Measure HAZ-MM-5: The Applicant shall install a Passive System regardless of the design methane concentration or the design methane pressures. The Passive System for the Project shall include, at minimum:

A. A standard de-watering system or a reinforced concrete mat slab designed to accommodate the hydrostatic pressure;

B. A sub-slap vapor collection and ventilation system that includes:

   a. Perforated horizontal collection piping;

   b. A permeable gravel blanket for soil gas migration of a minimum 2 inches thick;

   c. Solid vent risers (amount and size are dependent on building size); and

   d. A complete impervious membrane (barrier) system. Since there are known oil wells on-site, this barrier system will be a chemically compatible product that covers the entire footprint of the proposed structure.

C. If a concrete mat slab is used, the sub-slab vapor collection and ventilation system can be omitted, as approved by LADBS through

submission of a Request for Modification of Building Ordinances form.

f. Noise

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

- Along the eastern property line of the Project Site between the construction areas and the residential uses on the east side of White Knoll Drive and Alpine Street east of the Project Site (receptor locations R1, R2 and R3). The temporary sound barrier shall be designed to provide a minimum 18-dBA noise reduction at the ground level of receptor location R1, 15 dBA noise reduction at receptor location R2 and 9 dBA noise reduction at the ground level of receptor location R3.
- Along the northern property line of the Project Site between the construction areas and residential use on Boylston Street (receptor location R5). The temporary sound barrier shall be designed to provide a minimum 10-dBA noise reduction at the ground level of receptor location R5.
- Along the western property line of the Project Site between the construction areas and residential uses on Sunvue Place (receptor location R6) and the motel on the west side Sunset Boulevard (receptor location R7). The temporary sound barrier shall be designed to provide a minimum 11-dBA and 6-dBA noise reduction at the ground level of receptor locations R6 and R7, respectively.
- Along the south side of the on-site Elysian residential building between the construction area. The temporary sound barrier shall be designed to provide a minimum 15-dBA noise reduction at the ground level of the Elysian residential building.

g. Tribal Cultural Resources

Mitigation Measure TCR-MM-1: In coordination with CUL-MM-1, prior to commencing any ground disturbance activities, including demolition, excavating, digging, trenching, plowing, drilling, tunneling, grading, leveling, removing peat, clearing, augering, stripping topsoil or a similar activity ("Ground Disturbance Activities") at the Project Site, the Applicant, or its successor, shall retain a tribal monitor that is qualified to identify subsurface tribal cultural resources to monitor Ground Disturbance Activities. Any qualified tribal monitor shall be approved by the Gabrieleño Band of Mission Indians-Kizh Nation.

The tribal monitor shall observe all Ground Disturbance Activities on the Project site from the surface of native soil down until bedrock is encountered which is anticipated to be at depths ranging from 1 to 16 feet. If Ground Disturbance Activities are occurring simultaneously at multiple locations on the Project site, the principal archaeologist shall determine if additional tribal monitors are required for other locations where such simultaneous Ground Disturbance Activities are occurring. The on-site tribal monitoring shall end when the Ground Disturbance Activities encounter bedrock, or when the archaeological and tribal monitors both indicate that the monitoring for tribal cultural resources is no longer necessary.

In coordination with CUL-MM-1, prior to commencing any Ground Disturbance Activities, the archaeological monitor, in consultation with the tribal monitor, shall provide Worker Environmental Awareness Program ("WEAP") training to construction crews involved in Ground Disturbance Activities that provides information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover tribal cultural resources during Ground Disturbance Activities. In addition, workers will be shown examples of the types of resources that would require notification of the archaeological monitor and tribal monitor. The Applicant shall maintain on the Project Site, for City inspection, documentation establishing the training was completed for all members of the construction crew involved in Ground Disturbance Activities.

In the event that any subsurface objects or artifacts that may be tribal cultural resources are encountered during the course of any Ground Disturbance Activities, all such activities shall temporarily cease within the area of discovery, the radius of which shall be determined by a qualified archeologist, in consultation with the tribal monitor, until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all Ground Disturbance Activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; and (2) OHR.
2. If OHR determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource in its discretion and supported by substantial evidence, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant, or its successor, and the

City regarding the monitoring of future Ground Disturbance Activities, as well as the treatment and disposition of any discovered tribal cultural resources.

