

5.0 ALTERNATIVES

A. INTRODUCTION

Under CEQA, and as indicated in California Public Resources Code Section 21002.1(a), the identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process intended to consider ways to mitigate or avoid the significant environmental effects of a project.

Guidance regarding the definition of project alternatives is provided in State *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.

The State *CEQA Guidelines* emphasize that the selection of project alternatives be based primarily on the ability to reduce 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.”¹ The State *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 analyzed.²

In selecting project alternatives for analysis, potential alternatives should be feasible. The State *CEQA Guidelines* Section 15126.6(f)(1) explains 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 (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site.

The State *CEQA Guidelines* require the analysis of a “no project” alternative and, depending on the circumstances, evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. In general, the environmentally superior alternative is the alternative with the least adverse impacts on the environment. If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify another environmentally superior alternative among the other alternatives.³

¹ *CEQA Guidelines* Section 15126.6(b).

² *Ibid.*, Section 15126.6(f).

³ *Ibid.*, Section 15126.6(e)(2).

Section 15126.6(d) of the State *CEQA Guidelines* states that alternatives analysis need not be presented in the same level of detail as the assessment of the proposed project. Rather, the EIR is required to provide sufficient information to allow meaningful evaluation, analysis and comparison with the proposed project. If an alternative would cause one or more significant impacts in addition to those of the proposed project, analysis of those impacts is to be discussed, but in less detail than for the proposed project.

B. OBJECTIVES OF THE PROJECT

Chapter 2.0, Project Description, of this Draft EIR sets forth the Project's underlying purpose and a list of Project Objectives defined by the Applicant and the Lead Agency.

The Project Objectives are as follows:

- Objective 1: Support the diverse array of entertainment, shopping, nightlife, cultural, and residential uses in Downtown by locating new residences within the Downtown Housing Incentive Area, new hotel rooms to support the goals laid out in the Mayor's 2015 White Paper on the Future of the Los Angeles Convention Center, and neighborhood and visitor serving uses to support connectivity with LA LIVE, Staples Center Arena, and the Los Angeles Convention Center.
- Objective 2: Develop a mixed-use project that combines housing, hotel, and commercial uses in close proximity to public transit consistent with regional mobility goals to reduce vehicle trips and infrastructure costs, while supporting the use of public transportation and amenities, including the nearby Metro Stations, City bus and DASH lines.
- Objective 3: Respect and maintain the historical significance of the Petroleum Building by providing a setback along W. Olympic Boulevard to maintain views of the Petroleum Building's architecturally distinguished primary facades along W. Olympic Boulevard and S. Flower Street.
- Objective 4: Compliment and foster pedestrian activity through ground level retail/restaurant uses, street trees and landscaping, public art, and signage and lighting compatible with the active LASED and streetscape along W. Olympic Boulevard, S. Figueroa Street, S. Flower Street, and 11th Street.
- Objective 5: Create a visually vibrant and engaging pedestrian and vehicular experience along Figueroa Street, removing paved surface parking, and providing new pedestrian scale features such as a public plaza, that are compatible with the adjacent entertainment and restaurant venues at LA Live and Staples Center Arena directly across the street.
- Objective 6: Create a development that complements and improves the visual character of the area by connecting with the surrounding urban environment through a high level of architectural design and appropriate scale of development.
- Objective 7: Provide unique and vibrant signage that is integrated into the Project's architecture and that will visually connect to and be compatible with the scale of media and signage on existing and current development on adjacent blocks while informing and attracting visitors to the Project's content and offerings;
- Objective 8: Create a development with high quality design that is responsive environmental sustainability issues (e.g. energy efficiency, including electronic charging stations for Project tenants); and that provides open space and recreational amenities for Project's residents, hotel guests, commercial tenants, and site visitors.

- Objective 9: Redevelop an underutilized site with an economically viable and attractively designed development that supports the SCAG growth projections in Downtown by exercises TFAR provisions for fuller utilization of the Project Site and support of TFAR public benefits purposes.
- Objective 10: Maintain and enhance the economic vitality of the region by providing job opportunities that attract commercial and residential tenants, and increase the tax revenue, sales and property taxes.
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C. ALTERNATIVES SELECTED FOR ANALYSIS

The Alternatives Analysis has been prepared to evaluate the potential for reducing the Project's significant impacts. The Project's significant impacts include construction impacts on noise, vibration and traffic; and operations impacts on transportation and traffic. The analyses below conclude that the construction noise impacts would be significant and unavoidable at current and potential future residential uses across from the Project Site for both Project and cumulative development; construction vibration impacts would be potentially significant and unavoidable at the historic Petroleum Building; and Project construction when combined with multiple nearby projects would potentially result in cumulative construction traffic impacts. Project Operations would result in significant and unavoidable impacts at three intersections under Future with Project with Mitigation Conditions for Phase 1 (Year 2020); and Full Buildout (Year 2023).

Accordingly, three Alternatives have been selected for detailed analysis, as discussed further below. One is a No Project/No Build Alternative. The remaining two are build alternatives that would reduce the overall density of the Project, with reductions in the amount of traffic generation and construction activity. The three alternatives selected for evaluation are listed below and are described in detail and evaluated in subsection F, Alternatives Analysis.

1. No Project/No Build Alternative
2. Reduced Density Alternative
3. Residential with Ground Level Commercial Alternative

The first alternative, No Project/No Build Alternative, is included pursuant to Section 15126.6(e) of the CEQA Guidelines to allow decision makers to compare the impacts of approving a proposed project with the impacts and foreseeable future of not approving that project. Under the No Project/No Build Alternative, the Project would not be developed.

The property would maintain the Luxe Hotel, a 112,748 sf, nine story, building with 178 guest rooms, meeting area, restaurant/bar area, fitness center; and parking in a one-level parking deck with parking below and above the deck. Surface parking on the remainder of the Project Site would remain. The parking lot areas would continue to provide uses similar to those occurring today; e.g. hotel guest parking, special event parking, "overflow" parking, limousine staging, and construction/maintenance vehicle parking, and leased public parking.

The Reduced Density Alternative, representing a smaller project with the same uses, was selected to investigate ways of reducing or avoiding significant unavoidable impacts associated with construction noise and traffic as well as operational traffic; and also disclose the potential for reducing other less than significant impacts associated with the Project. The Reduced Density Alternative would include a similar hotel/residential/commercial use mix as the Project, but reduce the Project floor area ratio (FAR) to 6.0:1, a scale of development that would be permitted without the exercise of the TFAR provisions of the LAMC.

The Residential with Ground Level Commercial Alternative is also a reduced density alternative that would reduce some Project impacts. The Residential with Ground Level Commercial Alternative would also have an FAR of 6.0:1. However, rather than reducing density proportionately, it would achieve the reduction primarily through the elimination of the hotel component of the Project (and a slight reduction in the number of Residential units), as residential development typically generates less traffic than other potential uses of equivalent size.

D. ALTERNATIVES CONSIDERED AND REJECTED

The State *CEQA Guidelines* Section 15126.6(c) recommends that an EIR identify alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the State *CEQA Guidelines*, the following factors may be used to eliminate alternatives from detailed consideration: the alternative's failure to meet most of the basic Project Objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives that have been considered and rejected as infeasible are discussed below.

1. Alternative Off-Site Locations

State *CEQA Guidelines* Section 15126.6(f)(2) provides guidance regarding consideration of one or more alternative location(s) for a proposed project, stating that putting the Project in another location should be considered if doing so would allow significant effects of the project to be avoided or substantially lessened; and if no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion.

An alternative site would not offer environmental benefits over the Project Site for a mixed-use hotel, residential and commercial project at 9.7:1 FAR. Due to the scale and density of the Project, it must be located on a property with a Regional Center or High Residential general plan designation; within an area that does not limit hotel or residential density, such as the Downtown Housing Incentive Area; within an area of the City that permits transfer of floor area, if necessary (TFAR); and within walking distance of the Los Angeles Convention Center (LACC). This limits the potential sites for development. Also, there are few undeveloped properties located within walking distance of the Convention Center that also have the necessary zoning, and these properties are owned by other operators or developers. Therefore, an alternative site would not help fulfill the Mayor's identified need for 8,000 hotel rooms within walking distance of the LACC, an objective of this Project as well. In addition, development of the Project outside the nearby vicinity would not fulfill a key objective of the Project to create a mixed-use project that is compatible with and benefits from connectivity with LA LIVE, Staples Center, and the LACC.

Further, development of the Project at an Alternative Site would not be likely to materially reduce potential impacts. The Project's temporary construction noise and traffic impacts, as well as operations traffic impacts, are similar to impacts associated with development in urbanized areas generally and more so in the

Downtown area in the vicinity of the LACC. As a result, impact profiles for a Project of this nature at most alternative sites suited for such development are expected to, at the least, be similar; and could potentially be greater depending on their setting conditions. It is not apparent that an alternative site suited for such a project would be superior.

In addition, the Project is focused on the development of a particular site under the ownership and control of the Project applicant where a substantial investment has been made in developing a Project that is uniquely suited to its specific location. To pursue development at a different site would present a significant financial loss due to investments to date and those needed to design a new project and restart the entitlement process, without apparent benefit.

2. Alternative On-Site Uses

A number of alternative development programs for the Project Site were also considered and eliminated. The review of such proposals focused on potential Project Site development that would be consistent with the Downtown area, the infill character of the Project Site and the character of uses in the Project vicinity. Key land use mixes explored included the following:

All Commercial Project with Office and Hotel Alternative

An All Commercial Project Alternative was considered that would utilize the entire Project Site for hotel, commercial/retail, and office development, with a FAR of 6.0:1. This Alternative would include two towers, connected by a podium with subterranean parking, as is the case with the Project. This Alternative was identified, because it maintains the hotel use on-site, which is necessary to meet the hotel room needs for the LACC; and, it provides additional Class A office space, which would be an expansion of professional office use similar to the office towers on S. Figueroa Street north of W. Olympic Boulevard, and would be compatible with the office use in the adjacent Petroleum Building. This Alternative was eliminated, as it would not meet Project objectives to provide residential development in the Downtown Housing Incentive Area, or locate mixed-use residential development within a transit oriented area.

A larger all-commercial project alternative with a FAR of 9.7:1, similar to the Project's, was also considered. Such a Project could be developed by exercising TFAR provisions of the LAMC. Again, this alternative would not meet the objectives for a residential use within the Downtown Housing Incentive Area or transit oriented area. In addition, the office and hotel uses would generate greater impacts than the residential uses on many environmental topics, most notably traffic, as opposed to reducing potential impacts.

All Hotel Project with Commercial Alternative

An Alternative was considered that would provide hotel development with ground floor retail uses. Two variations were considered. The first would develop the Project Site with a 600 room hotel within the provisions of the zoning code; and with an FAR of 6.0:1, not exercising TFAR density transfers. This Alternative would likely include up to 600 hotel rooms in two towers, with related commercial/restaurant space on the ground floor and second level, an expanded conference space. The second variation would include a larger development with the Project's 9.7:1 FAR, by exercising TFAR provisions of the LAMC. This

variation would include up to 1,150 hotel rooms, with increased hotel-related commercial/restaurant space on the ground and second level, and expanded meeting and conference space.

This Alternative was identified, because it would contribute significantly to the 8,000 new hotel guest rooms necessary to support the nearby LACC renovation and expansion, as noted by the Mayor in his 2015 White Paper on the Future of the Los Angeles Convention Center. This Alternative was eliminated for further consideration as it would not meet the Project objectives to provide residential development in the Downtown Housing Incentive Area, and for not locating mixed-use residential development in a transit oriented area. Further, hotel uses generally produce more traffic than residential uses, which would be expected to increase rather than reduce the Project's environmental impacts.

Phase I Only Project Alternative

A Phase I Only Project Alternative was also considered. The new construction would include 353,508 sf tower space with subterranean parking and ground level commercial space, 255 residential dwelling units, 15,000 sf of residential amenities, and 40,000 sf of retail/commercial uses on the first two levels. Alternative would develop a new residential project on the Phase I portion of the property, while retaining the existing 178 room Luxe Hotel on the property. This alternative was rejected for further consideration as it would not meet a basic Project objective to provide new hotel rooms near the LACC, and it would not fulfill to the same extent the Project objective to increase housing stock in a high quality transit area.

E. ANALYSIS FORMAT

In accordance with State *CEQA Guidelines* Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less than, similar to, or greater than the corresponding impacts of the project. Furthermore, each alternative is evaluated to determine whether the Project objectives, identified in Chapter 2.0, Project Description would be substantially attained by the alternative. The evaluation of each of the alternatives follows the process described below:

- A description of the alternative.
- The net environmental impacts of the alternative before and after implementation of reasonable mitigation measures for each environmental issue area analyzed in the EIR are described. Where applicable, the evaluation is divided between temporary impacts that would occur during the Project's construction phase, and impacts that would occur during the Project's operational phase.
- Post-mitigation and less than significant environmental impacts of the alternative and the Project are compared for each environmental topic area. Where the impact of the alternative would be clearly less than the impact of the Project, the comparative impact is said to be "less." Where the alternative's net impact would clearly be more than the Project, the comparative impact is said to be "greater." Where the impacts of the alternative and Project would be roughly equivalent, the comparative impact is said to be "similar." Where the impacts of the alternative would be the same as the Project, the comparative impact is said to be the 'same'. The evaluation also documents whether compared to the Project an impact would be entirely avoided, whether a significant impact could be reduced to a less than significant level, or whether a significant unavoidable impact would be feasible to mitigate to a less than significant level.

- The comparative analysis of the impacts is followed by a general discussion of the extent to which the underlying purpose and Project Objectives are attained by the alternative.

At the end of the section, a relative comparison of the alternative's impacts and consistency with Project Objectives is provided. Pursuant to CEQA Guidelines Section 15126.6(e)(2) an "Environmentally Superior Alternative" is identified.

F. ALTERNATIVES ANALYSIS

1. ALTERNATIVE 1: NO PROJECT/NO BUILD ALTERNATIVE

(A) DESCRIPTION OF THE ALTERNATIVE

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the Guidelines states that, “in certain instances, the No Project/No Build Alternative means ‘no build’ wherein the existing environmental setting is maintained.” Accordingly, for purposes of this analysis, the No Project/No Build Alternative assumes that no new development would occur within the Project Site. This Alternative consists of the circumstance under which the Project does not proceed. The property would maintain the Luxe Hotel, which is a 112,748 sf, nine story building, that includes 178 guest rooms, a main lobby, meeting space area, interior restaurant, an indoor/outdoor bar and lounge area, fitness center, and a one-level parking deck with parking below and above the deck. The Luxe Hotel is surrounded by surface parking. The north lot, on the corner of W. Olympic Boulevard and S. Figueroa Street is used for hotel guest parking and special event parking; the south lot, located south of the Luxe Hotel on S. Figueroa Street, is used for overflow parking, limousine staging, and construction/maintenance vehicle parking; the southeastern lot, located on 11th street extending from S. Figueroa Street to S. Flower Street is leased for public parking.

(B) ENVIRONMENTAL IMPACTS

(1) Aesthetics/Visual Resources

i. Aesthetics and Views

Under the No Project/No Build Alternative, the Project Site would remain in its current condition. The existing Luxe Hotel is not considered an historic or architectural resource. The Project Site appearance is dominated by parking lots that do not enhance the aesthetic character of the area, and that represent an appearance that does not support City design guidelines that encourage avoidance of parking vistas. The Project Site currently offers a somewhat underutilized and auto-oriented appearance. The Luxe Hotel does not block views of the Petroleum Building or other valued visual resources.

The Project would replace the existing Luxe Hotel and parking lots with a modern well designed development. The Project would include new contemporary modern buildings, new landscaping, a public plaza, artwork, street front commercial uses, and other amenities. It would reflect the surrounding active, mixed-use development, and would not have a significant impact or interfere with views of the primary facades of the adjacent Petroleum Building. The Project would not adversely affect existing scenic resources and would not substantially obstruct or degrade an existing recognized and valued public view. For these reasons, the analysis of impacts on Aesthetics and Views concludes that the impact of the Project would be less than significant, although the analysis is not required pursuant to SB 743, and is only provided for informational purposes.

Conversion of the Project Site from its current underutilized state with substantial surface parking coverage into a new contemporary development with landscaping and other visual amenities, particularly at the street level and with the public plaza, would be considered beneficial; and would not result in a significant impact.

However, the No Project/No Build would have no impact, and therefore its impacts are considered to be less than those of the Project.

ii. Light and Glare

Under the No Project/No Build Alternative, the Project Site would continue to have the same lighting conditions, which generally include lighting of parking areas, lighting for safety and security, and typical building lighting.

The Project would introduce new sources of lighting, notably associated with wall signs, digital displays and animated signage, supergraphic signs, open panel roof signs, hotel building identification, residential building identification, retail and restaurant building identification, parking entry identification, loading dock entry identification, and wayfinding signage. No billboard signage is proposed. The graphics and signage program would support an active street front experience on all sides, but particularly along the Figueroa corridor that would mix art and signage graphic components.

The Analysis of the lighting for the Project concludes that the Project would not create a new source of light or glare that would substantially alter the character of off-site areas or that would result in substantial light spill/or glare onto adjacent light-sensitive receptors. Therefore, impacts regarding light and glare for the Project would be less than significant.

The continued lighting of the No Project/No Build Alternative would result in no impact to the environment. This Alternative would not contribute to the Project's enhancement to the lit visual character of the area in proximity to LA LIVE, Staples Center Arena, and the LACC. As this Alternative would have no impact on the environment, its impacts would be less than those of the Project.

iii. Shade/Shadow

Under the No Project/No Build Alternative, the existing Luxe Hotel would continue to cast its current shadow, which causes no significant shading on any off-site locations. The analysis of the Project's impacts on shading indicates that the Project would not shade shadow-sensitive uses for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. PST, or more than four hours between the hours of 9:00 a.m. and 5:00 p.m. PDT; and that the shade/shadow impacts would be less than significant. Therefore, the reduced shadows of the Alternative development would be less than those of the Project and also less than significant. There would be no impact on the environment with this Alternative and therefore its impacts would be less than those of the Project.

(2) Air Quality

i. Construction

The No Project/No Build Alternative would require no construction activity, would produce no additional emissions over baseline conditions, and would have no construction impacts on air quality.

The Project would emit regional and localized construction emissions below the SCAQMD daily numeric thresholds across applicable pollutants. The analysis of the Project's contribution to negative health effects indicates that the Project (inclusive of construction activities and operations) would have a less than

significant impact regarding TAC emissions. The Project includes Project Design Features that would minimize construction-related emissions and ensure they remain less than significant.

Impact of the Project on air quality due to construction activity would be less than significant. However, the No Project/No Build Alternative would have no impact and would have less impact than the Project.

ii. Operations

The No Project/No Build Alternative would result in no new impacts on air quality due to operation of the existing hotel.

The Project would result in less than significant impacts with respect to both regional and localized air quality emissions due to Project operations. The Project would also have a less than significant contribution to CO hotspots. The Project includes as Project Design Features a number of green building measures that would reduce Project impacts to less than significant levels.

The impact of the Project on air quality due to operations would be less than significant. However, the No Project/No Build Alternative would have no impact. Therefore, impacts would be less than the Project.

(3) Cultural Resources

i. Archeological Resources and Tribal Cultural Resources

The No Project/No Build Alternative would require no excavation and therefore it would have no potential to encounter cultural resources.

The Project would not involve excavations into soils with the potential to contain resources associated with former turn of the 20th century residential uses on the Project Site. The Project would not result in a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code 21074.

The No Project/No Build Alternative would have no impacts on Archeological Resources and Tribal Cultural Resources and its impacts would be less than those of the Project.

ii. Paleontological Resources

The No Project/No Build Alternative would require no excavation and therefore would have no potential to encounter cultural resources.

The analysis of the Project's impacts on paleontological indicates that Project grading and excavation may encounter native soil/sediment associated with older Quaternary Alluvium, the Fernando Formation, and the Puente Formation deposits below the previously disturbed ground surface levels. These formations have high potential for containing buried paleontological resources.

The No Project/No Build Alternative would have no impacts on Paleontological Resources and its impacts would be less than those of the Project.

iii. Historical Resources

The No Project/No Build Alternative would not alter or require the demolition of the existing Luxe Hotel.

The Luxe Hotel was evaluated and found ineligible as a historical resource under any of the applicable federal, state, or local criteria. Therefore, the Luxe Hotel does not qualify as a historical resource under CEQA. Because the Luxe Hotel is not a historical resource, no impacts associated with demolition of the Luxe Hotel building would occur with the Project.

The analysis of historical resources for the Project also indicated that the Project would not result in a substantial material change to the integrity and significance of historical resources within proximity to the Project Site. This is true for the Petroleum Building that is located immediately adjacent to the Project Site, as well as the four other historical resources located in the Project vicinity. The No Project/No Build Alternative would not change existing conditions and would have no impacts on historic resources. Although the Project's impacts on historic resources would be indirect and less than significant, its impacts would be greater than the No Project/No Build Alternative, which would have no impacts on historic resources.

(4) Greenhouse Gas Emissions

The No Project/No Build Alternative would require no construction activity and generate no GHG emissions due to construction. The continued operation of the hotel would not generate greater GHG emissions beyond those currently occurring.

The Project would be consistent with the applicable City's goals and actions for GHG emissions, GHG emissions and associated impacts would be less than significant. Furthermore, the Project would be consistent with the AB 32 goals and CARB guidelines for assessing GHG emissions. The No Build Alternative would include land use characteristics and design features that would be consistent with State, Regional, and Local Regulations for reducing GHG emissions. Therefore, as the Project would be consistent with applicable plans, policies and regulations adopted for the purpose of reducing GHG emissions, impacts regarding greenhouse gas reduction plans would be less than significant. However, the No Project/No Build Alternative would have no impact and would have less impact than the Project.

(5) Hazards and Hazardous Materials

The No Project/No Build Alternative would require no demolition, excavation, or other construction activities. Therefore, the Alternative would not expose the public to hazardous conditions associated with soil/ground conditions. The current hotel operations involve the use of regulated products routinely used in performing everyday household and retail activities.

The analysis of the Project's impacts on Hazards and Hazardous wastes indicated that the Project's use of hazardous materials during Project operations would also include only routinely used and regulated products and would not require the use of otherwise hazardous waste materials. Impacts due to operations would be less than significant.

The analysis of the Project's impacts on Hazards and Hazardous Material also identified several potential Site conditions that could result in significant impacts if not properly addressed through regulatory measures and mitigation measures. Demolition of the Luxe Hotel building could provide an exposure to ACMs and/or LBP. The identification, handling, removal, and/or disposal of ACMs and LBP would be completed in compliance with regulatory requirements, thereby resulting in a less than significant impact. Further, the Project's location in an LADBS designated Methane Hazard Area (Methane Zone), containing methane gas in soil samples would also be addressed through regulatory measures. A methane mitigation system designed in accordance with Division 71 of LAMC Section 91.7104 would be incorporated into the Project structures to provide for the public safety. This would reduce potential impacts associated with methane beneath the Project Site to a less than significant impact.

As the No Project/No Build Alternative would have no impacts, its impacts would be less than those of the Project.

(6) Land Use and Planning

Under the No Project/No Build Alternative, the Project would not proceed and the Luxe Hotel would continue its operations. There would be no changes in the land use relationships in the Project area. The Project Site would continue to provide hotel uses for nearby visitor facilities; albeit in a limited manner.

The Project would provide a mixed use development with an FAR of 9.7:1. The Project's development program would include 650 residential units, a 300 room hotel with banquet, conference and amenity areas. It would also include 80,000 sf of commercial retail/restaurant space with two stories of pedestrian access frontage along the periphery of S. Figueroa Street, 11th Street, W. Olympic Boulevard, and S. Flower Street. The Project also includes a Podium Garden Terrace on the roof of the fourth level that would provide open space amenities for use by residents and hotel guests. Recreation rooms and other amenities and open space would also be provided. The Hotel Tower would also include a rooftop amenity deck with a swimming pool, bar, spa tub, lounging area, and function space for hotel guests.

The analysis of the Project's impacts on Land Use concludes that the Project would be substantially consistent with and would not substantially impede implementation of adopted land use plans, policies, guidance, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. This conclusion is based analysis of Project consistency with applicable policies of the General Plan Framework, Do Real Planning, Walkability Checklist, Central City Community Plan, City Center Redevelopment Plan, LAMC, 2010 Bicycle Plan and Mobility Plan 2035, and SCAG's 20122016 RTP/SCS. The Project's requested entitlements regarding TFAR, conditional use permits, Vesting Tentative Tract Map, site plan review, and project permit compliance with a new Sign District would be consistent with the regulatory requirements and development would be compatible with surrounding land uses.

Key features of the Project that support the conclusions include the following:

- The Project would provide a mixed-use development within the high quality transit area with access to the Metro Blue, Red and Purple Lines; and multiple bus and shuttle lines. The City, as well as SCAG, have been promoting development patterns that aim to reduce the vehicle miles traveled by

providing reductions in energy consumption and air quality emissions, as well as convenience for commuters.

- The Project would provide needed housing to the region and the Downtown area, as well as visitor-serving uses at a scale and intensity that distinguishes and uniquely identifies the Downtown Center. This includes hotel development in proximity to LA LIVE, Staples Center Arena, and the LACC.
- The Project would build upon and support the vibrancy of the Downtown Center and proximity to LA LIVE, Staples Center Arena, and the LACC and would bring and encourage further investment in the area.
- It would provide a pedestrian friendly street frontage with pedestrian access to commercial frontage along the periphery of the property and a 5,000 sf public plaza along S. Figueroa Street, including wide sidewalks, parkways, landscaping, and special paving.

The Project features are consistent with the Framework Element's designation for the "Downtown Center" district as further articulated in the various plans and regulations that are applicable to the Downtown Center. The Framework Element identifies the Downtown District as the location for "... major cultural and entertainment facilities, hotels, professional offices, corporate headquarters, financial institutions, high-rise residential towers, regional transportation facilities and the Convention Center, ... generally characterized by floor area ratio up to 13:1 and high rise buildings."

The No Project/No Build Alternative would provide none of the benefits of the Project. Nonetheless, the No Project/No Build Alternative would have no impact on land use and therefore, its impacts would be less than those of the Project.

(7) Noise

i. Construction Noise and Vibration

The No Project/No Build Alternative would require no construction activity and have no construction impacts on noise and vibration.

The Project was identified to result in a significant impact due to construction noise at nearby sensitive receptors (multi-family residential) development; and the analysis, included mitigation measures (i.e., sound barriers) to substantially reduce construction noise impacts. However, even with implementation of the sound barriers, noise associated with the Project would be expected to increase ambient noise levels at nearby multi-family residential uses by 5 dBA or more, notably at upper floor levels, resulting in a temporary but significant unavoidable impact.

Project-related construction vibration during Site clearing, grading, and shoring activity in the vicinity of the Petroleum Building would generate vibration levels that could potentially exceed the 0.50 inches per second PPV significance threshold for potential damage of historic buildings. However, a mitigation measure has been proposed (vibration monitoring, adjustment in construction activity if needed to reduce vibration levels and repair of the building if needed) that, if implemented, would reduce impacts to a less than significant level. However, implementation may not be feasible, and therefore the impact is considered to be a potentially significant and unavoidable impact. The vibration from the construction levels at nearby locations with human activity would be sufficiently low to avoid significant impacts on human activity.

The No Project/No Build Alternative would have no impact on construction noise and vibration; and would avoid the Project's potentially significant vibration impact.

ii. Operations Noise and Vibration

The No Project/No Build Alternative would have no change in Project Site activity and would not cause new noise or vibration effects.

Impacts of the Project on ambient noise levels due to traffic, stationary noise sources, and increases in vibration levels would be less than significant. Impacts of the No Project/No Build Alternative would be less than those of the Project.

(8) Population, Housing, and Employment

The No Project/No Build Alternative would generate no construction employment opportunities. It would add no new residential development or increases in permanent employment opportunities.

The Project's construction phase would have no impact on the supply of housing units or population growth. Construction activities would create work for construction workers that would be drawn from an existing regional pool of existing workers. The short-term employment opportunities would contribute to the local and regional economy.

The Project operations would include 650 residential units, housing a potential population of 1,060 people. It would provide an increase in employment of 438 employees over the existing 118 hotel employees. These increases would be consistent with SCAG's short-term and long-term growth projections for the Community Plan area and the City, which are the basis for planning of services, utilities and infrastructure. The increase in housing would help the City meet or exceed its housing objectives per the General Plan Housing Element, and housing allocation established in the SCAG RHNA.

The Project would also be consistent with City and SCAG policies that seek to promote concentrated development within a high quality transit area, reducing vehicle miles traveled and improving the downtown ratio of jobs to housing. Further, the Project is an infill development, would add no new infrastructure other than that needed to serve the Project Site, and would not foster otherwise unplanned growth. Project impacts regarding population, housing and employment would be less than significant.

The No Project/No Build Alternative would not provide the benefits of the Project as regards increased housing stock, employment opportunities and transit oriented development in the Downtown area. However, as the Alternative would have no impact on population, housing and employment, its impacts would be less than those of the Project.

(9) Public Services

i. Fire Protection

Under the No Project/No Build Alternative, no increased demand for fire protection and emergency medical services would occur and there would be no effect on emergency response times or emergency access, as would occur under the Project from construction activities and Project operations.

The analysis of the Project's impact of fire protection and emergency services indicates that the Project Site has access to adequate fire services with relatively low response times, has sufficient water flow for firefighting service and would not require the addition of new facilities for its service. Further, the Project would meet regulatory requirements that provide for the public safety and that reduce the demand for firefighting responses. Impacts of the Project on Fire Services would be less than significant.

As the No Project/No Build Alternative would not result in impacts to Fire Protection Services, the impacts of this Alternative on fire protection services would be less than those of the Project.

ii. Police Protection

The No Project/No Build Alternative would not change existing conditions or increase the level of activity at the Project Site and therefore would not alter demand for police protection services or affect emergency response times.

The Project would provide a new residential population, additional hotel guests and workers, and new commercial uses, and site activity that would increase the need for police services. At the same time, the Project includes numerous security features that would reduce Project impacts and reduce the need for police services. These include, among other provisions, Close Circuit Television systems (CCTV), restriction of access to non-public areas by electronically controlled and locking access cards, controlled access to parking structures, and 24-hour on-site security, including four to five private security staff. A site design intended to enhance on-site safety would also reduce the need for additional police services or the provision of new police facilities. With the implementation of these security features, the impacts on police services would be less than significant.

As the No Project/No Build Alternative would not result in impacts to Police Protection Services, the impacts of this Alternative on police protection services would be less than those of the Project.

iii. Libraries

The No Project/No Build Alternative would not result in new site population that would increase the demand for library services. Impacts to library facilities associated with the Project would be less than significant, because there is sufficient capacity to accommodate the Project's new residents. However, since the No Project/No Build Alternative would not generate an increase in demand for library services as compared to existing conditions, impacts relative to libraries would be less under the No Project/No Build Alternative than under the Project.

iv. Parks and Recreation

The No Project/No Build Alternative would not result in new site population that would increase the demand for parks and recreation services.

In contrast, the Project would generate approximately 1,060 new residents that would generate a demand for parks and recreational facilities; and provide 1.62 acres of residential recreation and open space for Site residents with an additional 0.26 acres of recreation and open space area to serve hotel visitors. Of this 9,250 sf would be public serving open space in the street level public plaza and other street level locations.

The Project's 1.62 acres of recreation and open space would be less than the amount that would be required under the Recreation Plan's (PRP's) long-range standard of four acres per 1,000 persons, i.e. 4.24 acres and the PRP's more attainable short- and intermediate-range standard of two acres per 1,000 persons, i.e. 2.12 acres. However, the 1.62 acres of recreation and open space would be sufficient to meet the requirement of 1.61 acres per LAMC Section 12.21.G. The Project would also provide for dedication of land for park uses and/or in-lieu fees to offset the park impacts of new residential development pursuant to Section 17.12. The Project would meet these requirements through a provision of on-site recreation amenities and payment of fees. It is expected that site residents will primarily use the Project's recreation facilities; and, residual off-site park usage would likely be dispersed among the 26 existing LADRP parks in the Project vicinity, with only a small increment of use at area public parks. As the Project would meet its obligations for reducing impacts per LAMC regulations, impacts of the Project on parks and Recreation would be less than significant.

The No Project/No Build Alternative would have no impact on the demand for parks and recreation space. Impacts related No Project/No Build Alternative would be less than those of the Project.

(10) Transportation and Circulation

i. Construction

The No Project/No Build Alternative would require no construction activity and would have no traffic impacts due to construction.