3. The Applicant, or its successor, shall implement the tribe's recommendations of the qualified archaeologist retained by the City and paid for by the Applicant, in consultation with the tribal monitor, reasonably conclude that the tribe's recommendations are reasonable and feasible.
4. In addition to any recommendations from the applicable tribe(s), the qualified archeologist shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation.
5. If the Applicant, or its successor, does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or qualified tribal monitor, the Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant, or its successor, and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require the recommendation be implemented as originally proposed by the archaeologist or tribal monitor; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate an significant impacts to tribal cultural resources. The Applicant, or its successor, shall pay all costs and fees associated with the mediation.
6. The Applicant, or its successor, may recommence Ground Disturbance Activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by both the qualified archaeologist and tribal monitor and determined to be reasonable and appropriate.
7. The Applicant, or its successor, may recommence Ground Disturbance Activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in paragraphs 2 through 5 above.

8. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to OHR, the South Central Coastal Information Center ("SCCIC") at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.
9. Notwithstanding paragraph 8 above, any information that the Department of City Planning, in consultation with the City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code, section 6254(r), and handled in compliance with the City's AB 52 Confidentiality Protocols.

12. Summary of Alternatives

This Draft EIR examined six alternatives to the Project in detail, which include the No Project/No Build Alternative, the Zoning Compliant Alternative, the Office Campus Alternative, the Retail and Residential Campus Alternative, the Reduced Density Alternative, and the Residential Townhome Alternative. A general description of these alternatives is provided below. Refer to Section V, Alternatives, of this Draft EIR for a more detailed description of these alternatives, a comparative analysis of the impacts of these alternatives with those of the Project, and a description of the alternatives considered but rejected as infeasible.

a. Alternative 1: No Project/No Build Alternative

In accordance with the CEQA Guidelines, the No Project 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, Alternative 1, the No Project/No Build Alternative, assumes that the Project would not be approved, no new 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 vacant buildings as well as the surface parking areas would remain on the Project Site, and no new construction would occur.

While the No Project/No Build Alternative would avoid all of the Project's significant environmental impacts, the No Project/No Build Alternative would not implement best management practices that would improve stormwater flows; therefore, this alternative

would result in a greater impact with respect to surface water quality, surface water hydrology, and groundwater hydrology during operation. In addition, without updating the existing older and more energy consuming buildings, Alternative 1 would result in a greater impact associated with energy use compared to the Project.

b. Alternative 2: Zoning Compliant Alternative

In accordance with CEQA Guidelines Section 15126.6(e)(3)(B), the No Project Alternative, may discuss "predictable actions by others, such as some other project if disapproval of the project under consideration were to occur." CEQA Guidelines Section 15126.6(e)(3)(B) states that "If disapproval of the project under consideration would result in actions by others, such as the proposal of some other project, this "no project" consequence should be discussed… and the analysis should identify the practical result of the project's non-approval…" CEQA Guidelines Section 15126.6(e)(3)(C) further states that the No Project Alternative should project "what would reasonably be expected to occur in the foreseeable future if the project were not approved based on current plans and consistent with available infrastructure and community services." Based on this guidance, Alternative 2, the Zoning Compliant Alternative, considers development of the Project Site in accordance with the parameters set forth by the existing land use designation and zoning on the Project Site, which are General Commercial and C2-2D (Commercial Zone, Height District 2 with Development Limitation), respectively, as an additional No Project Alternative.

Based on the existing land use designation and zoning for the Project Site, Alternative 2 would include the development of a mixed-use project, including 587 residential units, 48,000 square feet of office space, and 75,000 square feet of general commercial floor area, including food and beverage uses. As compared to the Mixed Use Development Scenario, Alternative 2 would construct 150 fewer residential units, would eliminate the hotel, and would construct 20,000 less square feet of commercial uses. As compared to the No-Hotel Development Scenario, Alternative 2 would construct 240 fewer residential units and would construct 20,000 less square feet of commercial uses. Overall, Alternative 2 would construct 708,418 square feet of new floor area within the Project Site, a reduction of 286,564 square feet compared to the Project and would result in a net floor area ratio of 2.58:1. As with the Project, implementation of the Zoning Compliant Alternative would require the removal of the existing vacant buildings within the Project Site that together comprise approximately 114,600 square feet.