In contrast, the Project would add haul trucks, equipment vehicles and worker trips to the nearby road network, with short-term effects on traffic flow adjacent to the Project Site. The Project would be required to provide a Construction Management Plan (PDF-TRAF-1) to reduce potential construction impacts through scheduling of construction activities, traffic controls, notification, and safety procedures. With the implementation of the Construction Management Plan, the Project would not result in substantial disruption of traffic flow, intersection operational impacts, conflicts with pedestrians and/or bicyclists, the loss of on-street parking, or conflicts with construction of My Figueroa Project and existing Metro operations. Transportation and parking impacts related to construction would be less than significant for the Project. However, due to the large number of cumulative projects in the vicinity with potential for overlapping construction, the Project could contribute to a cumulatively significant construction impact.

The No Project/No Build Alternative would have no impact on the traffic due to construction activities. Its impacts would be less than those of the Project.

ii. Operations

The No Project/No Build Alternative would not result in an increase in the intensity of on-site development, and thus, would not result in any traffic impacts.

In contrast, the Project would add trips to regional and local roadways associated with Project operations. The Project would produce an increase in traffic over the current Luxe hotel trips with a total of 6,583 daily weekday trips, including 478 A.M. peak hour trips (204 inbound, 274 outbound) and 593 P.M. peak hour trips (312 inbound, 127 outbound). The analysis of Transportation and Traffic concluded that the Project would result in significant impacts at the same four intersections prior to mitigation. The analysis identified feasible mitigation measures to reduce Project impacts including physical improvements at Intersection 30, Grand Avenue & 17th Street/I-10 Westbound On-Ramp, and a requirement for a Travel Demand Management Program to promote non-auto travel and reduce the use of single-occupant vehicle trips. The traffic analysis indicates that with implementation of the Project's mitigation program, the impact at the following three intersections would remain significant and unavoidable:

12. Figueroa Street & Olympic Boulevard (P.M. peak hour)
13. Figueroa Street & 11th Street (A.M. and P.M. peak hour)
19. Flower Street & 11th Street (P.M. peak hour)

Impacts of the No Project/No Build Alternative would be less than those of the Project.

(11) Utilities and Service Systems

i. Water Supply

The No Project/No Build Alternative would not add population or new facilities at the Project Site; therefore, water demand for this Alternative would be consistent with the existing operation of the Luxe Hotel which utilizes 19,287 gpd or 21.61 af/y, and no impact would occur.

In contrast, the Project would increase on-site water demand by approximately 219,529 gpd, or 246 af/y. The WSA for the Project indicates that LADWP has sufficient water supply to meet the Project's needs. The Project includes numerous design features to reduce the demand for water consumption. Water infrastructure and water supply is sufficient to meet the demands of the Project without Project mitigation and the Project impact on the provision of water services would be less than significant. Impacts of the No Project/No Build Alternative would be less than those of the Project.

ii. Wastewater

The No Project/No Build Alternative would not add population or new facilities at the Project Site; therefore, wastewater generation for this Alternative would be consistent with the existing operation of the Luxe Hotel. This Alternative would not increase wastewater generation from existing conditions and no additional wastewater would be added to the Hyperion Treatment Conveyance System or Hyperion Treatment Plant. Therefore, no impact would occur.

In contrast the Project would increase on-site wastewater generation by approximately 198,247 gpd that would need conveyance and treatment. The Project's additional wastewater would be within the capacity limits of the conveyance and treatment facilities serving the Project Site, and impacts would be less than significant. Impacts of the No Project/No Build Alternative would be less than those of the Project.

(C) RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES

The No Project/No Build Alternative would provide no new development and accomplish none of the Project Objectives, which include the following:

- Objective 1: Support the diverse array of entertainment, shopping, nightlife, cultural, and residential uses in Downtown by locating new residences within the Downtown Housing Incentive Area, new hotel rooms to support the goals laid out in the Mayor's 2015 White Paper on the Future of the Los Angeles Convention Center, and neighborhood and visitor serving uses to support connectivity with LA LIVE, Staples Center Arena, and the Los Angeles Convention Center.
- Objective 2: Develop a mixed-use project that combines housing, hotel, and commercial uses in close proximity to public transit consistent with regional mobility goals to reduce vehicle trips and infrastructure costs, while supporting the use of public transportation and amenities, including the nearby Metro Stations, City bus and DASH lines.
- Objective 3: Respect and maintain the historical significance of the Petroleum Building by providing a setback along W. Olympic Boulevard to maintain views of the Petroleum Building's architecturally distinguished primary facades along W. Olympic Boulevard and S. Flower Street.
- Objective 4: Compliment and foster pedestrian activity through ground level retail/restaurant uses, street trees and landscaping, public art, and signage and lighting compatible with the active LASED and streetscape along W. Olympic Boulevard, S. Figueroa Street, S. Flower Street, and 11th Street.
- Objective 5: Create a visually vibrant and engaging pedestrian and vehicular experience along Figueroa Street, removing paved surface parking, and providing new pedestrian scale features such as a public plaza, that are compatible with the adjacent entertainment and restaurant venues at LA Live and Staples Center Arena directly across the street.
- Objective 6: Create a development that complements and improves the visual character of the area by connecting with the surrounding urban environment through a high level of architectural design and appropriate scale of development.
- Objective 7: Provide unique and vibrant signage that is integrated into the Project's architecture and that will visually connect to and be compatible with the scale of media and signage on existing and current development on adjacent blocks while informing and attracting visitors to the Project's content and offerings;
- Objective 8: Create a development with high quality design that is responsive environmental sustainability issues (e.g. energy efficiency, including electronic charging stations for Project tenants); and that provides open space and recreational amenities for Project's residents, hotel guests, commercial tenants, and site visitors.

- Objective 9: Redevelop an underutilized site with an economically viable and attractively designed development that supports the SCAG growth projections in Downtown by exercises TFAR provisions for fuller utilization of the Project Site and support of TFAR public benefits purposes.
- Objective 10: Maintain and enhance the economic vitality of the region by providing job opportunities that attract commercial and residential tenants, and increase the tax revenue sales, and property taxes.

F. ALTERNATIVES ANALYSIS

2. ALTERNATIVE 2: REDUCED DENSITY ALTERNATIVE

(A) DESCRIPTION OF THE ALTERNATIVE

The Reduced Density Alternative would provide the same uses as the Project; but at a reduced density that would comply with the provisions of the LAMC without a transfer of floor area TFAR. The total FAR would be limited to 6:1 with a floor area of 699,960 sf, which is approximately 62 percent of the floor area of the Project (9.7:1 FAR).

The Alternative would include a hotel with 186 guest rooms with meeting rooms, restaurant, and spa facilities (175,000 sf, including 10,000 sf meeting rooms and 10,000 sf amenities); 403 residential units (475,360 sf); and 49,600 sf of commercial/retail/restaurant space on the first two levels. The residential development would include similar amenities to those of the Project, although scaled commensurate with the reduction in residential units. The density of the hotel, residential and commercial uses would be reduced approximately 38 percent, commensurate with the 38 percent reduction in FAR, while including the 75 percent retail frontage on the ground level. Parking would be provided in a subterranean structure similar to that of the Project, although requiring less subterranean parking than that of the Project. The Alternative would include two towers: a 353,508 sf hotel and residential tower with a commercial podium on the Phase 1 portion of the Project Site and a 346,462 sf residential tower with commercial podium on the Phase 2 portion.

The Alternative is intended to reduce the Project's significant and unavoidable construction impacts (construction noise, vibration and cumulative traffic) by reducing the amount of building volume to be constructed and the amount of exported excavation required. The Alternative also is intended to reduce the Project's significant and unavoidable traffic impacts during operations (at three intersections under Future with Project with Mitigation Conditions for Phase 1 (Year 2020); and Full Buildout (Year 2023)). With a reduced building profile and level of Project activity, the Alternative would provide potential reductions in other environmental topics that were not found to be significant.

(B) ENVIRONMENTAL IMPACTS

(1) Aesthetics/Visual Resources

i. Aesthetics and Views

The Reduced Density Alternative would replace the existing Luxe Hotel and parking lots with a new residential, hotel and retail project with two towers and a podium structure. The architectural styling and general appearance would be similar to that of the Project, and like the Project would include a setback to maintain views of the primary facades of the adjacent Petroleum Building. However, with a reduced FAR of 62 percent of the Project's FAR, the massing of volume of the development would be reduced.

In the Reduced Density Alternative, views of the Project Site at ground level and in the near vicinity would be similar to those of the Project, as the buildings would blend into the existing, developed urban setting; Views of the Project Site would be blocked from more distant locations along the public viewing corridors. Nearby site views would be characterized by the pedestrian oriented level design adjacent to the Project Site.

The Project would replace the existing Luxe Hotel and parking lots with a modern, well-designed development. The Project would include new contemporary modern buildings, new landscaping, a public plaza, artwork, street front commercial uses, and other amenities. It would be compatible with surrounding development, would maintain views of the primary facades of the adjacent Petroleum Building, and would not result in a substantial material change to the integrity and significance of that historic building. Pursuant to SB 743, an analysis of aesthetic/visual resources impacts of the Project is not required, and is provided for informational purposes only. The Project would not adversely affect existing scenic resources, and would not substantially obstruct or degrade an existing recognized and valued public view of view resources. For these reasons, the analysis of impacts on Aesthetics and Views concludes that impact of the Project would be less than significant.

Impacts of Alternative 2 would also be less than significant pursuant to SB 743 and the City's standard thresholds for evaluating aesthetic and view impacts, because the Alternative would have similar design features to those of the Project, varied only by a smaller building mass, and would not block views. The reduced building mass would occur above the pedestrian level that would be defined by the commercial uses and street amenities. Because the aesthetic character of the Alternative would be similar to that of the Project and the variation in massing would have limited effect, the Alternative's impacts would be similar to those of the Project.

ii. Light and Glare

Under the Reduced Density Alternative, the development would have light and glare characteristics similar to those of the Project. It is assumed that the Alternative would not require highly reflective materials that would cause adverse glare impacts and the Alternative would have a signage program similar to that of the Project, although proportionately reduced in scale. Thus, light and glare effects of this Alternative would be similar to those of the Project.

The Project would introduce new sources of lighting, notably associated with wall signs, digital displays and animated signage, supergraphic signs, open panel roof signs, hotel building identification, residential building identification, retail and restaurant building identification, parking entry identification, loading dock entry identification, and wayfinding signage. The graphics and signage program would support an active street front experience on all sides, but particularly along the Figueroa corridor that would mix art and signage graphic components. The analysis of lighting for the Project concludes that the Project would not create a new source of light or glare that would substantially alter the character of off-site areas or that would result in substantial light spill/or glare onto adjacent light-sensitive receptors. Therefore, impacts regarding light and glare for the Project would be less than significant.

The reduced lighting resulting from the Alternative's reduced building profile would not be sufficient to be noticeable. Lighting at ground level for the Alternative and the Project would be similar. Building materials would also be similar, with resulting similar glare effects. Impacts of the Reduced Density Alternative regarding light and glare would be similar to those of the Project and less than significant.

iii. Shade/Shadow

Under the Reduced Density Alternative, new buildings would have less volume than the Project. Further, the Alternative's towers would have locations that would be no closer to the edges of the Project Site than the

Project's proposed residential and hotel towers. Therefore, the extent and time duration of the shadow cast by the Reduced Density Alternative on shade shadow-sensitive uses would be less than the Project's shadow.

The analysis of Project impacts on shading indicates that the Project would not shade shadow-sensitive uses for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. PST, or more than four hours between the hours of 9:00 a.m. and 5:00 p.m. PDT; and therefore shade/shadow impacts would be less than significant. Therefore, the reduced shadows of the Alternative development would be less than those of the Project and also less than significant.

(2) Air Quality

i. Construction

The Reduced Density Alternative would require a construction program inclusive of demolition, excavation, foundation placement, building construction, and paving. The general construction activities would be similar to those of the Project; although the amount of development would be reduced with the 38 percent reduction in FAR and reduction in need for subterranean parking. Although the reduction in the amount of development under the Reduced Density Alternative would result in a shorter overall construction schedule, the maximum construction activity that could occur on a given day, the basis for the analyses of construction impacts, would be similar.

The Project would emit regional and localized construction emissions below the SCAQMD daily numeric thresholds across applicable pollutants. The Reduced Density Alternative, which would have similar daily construction activities, would also emit regional and local construction emissions that would be below the SCAQMD daily numeric thresholds for applicable pollutants. As a result, impacts of the Reduced Density Alternative on criteria air pollutant emissions would be similar to the Project on a maximum day of construction. Overall, impacts would be reduced. Like the Project, construction impacts regarding air emissions would be less than significant.

The Project's contribution to potential health risks would occur due to construction activities. The Project includes Project Design Features that would minimize construction-related emissions. The analysis of the Project's contribution to health effects indicates that the Project (inclusive of construction activities and operations) would have a less than significant impact on TACs. The Alternative would incorporate similar Project Design Features that would minimize emissions sufficient to meet the same standard as the Project. As a result, impacts of the Alternative on TACs would be similar to, or less than those of the Project

ii. Operations

The Reduced Density Alternative would result in reduced operational emissions due to the reduced consumption of energy (i.e., natural gas) for site activities, transportation to and from the Project Site, and use of consumer products. The Reduced Density Alternative would reduce the FAR by approximately 38 percent in comparison to the Project, and provide a mix of the same uses, each reduced by approximately 38 percent. Therefore, criteria air pollutants associated with energy consumption, transportation, and use of consumer products would be reduced somewhat proportionately; and would be well less than those of the Project.

The Project would result in less than significant impacts with respect to both regional and localized air quality emissions due to Project operations. The Project would also have a less than significant contribution to CO hotspots. The Project includes as Project Design Features a number of green building measures that would reduce Project impacts. The Alternative would include similar features. Impacts of the Alternative would be less than those of the Project, and as is the case with the Project, would be less than significant.

At the same time, the reduction in development under the Reduced Density Alternative would locate fewer on-site residents and employees in proximity to the public transportation hub that is the downtown area; and less population in proximity to other nearby commercial and retail uses, and nearby office buildings and other job centers as compared to the Project. Therefore, this Alternative would support regional transportation reductions and regional transportation-related air pollutant emission reductions associated with infill and transit oriented development strategies to a lesser degree than the Project. By accommodating less growth in the well served transit area, a number of the people who would live at the Project Site would end up locating in other areas where there is less access to public transit and possible longer trips to places of employment. Therefore, the Alternative would be less effective in reducing vehicle miles traveled with associated reduced reductions in vehicular emissions.

(3) Cultural Resources

i. Archeological Resources and Tribal Cultural Resources

The Reduced Density Alternative would require the implementation of a construction program similar to that of the Project, although with less excavation for subterranean parking. Accordingly, there would be less excavation into native soils and less potential to encounter/disturb paleontological resources.

The Project would involve excavations into soils with the potential to contain resources associated with former turn of the 20th century residential uses on the Project Site. If such resources were to be present, potentially significant impacts on archaeological resources could occur unless mitigation measures were implemented. Mitigation measures are recommended that require monitoring of excavation activities with treatment, reporting and curation of resources should they be encountered. These measures would reduce impacts to less than significant levels. Further, the Project would not result in a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074.

As the resources are generally assumed potentially to be distributed throughout soils underlying the Project Site, the potential impacts with the reduced excavation depth would be slightly less than those of the Project; and the same mitigation measures would be applicable. Therefore, impacts of the Reduced Density Alternative on archaeological resources would be similar to those of the Project, and would be less than significant with mitigation.

ii. Paleontological Resources

The Reduced Density Alternative would require the implementation of a construction program similar to that of the Project, although with less excavation for subterranean parking. Depending on the design of the subterranean structure, the depth of excavation might potentially be similar to the 50-foot depth of excavation of the Project at some locations, with shallower excavation at other locations. Or more even reduction in excavation across the Site might reduce the maximum depth by about 10 feet. Accordingly,

there would be less excavation into native soils and less potential to encounter/disturb archaeological resources.

The analysis of the Project's impacts on paleontological indicates that Project grading and excavation may encounter native soil/sediment associated with older Quaternary Alluvium, the Fernando Formation, and the Puente Formation deposits below the previously disturbed ground surface levels. These formations have high potential for containing buried paleontological resources. As a result, the potential exists for construction to directly or indirectly destroy buried unique paleontological resources or sites or unique geologic features. Impacts to buried paleontological resources are considered potentially significant. Therefore, the Project includes standard mitigation measures to avoid adverse effects on paleontological resources. These measures would include a monitoring program and treatment/curation of discovered fossils.

With a lesser amount of excavation, the Reduced Density Alternative would be less likely to disturb resources. However, because the depth of excavation is less, impacts would be less than those of the Project and less than significant with the implementation of the mitigation measures.

iii. Historical Resources

The Reduced Density Alternative would demolish the existing Luxe Hotel and replace it with a new residential, hotel and commercial mixed-use Project with new towers and a Podium. However, with a reduced FAR of 38 percent, the volume of massing of the development would be reduced. The Reduced Density Alternative will be designed and constructed in substantial accordance with the Downtown Design Guide. The Downtown Design Guide is intended to provide guidance for creating a livable and more sustainable Downtown community and places an emphasis on walkability and the relationship of buildings to the street, including sidewalk treatment, character of the building as it adjoins the sidewalk, and connections to transit.

The Luxe Hotel does not qualify as a historical resource under CEQA. Because the Luxe Hotel is not a historical resource, no impacts associated with demolition of the Luxe Hotel building would occur. The Project would not reduce or materially impair the integrity or significance of important historical resources in the Project vicinity such that their eligibility for listing on a register of historical resources would be substantially changed. However, during construction indirect vibration impacts on the Petroleum Building have the potential to exceed a vibration threshold should the consent of the property owner not be secured for the installation of continuously operational automated vibrational monitors on the Petroleum Building. Therefore, indirect impacts of the Project on the Petroleum Building were conservatively concluded to be significant and unavoidable.

The Reduced Density Alternative would have less mass than the Project, but with a generally similar appearance. Therefore, the Alternative would create less change in the appearance of the Project Site, but have a generally similar effect on views of historic resources in the Project vicinity. Direct impacts of the Reduced Density Alternative would be similar to those of the Project would be less than significant. Indirect impacts of the Reduced Density Alternative would be similar to those of the Project and would be significant and unavoidable.

(4) Greenhouse Gas Emissions

The Reduced Density Alternative would generate GHG emissions due to construction and operational activities. Similar to the Project, construction would generate GHG emissions from fossil fuel combustion from heavy-duty equipment, haul trucks, concrete trucks, worker trips, and vendor delivery trips. Operational activities would generate GHG emissions from transportation to and from the Project Site, energy consumption (i.e., electricity and natural gas), water demand, and wastewater and solid waste generation. The Reduced Density Alternative would reduce the residential, hotel/amenity and commercial uses, each by approximately 38 percent as compared to the Project. Therefore, GHG emissions associated with transportation, energy consumption, water demand, and solid waste generation would be reduced by a somewhat similar proportion; well less than that of the Project.

The Project was identified to generate GHG emissions from construction and operational activities; however, the net increase in annual GHG emissions, directly and indirectly, would be consistent with the City of Los Angeles LA Green Plan and Sustainable City Plan. Therefore, as the Project would be consistent with the applicable City's goals and actions for GHG emissions, GHG emissions and associated impacts would be less than significant. Further, the Project would be consistent with the AB 32 goals and CARB guidelines for assessing GHG emissions.

The Project includes land use characteristics and design features that would be consistent with State, Regional, and Local Regulations for reducing GHG emissions. Therefore, as the Project would be consistent with applicable plans, policies and regulations adopted for the purpose of reducing GHG emissions, impacts regarding greenhouse gas reduction plans would be less than significant.

The reduction in development under the Reduced Density Alternative would locate fewer on-site residents and employees in proximity to the public transportation hub that is the Downtown area, and less population in proximity to other nearby commercial and entertainment uses, and nearby office buildings and other job centers as compared to the Project. Therefore, this Alternative would still support regional transportation reductions and regional transportation-related air pollutant emission reductions associated with infill and transit oriented development strategies to a lesser degree than the Project.

The Alternative would directly generate lower GHG emissions than the Project, and in that sense would have a lower impact than the Project. At the same time, by accommodating less growth in the well served transit area, a number of the people who would live at the Project Site could potentially locate in other areas where there is less access to public transit and possible longer trips to places of employment. Therefore, this Alternative would be less effective in reducing vehicle miles traveled, with associated reductions in vehicular emissions. In this sense, impacts would be greater than those of the Project. As is the case with the Project, impacts caused by GHG emissions would be less than significant.

(5) Hazards and Hazardous Materials

The Reduced Density Alternative would require a construction program inclusive of demolition, excavation, foundation preparation, building construction, and paving. The general construction activities would be similar to those of the Project, although the amount of development would be reduced with the 38 percent reduction in FAR and reduction in the need for subterranean parking.

The Reduced Density Alternative would also provide residential, hotel and commercial site uses that would require the use of products routinely utilized in performing everyday household and retail activities consistent with regulatory requirements, similar to the Project. The Alternative would not require the use of hazardous materials beyond these routinely used products.

The analysis of the Project's impacts on Hazards and Hazardous wastes stated that the Project's use of hazardous materials during Project operations would include routinely used and regulated products and would not require the use of otherwise hazardous waste materials. Impacts due to operations would be less than significant.

The analysis also identified several potential Site conditions that could result in significant impacts if not properly addressed through regulatory measures and mitigation measures. Demolition of the Luxe Hotel building could provide an exposure to ACMs and/or LBP. The identification, handling, removal, and/or disposal of ACMs and LBP would be completed in compliance with regulatory requirements, thereby resulting in a less than significant impact. Further, the Project's location in an LADBS designated Methane Hazard Area (Methane Zone), containing methane gas in soil samples would also be addressed through regulatory measures. A methane mitigation system designed in accordance with Division 71 of LAMC Section 91.7104 would be incorporated into the Project structures to provide for the public safety. This would reduce potential impacts associated with methane beneath the Project Site to a less than significant level.

Further, it was determined that excavation would encounter contaminated soils and abandoned fuel facilities, which if not properly handled in accordance with applicable federal, state, and local regulations, could expose people to contaminants, resulting in a potentially significant impact. Excavation of the Project Site could also pose a risk to construction workers and future building occupants due to soils with pollutant concentrations above federal and state remediation levels. Lastly, unknown hazardous materials may be present in untested areas of the Site beneath existing structures. The Project would include mitigation measures to reduce these potentially significant hazardous conditions to less than significant levels. These measures require preparation and implementation of a Soil Management Plan, a Health and Safety Plan, and additional subsurface soil and a soil gas sampling and testing in accordance with the recommendations of the *Soil and Soil Gas Investigation* Technical Report prepared by Terra-Petra.

The Reduced Density Alternative, while requiring less excavation than the Project, would still encounter the same potentially hazardous site conditions as the Project, and would be required to comply with the same regulations and implement the same mitigation measures to reduce the potential impacts. While the future Project Site population would be reduced from that of the Project, the Alternative's use of routinely used and regulated products would be generally similar to that of the Project. Impacts of the Reduced Density Alternative on Hazards and Hazardous materials would be similar to those of the Project, and as is the case with the Project, would be less than significant.

(6) Land Use and Planning

The Reduced Density Alternative would have the same land use mix as the Project, but the amount of new development would be reduced by approximately 38 percent. It would include 186 hotel guest rooms, 403 dwelling units and commercial/retail/restaurant space on the first two levels. The Alternative would have

an FAR of 6:1, which is the maximum density that would be allowed without implementation of TFAR as provided for under LAMC Sections 14.5.6 through 14.5.12. Otherwise, the necessary approvals would be similar to those of the Project. It is assumed that the Alternative would have amenities similar to those of the Project, although scaled back in proportion to the reduction in density.

The Project proposes an FAR of 9.7:1 requiring floor area transfer pursuant to the City's LAMC TFAR provisions. The Project's development program would include 650 residential units, a 300 room hotel with banquet, conference and amenity areas. It would also include 80,000 sf of commercial retail/restaurant space with two stories of pedestrian access frontage along the periphery of S. Figueroa Street, 11th Street, W. Olympic Boulevard, and S. Flower Street. The Project also includes a Podium Garden Terrace on the roof of the fourth level that would provide open space amenities for use by residents and hotel guests. Recreation rooms and other amenities and open space would also be provided. The Hotel Tower would also include a rooftop amenity deck with a swimming pool, bar, spa tub, lounging area, and function space for hotel guests.

The analysis of the Project's impacts on Land Use concludes that the Project would be substantially consistent with and would not substantially impede implementation of adopted land use plans, policies, guidance, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. This conclusion is based on analysis of Project consistency with applicable policies of the General Plan Framework, Do Real Planning, Walkability Checklist, Central City Community Plan, City Center Redevelopment Plan, LAMC, 2010 Bicycle Plan and Mobility Plan 2035, and SCAG's 2016 RTP/SCS. The Project's requested entitlements regarding TFAR, conditional use permits, Vesting Tentative Tract Map, Site Plan Review, and project permit compliance with a new Sign District would be consistent with the regulatory requirements and development would be compatible with surrounding land uses. Therefore, Project impacts on Land Use would be less than significant.

Key features of the Project that support the conclusion that land use impacts would be less than significant includes the following:

- The Project would provide a mixed-use development within the high quality transit area with access to the Metro Blue, Red and Purple Lines; and multiple bus and shuttle lines. The City and SCAG have been promoting development patterns that will reduce vehicle miles traveled, providing reductions in energy consumption and air quality emissions, as well as convenience for commuters.
- The Project would provide needed housing to the region and the Downtown area, as well as visitor-serving uses at a scale and intensity that distinguishes and uniquely identifies the Downtown Center. This includes hotel development in proximity to LA LIVE, Staples Center Arena, and the LACC.
- The Project would build upon and support the vibrancy of the Downtown Center and proximity to LA LIVE, Staples Center Arena, and the LACC and would bring and encourage further investment in the area.
- It would provide a pedestrian friendly street frontage with pedestrian access to commercial and restaurant frontage along the periphery of the property and a 5,000 sf public plaza along S. Figueroa Street, including wide sidewalks, parkways, landscaping, and special paving.

The Project features are consistent with the Framework Element's designation for the "Downtown Center" district as further articulated in the various plans and regulations that are applicable to the Downtown Center. The Framework Element identifies the Downtown District as the location for "... major cultural and

entertainment facilities, hotels, professional offices, corporate headquarters, financial institutions, high-rise residential towers, regional transportation facilities and the Convention Center, ... generally characterized by floor area ratio up to 13:1 and high rise buildings.”

The Reduced Density Alternative includes similar land use activities to the Project, with generally similar land use classifications, albeit at reduced density, and therefore the Alternative’s impacts regarding consistency with land use regulations would be similar to those of the Project.

The Reduced Density Alternative, with similar uses and Site design concept to the Project, would have similar impacts on land use patterns and activity in the Project vicinity. The variation in density between the Alternative and the Project would have two effects. On the one hand, the lower density of the Alternative would cause less change in the amount of activity in the Project vicinity, with corresponding reductions in demand for services in the area, and in this sense the impacts would be slightly lower than the Project. On the other hand, the higher density of the Project achieves greater land use benefits related to clustering of activity, in particular increased activity in proximity to transit facilities and support for the vibrancy of the Downtown Center and the LA LIVE/Staples Center Arena/LACC complex. This advantage would be lost with the Alternative and in this sense impacts would be greater.

If the Reduced Density Alternative were to be implemented, it would provide a smaller project and therefore reduced environmental impacts on several environmental topics as indicated in the remainder of this analysis. However, if this Alternative were implemented, the density rights that would be transferred would remain available for transfer to another project site under the TFAR provisions of the LAMC. This density represents development anticipated and available in the Downtown area. If the floor area were transferred to an alternative project, the impact reductions would not occur, but rather could occur at another location. In such a case the impacts associated with this increased floor area would not be eliminated, but would be relocated to another project site, without necessarily providing hotel rooms in an equally accessible area to the LA LIVE/Staples Center Arena/LACC complex.

(7) Noise

i. Construction Noise and Vibration

The Reduced Density Alternative would require a construction program similar to the Project, including demolition, grading/excavation, foundation placement, building construction, and finishing/paving. The general construction activities would be identical to those of the Project; although the amount of development would be reduced by 38 percent, with reduced requirements for subterranean parking. Although the reduction in the amount of development under the Reduced Density Alternative would result in a shorter overall construction schedule with reduced noise overall, the maximum construction activity that could occur on a given day, the basis for the analyses of construction impacts, would be similar.

The Project would result in a significant impact due to construction noise at nearby sensitive receptors (multi-family residential uses). The Project would include the implementation of mitigation measures (i.e., sound barriers) to substantially reduce construction noise impacts. However, even with implementation of the sound barriers, noise associated with the Project would be expected to increase ambient noise levels at

nearby multi-family residential uses by 5 dBA or more, notably at upper floor levels, resulting in a significant unavoidable impact.

Construction vibration during Site clearing, grading and shoring activity in the vicinity of the Petroleum Building would generate vibration levels that could potentially exceed the 0.50 inches per second PPV significance threshold for potential damage of historic building. However, a mitigation measure has been proposed (vibration monitoring, adjustment in construction activity if needed to reduce vibration levels and repair of the building if needed) that, if implemented, would reduce impacts to a less than significant level. However, implementation may not be feasible, and therefore the impact is considered to be a potentially significant and unavoidable impact. The vibration from the construction levels at nearby locations with human activity would be sufficiently low to avoid significant impacts on human activity.

As the construction noise and vibration of the Alternative would be similar to that of the Project on days of maximum construction activity, the noise and vibration impacts of the Alternative would be similar to those of the Project. The Alternative would include the same mitigation measures as the Project and, like the Project, would have a significant impact on construction noise, less than significant impact from construction vibration if mitigated, but potentially significant and unavoidable impact if not mitigated, and a less than significant impact on human annoyance due to vibration.

ii. Operations Noise and Vibration

The Reduced Density Alternative would increase noise associated with stationary and mobile (i.e. automobile trip) sources. The noise levels would be reduced slightly with less traffic generation and fewer people on Site. Noise levels from stationary equipment would be similar to that of the Project.

Impacts of the Project on ambient noise levels due to traffic, stationary noise sources, and increases in vibration levels would be less than significant. Due to less development and less mobile source noise, the operational noise impacts of the Reduced Density Alternative would be less than those of the Project, and like the Project, would be less than significant.

(8) Population, Housing, and Employment

The Reduced Density Alternative would include residential, commercial and hotel uses that would add population and employment within the Central City Community Plan area, the City Center Redevelopment Plan area, the City, and the SCAG region. The Reduced Density Alternative would include 403 dwelling units housing a potential residential population of 657 people. The hotel and commercial uses would create employment for an estimated net increase of 228 employees over the existing 118 hotel employees.

The Project's construction phase would have no impact on the supply of housing units or population growth. Construction activities would create work for construction workers that would be drawn from an existing regional pool of existing workers. The short-term employment opportunities would contribute to the local and regional economy.

The Project operations would include 650 residential units, housing a potential population of 1,060 people. It would provide a net increase in employment of 438 employees over the existing 118 hotel employees. These increases would be consistent with SCAG's short-term and long-term growth projections for the

Community Plan area and the City of Los Angeles, which are the basis for planning of services, utilities and infrastructure. The increase in housing would help the City meet or exceed its housing objectives per the General Plan Housing Element, and housing allocation established in the SCAG RHNA.

The Project would also be consistent with City and SCAG policies that seek to promote concentrated development within a high quality transit area, reducing vehicle miles traveled and improving the downtown ratio of jobs to housing. Further, the Project is an infill development, that would add no new infrastructure other than that needed to serve the Project Site, and would not foster otherwise unplanned growth. Project impacts regarding population, housing and employment would be less than significant.

The Reduced Density Alternative would result in the provision of 247 fewer housing units, with a reduction in residential population of 403 people and 210 fewer employees. In terms of direct contribution to growth, the Reduced Density Alternative would result in less impact regarding changes to the community and secondary effects on the provision of services and utilities; and its impacts would be less than significant. In terms of growth policies, and population distribution, this Alternative would not contribute as effectively in meeting future housing needs or fully utilizing the Project's accessibility to a large range of public transit facilities. The Project's increases in housing and residential population in a transit area would have greater benefit, that is it would have less adverse effect regarding attainment of growth policies (impacts of the Alternative would be greater.) Similar to the Project, impacts of the Alternative would be less than significant.

(9) Public Services

i. Fire Protection

The Reduced Density Alternative would add new population, employment and visitor activity at the Project Site increasing the potential need for fire and/or emergency services. The Alternative's reduction in building volume along with related Site activities would result in lower demand for fire and emergency services than would the Project.