As provided in Section V, Alternatives, of this Draft EIR, Alternative 2 would not eliminate any of the Project's significant and unavoidable impacts. Specifically, the Project's significant and unavoidable impacts related to regional air quality emissions during construction; on- and off-site construction noise; and vibration from on- and off-site construction with respect to the significance threshold for human annoyance would remain

with the Zoning Compliant Alternative. Additionally, Alternative 2 would not avoid the Project's significant and unavoidable cumulative regional air quality impacts during construction; cumulative construction noise impacts from on-site and off-site noise sources; and cumulative vibration impacts associated with off-site construction, pursuant to the significance threshold for human annoyance. In addition, since this Alternative would result in a greater average household VMT per capita and a greater average work VMT per employee than the No-Hotel Development Scenario, Alternative 2 would result in a greater impact associated with VMT. The remaining impacts would be similar to or less than those of the Project.

c. Alternative 3: Office Campus Alternative

Alternative 3, the Office Campus Alternative, would include the development of a 708,418-square-foot office campus, including 633,418 square feet of office uses and 75,000 square feet of ancillary retail and restaurant space. The Office Campus Alternative would not include any residential or hotel uses as proposed by the Project. As with the Project, the existing vacant buildings and surface parking areas within the Project Site would be removed. Overall, Alternative 3 would construct 708,418 square feet of new floor area within the Project Site, a reduction of 286,564 square feet compared to the Project's 994,982 square feet of new floor area within the Project Site, and would result in a net floor area ratio of 2.58:1.

The Office Campus Alternative would not avoid any of the Project's significant and unavoidable impacts. Specifically, the Project's significant and unavoidable impacts related to regional air quality during construction; on- and off-site construction noise; and vibration from on-site and off-site construction with respect to the significance threshold for human annoyance would remain with development of Alternative 3. The Office Campus Alternative also would not avoid the Project's significant and unavoidable cumulative impacts related to regional air quality during construction; construction noise from on-site and off-site noise sources; and vibration associated with off-site construction, pursuant to the significance threshold for human annoyance. In addition, since this Alternative would not provide for the synergy of uses as the Project, which could serve to reduce vehicle trips and vehicle miles traveled and associated air and GHG emissions, Alternative 3 would result in a greater impact associated with consistency with land use plan and policies and GHG emissions compared to the Project. All other impacts would be less than or similar to those of the Project.

d. Alternative 4: Retail and Residential Mixed-Use Alternative

Alternative 4, the Retail and Residential Mixed-Use Alternative, would eliminate the 48,000 square feet of office uses and the 180-room hotel proposed by the Project (under

the Mixed Use Development Scenario) and would include the maximum number of residential units that could potentially be included as part of the Project (which, under the No Hotel Development Scenario, could have up to 827 residential units). As with the Project, under either development scenario, 76 units would be set aside as affordable housing units. The retail/restaurant component would increase from 95,000 square feet to 200,000 square feet. Specifically, Alternative 4 would include 75,000 square feet of general retail, a 40,000-square-foot grocery store, a 25,000-square-foot health club/spa, a 30,000-square-foot restaurant, and a 30,000-square-foot movie theater. Overall, similar to the No-Hotel Development Scenario, the Retail and Residential Mixed-Use Alternative would also construct 994,982 square feet of new floor area within the Project Site with a net FAR of 3.65:1.

Alternative 4 would not avoid any of the Project's significant and unavoidable impacts. Specifically, the Project's significant and unavoidable impacts related to regional air quality during construction, on- and off-site construction noise, and vibration from on- and off-site construction with respect to the significance threshold for human annoyance would remain significant with development of Alternative 4. The Retail and Residential Mixed-Use Alternative also would not avoid the Project's significant and unavoidable cumulative impacts related to regional air quality during construction, construction noise from on-site and off-site noise sources, and vibration associated with off-site construction pursuant to the significance threshold for human annoyance. In addition, impacts related to surface water hydrology during operation could be greater than those of the Project due to the increased impervious surfaces and employee population, respectively. Additionally, since this Alternative would not provide for the synergy of uses as the Project, which could serve to reduce vehicle trips and vehicle miles traveled and associated air and GHG emissions, Alternative 4 would result in a greater impact associated with land use consistency and GHG emissions compared to the Project. Furthermore, as a result of the increase in vehicle trips, Alternative 4 would result in significant and unavoidable impacts with respect to off-site operational noise. All other impacts would be similar to or less than those of the Project.

e. Alternative 5: Reduced Density Alternative

Alternative 5, the Reduced Density Alternative, would reduce the amount of total new floor area proposed by the Project (under the Mixed Use Development Scenario) by approximately 35 percent. Specifically, Alternative 5 proposes the development of 479 dwelling units (none of which are affordable units), a 117-room hotel, 61,750 square feet of commercial uses, and 31,200 square feet of office uses. Overall, the Reduced Density Alternative would construct 646,738 square feet of new floor area (a reduction of 348,244 square feet compared to the Project) and would result in a floor area ratio of 2.37:1 compared to the Project's net FAR of 3.65:1.