The analysis of the Project's impact of fire protection and emergency services indicates that the Project Site has access to adequate fire services with relatively low response times, has sufficient water flow for firefighting service and would not require the addition of new facilities for its service. Further, the Project would meet regulatory requirements that provide for the public safety and that reduce the demand for firefighting responses.

The Alternative's population and building volume would be 38 percent less than that of the Project, and therefore the need for emergency and fire-fighting services would be reduced compared to the Project. At the same time, the Alternative would benefit from the same availability of firefighting and emergency services as the Project. Likewise, the Alternative would also comply with regulatory measures for the public safety and would provide design features to provide for public safety. Impacts of the Alternative on fire and emergency services would be less than the Project, and like the Project, impacts would be less than significant.

ii. Police Protection

The Reduced Density Alternative would add new population, employment and visitor activity at the Project Site, with an increased potential need for police and emergency services. The estimated residential population that would be used for estimating police service ratios would be approximately 38 percent reduced from the Project with a Site population of approximately 657 residents.

If the existing officer to resident ratio of 1 to 93 were to be maintained, the number of new officers required to maintain the existing service level would be approximately seven officers. If considering the Alternative's non-residential population of 149 people for calculating police impacts, the Alternative would generate a potential need for an additional 1.6 potential officers. When combined with the residential population, the Reduced Density Alternative would generate a need for 8.6 officers, if the service ratio were to remain constant.

The Project, with a larger population and increased level of Project Site activity, would generate an estimated need for 11 new officers based on residential population and a need for an additional 4.5 officers, if the non-residential population is considered as residential population and the service ratio were to remain constant. At the same time, the Project includes numerous security features that would reduce Project impacts and reduce the need for police services. These include, among other provisions, CCTV, restriction of access to non-public areas by electronically controlled and locking access cards, controlled access to parking structures, and 24-hour on-site security, including four to five private security staff. A Project Site design intended to enhance on-site safety would also reduce the need for additional police services or the provision of new police facilities. With the implementation of these security features, impacts on police services would be less than significant.

It is assumed that the Alternative would provide similar security provisions. Because the Alternative would add a smaller population and less activity to the Project area, its impacts would be less than those of the Project. As was the case with the Project, impacts of the Alternative would be less than significant.

iii. Libraries

The Reduced Density Alternative would generate new residential population that would use local libraries. There would be 657 new residents under this Alternative.

The Project would include a population of 1,060 new residents that would use local libraries. As indicated in the analysis of the Project's impacts, library services would be available primarily from the Richard J. Riordan Central Library less than 1-mile away, as well as 5 other libraries in the Project vicinity. The existing libraries have the capacity to service the Project residents and impact on library services would be less than significant.

The Reduced Density Alternative would have similar patterns of library usage to those of the Project. Because the Alternative has a 38 percent smaller population than estimated for the Project, its impacts on library services would be less than the Project, and like the Project, its impacts would be less than significant.

iv. Parks and Recreation

The Reduced Density Alternative would produce an on-site population of 657 new residents that would generate a need for park and recreation facilities. It is expected that the Alternative would include recreation facilities that are similar to those of the Project, but reduced proportionately with the reduction in the number of dwelling units. Accordingly, it is assumed that the Alternative would provide approximately 1 acre of recreation facilities.

The Project's 650 residential units would generate an estimated 1,060 residents that would create a demand for park and recreation space, and 1.62 acres of recreation and open space area for Site residents with an additional 0.26 acres of recreation and open space area to serve hotel visitors. Of this amount, 9,250 sf would be public serving open space in the street level public plaza and other street level locations.

The Project's 1.62 acres of recreation and open space would be less than the amount that would be required under the Public Recreation Plan's (PRP) long-range standard of four acres per 1,000 persons, i.e. 4.24 acres and the PRP's more attainable short- and intermediate-range standard of two acres per 1,000 persons, i.e. 2.12 acres. However, the 1.62 acres of recreation and open space would be sufficient to meet the requirement of 1.61 acres per LAMC Section 12.21.G. The Project would also provide for dedication of land for park uses and/or in-lieu fees to offset the park impacts of new residential development pursuant to Section 17.12. The Project would meet these requirements through a provision of on-site recreation amenities and payment of fees.

It is expected that Site residents will primarily use the Project's recreation facilities; and, residual off-site park usage would likely be dispersed among the 26 existing LADRP parks in the Project vicinity, with only a small increment of use at area public parks. As the Project would meet its obligations for reducing impacts per LAMC regulations, impacts of the Project on parks and Recreation would be less than significant.

The demand for park and recreation space would be less than that of the Project's. However, it is assumed that the Alternative would provide similar facilities to those of the Project, according to LAMC regulations, for reducing Project impacts. Therefore, impacts of the Alternative would be similar to those of the Project and is the case with the Project would be less than significant.

(10) Transportation and Circulation

i. Construction

The Reduced Density Alternative would add haul trucks, equipment vehicles and worker trips to the local road system during construction. It could also have short-term effects on traffic flow adjacent to the Project Site.

The Project would also have a construction program that would add vehicles to the local road system and potentially affect traffic flows adjacent to the Project Site. The Project would be required to provide a Construction Management Plan (PDF-TRAF-1) to reduce potential construction impacts through scheduling of construction activities, traffic controls, notification, and safety procedures. With the implementation of the Construction Management Plan, the Project would not result in substantial disruption of traffic flow,

intersection operational impacts, conflicts with pedestrians and/or bicyclists, the loss of on-street parking, or conflicts with construction of My Figueroa Project and existing Metro operations. Transportation and parking impacts related to construction would be less than significant. However, due to a large number of cumulative projects in the Project vicinity with a potential for overlapping construction, the Project could contribute to a cumulatively significant construction traffic impact.

The Reduced Density Alternative's maximum construction traffic on any one day of maximum construction activity would be similar to the Project's traffic. However, maximum activities might occur on fewer days and/or the number of days of construction would be reduced due to less building volume. The Alternative would include a similar Construction Management Plan to that of the Project. Therefore, impact of the Alternative would be somewhat less than the Project, but like the Project, would result in a significant unavoidable cumulative impact associated with construction.

ii. Operations

The Reduced Density Alternative would provide residential, hotel and commercial uses that would add traffic to the local and regional roadway systems. The increase in traffic volumes above those currently occurring with the existing Luxe Hotel are shown in **Table 5-1, Alternative 2 - Net Trip Generation Summary**. As indicated the Alternative is estimated to generate a net total increase of 3,735 daily weekday trips, including 279 A.M. peak hour trips (112 inbound, 167 outbound) and 307 P.M. peak hour trips (180 inbound, 127 outbound).⁴

Table 5-1

Alternative 2 - Net Trip Generation Summary

Alternative	Trip Generation Estimates						
	Daily	A.M. Peak Hour			P.M. Peak Hour		
		In	Out	Total	In	Out	Total
Alternative 2	3,735	112	167	279	180	127	307
Project	6,583	204	274	478	312	227	593
Comparison (Alternative 2 - Proposed)	-2,848	-92	-107	-199	-132	-100	-232

Source: Gibson Transportation, 2016

Prior to mitigation, the Reduced Density Alternative would result in a significant impact at the following study intersections under Future with Project (Year 2023) Conditions:

12. Figueroa Street & Olympic Boulevard (P.M. peak hour)
13. Figueroa Street & 11th Street (A.M. and P.M. peak hour)
19. Flower Street & 11th Street (P.M. peak hour)
30. Grand Avenue & 17th Street/I-10 Westbound On-Ramp (P.M. peak hour)

⁴ Worksheets presenting the calculations of the trips generation for the Alternative, as well as the intersection analyses are presented in Appendix J-2 of this Draft EIR.

As also indicated in Table 5-1, the Project would produce an increase in traffic over the current Luxe hotel trips a total of 6,583 daily weekday trips, including 478 A.M. peak hour trips (204 inbound, 274 outbound) and 593 P.M. peak hour trips (312 inbound, 127 outbound). The analysis of Transportation and Traffic concluded that the Project would result in significant impacts at the same four intersections prior to mitigation. The analysis identified feasible mitigation measures to reduce Project impacts including physical improvements at Intersection 30, Grand Avenue & 17th Street/I-10 Westbound On-Ramp, and a requirement for a Travel Demand Management Program to promote non-auto travel and reduce the use of single-occupant vehicle trips. The traffic analysis indicates that with implementation of the Project's mitigation program, the impact at the following three intersections would remain significant and unavoidable:

12. Figueroa Street & Olympic Boulevard (P.M. peak hour)
13. Figueroa Street & 11th Street (A.M. and P.M. peak hour)
19. Flower Street & 11th Street (P.M. peak hour)

The Reduced Density Alternative would generate fewer trips due to the reduced development program and amount of Site activity. There would be 2,848 fewer daily trips, with 199 fewer A.M. trips (92 inbound, 107 outbound) and 232 fewer P.M. trips (132 inbound and 100 outbound). It is expected that the Alternative would be required to implement mitigation measures similar to those of the Project. However, even with the lower traffic generation, the Alternative would continue to have significant impacts at the same three intersections after mitigation.

(11) Utilities and Service Systems

i. Water Supply

The Reduced Density Alternative would include new residential, hotel, commercial and related amenity uses that would generate demand for the consumption of water resources. The estimated water consumption is shown in **Table 5-2, Alternative 2 - Estimated Water Consumption**. As indicated, Alternative 2 would require 150,537 gallons per day (gpd) or 169 acre feet per year (af/y) of water consumption.

In contrast, the Project with similar uses, but a larger development program, would increase on-site water demand by approximately 219,529 gpd, or 246 af/y. The WSA for the Project indicates that LADWP has sufficient water supply to meet the Project's needs. The Project includes numerous design features to reduce the demand for water consumption. It is assumed that the Alternative would include similar features. Water infrastructure and water supply is sufficient to meet the demands of the Project without Project mitigation and the Project impact on the provision of water services would be less than significant.

The Alternative would require 68,992 gpd or 77 af/y less than the Project. Impacts of the Reduced Density Alternative would be less than those of the Project and would also be less than significant.

ii. Wastewater

The Reduced Density Alternative would include new residential, hotel, commercial and related amenity uses that would generate wastewater requiring conveyance from the Project Site and treatment. The estimated

wastewater generation is shown in **Table 5-3, Alternative 2 - Estimate of Wastewater Generation**. As indicated, under Alternative 2, the Project would generate 137,996 gpd of wastewater.

In contrast the Project would increase on-site wastewater generation by approximately 198,247 gpd that would need conveyance and treatment. The Project's additional wastewater would be within the capacity limits of the conveyance and treatment facilities serving the Project Site, and impacts would be less than significant. The Alternative would generate 60,251 gpd less wastewater than the Project. Impacts of the Reduced Density Alternative would be less than those of the Project and would also be less than significant.

Table 5-2

Alternative 2 - Estimated Water Consumption

Land Use	Quantity	Unit	Water	Water		
			Consumption	Consumption		
			Factor ^a	(gpd/unit)	(gpd)	(af/y)
Residential Units	403	units	108.50		43,726	49
Residential Common ^b	20,000	sf	0.11		2,146	2
Hotel						
Hotel Rooms	186	rooms	120.00		22,320	25
Hotel Banquet/Ballroom	9,920	sf	0.35		3,472	4
Retail	24,800	sf	0.44		10,788	12
Restaurant	992	seats	30.00		29,760	33
Open Space	35,487	sf	0.13		4,496	5
Landscaping ^b	16,263	sf	0.04		629	1
Structured/Subterranean Parking ^c	177,029	sf	0.001		115	0
Cooling Tower ^c	1,835	ton	29.040		53,288	60
Less Existing Water Consumption					-19,287	-22
Less Voluntary Conservation ^c					-916	-1
Total Alternative 2					150,537	169
Project					219,529	246
Comparison (Alternative -Project)					-68,992	-77

^a Water Consumption Rates are based on values prepared by the Bureau of Sanitation for measuring wastewater flow. The values shown here have been adjusted to account for weighted values amongst combined land uses. The rate for residential uses is a weighted average for the unit size mix of the Project. The restaurant/retail rate is a weighted rate taking into account the relative amounts of each use and the varied rates for restaurant versus retail uses. Other uses are similarly average as well. The averaged values are based on the more detailed calculations provided in Table I of the WSA for the Project that was prepared by LADWP.

^b Assumes the area for these uses would be similar to that of the Project.

^c Assumes that these values would be reduced proportionately from the Project with the overall reduction in development for this alternative.

Source: PCR Services Corporation, 2016

(C) RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES

The Reduced Density Alternative would include the same mix of uses as the Project, however the amount of development would be reduced by approximately 38 percent. The reduction in development would be achieved with an across the board reduction in the amount of space given to the Project's mixed uses.

Otherwise the Project buildings would be similar in concept and land use relationships to those of the Project.

Since the Alternative would include uses that are the same type as the Project, but of lesser amount, the Alternative would not meet the Objectives pertaining to the proposed development program, the support for transit and support to the economy to the same extent as the Project.

Therefore, this Alternative would meet the following objectives but not to the same extent as the Project:

Table 5-3

Alternative 2 - Estimated Wastewater Generation

Land Use	Quantity	Unit	Wastewater Generation Factor (gpd/unit)	Wastewater (gpd)
Residential ^b	403	du	105	42,315
Retail ^c	24,800	sf	0.05	1,240
Restaurant ^c	992	seat	30	29,760
Hotel				
Hotel rooms	186	room	120	22,320
Hotel Banquet/Ballroom	9,920	sf	0.35	3,472
Swimming Pools ^d	56,676	sf	1	56,676
Industrial Discharge ^d				1,500
Less Existing Wastewater Generation				-19,287
Total Alternative 2				137,996
Project				198,247
Comparison (Alternative 2 - Project)				-60,251

^a Wastewater generation rates are taken from list provided by the Los Angeles Bureau of Sanitation.

^b The wastewater generation rate is a weighted average that is based on the assumption that the mix of residential unit sizes a similar mix to that of the Project.

^c It is assumed that the 49,600 sq.ft. of commercial space would include the same proportionate mix of restaurant to retail space as the Project. It is assumed that restaurant seating would be provided at a rate of 1 seat per 25 sf of space.

^d The amount of swimming pool area has been reduced proportionately by 38 percent. It is assumed that the industrial discharge associated with the pools would be reduced by one third.

Source: PCR Services Corporation, 2016

- Objective 1: Support the diverse array of entertainment, shopping, nightlife, cultural, and residential uses in Downtown by locating new residences within the Downtown Housing Incentive Area, new hotel rooms to support the goals laid out in the Mayor’s 2015 White Paper on the Future of the Los Angeles Convention Center, and neighborhood and visitor serving uses to support connectivity with LA LIVE, Staples Center Arena, and the Los Angeles Convention Center.
- Objective 2: Develop a mixed-use project that combines housing, hotel, and commercial uses in close proximity to public transit consistent with regional mobility goals to reduce vehicle trips and infrastructure costs, while supporting the use of public transportation and amenities, including the nearby Metro Stations, City bus and DASH lines.

- Objective 9: Redevelop an underutilized site with an economically viable and attractively designed development that supports the SCAG growth projections in Downtown by exercises TFAR provisions for fuller utilization of the Project Site and support of TFAR public benefits purposes.
- Objective 10: Maintain and enhance the economic vitality of the region by providing job opportunities that attract commercial and residential tenants, and increase the tax revenue, sales, and property taxes.

The Alternative would meet the following Project Objectives related to the design of the Project to a similar extent as the Project:

- Objective 3: Respect and maintain the historical significance of the Petroleum Building by providing a setback along W. Olympic Boulevard to maintain views of the Petroleum Building's architecturally distinguished primary facades along W. Olympic Boulevard and S. Flower Street.
- Objective 4: Compliment and foster pedestrian activity through ground level retail/restaurant uses, street trees and landscaping, public art, and signage and lighting compatible with the active LASED and streetscape along W. Olympic Boulevard, S. Figueroa Street, S. Flower Street, and 11th Street.
- Objective 5: Create a visually vibrant and engaging pedestrian and vehicular experience along Figueroa Street, removing paved surface parking, and providing new pedestrian scale features such as a public plaza, that are compatible with the adjacent entertainment and restaurant venues at LA Live and Staples Center Arena directly across the street.
- Objective 6: Create a development that complements and improves the visual character of the area by connecting with the surrounding urban environment through a high level of architectural design and appropriate scale of development.
- Objective 7: Provide unique and vibrant signage that is integrated into the Project's architecture and that will visually connect to and be compatible with the scale of media and signage on existing and current development on adjacent blocks while informing and attracting visitors to the Project's content and offerings;
- Objective 8: Create a development with high quality design that is responsive environmental sustainability issues (e.g. energy efficiency, including electronic charging stations for Project tenants); and that provides open space and recreational amenities for Project's residents, hotel guests, commercial tenants, and site visitors.

F. ALTERNATIVES ANALYSIS

3. ALTERNATIVE 3: RESIDENTIAL WITH GROUND LEVEL COMMERCIAL

(A) DESCRIPTION OF THE ALTERNATIVE

Alternative 3, the Residential with Ground Level Commercial Alternative would utilize the entire site for a residential development with 50,000 sf of ground level commercial (retail/restaurant) use within the provision of the zoning code. This Alternative would include 669,960 sf resulting in an FAR of 6.0:1. The Alternative would include 520 residential dwelling units of similar size and configuration to the Project. The residential development would be provided in two residential towers with 15,000 sf of residential amenities. It would include parking in a subterranean structure.

The Alternative is intended to reduce the Project's significant and unavoidable construction impacts (construction noise, vibration and cumulative traffic) by reducing the amount of building volume to be constructed and the amount of exported excavation required. The Alternative also is intended to reduce the Project's significant and unavoidable traffic impacts during operations (at three intersections under Future with Project with Mitigation Conditions for Phase 1 (Year 2020); and Full Buildout (Year 2023)). With a reduced building profile and level of Project activity, the Alternative would provide potential reductions in other environmental topics that were not found to be significant.

(B) ENVIRONMENTAL IMPACTS

(1) Aesthetics/Visual Resources

i. Aesthetics and Views

The Residential with Ground Level Commercial Alternative would replace the existing Luxe Hotel and parking lots with two new residential towers with pedestrian oriented ground level commercial uses. The architectural styling and general appearance would be similar to that of the Project, and like the Project would not interfere with views of the primary facades of the adjacent Petroleum Building. However, with a reduced FAR of 62 percent of the Project, volume of massing would be reduced.

Views of the Project Site at ground level and in the near vicinity would be similar to those of the Project, as the buildings would blend into the existing, developed urban setting; and whereby views of the site are blocked from more distant locations along the public viewing corridors. Nearby views of the Alternative would largely consist of the street level commercial uses and landscaping level design adjacent to the Project Site.

The Project would replace the existing Luxe Hotel and parking lots with a modern well designed development. The Project would include new contemporary modern buildings, new landscaping, a public plaza, artwork, street front commercial uses, and other amenities. It would be compatible with surrounding development, would maintain views of the primary facades of the adjacent Petroleum Building, and would not result in a substantial material change to the integrity and significance of the building. The Project would

not adversely affect existing scenic resources would not substantially obstruct or degrade an existing recognized and valued public view of view resources. For these reasons, the analysis of impacts on Aesthetics and Views concludes that impact of the Project would be less than significant.

Impacts of the Residential with Ground Level Commercial Alternative would also be less than significant pursuant to SB 743 and the City's standard thresholds for evaluating aesthetic and view impacts because the Alternative would have similar design features to those of the Project, varied only by a smaller amount of building mass, and would not block views. The reduced building mass would occur above the pedestrian level that would be defined by the commercial uses and street amenities. Since, the aesthetic character of the Alternative would be similar to that of the Project and the variation in massing would have limited effect, the Alternative's impacts would be similar to those of the Project.

ii. Light and Glare

As an all residential development the Residential with Ground Level Commercial Alternative would most likely have a simplified signage program featuring architectural highlighting, building identification, commercial definition and security lighting. It is assumed that the Alternative would not require highly reflective materials. Thus, light and glare effects of this Alternative would be less than those of the Project.

The Project would introduce new sources of lighting, notably associated with wall signs, digital displays and animated signage, supergraphic signs, open panel roof signs, hotel building identification, residential building identification, retail and restaurant building identification, parking entry identification, loading dock entry identification, and wayfinding signage. The graphics and signage program would support an active street front experience on all sides, but particularly along the Figueroa corridor that would mix art and signage graphic components. The analysis of lighting for the Project concludes that the Project would not create a new source of light or glare that would substantially alter the character of off-site areas or that would result in substantial light spill/or glare onto adjacent light-sensitive receptors. Therefore, impacts regarding light and glare for the Project would be less than significant.

The reduced lighting resulting from the Alternative's reduced building profile and residentially oriented uses would be less than that of the Project, but would remain noticeable and consistent with the general character of the lighting surrounding the Project Site. Lighting at ground level for the Alternative and the Project would be similar. Building Residential with Ground Level Commercial Alternative materials would also be similar, with resulting similar glare effects. Impacts of the Residential with Ground Level Commercial Alternative regarding light and glare would be less than those of the Project and less than significant.

iii. Shade/Shadow

Under the Residential with Ground Level Commercial Alternative, buildings would have less volume than the Project. Further, the Alternative's towers would have locations that would be no closer to site edges than the Project's proposed towers.

The analysis of Project impacts on shading indicates that the Project would not shade shadow-sensitive uses for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. PST, or more than four hours between the hours of 9:00 a.m. and 5:00 p.m. PDT; and therefore shade/shadow impacts would be less than

significant. Therefore, the reduced shadows of the Alternative development would be less than those of the Project and also less than significant.

(2) Air Quality

i. Construction

The Residential with Ground Level Commercial Alternative would require a construction program inclusive of demolition, excavation, foundation placement, building construction, and paving. The general construction activities would be similar to those of the Project; although the amount of development would be reduced with a lesser amount of building floor area and reduction in the need for subterranean parking. Although the reduction in the amount of development under the Residential with Ground Level Commercial Alternative would result in a shorter overall construction schedule, the maximum construction activity that could occur on a given day, the basis for the analyses of construction impacts, would be similar.

The Project would emit regional and localized construction emissions below the SCAQMD daily numeric thresholds for all applicable pollutants. The Residential with Ground Level Commercial Alternative, which would have similar daily construction activities, would also emit regional and local construction emissions that would be below the SCAQMD daily numeric thresholds for applicable pollutants. As a result, impacts of the Residential with Ground Level Commercial Alternative on criteria air pollutant emissions would be similar to the Project on days of greatest construction activity, but reduced overall. Like the Project, the impact would be less than significant.

The Project's contribution to potential health risks would occur due to construction activities. The Project includes Project Design Features that would minimize construction-related emissions. The analysis of the Project's contribution to health effects indicates that the Project (inclusive of construction activities and operations) would have a less than significant impact on TACs. The Alternative would incorporate similar Project Design Features that would minimize emissions sufficient to meet the same standard as the Project. As a result, impacts of the Alternative on TACs would be similar to, or less than those of the Project

ii. Operations

The Residential with Ground Level Commercial Alternative would result in reduced operational emissions due to the reduced consumption of energy (i.e., natural gas) for site activities, transportation to and from the Project Site, and use of consumer products. Because the Residential with Ground Level Commercial Alternative would reduce the amount of development with a reduction in floor area and produce less traffic with the mostly residential nature of the Alternative, criteria air pollutants associated with energy consumption, transportation, and use of consumer products would be reduced from those of the Project.

The Project would result in less than significant impacts with respect to both regional and localized criteria pollutant emissions due to Project operations. The Project would also have a less than significant contribution to CO hotspots. The Project includes as Project Design Features a number of green building measures that would reduce Project impacts. The Alternative would include similar features. Impacts of the Alternative would be less than those of the Project, and as is the case with the Project, less than significant.

At the same time, the reduction in development under the Residential with Ground Level Commercial Alternative would locate fewer on-site residents and employees in proximity to the public transportation hub that is the downtown area; and less population in proximity to other nearby commercial and retail uses, and nearby office buildings and other job centers as compared to the Project. Therefore, this Alternative would support regional transportation reductions and regional transportation-related air pollutant emission reductions associated with infill and transit oriented development strategies to a lesser degree than the Project. By accommodating less growth in the well served transit area, a number of the people who would live at the Project Site would end up locating in other areas where there is less access to public transit and possible longer trips to places of employment. Therefore, the Alternative would be less effective in reducing vehicle miles traveled with associated reduced reductions in vehicular emissions.

(3) Cultural Resources

i. Archeological Resources and Tribal Cultural Resources

The Residential with Ground Level Commercial Alternative would require the implementation of a construction program similar to that of the Project, although with less excavation for subterranean parking. Accordingly, there would be less excavation into native soils and less potential to encounter/disturb archaeological resources.

The Project would involve excavations into soils with the potential to contain resources associated with former turn of the 20th century residential uses on the Project Site, as well as other archaeological resources that may be present. If such resources were to be present, potentially significant impacts on archaeological resources could occur unless mitigation measures were implemented. Mitigation measures are recommended that require monitoring of excavation activities with treatment, reporting and curation of resources should they be encountered. These measures would reduce impacts to less than significant levels. Further, the Project would not result in a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074.

As the resources are generally assumed potentially to be distributed throughout soils underlying the Project Site, the potential impacts with the reduced excavation depth would be slightly less than those of the Project; and the same mitigation measures would be applicable. Therefore, impacts of the Residential with Ground Level Commercial Alternative on archaeological resources would be similar to those of the Project, and would be less than significant with mitigation.

ii. Paleontological Resources

The Residential with Ground Level Commercial Alternative would require the implementation of a construction program similar to that of the Project, although with less excavation for subterranean parking. Accordingly, there would be less excavation into native soils and less potential to encounter/disturb paleontological resources.

The analysis of the Project's impacts on paleontological indicates that Project grading and excavation may encounter native soil/sediment associated with older Quaternary Alluvium, the Fernando Formation, and the Puente Formation deposits below the previously disturbed ground surface levels. These formations have high potential for containing buried paleontological resources. As a result, the potential exists for construction to directly or indirectly destroy buried unique paleontological resources or sites or unique

geologic features. Impacts to buried paleontological resources are considered potentially significant. Therefore, the Project includes standard mitigation measures to avoid adverse effects on paleontological resources. These measures would include a monitoring program and treatment/curation of discovered fossils.

With less excavation, the Residential with Ground Level Commercial Alternative would be less likely to disturb resources. The Alternative would also include a mitigation program similar to that of the Project. With less excavation, impacts would be less than those of the Project and less than significant with the implementation of the mitigation measures.

iii. Historical Resources

The Residential with Ground Level Commercial Alternative would like the Project demolish the existing Luxe Hotel and replace it with a new residential, and retail Project with new towers and a podium structure. However, with a reduced FAR, the massing of development volume would be reduced.

The Luxe Hotel does not qualify as a historical resource under CEQA. Therefore, no impacts associated with demolition of the Luxe Hotel building would occur.

The analysis of historical resources for the Project also indicated that the Project would not result in a substantial material change to the integrity and significance of historical resources within the vicinity. This is true for the Petroleum Building that is located immediately adjacent to the Project Site, as well as the remaining four historical resources located in the vicinity as the Project would not adversely affect views of historic resources from those locations.

However, during construction indirect vibration impacts on the Petroleum Building have the potential to exceed a vibration threshold should the consent of the property owner not be secured for the installation of continuously operational automated vibrational monitors on the Petroleum Building. Therefore, indirect impacts of the Project on the Petroleum Building were conservatively concluded to be significant and unavoidable.

The Residential with Ground Level Commercial Alternative would have less mass than the Project, but with a generally similar appearance. Therefore, the Alternative would create less change in the appearance of the Project Site; but have a generally similar effect in regard to historic resources in the Project vicinity.

Both direct of the Residential with Ground Level Commercial Alternative would be similar to those of the Project and less than significant. Indirect impacts of the Reduced Density Alternative would be similar to those of the Project and would be significant and unavoidable.

(4) Greenhouse Gas Emissions

The Residential with Ground Level Commercial Alternative would generate GHG emissions due to construction and operational activities. Similar to the Project, construction would generate GHG emissions from fossil fuel combustion from heavy-duty equipment, haul trucks, concrete trucks, worker trips, and

vendor delivery trips. Operational activities would generate GHG emissions from transportation to and from the Project Site, energy consumption (i.e., electricity and natural gas), water demand, and wastewater and solid waste generation. Because the Residential with Ground Level Commercial Alternative would reduce the amount of development, with a reduction in floor area and a corresponding reduction in traffic, given the mostly residential nature of the Alternative, GHG emissions associated with transportation, energy consumption, water demand, and solid waste generation would be reduced from that of the Project.

The Project would generate GHG emissions due to construction and operational activities; however, the net increase in annual GHG emissions, directly and indirectly, would be consistent with the City of Los Angeles LA Green Plan and Sustainable City Plan. Therefore, as the Project would be consistent with the applicable City's goals and actions for GHG emissions, GHG emissions and associated impacts would be less than significant. Further, the Project would be consistent with the AB 32 goals and CARB guidelines for assessing GHG emissions.

The Project would include land use characteristics and design features that would be consistent with State, Regional, and Local Regulations for reducing GHG emissions. Therefore, as the Project would be consistent with applicable plans, policies and regulations adopted for the purpose of reducing GHG emissions, impacts regarding greenhouse gas reduction plans would be less than significant.

The reduction in development under the Residential with Ground Level Commercial Alternative would locate fewer on-site residents and employees in proximity to the public transportation hub that is the downtown area; and less population in proximity to other nearby commercial and retail uses, and nearby office buildings and other job centers, as compared to the Project. Therefore, this Alternative would support regional transportation reductions and regional transportation-related air pollutant emission reductions associated with infill and transit oriented development strategies to a lesser degree than the Project.

The Alternative would generate fewer GHG emissions than the Project directly and in that sense would have less impact than the Project. At the same time, by accommodating less growth in the well served transit area, a number of the people who would live at the Project Site would end up locating in other areas where there is less access to public transit and possible longer trips to places of employment. Therefore, the Alternative would be less effective in reducing vehicle miles traveled associated with reduced reductions in vehicular emissions. In this sense, impacts would be greater than those of the Project. As is the case with the Project, impacts would be less than significant.

(5) Hazards and Hazardous Materials

The Residential with Ground Level Commercial Alternative would require a construction program inclusive of demolition, excavation, foundation preparation, building construction, and paving. The general construction activities would be similar to those of the Project; although the amount of development would be reduced, as well as the amount of excavation for the subterranean parking.

The Residential with Ground Level Commercial Alternative would also provide residential commercial uses that would require the use of products routinely used in performing everyday household and retail activities consistent with regulatory requirements, similar to the Project. The Alternative would not require the use of hazardous materials beyond these routinely used products.

The analysis of the Project's impacts on Hazards and Hazardous wastes indicated that the Project's use of hazardous materials during Project operations would include routinely used and regulated products and would not require the use of otherwise hazardous waste materials. Impacts due to operations would be less than significant.

The analysis also identified several potential Site conditions that could result in significant impacts if not properly addressed through regulatory measures and mitigation measures. Demolition of the Luxe Hotel building could provide an exposure to ACMs and/or LBP. The identification, handling, removal, and/or disposal of ACMs and LBP would be completed in compliance with regulatory requirements, thereby resulting in a less than significant impact. Further, the Project's location in an LADBS designated Methane Hazard Area (Methane Zone), containing methane gas in soil samples would also be addressed through regulatory measures. A methane mitigation system designed in accordance with Division 71 of LAMC Section 91.7104 would be incorporated into the Project structures to provide for the public safety. This would reduce potential impacts associated with methane beneath the Project Site to a less than significant level.

Further, it was determined that excavation would encounter contaminated soils and abandoned fuel facilities, which if not properly handled in accordance with applicable federal, state, and local regulations, could expose people to contaminants, resulting in a potentially significant impact. Excavation of the Project Site could also pose a risk to construction workers and future building occupants due to soils with pollutant concentrations above federal and state remediation levels. Lastly, unknown hazardous materials may be present in untested areas of the Site beneath existing structures. The Project would include mitigation measures to reduce these potentially significant hazardous conditions to less than significant levels. These measures require preparation and implementation of a Soil Management Plan, a Health and Safety Plan, and additional subsurface soil and a soil gas sampling and testing in accordance with the recommendations of the *Soil and Soil Gas Investigation* Technical Report prepared by Terra-Petra contained in Appendix F of this Draft EIR.

The Residential with Ground Level Commercial Alternative, while requiring less excavation than the Project would still confront the same hazardous Site conditions, as the Project; and would implement the same regulations and mitigation measures to reduce the potential impacts. While the future Site population would be reduced from that of the Project, the Alternative's use of routinely used and regulated products would be generally similar to that of the Project. Impacts of the Residential with Ground Level Commercial Alternative on Hazards and Hazardous materials would be similar to those of the Project, and as is the case with the Project, would be less than significant.