The Reduced Density Alternative would not avoid any of the Project's significant and unavoidable impacts. Specifically, the Project's significant and unavoidable impacts related to regional air quality emissions during construction, on- and off-site construction noise, and vibration from on- and off-site construction with respect to the significance threshold for human annoyance would remain with development of the Reduced Density Alternative. Alternative 5 also would not avoid the Project's significant and unavoidable cumulative impacts related to regional air quality during construction, construction noise from on-site and off-site noise sources, and vibration impacts associated with off-site construction, pursuant to the significance threshold for human annoyance. In addition, since this Alternative would result in a greater average household VMT per capita and a greater average work VMT per employee, Alternative 5 would result in a greater impact associated with VMT. All other impacts would be similar to or less than those of the Project.

f. Alternative 6: Residential Townhomes Alternative

Alternative 6, the Residential Townhomes Alternative, would include the development of 250 multi-family residential townhome units. The Residential Townhomes Alternative would not include affordable housing units and would not develop any retail, office, or hotel uses proposed by the Project. As with the Project, the existing vacant buildings and surface parking areas within the Project Site would be removed. Alternative 6 would construct 300,000 square feet of new floor area within the Project Site, a reduction of 694,982 square feet compared to the Project's 994,982 square feet of new floor area within the Project Site, and would result in a net floor area ratio of 1.10:1.

Alternative 6 would not eliminate any of the Project's significant and unavoidable impacts. Specifically, the Project's significant and unavoidable impacts related to regional air quality emissions during construction; on- and off-site construction noise; and vibration from on- and off-site construction with respect to the significance threshold for human annoyance would remain with the Residential Townhomes Alternative. Furthermore, Alternative 6 would not avoid the Project's significant and unavoidable cumulative regional air quality impacts during construction; cumulative construction noise impacts from on-site and off-site noise sources; cumulative and vibration impacts associated with off-site construction, pursuant to the significance threshold for human annoyance. In addition, since this Alternative would not provide for the synergy of uses as the Project, which could serve to reduce vehicle trips and associated air emissions, Alternative 6 would result in a greater impact associated with land use consistency and VMT compared to the Project. The remaining impacts would be similar to or less than those of the Project.

g. 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/No Build Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives.

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project/No Build Alternative would avoid all of the Project's significant environmental impacts, including the Project's significant and unavoidable impacts related to regional air quality emissions during construction, on- and off-site construction noise, and vibration from on- and off-site construction with respect to the significance threshold for human annoyance. Alternative 1 would also avoid the Project's significant and unavoidable cumulative impacts related to regional air quality emissions during construction, cumulative construction noise from on-site and off-site noise sources, cumulative vibration impacts associated with off-site construction, pursuant to the significance threshold for human annoyance. Alternative 1 would also avoid most of the Project's remaining less-than-significant and less-than-significant with mitigation impacts as no changes to the existing conditions would occur. However, as Alternative 1 would not implement best management practices that would improve existing stormwater flows, this alternative would result in a greater impact with respect to surface water quality, surface water hydrology, and groundwater hydrology during operation. In addition, without updating the existing older and more energy consuming buildings, Alternative 1 would result in a greater impact associated with energy use compared to the Project.

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 6, the Residential Townhomes Alternative, would be the Environmentally Superior Alternative. Although Alternative 6 would not include affordable housing units or the range of housing types, other than the No Project Alternative, Alternative 6 is the only alternative that would eliminate the Project's significant and unavoidable impacts related to regional air quality emissions during construction. In addition, other than the No Project Alternative, Alternative 6 is the only alternative that would reduce the Project's significant and unavoidable impacts related to on- and off-site construction noise and vibration from on- and off-site construction with respect to the significance threshold for human annoyance, but even then those impacts would remain significant and unavoidable. Furthermore, Alternative 6 would also reduce most of the Project's remaining impacts. Thus, of the range of alternatives analyzed, Alternative 6, the Residential Townhomes Alternative, would be the Environmentally Superior Alternative.