(6) Land Use and Planning

The Residential with Ground Level Commercial Alternative would provide a mostly residential development with 520 residential units, 20 percent fewer units than the Project. It would also provide 50,000 square feet of ground level commercial space contributing to the pedestrian level commercial character of the vicinity. The Alternative would have an FAR of 6:1, which is the maximum density that would be allowed without implementation of TFAR credits as provided for under LAMC Sections 14.5.6 through 14.5.12. Otherwise necessary approvals would be mostly similar to those of the Project; although certain approvals more closely tied to a potential hotel use would not be needed or would be modified, because the conditional use permit

for service of alcohol in the hotel, hotel commercial space, and banquet/conference space would no longer be necessary. A conditional use permit for service of alcohol in the commercial restaurant and bars on the first two levels of the Alternative project would still be required.

The Project would have an FAR of 9.7:1. To achieve this density, it would require floor area transfers pursuant to the City's LAMC TFAR provisions. The Project's development program would include 650 residential units, a 300 room hotel with banquet, conference and amenity areas. It would also include 80,000 square feet of commercial retail/restaurant space with two stories of pedestrian access frontage along the periphery of S. Figueroa Street, 11th Street, W. Olympic Boulevard, and S. Flower Street. The Project also includes a Podium Garden Terrace on the roof of the fourth level that would provide open space amenities for use by residents and hotel guests. Recreation rooms and other amenities and open space would also be provided. The Hotel Tower would also include a rooftop amenity deck with a swimming pool, bar, spa tub, lounging area, and function space for hotel guests.

The analysis of the Project's impacts on Land Use concludes that the Project would be substantially consistent with and would not substantially impede implementation of adopted land use plans, policies, guidance, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. This conclusion is based on analysis of Project consistency with applicable policies of the General Plan Framework, Do Real Planning, Walkability Checklist, Central City Community Plan, City Center Redevelopment Plan, LAMC, 2010 Bicycle Plan and Mobility Plan 2035, and SCAG's 2016 RTP/SCS. The Project's requested entitlements would be consistent with the regulatory requirements and development would be compatible with surrounding land uses. Therefore, Project impacts on Land Use would be less than significant.

Key features of the Project that support the conclusion that land use impacts would be less than significant include the following:

- The Project would provide a mixed-use development within the high quality transit area with access to the Metro Blue, Red and Purple Lines; and multiple bus and shuttle lines. The City as well as SCAG have been promoting development patterns that will reduce vehicle miles traveled providing reductions in energy consumption and air quality emissions, as well as convenience for commuters.
- The Project would provide needed housing to the region and the Downtown area, as well as visitor-serving uses at a scale and intensity that distinguishes and uniquely identifies the Downtown Center. This includes hotel development in proximity to LA LIVE, Staples Center Arena, and the LACC.
- The Project would build upon and support the vibrancy of the Downtown Center and proximity to LA LIVE, Staples Center Arena, and the LACC and would bring and encourage further investment in the area.
- It would provide a pedestrian friendly street frontage with pedestrian access to commercial and restaurant frontage along the periphery of the property and a 5,000 sf public plaza along S. Figueroa Street, including wide sidewalks, parkways, landscaping, and special paving. It would also support bicycle use in the downtown area by Project residents.

The Project features are consistent with the Framework Element's designation for the "Downtown Center" district as further articulated in the various plans and regulations that are applicable to the Downtown Center. The Framework Element identifies the Downtown District as the location for "... major cultural and

entertainment facilities, hotels, professional offices, corporate headquarters, financial institutions, high-rise residential towers, regional transportation facilities and the Convention Center, ... generally characterized by floor area ratio up to 13:1 and high rise buildings.”

The Residential with Ground Level Commercial Alternative has a more limited development profile than the Project, with fewer residential units and no hotel development. The Alternative would contribute needed housing stock to the City and Downtown area, enhancing the Downtown area as a mixed use area. However, it would include fewer residential units thereby providing a lesser contribution to the City’s housing needs; and the lack of hotel rooms would represent a missed opportunity for providing needed hotel rooms to support the LACC complex as well as LA LIVE and the Staples Center Arena (i.e. it would not be supportive of the Mayor’s White Paper). The Alternative would have a less complementary/synergistic affect in supporting these other nearby activities and the vibrancy of the vicinity.

The lower density of the Alternative would cause less change in the amount of activity in the Project vicinity with reductions in demand for services and utilities, maximize utilization of existing infrastructure and transit rich amenities. On the other hand, the higher density of the Project achieves greater land use benefits related to clustering of activity in proximity to transit facilities in a manner that reduces the amount of vehicle miles traveled at the regional level. Because this Alternative has less development it would result in less change to the area than the Project, and in this sense its impacts would be less.

If the Residential with Ground Level Commercial Alternative were to be implemented, it would provide a smaller project and therefore reduced environmental impacts on several environmental topics as indicated in the remainder of this analysis. However, if this Alternative were implemented, the floor area rights that would be transferred would remain available for transfer to another project site under the TFAR provisions of the LAMC. This floor area represents development anticipated and available in the Downtown area. If the FAR area were transferred to an alternative project, the impact reductions would not occur, but rather could potentially occur at another location. In such a case the impacts associated with this floor area would not be eliminated but would be relocated to another project site.

(7) Noise

i. Construction Noise and Vibration

The Residential with Ground Level Commercial Alternative would require a construction program inclusive of demolition, grading/excavation, foundation placement, building construction, and finishing/paving. The general construction activities would be identical to those of the Project; although the amount of development and excavation would be reduced. The reduction in the amount of development under the Residential with Ground Level Commercial Alternative would result in a shorter overall construction schedule, and the maximum construction activity that could occur on a given day, the basis for the analyses of construction impacts, would be similar to the project.

The Project would result in a significant impact due to construction noise at nearby sensitive receptors (multi-family residential) development. The Project would include the implementation of mitigation measures (i.e., sound barriers) to substantially reduce construction noise impacts. However, even with implementation of the sound barriers, noise associated with the Project would be expected to increase

ambient noise levels at nearby multi-family residential uses by 5 dBA or more, notably at upper floor levels, resulting in a significant unavoidable impact.

Construction vibration during Site clearing, grading and shoring activity in the vicinity of the Petroleum Building would generate vibration levels that could potentially exceed the 0.50 inches per second PPV significance threshold for potential damage of historic building. However, a mitigation measure has been proposed (vibration monitoring, adjustment in construction activity if needed to reduce vibration levels and repair of the building if needed) that, if implemented, would reduce impacts to a less than significant level. However, implementation may not be feasible, and therefore the impact is considered to be a potentially significant and unavoidable impact. The vibration from the construction levels at nearby locations with human activity would be sufficiently low to avoid significant impacts on human activity.

As the construction noise and vibration of the Alternative would be similar to that of the Project on days of maximum construction activity the noise and vibration impacts of the Alternative would be similar to those of the Project. The Alternative would include the same mitigation measures as the Project and like the Project would have a significant impact on construction noise, less than significant impact from construction vibration if mitigated, but potentially significant and unavoidable impact if not mitigated, and a less than significant impact on human annoyance due to vibration.

ii. Operations Noise and Vibration

The Residential with Ground Level Commercial Alternative would increase noise associated with stationary and mobile (i.e. automobile trip) sources. The noise levels would be reduced slightly with less traffic generation and fewer people on Site. Noise levels from stationary equipment would be similar to that of the Project.

Impacts of the Project on ambient noise levels due to traffic, stationary noise sources, and increases in vibration levels would be less than significant. Due to less development and less mobile source noise, the operational noise impacts of the Residential with Ground Level Commercial Alternative would be less than those of the Project, and like the Project, would be less than significant.

(8) Population, Housing, and Employment

The Residential with Ground Level Commercial Alternative would include residential and commercial and uses that would add population and employment within the Central City Community Plan area, the City Center Redevelopment Plan area, the City of Los Angeles, and the SCAG region. The Residential with Ground Level Commercial Alternative would include 520 dwelling units housing a potential residential population of 848 people. The commercial uses would create employment for an estimated net increase of 41 employees over the existing 118 hotel employees.⁵

The Project's construction phase would have no impact on the supply of housing units or population growth. Construction activities would create work for construction workers that would be drawn from an existing

⁵ Residential population is based on a household size of 1.63 people per household. The number of employees is based on a calculation of 0.00271 employees per each of 50,000 square feet and 0.00153 per each of 15,000 square feet, prior to the reduction for the existing 118 employees.

regional pool of existing workers. The short-term employment opportunities would contribute to the local and regional economy.

The Project operations would include 650 residential units, housing a potential population of 1,060 people. It would provide an increase in employment of 438 employees over the existing 118 hotel employees. These increases would be consistent with SCAG's short-term and long-term growth projections for the Community Plan area and the City of Los Angeles, which are the basis for planning of services, utilities and infrastructure. The increase in housing would help the City meet or exceed its housing objectives per the General Plan Housing Element, and housing allocation established in the SCAG RHNA.

The Project would also be consistent with City and SCAG policies that seek to promote concentrated development within a high quality transit area, reducing vehicle miles traveled and improving the downtown ratio of jobs to housing. Further, the Project is an infill development, would add no new infrastructure other than that needed to serve the Project Site, and would not foster otherwise unplanned growth. Project impacts regarding population, housing and employment would be less than significant.

The Residential with Ground Level Commercial Alternative would result in the provision of 130 fewer housing units, with a reduction in residential population of 212 people and 398 fewer employees. In terms of direct contribution to growth, the Residential with Ground Level Commercial Alternative would result in less impact regarding changes to the community and secondary effects on the provision of services and utilities; and its impacts would be less than significant. In terms of growth policies, and population distribution, this Alternative would not contribute as effectively in meeting future housing needs or fully utilizing the Project's accessibility to a large range of public transit facilities. The Project's increases in housing and residential population in a transit area would have greater benefit, that is it would have less adverse effect regarding attainment of growth policies (impacts of the Alternative would be greater.) As was the case with the Project, impacts of the Alternative would be less than significant.

(9) Public Services

i. Fire Protection

The Residential with Ground Level Commercial Alternative would add new population and employment to the Project Site, thus increasing the potential need for fire and/or emergency services. The Alternative's reduction in building volume along with related Site activities would result in lower demand for fire and emergency services than would the Project.

The analysis of the Project's impact of fire protection and emergency services indicates that the Project Site has access to adequate fire services with relatively low response times, has sufficient water flow for firefighting service and would not require the addition of new facilities for its service. Further, the Project would meet regulatory requirements that provide for the public safety and that reduce the demand for firefighting responses.

Therefore, the demand for emergency and fire-fighting services would be reduced compared to the Project, while the Alternative would benefit from the same availability of firefighting and emergency services as the Project. Likewise, the Alternative would also comply with regulatory measures for the public safety and

would provide design features to provide for public safety. Impacts of the Alternative on emergency services would be less than the Project, and like the Project, impacts would be less than significant.

ii. Police Protection

The Residential with Ground Level Commercial Alternative would add new population and employment to the Project Site with a potential need for police and emergency services. The estimated residential population that would be used for estimating police service ratios would be 848. If the existing officer to resident ratio of 1 officer to 93 residents were to be maintained, the number of new officers required to maintain the existing service level would be approximately nine officers. If considering the Alternative's non-residential population of 195 people for calculating police impacts, the Alternative would generate a potential need for an additional 2 potential officers. When combined with the residential population, the Residential with Ground Level Commercial Alternative would generate a need for 11 officers, if the service ratio were to remain constant.

The Project, with a larger population and increased level of Project Site activity, would generate an estimated need for 11 new officers based on residential population alone, and an additional 4.5 officers if the non-residential population is considered as residential population and the service ratio were to remain constant. At the same time, the Project includes numerous security features that would reduce Project impacts and reduce the need for police services. These include, among other provisions, CCTV, restriction of access to non-public areas by electronically controlled and locking access cards, controlled access to parking structures, and 24-hour on-site security, including four to five private security staff. A Project Site design intended to enhance on-site safety would also reduce the need for additional police services or the provision of new police facilities. With the implementation of these security features, impacts on police services would be less than significant.

It is assumed that the Alternative would provide similar security provisions to those of the Project. Since the Alternative would add a smaller population and less activity to the Project area, its impacts would be less than those of the Project. As was the case with the Project, impacts of the Alternative would be less than significant.

iii. Libraries

The Residential with Ground Level Commercial Alternative would generate new residential population that would use local libraries. There would be 848 new residents under this Alternative.

The Project would include a population of 1,060 new residents that would use local libraries. As indicated in the analysis of the Project's impacts, library services would be available primarily from the Richard J. Riordan Central Library less than 1-mile away, as well as five other libraries in the Project vicinity. The existing libraries have the capacity to service the Project residents and impact on library services would be less than significant.

The Residential with Ground Level Commercial Alternative would have similar patterns of library usage to those of the Project. Since the Alternative has 212 fewer residents than estimated for the Project, its impacts on library services would be less than the Project, and like the Project, its impacts would be less than significant.

iv. Parks and Recreation

The Residential with Ground Level Commercial Alternative would produce an on-site population of 848 new residents that would generate a need for park and recreation facilities. It is expected that the Alternative would include recreation facilities that are similar to those of the Project, but reduced proportionately with the reduction in the number of dwelling units. Accordingly, it is assumed that the Alternative would provide approximately 1.3 acres of recreation facilities.

The Project's 650 residential units would generate an estimated 1,060 residents that would create a demand for park and recreation space; and 1.62 acres of recreation and open space area for Site residents with an additional 0.26 acres of recreation and open space area to serve hotel visitors. Of this 9,250 square feet would be public serving open space in the street level public plaza and other street level locations.

The Project's 1.62 acres of recreation and open space would be less than the amount that would be required under the PRP's long-range standard of four acres per 1,000 persons, i.e. 4.24 acres and the PRP's more attainable short- and intermediate-range standard of two acres per 1,000 persons, i.e. 2.12 acres. However, the 1.62 acres of recreation and open space would be sufficient to meet the requirement of 1.61 acres per LAMC Section 12.21.G. The Project would also provide for dedication of land for park uses and/or in-lieu fees to offset the park impacts of new residential development pursuant to Section 17.12. The Project would meet these requirements through a provision of on-site recreation amenities and payment of fees.

It is expected that Site residents would primarily use the on-Site recreation facilities; and residual off-site park usage would likely be dispersed among the 26 existing LADRP parks in the Project vicinity, with only a small increment of use at area public parks. As the Project would meet its obligations for reducing impacts per LAMC regulations, impacts of the Project on parks and recreation would be less than significant.

The demand for park and recreation space would be less than that of the Project's. However, it is assumed that the Alternative would provide similar facilities to those of the Project in accord with the LAMC regulations for reducing Project impacts. Therefore, impacts of the Alternative would be similar to those of the Project and as is the case with the Project would be less than significant.

(10) Transportation and Circulation

i. Construction

The Residential with Ground Level Commercial Alternative would add haul trucks, equipment vehicles and worker trips to the local road system during construction. It could also have short-term effects on traffic flow adjacent to the Project Site.

The Project would also have a construction program that would add vehicles to the local road system and potentially affect traffic flows adjacent to the Project Site. The Project would be required to provide a Construction Management Plan (PDF-TRAF-1) to reduce potential construction impacts through scheduling of construction activities, traffic controls, notification, and safety procedures. With the implementation of the Construction Management Plan, the Project would not result in substantial disruption of traffic flow, intersection operational impacts, conflicts with pedestrians and/or bicyclists, the loss of on-street parking,

or conflicts with construction of My Figueroa Project and existing Metro operations. Transportation and parking impacts related to construction would be less than significant. However, due to a large number of cumulative projects in the Project vicinity with a potential for overlapping construction, the Project could contribute to a cumulatively significant construction impact.

The Residential with Ground Level Commercial Alternative's construction traffic on any one day of maximum construction activity would be similar to the Project's. However, maximum activities might occur on fewer days and/or the number of days of construction would be reduced due to less building volume. The Alternative would include a similar Construction Management Plan to that of the Project. Therefore, impact of the Alternative would be somewhat less than the Project, but like the Project would result in a significant unavoidable cumulative impact associated with construction.

ii. Operations

The Residential with Ground Level Commercial Alternative would provide residential commercial uses that would add traffic to the local and regional roadway systems. The increase in traffic volumes above those currently occurring with the existing Luxe Hotel are shown in **Table 5-4, Alternative 3 - Net Trip Generation Summary**. As indicated the Alternative is estimated to generate a net total increase of 2,968 daily weekday trips, including 233 AM peak hour trips (75 inbound, 159 outbound) and 257 PM peak hour trips (159 inbound, 98 outbound).⁶

Table 5-4
Alternative 3 - Net Trip Generation Summary

Alternative	Trip Generation Estimates						
	Daily	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Alternative 3	2,968	75	159	233	159	98	257
Project	6,583	204	274	478	312	227	539
Comparison (Alternative - Proposed)	-3,615	-129	-115	-245	-153	-129	-282

Source: Gibson Transportation, 2016

Prior to mitigation, the Residential with Ground Level Commercial Alternative would result in a significant impact at the following study intersections under Future with Project (Year 2023) Conditions:

- 13. Figueroa Street & 11th Street (AM and PM peak hour)
- 19. Flower Street & 11th Street (PM peak hour)

⁶ Worksheets presenting the calculations of the trip generation for the Alternative, as well as the intersection analyses are presented in Appendix J-2 of this Draft EIR.

30. Grand Avenue & 17th Street/I-10 Westbound On-Ramp (PM peak hour)

Thus, Alternative 3 would result in one less significantly impacted intersection than the Project under pre-mitigation conditions.

As also indicated in Table 5-4, the Project would produce an increase in traffic over the current Luxe hotel trips a total of 6,583 daily weekday trips, including 478 AM peak hour trips (204 inbound, 274 outbound) and 593 PM peak hour trips (312 inbound, 127 outbound). The analysis of Transportation and Traffic concluded that the Project would result in significant impacts at the same four intersections prior to mitigation. The analysis identified feasible mitigation measures to reduce Project impacts including physical improvements at Intersection 30, Grand Avenue & 17th Street/I-10 Westbound On-Ramp, and a requirement for a Travel Demand Management Program to promote non-auto travel and reduce the use of single-occupant vehicle trips. The traffic analysis indicates that with implementation of the Project's mitigation program, the impact at the following three intersections would remain significant and unavoidable:

12. Figueroa Street & Olympic Boulevard (PM peak hour)

13. Figueroa Street & 11th Street (AM and PM peak hour)

19. Flower Street & 11th Street (PM peak hour)

The Residential with Ground Level Commercial Alternative would generate fewer trips due to the reduced development program and amount of Site activity. There would be 3,615 fewer daily trips, with 245 fewer AM trips (129 inbound, 115 outbound) and 282 fewer PM trips (153 inbound and 129 outbound). It is expected that the Alternative would be required to implement mitigation measures similar to those of the Project.

With implementation of the Project's mitigation program, the impact at the following two intersections would remain significant and unavoidable:

13. Figueroa Street & 11th Street (AM and PM peak hour)

19. Flower Street & 11th Street (PM peak hour)

Thus, Alternative 4 would result in one less significantly and unavoidably impacted intersection than the Project.

(11) Utilities and Service Systems

i. Water Supply

The Residential with Ground Level Commercial Alternative would include new residential, and commercial uses with related amenity uses that would generate demand for the consumption of water resources. The estimated water consumption is shown in **Table 5-5, Alternative 3 - Estimated Water Consumption**. As indicated, Alternative 3 would require 126,242 gallons per day (gpd) or 141 acre feet per year (af/y) of water consumption.

Table 5-5

Alternative 3 - Estimated Water Consumption

Land Use	Quantity	Unit	Water	Water	
			Consumption Factor ^a (gpd/unit)	Consumption (gpd)	(af/y)
Residential Units	520	units	108.50	56,420	63
Residential Common	20,000	sf	0.11	2,146	2
Retail	25,000	sf	0.44	10,875	12
Restaurant	1,000	seats	30.00	30,000	34
Open Space/Amenity	15,000	sf	0.13	1,901	2
Landscaping ^b	16,263	sf	0.04	629	1
Structured/Subterranean Parking ^c	177,029	sf	0.001	115	0
Cooling Tower ^c	1,839	ton	29.040	53,405	60
Less Existing Water Consumption				-19,287	-22
Less Voluntary Conservation ^c				-9,961	-11
Total Alternative 2				126,242	141
Project				219,529	246
Comparison (Alternative -Project)				-93,287	-105

^a Water Consumption Rates are based on values prepared by the Bureau of Sanitation for measuring wastewater flow. The values shown here have been adjusted to account for weighted values amongst combined land uses. The rate for residential uses is a weighted average for the unit size mix of the Project. The restaurant/retail rate is a weighted rate taking into account the relative amounts of each use and the varied rates for restaurant versus retail uses. Other uses are similarly average as well. The averaged values are based on the more detailed calculations provided in Table I of the WSA for the Project that was prepared by LADWP.

^b Assumes the area for these uses would be similar to that of the proposed Project.

^c Assumes that these values would be reduced proportionately from the proposed Project with the overall reduction in development for this alternative.

Source: PCR Services Corporation, 2016

In contrast, the Project would increase on-site water demand by approximately 219,529 gpd, or 246 af/y. The WSA for the Project indicates that LADWP has sufficient water supply to meet the Project's needs. The Project includes numerous design features to reduce the demand for water consumption. It is assumed that the Alternative would include similar features. Water infrastructure and water supply is sufficient to meet the demands of the Project without Project mitigation and the Project impact on the provision of water services would be less than significant.

The Alternative would require 93,287 gpd or 105 af/y less than the Project. Impacts of the Residential with Ground Level Commercial Alternative would be less than those of the Project and would also be less than significant.

ii. Wastewater

The Residential with Ground Level Commercial Alternative would include new residential, hotel, commercial and related amenity uses that would generate wastewater requiring conveyance from the Project Site and

treatment. The estimated wastewater generation is shown in **Table 5-6, Alternative 3 - Estimate of Wastewater Generation**. As indicated, Alternative 3 would generate 105,469 gpd of wastewater.

Table 5-6

Land Use	Quantity	Unit	Wastewater Generation	
			Factor ^a (gpd/unit)	Waste Water (gpd)
Residential ^b	520	du	105	54,600
Retail ^c	25,000	sf	0.05	1,250
Restaurant ^c	1000	seat	30	30,000
Swimming Pools ^d	37,406	sf	1	37,406
Industrial Discharge ^d				1,500
Less Existing Wastewater Generation				-19,287
Total Alternative 3				105,469
Proposed Project				198,247
Comparison (Alternative -Project)				-92,778

^a Wastewater generation rates are taken from list provided by the Los Angeles Bureau of Sanitation.

^b The wastewater generation rate is a weighted average that is based on the assumption that the mix of residential unit sizes is a similar mix to that of the proposed Project.

^c It is assumed that the 50,000 sq.ft. of commercial space would include the same proportionate mix of restaurant to retail space as the proposed Project. It is assumed that restaurant seating would be provided at a rate of 1 seat per 25 square feet of space.

^d The amount of swimming pool area has been reduced proportionately by 33 percent. It is assumed that the industrial discharge associated with the pools would be reduced by the same amount.

Source: PCR Services Corporation, 2016

In contrast the Project would increase on-site wastewater generation by approximately 198,247 gpd that would need conveyance and treatment. The Project’s additional wastewater would be within the capacity limits of the conveyance and treatment facilities serving the Project Site, and impacts would be less than significant. The Alternative would generate 92,778 gpd less than the Project. Impacts of the Residential with Ground Level Commercial Alternative would be less than those of the Project and would also be less than significant.

(c) Relationship of the Alternative to Project Objectives

The Residential with Ground Level Commercial Alternative would provide a primarily residential development in contrast to the Project’s mix of residential and hotel uses. Further, the Alternative would contribute less density to the Downtown area, and result in a Project less conducive to enlivening the surrounding community. Therefore, the Alternative would meet some of the Project Objectives, would only partially meet some others, and would not meet one of the Objectives at all.

The Alternative would not meet the following Project Objective:

- Objective 1: Support the diverse array of entertainment, shopping, nightlife, cultural, and residential uses in Downtown by locating new residences within the Downtown Housing Incentive Area, new

hotel rooms to support the goals laid out in the Mayor's 2015 White Paper on the Future of the Los Angeles Convention Center, and neighborhood and visitor serving uses to support connectivity with LA LIVE, Staples Center Arena, and the Los Angeles Convention Center.

This Alternative would not provide the same mixed-use synergies with the surrounding area as would the Project; and with less density would contribute less to the potential utilization of the Project Site for transit oriented development. Therefore, the Alternative would meet the following objectives but not to the same extent as the Project.

- Objective 2: Develop a mixed-use project that combines housing, hotel, and commercial uses in close proximity to public transit consistent with regional mobility goals to reduce vehicle trips and infrastructure costs, while supporting the use of public transportation and amenities, including the nearby Metro Stations, City bus and DASH lines.
- Objective 7: Provide unique and vibrant signage that is integrated into the Project's architecture and that will visually connect to and be compatible with the scale of media and signage on existing and current development on adjacent blocks while informing and attracting visitors to the Project's content and offerings.
- Objective 9: Redevelop an underutilized site with an economically viable and attractively designed development that supports the SCAG growth projections in Downtown by exercises TFAR provisions for fuller utilization of the Project Site and support of TFAR public benefits purposes.
- Objective 10: Maintain and enhance the economic vitality of the region by providing job opportunities that attract commercial and residential tenants, and increase the tax revenue, sales, and property taxes.

The Alternative would meet the remaining Project Objectives related to the design of the Project to a similar extent as the Project:

- Objective 3: Respect and maintain the historical significance of the Petroleum Building by providing a setback along W. Olympic Boulevard to maintain views of the Petroleum Building's architecturally distinguished primary facades along W. Olympic Boulevard and S. Flower Street.
- Objective 4: Compliment and foster pedestrian activity through ground level retail/restaurant uses, street trees and landscaping, public art, and signage and lighting compatible with the active LASED and streetscape along W. Olympic Boulevard, S. Figueroa Street, S. Flower Street, and 11th Street.
- Objective 5: Create a visually vibrant and engaging pedestrian and vehicular experience along Figueroa Street, removing paved surface parking, and providing new pedestrian scale features such as a public plaza, that are compatible with the adjacent entertainment and restaurant venues at LA Live and Staples Center Arena directly across the street.
- Objective 6: Create a development that complements and improves the visual character of the area by connecting with the surrounding urban environment through a high level of architectural design and appropriate scale of development.
- Objective 8: Create a development with high quality design that is responsive environmental sustainability issues (e.g. energy efficiency, including electronic charging stations for Project tenants); and that provides open space and recreational amenities for Project's residents, hotel guests, commercial tenants, and site visitors.

G. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the State *CEQA Guidelines* indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR and that if 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 the No Project/No Build Alternative, Reduced Density Alternative, and Residential with Ground Level Alternative. A comparative summary of the environmental impacts anticipated under each Alternative to the environmental impacts associated with the Project is provided in **Table 5-7, Comparison of Impacts Associated with the Alternatives and the Project**, based on the detailed evaluation of the potential impacts associated with each Alternative provided in the previous sections. As indicated in Table 5-7, the No Project/No Build Alternative would have less impact than the Project or other alternatives as it would have no impacts on the environment. Further, it would avoid the Project’s short term significant and unavoidable construction impacts associated with noise, vibration, and traffic as well as traffic operations. Therefore, the No Project/No Build Alternative is considered the overall environmentally superior Alternative.

However, this Alternative would not meet any Project objectives and would not provide the benefits associated with the Project. It would not result in the development of a mixed use development providing convention center hotel rooms, Downtown residential development, and transit oriented development.

In accordance with the State *CEQA Guidelines* requirement to identify an environmentally superior Alternative other than the No Project/No Build Alternative, a comparative evaluation of the remaining Alternatives indicates that Alternative 3, the Residential with Ground Level Commercial, would be the environmentally superior Alternative due to the reductions in traffic when evaluated with LOS traffic criteria. As shown below in Table 5-7, Alternative 3, the Residential with Ground Level Commercial Alternative would generate fewer traffic impacts than the Reduced Density Alternative, reducing the amount of trip generation and eliminating a significant intersection impact at one location. However, both the Residential with Ground Level Commercial and the Reduced Density Alternative, while reducing impacts from those of the Project would continue to result in significant traffic impacts due to operations and continue to have a significant noise impact due to construction as well as a significant cumulative impact on traffic.

Alternative 3, Residential with Ground Level Commercial would also result in less impact for some other environmental topics than would Alternative 2, Reduced Density Alternative. Alternative 3 would result in fewer impacts that are traffic related including air emission and noise impacts due to traffic. This alternative would also result in less impact on water and wastewater utility services. Related to these topics, Alternative 3 would also result in a lower level of energy consumption.

Alternative 3 would only partially meet the Project Objectives. It would meet the Project’s Objective’s regarding the overall design of the Project. However, it would not meet Project Objectives regarding the contribution of hotel rooms to serve the LACC, or the complementary mix of uses anticipated with the Project. It would meet the Project Objectives regarding the provision of housing units and the Project’s economic objectives, but not to the same extent as the Project. Further, it would not so fully fulfill the Objectives regarding the implementation of transit oriented development.

Table 5-7

Comparison of Impacts Associated with the Project and the Alternatives

	Project Impact	Alternative 1 No Project/ No Build	Alternative 2 Reduced Density/Traffic Reduction Alternative	Alternative 3 Residential with Ground Level Commercial
A. Aesthetics/Visual Resources				
Aesthetic Character	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)
Views	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)
Light and Glare	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Less (Less than Significant)
Shade/Shadow	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
B. Air Quality				
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Less/Greater (Less than Significant)	Less/Greater (Less than Significant)
C. Cultural Resources				
Archeological Resources/Tribal Cultural Resources	Less than Significant with Mitigation	Less (No Impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Paleontological Resources	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)

Table 5-4 (Continued)
Comparison of Impacts Associated with the Project and the Alternatives

	Project Impact	Alternative 1 No Project/ No Build	Alternative 2 Reduced Density/Traffic Reduction Alternative	Alternative 3 Residential with Ground Level Commercial
Historic Resources	Less than Significant - (Direct Impacts) Significant and Unavoidable (Indirect Impacts - Construction Vibration)	Less (No Impact)	Similar (Less than Significant-Direct Impacts) Similar (Significant and Unavoidable-Indirect Impacts- Construction Vibration))	Similar (Less than Significant-Direct Impacts) Similar (Significant and Unavoidable-Construction Vibration)
D. Greenhouse Gas Emissions				
Greenhouse Gas Emissions	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
Greenhouse Gas Reduction Plans	Less than Significant	Less (No Impact)	Less/greater (Less than Significant)	Less/greater (Less than Significant)
E. Hazards and Hazardous Materials				
Hazardous Materials/Health Hazard	Less than Significant with mitigation	Less (No Impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
F. Land Use and Planning				
Land Use and Planning	Less than Significant	Less (No Impact)	Less/greater (Less than Significant)	Less/greater (Less than Significant)
G. Noise				
Construction Noise	Significant and Unavoidable	Less (No Impact)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)
Construction Vibration (Human Annoyance)	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
Construction Vibration (Historic Buildings)	Significant and Unavoidable	Less (No Impact)	Similar Significant and Unavoidable	Similar Significant and Unavoidable

Table 5-4 (Continued)

Comparison of Impacts Associated with the Project and the Alternatives

	Project Impact	Alternative 1 No Project/ No Build	Alternative 2 Reduced Density/Traffic Reduction Alternative	Alternative 3 Residential with Ground Level Commercial
Operation Noise	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
Operation Vibration	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
H. Population, Housing, and Employment				
Population	Less than Significant	Less (No Impact)	Less/greater (Less than Significant)	Less/greater (Less than Significant)
Housing	Less than Significant	Less (No Impact)	Less/greater (Less than Significant)	Less/greater (Less than Significant)
Employment	Less than Significant	Less (No Impact)	Less/greater (Less than Significant)	Less/greater (Less than Significant)
I. Public Services				
Fire Protection	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less(Less than Significant)
Police Protection	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Libraries	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
Parks and Recreation	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)
J. Transportation and Circulation				
Construction	Cumulative Significant and Unavoidable	Less (No Impact)	Less (Cumulative Significant and Unavoidable)	Less (Cumulative Significant and Unavoidable)
Operation	Significant and Unavoidable	Less (No Impact)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)

Table 5-4 (Continued)
Comparison of Impacts Associated with the Project and the Alternatives

	Project Impact	Alternative 1 No Project/ No Build	Alternative 2 Reduced Density/Traffic Reduction Alternative	Alternative 3 Residential with Ground Level Commercial
K. Utilities				
Water Supply	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
Waste Water	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
<hr/> <i>Source: PCR Services Corporation, 2016.</i>				

